



NEW YORK CITY COMPTROLLER
BRAD LANDER

Maura Hayes-Chaffe
Deputy Comptroller for Audit

Audit Report on the Office of the New York City Public Advocate's Provision of Language Access Services

SZ25-075A | October 10, 2025





THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BRAD LANDER

October 10, 2025

To the Residents of the City of New York,

My office has conducted an audit of the Office of the Public Advocate's ("PAO") compliance with relevant laws, standards, and guidelines regarding the provision of language access services to the non-English Language Preference ("NELP") population. The audit also assessed whether PAO's language access services meet the needs of the NELP population as intended. We conducted this audit to ensure NELP residents have adequate, effective, and equitable access to City services.

The audit found that PAO generally complies with the language access standards prescribed by relevant laws, standards, and guidelines, with some exceptions. During the audit scope period, PAO did not fully comply with certain aspects of the law pertaining to language access plans, translation of its most commonly distributed documents, and posting certain information to its website.

The audit makes five recommendations, including that PAO periodically test its website to ensure fully functioning and translatable features; train personnel in the provision of language access services; publish reports directly on its website to enable translation of reports in their entirety; conspicuously post its Language Access Implementation Plan on its website; and continue to ensure that the name and title of its Language Access Coordinator is posted on its website.

I am pleased to report that PAO agreed with the audit findings and recommendations and has implemented the recommendations.

The results of this audit have been discussed with PAO officials, and their comments have been considered in preparing this report. PAO's complete written response is attached to this report.

If you have any questions concerning this report, please email my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Lander", is positioned below the word "Sincerely,".

Brad Lander
New York City Comptroller

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Audit Impact

Summary of Findings

The audit found that the Office of the Public Advocate (“PAO”) generally complies with the website translation and in-person and telephonic interpretation standards prescribed by relevant laws, standards, and guidelines, with some exceptions noted below. The language access services provided by PAO generally meet the needs of the Non-English Language Preference (NELP) population as intended, and the NELP population generally has the same access to government services as the English-speaking population.

However, the audit found that PAO was not fully compliant with certain aspects of Local Law 30. Specifically, PAO’s website did not indicate whether the agency provides free language access services, did not generally allow for translation of PAO’s published reports and other documents into the City’s top 10 NELP languages, and did not list the name and title of its Language Access Coordinator.¹ Also, PAO did not have a Language Access Implementation Plan (LAIP), as required.

During the audit and at the exit conference held on August 5, 2025, PAO officials provided auditors with documentation showing that they had begun implementing the audit’s recommendations. Auditors confirmed that the implementations had been made and assessed that PAO is now in compliance with Local Law 30. Based on recent improvements, PAO generally meets the needs of the Non-English Language Preference (NELP) population as intended.

Intended Benefits

While the audit found that NELP constituents generally have access to the same PAO services as English-speaking constituents, the audit also found that PAO should create and implement an LAIP and offer translations of PAO reports published on their website.

¹ Although PAO posts all required information in its physical offices, its website does not meet the requirements of Local Law 30. Although PAO provides for translation of some of its documents, including a blog that it distributes, the website does not support translation of certain reports and documents issued by PAO.

Introduction

Background

PAO conducts oversight of City agencies, monitors and evaluates the services City agencies provide, develops and publishes policy recommendations for resolving Citywide issues, and investigates citizens' complaints. Part of PAO's mission, as stated on its website, is to "fight for equitable access to quality housing, education, and economic opportunity in a healthy, safe environment, and advance equity in the distribution of resources."

New York City is home to one of the most diverse populations in the world, with more than 3 million foreign-born residents. According to the New York City Department of City Planning, nearly one-half of all New Yorkers speak a language other than English at home, and almost 25% of City residents aged five and over are not proficient in English. For residents with a Non-English Language Preference (NELP), interacting with City government and receiving access to City services can be a challenge.² Language services are necessary to ensure that all City residents have equal access to the information and services provided by PAO.

Since 2003, the City government has striven to enhance language access for NELP residents through a series of legislative actions including:

- **Executive Order No.120 (EO120):** EO120, New York's "Citywide Policy on Language Access to Ensure Effective Delivery of City Services," was established in 2008, and required all City agencies providing direct customer services to offer language access services.
- **Local Law 25 of 2016 (LL25):** LL25 required all City agency websites to include a translation feature for the most widely used languages in the City, other than English.
- **Local Law 30 of 2017 (LL30):** LL30 required all City agencies that provide direct public or emergency services, to designate a Language Access Coordinator and to develop Language Access Implementation Plans (LAIP). LAIPs consist of the following components: identification and translation of the most commonly distributed public documents; interpretive services, including telephonic interpretation in at least 100 languages; training of frontline workers on language access policies; posting of signage in conspicuous locations about the availability of free interpretation services; and the establishment of an appropriate monitoring and measurement system regarding the provision of agency language services. Agencies were also expected to incorporate consideration of language access in public communications (including emergency notifications, public hearings, and events), and craft widely distributed documents using

² Executive Order 120 of 2008 and Local Law 30 of 2017 use the term "limited English proficient" or "LEP"; however, for the purposes of this report, the term "Non-English Language Preference" (or "NELP") will be used.

plain language principles. The law also required agencies to develop their LAIPs using the four-factor analysis and to update their LAIPs every three years.³

- **Local Law 13 of 2023 (LL13):** LL13 amends the New York City Administrative Code by adding a new section, **23-1105**. This section outlines the requirements and best practices for agencies providing City services to “individuals whose primary language is not English (NELP) arriving in the city and seeking city services.”
- The Mayor’s Office of Immigrant Affairs (MOIA) designated Wolof and Pulaar/Fulani as the current “temporary languages” in New York City, as required by Local Law 13, based on data from the Office of Asylum Seeker Operations (OASO).⁴ Wolof and Pulaar/Fulani are both considered oral languages with limited use in written format. MOIA recommends that agencies refer to its “Best Practices” to plan ways to utilize video and audio whenever possible, and to prioritize interpretation services for these languages. Agencies under OASO’s coordination, including NYC Emergency Management, NYC Health + Hospitals, and NYC Department of Homeless Services, and other relevant agencies are all required to provide translation and interpretation in “temporary languages.” Wolof and Pulaar/Fulani are part of Language Line Solutions’ telephonic translation services.

Objectives

The objectives of this audit were to determine: (1) whether PAO is providing agency services to the Non-English Language Preference (NELP) population in the languages required by relevant laws, standards, and guidelines; (2) whether the agency’s language access services meet the needs of the NELP population as intended; and (3) whether the NELP population has the same access to government services as English-speakers.

Discussion of Audit Results with PAO

The matters covered in this report were discussed with PAO officials during and at the conclusion of this audit. An Exit Conference Summary was sent to PAO on July 2, 2025, and discussed with PAO officials at an exit conference held on August 5, 2025. We submitted a Draft Report to PAO with a request for written comments. After it was issued, however, PAO disagreed with the manner in which some of its corrective measures were presented in the report. To address those concerns, a revised Draft Report was submitted to PAO on August 29, 2025, with a request for written comments. We received a written response from PAO on September 15, 2025. In its response, PAO agreed with the findings and the five recommendations.

³ The four-factor analysis, issued by the U.S. Department of Justice, is required for programs and activities that receive federal funding and is intended to assess the language access needs and resources needed. The four factors consist of the following: (1) number or proportion of NELP persons in the eligible service population; (2) the frequency with which NELP individuals come into contact with the agency; (3) the importance of the benefit, service, information, or encounter to the NELP person; and (4) the resources available to the agency and the costs of providing various types of language services.

⁴ Wolof is a language primarily spoken in Senegal, Gambia, and southern Mauritania; Pulaar/Fulani is a language spoken by the Fulani people, primarily in West and Central Africa.

PAO's written response has been fully considered and, where relevant, comments have been added to the report.

The full text of the PAO's response is included as an addendum to this report.

Detailed Findings

PAO Generally Provides Language Access Services to NELP Constituents as Required

The auditors found that PAO:

- **Provides language access services to NELP clients.** PAO contracts with two language access vendors for language access services—Language Line Solutions (for telephonic interpretation) and JR Language Translation Services, Inc. (for document translation services). Language Line Solutions can provide interpretation in over 240 languages and JR Language Translation Services can provide translation services in over 100 languages. Both vendors can provide language access services in the City’s top 10 NELP languages, as designated by MOIA. PAO also makes use of multilingual staff to assist NELPs and provide services—of the nine staff members in the Constituent Services Department, five can provide interpretation in Spanish, Haitian Creole, and Polish. PAO also contracts with SignNexus, a national sign language interpretation service vendor.
- **Notifies the public of the right to free interpretation services.** PAO informs the public of the availability of interpretation services in English and the top 10 NELP languages by posting signs in conspicuous, publicly accessible locations within its offices. PAO has a complaint hotline on its website that constituents can use to file complaints or submit inquiries involving government-related services and regulations.

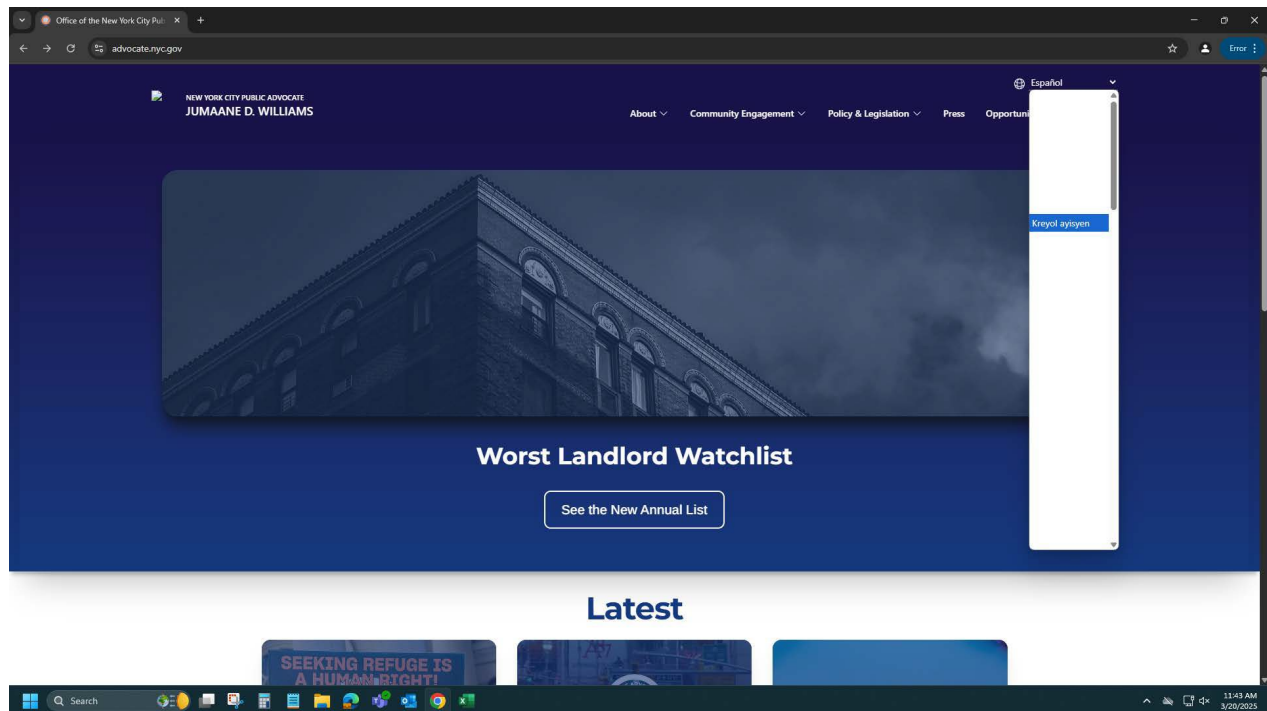
At the time of testing, the webpage translated into over 100 languages but did not indicate that free interpretation was available to constituents who call the hotline.

At the exit conference, PAO officials informed auditors that their website has been updated to include the name and contact information of their Language Access Coordinator. The website was also updated to include instructions to contact the LAC with any questions regarding PAO’s language access services, instructions for submitting any complaints about language access, and to incorporate public awareness strategies. The website now states that PAO can provide “translation at no cost in Arabic, Bangla, Chinese (Cantonese, Chaochow, Fukienese, Mandarin, Shanghai, Taiwanese, and Toishanese), French, Haitian Creole, Korean, Polish, Russian, Spanish and Urdu.” These changes collectively ensure compliance with Local Law 30.

- **Provides access to pertinent information on its website in over 100 languages.** When functioning correctly, the translation feature provided by PAO can translate website text into 104 languages, including English and the top 10 NELP languages. A dropdown menu showing the different language options should appear when the user selects the down arrow next to the word “English” in the top right corner of the webpage. However, when auditors initially tested the translation feature in March 2025, the dropdown menu

was not functioning properly, with language options appearing blank. This made it difficult for a user to determine if their preferred language was available (see Figure 1 below).

Figure 1: Screenshot of PAO Website Translation Feature



Auditors informed PAO of this bug and staff promptly corrected it. Auditors tested the feature again in April 2025 and found that it was operating properly, with all language options visible when the dropdown menu was engaged.

- **Trains its staff in the availability of language access services.** PAO gave auditors material used to train staff in accessing and using Language Line Solutions effectively. The material included tips for conducting telephonic interviews with an interpreter. During a site visit, auditors questioned frontline staff about PAO's intake procedures for NELP constituents. PAO staff demonstrated these procedures, which consisted of identifying constituents that may need language access services, assisting the constituent in identifying their preferred language, and logging the complaint to show that the constituent required language access services. PAO also showed auditors video and written guides that included instructions and best practices for using PAO's contracted telephonic interpretation service provider. PAO informed auditors that the Constituents Services staff had received language access training; other agency staff are scheduled to receive training in the summer of 2025.

Although PAO staff demonstrated knowledge of language access procedures and were able to perform them during an on-site observation, PAO was unable to show auditors a record of staff who attended language access training, such as sign-in or attendance sheets.

At the exit conference, PAO officials showed auditors sign-in sheets to document that 12 staff members had attended language access training as of August 4, 2025. PAO also incorporated training into its LAIP, which now states that staff are required to be trained yearly in the provision of language access services and the use of PAO's contracted telephonic interpretation vendor, in compliance with Local Law 30.

PAO Did Not Comply with Several Key Aspects of Local Law 30

PAO's Most Commonly Distributed Documents Were Not Translatable into the City's Top 10 NELP Languages

Local Law 30 requires agencies to identify and translate documents that are most commonly distributed to the public. PAO publishes a blog called "The Advocate," which covers a range of topics aligned with PAO's mission, including Civic & Community Empowerment; Housing & Health Equity; Infrastructure & Environmental Justice; Education & Opportunity; and Justice & Safety, among others. The audit found that these entries are translatable using the translation feature on the PAO's website.

However, PAO also publishes reports on its website under the Policy & Legislation tab that are not translatable into the City's top 10 NELP languages. According to its website, PAO's Policy Department develops "progressive policy recommendations for city-wide issues such as pay equity, education, and affordable housing" and "monitors and evaluates the services of city agencies and forms actionable solutions to improve their functioning for the benefit of all New Yorkers." However, while these reports are distributed digitally and accessible on the website, they are not translatable documents—only the report summaries can be translated. When a user clicks a link to the report, they are directed to a page that displays a PDF that does not translate when the translation feature is selected.

PAO informed auditors that translations of reports can be provided to constituents upon request. (As stated above, PAO contracts with JR Language Translation Services, Inc. to offer this service.) However, this accommodation is not stated on PAO's website, so there is no way a visitor to the site would know that this option is available.

PAO generally did not create printed informational materials for public consumption. Instead, PAO distributes printed materials created by other City agencies, such as voter registration forms (from the Board of Elections); safety training requirements information cards (from the Department of Buildings); and an HIV/AIDS medical resources information card (from the Department of Health and Mental Hygiene).

PAO does generate complaint forms, which are translatable online using the translation feature prior to completion. PAO's contract with JR Language Translation Services, Inc. allows the

agency to translate complaint forms for NELP constituents to complete during in-person visits to PAO's office, as well as any other documents it may produce and distribute to the public.

At the exit conference, PAO officials provided auditors with copies of constituent complaint forms and language access surveys in each of the top 10 designated citywide languages. These forms will allow PAO to more effectively monitor and respond to any issues or complaints constituents may have with PAO's provision of language access services and may also allow PAO to evaluate "the language access needs of the population likely to be served," in compliance with Local Law 30.

PAO staff also informed auditors that they have started the process of uploading publicly accessible reports to their website so that the reports can be translated using the translation feature. These are PAO's most commonly distributed documents. Auditors confirmed that PAO's most recent report has been posted and was translatable into the top 10 designated citywide languages, in compliance with Local Law 30.

PAO Did Not Create a Language Access Implementation Plan in Compliance with Local Law 30

Language Access Implementation Plans (LAIP) are used by agencies to outline the provision of interpretation and translation services and to ensure equal access to government services for English-speaking and NELP individuals, as well as agency compliance with applicable laws and regulations. However, PAO had not created or implemented an LAIP in compliance with LL30 prior to this audit.

Auditors obtained a copy of PAO's Language Access Procedures in March 2025 and found that, while some key aspects of the law are addressed (including descriptions of how PAO will offer language access services and how PAO records language access service requests), the procedures do not include most of the key aspects required by the law. Therefore, auditors concluded that PAO's Language Access Procedures could not be considered a Language Access Implementation Plan, but rather a template PAO can use to outline what it needs for such a plan.

The elements of LL30 that were not addressed in PAO's Language Access Procedures include:

- stating that the contracted vendor can provide telephonic interpretation (audio interpretation or web-based services) in over 100 languages. During an on-site observation, PAO staff stated that this is possible; however, this information is required to be included in the agency's LAIP.
- ensuring that PAO's most commonly distributed documents are translated into the top 10 NYC NELP languages using plain language principles.⁵
- requiring the name and title of the Language Access Coordinator to be posted in a conspicuous place on the agency's website. In March 2025, PAO informed auditors that it

⁵ Plain language is clear communication that the public can easily understand and use. Plain languages uses concise, accurate, well-organized, grammatically correct short sentences and simple, everyday language.

had designated one of its staff as Language Access Coordinator, as required by LL30, but the name and title had not been posted.

- training policy and procedures for annual training of PAO frontline and management staff on the provision of language access services.
- incorporating consideration of language access in public communications (e.g., public hearings and events, press releases).
- addressing language access needs in PAO's emergency preparedness and response.
- incorporating appropriate public awareness strategies regarding the agency's language access services.
- including a process to monitor and promptly respond to public complaints regarding language access.
- updating its LAIP (based on changes in the PAO's service population or services) at least once every three years and publishing the plan on its website.

An LAIP that incorporates all aspects required by LL30 would more effectively “promote equity in economic opportunity, education, health, civic participation, and all other aspects of the life of the city” as defined by the local law. In a meeting held in May 2025 with the auditors, PAO officials stated that the agency will update their procedures to create a fully compliant LAIP, include the necessary information, and post the plan on its website as required. At a follow-up meeting in June 2025, PAO officials stated they were still working on it but did not provide a target date for when it might be completed.

LL30 also requires agencies to monitor and respond to complaints about their provision of language access services in a timely manner. The auditors found that PAO maintains a spreadsheet containing a record of general complaints filed against other City agencies by constituents who required assistance in a language other than English, but it does not indicate whether PAO monitors or responds to language access complaints, nor does the LAIP account for the monitoring of complaints.

Finally, based on discussions with PAO officials, the agency was unaware that it is required to perform the four-factor analysis issued by the U.S. Department of Justice to assess language access needs and resources needed when creating or updating the agency's LAIP.

At the exit conference, PAO officials provided auditors with an LAIP. The LAIP was developed using the four-factor analysis and incorporated key aspects of Local Law 30, such as:

- designating a Language Access Coordinator;
- accounting for interpretation in over 100 languages by both PAO officials and a contracted telephonic interpretation vendor;
- translation of commonly distributed documents into the top 10 designated city wide languages;

- requiring yearly training for PAO staff;
- addressing language access needs in PAO's emergency preparedness;
- incorporating public awareness strategies,
- including a process to monitor and promptly respond to public complaints regarding language access; and
- requiring that the LAIP be evaluated every three years to make sure that it is in compliance with federal, state, and local law.

Based on these additions, auditors conclude that PAO has created and implemented an LAIP that complies with Local Law 30.

Recommendations

To address these findings, the auditors propose that PAO should:

1. Periodically test website features to ensure that they are functioning as intended.

PAO Response: PAO agreed with this recommendation.

2. Going forward, ensure all frontline and managerial staff receive annual training regarding language access services as required by LL30, and maintain documentation (e.g., attendance sheets, training material) of training provided.

PAO Response: PAO agreed with this recommendation.

3. Continue to publish reports directly on the PAO website so that the translation feature can be used to translate reports in their entirety. If this option is not feasible, include a notice on the website informing constituents that published reports can be translated upon request.

PAO Response: PAO agreed with this recommendation.

4. Ensure that the newly created Language Access Implementation Plan is posted in a conspicuous location on its website.

PAO Response: PAO agreed with this recommendation.

5. Continue to ensure that the name and title of the agency's Language Access Coordinator is posted on its website as required.

PAO Response: PAO agreed with this recommendation.

Recommendations Follow-up

Follow-up will be conducted periodically to determine the implementation status of each recommendation contained in this report. Agency reported status updates are included in the Audit Recommendations Tracker available here: <https://comptroller.nyc.gov/services/for-the-public/audit/audit-recommendations-tracker/>

Scope and Methodology

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). GAGAS requires that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions within the context of our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, § 93, of the New York City Charter.

The scope period was from January 1, 2019 through August 6, 2025.

To achieve the audit objectives, auditors performed the following:

- Reviewed relevant criteria including:
 - NYC Executive Order No.120 July 22, 2008 (EO120);
 - NYC Administrative Code, Title 23, Chapter, 8, City Website § 23-801, Local Law 25 of 2016;
 - NYC Administrative Code, Title 23, Chapter 11, Language Access § 23-1101, Local Law 30 of 2017;
 - NYC Administrative Code Title 23, Chapter 11, Language Access § 23-1105. Local Law 13 of 2023
- Created compliance checklists to assess PAO's compliance with Local Law 30.
- Conducted interviews and walkthroughs with key PAO personnel involved with the provision of language access services.
- Reviewed and assessed whether PAO's Language Access Procedures were developed in accordance with Local Law 30, using the required four-factor analysis (the number or proportion of NELP persons in the eligible service population; the frequency with which NELP individuals come into contact with the agency; the importance of the benefit, service, information, or encounter to the NELP person; and the resources available to the agency and the costs of providing various types of language services).
- Reviewed and assessed whether PAO Language Access Procedures as of March 2025 included required information to be determined a Language Access Implementation Plan in accordance with Local Law 30.
- Tested whether PAO provided direct public services in at least the top 10 NYC NELP languages spoken by the New York City population by (1) reviewing PAO's Language Access Implementation Plan; (2) conducting a visit to PAO's location; and (3) conducting interviews with pertinent personnel regarding the provision of language access services.
- Obtained and reviewed documentation and assessed whether PAO identified and translated the agency's most commonly distributed public documents provided to or completed by the public.

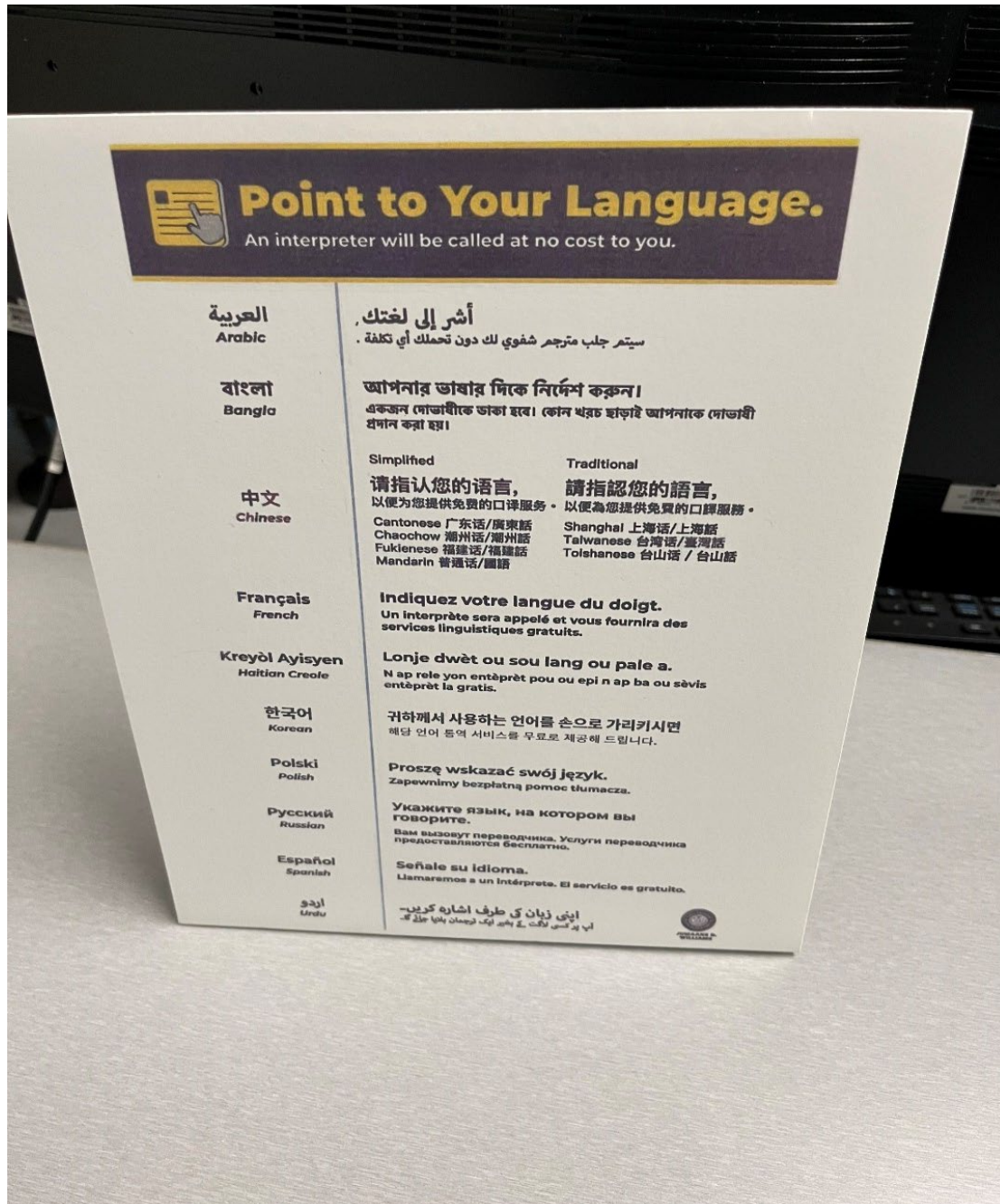
- Conducted site visits to PAO's location on May 15, 2025, and June 10, 2025 to observe PAO's interpretation services and ensure equity and inclusion for PAO's NELP clients. To accomplish this, auditors (1) checked for the required signage and multilingual documents; (2) interviewed pertinent personnel regarding the provision of language access services; and (3) obtained and reviewed the employee manual for language access training and/or written policies and procedures.
- Reviewed PAO signage kits to determine whether they contain multilingual posters.
- Reviewed and assessed whether PAO established an appropriate monitoring and measurement system regarding the provision of agency language services. To assess whether PAO established an appropriate monitoring and measurement system regarding the provision of agency language services, the auditors obtained and reviewed 27 complaints received during January 2024 through April 2025.
- Reviewed and assessed whether PAO created appropriate public awareness strategies for the agency's serviced NELP population by visiting PAO's locations to determine whether the required notification of the right of free interpretation services is posted in conspicuous locations. Auditors observed various PAO documents notifying the public of the right to interpretation such as the posters on the wall.
- Reviewed whether PAO's Language Access Implementation Plan and name and title of the designated Language Access Coordinator are posted to its website.
- Accessed PAO's website and translated the information into the top 10 NYC NELP languages.
- Reviewed Mayor's Office of Immigrant Affairs Local Law 13 guidelines explaining the current designation, agency requirements, and best practices for implementation.

The objectives of the audit rely on a review of PAO's policies and procedures, ability to provide interpretation and translation in the top 10 NELP languages spoken in NYC, website, training materials, and most commonly distributed documents to determine compliance with applicable laws and regulations. Auditors obtained copies of PAO's policies and procedures, contracts with vendors to provide interpretation and translation services, training material, required signage, commonly distributed documents and records of complaints filed in constituents' preferred language. Auditors determined that they had obtained sufficient evidence on which to base a reasonable conclusion regarding PAO's compliance with relevant laws, standards, and guidelines.

Appendix I

PAO LANGUAGE ACCESS COMPLIANCE OBSERVATIONS

#1: PAO SIGNAGE



Signage is conspicuously placed and notifies the public of the availability and their right to free interpretation services.

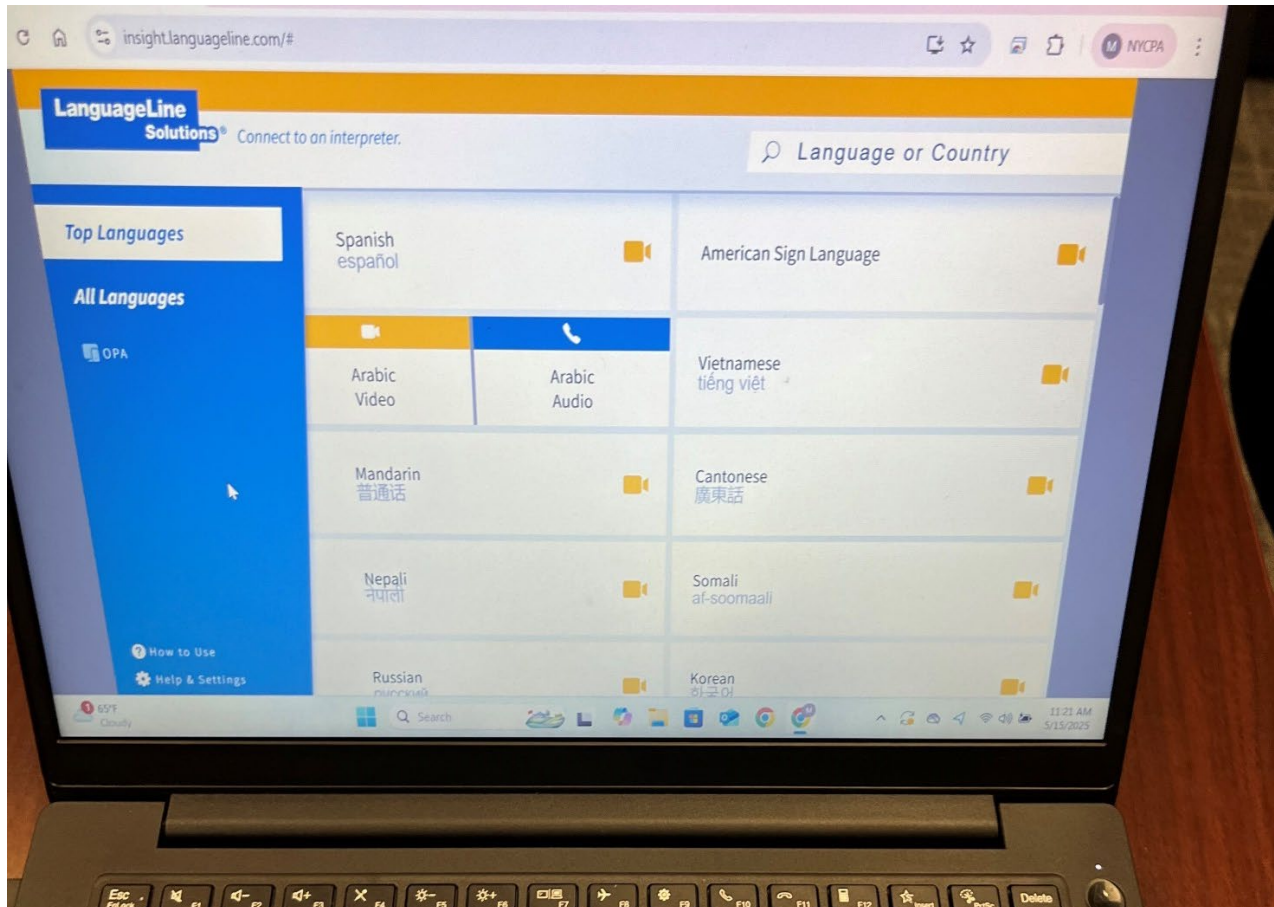


Cards informing constituents of their Fourth and Fifth Amendment rights in Spanish, Russian, Arabic, Haitian Creole, French, Korean, Chinese (Traditional), and English.



PAO signage is conspicuously placed, informing constituents that assistance is available in English, Spanish, Haitian-Creole, and Polish (the languages spoken by PAO constituent services staff).

#2: PAO Uses Language Line Solutions to Provide Telephonic and/or Web-based Interpretation Services



Language Line's online portal is used to provide audio interpretation in over 100 languages.

Appendix II

LANGUAGE ACCESS IMPLEMENTATION PLAN COMPLIANCE

Local Law 30 Section(s)	Required in LAIP
§ 23-1102 (a) and § 23-1102 (b)(2)	Provide language access services for all designated citywide languages.
§ 23-1102 (a)(1), § 23-1102 (b)(2) and § 23-1102 (b)(7)	Ensure the agency's most commonly distributed documents are translated into the top 10 NYC NELL languages using plain language principles.
§ 23-1102 (a)(2) and § 23-1102 (c) and § 23-1102 (b)(2)	Provide free interpretation services, including through telephonic interpretation services in at least 100 languages, including both common and esoteric languages as identified by the Office of the Language Services Coordinator.
§ 23-1102 (a)(3) and § 23-1102 (b)(2)	Post multilingual signage in conspicuous locations about the availability of free interpretation services.
§ 23-1102 (b) and § 23-1102 (b)(3)	Develop a Language Access Implementation Plan using the four-factor analysis.
§ 23-1102 (b)(1)	Designate a language access coordinator to oversee the creation and execution of such implementation plan and provide for the name and title of such language access coordinator to be posted in a conspicuous place on such agency's website.
§ 23-1102 (b)(4)	Incorporate an evaluation of the language access needs of the population likely to be served and consider under what circumstance some or all of the direct public services of such agency should be provided in a language or languages supplemental to the designated citywide languages.
§ 23-1102 (b)(5)	Address language access needs in agency's emergency preparedness and response.
§ 23-1102 (b)(6)	Incorporate consideration of language access in public communications (e.g., public hearings and events, press releases).
§ 23-1102 (b)(8)	Incorporate training of agency frontline and management staff on the procedures for providing language access services.
§ 23-1102 (b)(9)	Incorporate appropriate public awareness strategies regarding the agency's language access services.
§ 23-1102 (b)(10)	Include a process to monitor and timely respond to public complaints regarding language access.
§ 23-1102 (b)(11)	Determine agency's capacity with regard to providing language access services, both through agency staffing and contracts with third parties.
§ 23-1102 (d)	Update its language access implementation plan, based on changes in the PAO's service population or services, at least every three years and publish such implementation plan on its website.



JUMAANE D. WILLIAMS

September 15, 2025

Via email (mhayes1@comptroller.nyc.gov)

Maura Hayes-Chaffe
Deputy Comptroller for Audit
City of New York Office of the Comptroller
1 Centre St.
New York NY 10007

Re: Audit Report on Office of the New York City Public Advocate Provision of Language Access Services, SZ25-075A

Dear Ms. Hayes-Chaffe:

I am writing in response to your August 29, 2025 letter enclosing the revised draft report for the above-referenced audit of the Office of the New York City Public Advocate (PAO).

The report's summary states:

However, the audit found that PAO was not fully compliant with certain aspects of Local Law 30. Specifically, PAO's website did not indicate whether the agency provides free language access services, did not generally allow for translation of PAO's published reports and other documents into the City's top 10 NELP languages, and does not list the name and title of its Language Access Coordinator.¹ Also, PAO did not have a Language Access Implementation Plan (LAIP), as required.

In response, our office is in compliance with Local Law 30:

- Our Get Help page on our website indicates that the agency provides free language access services.

- Although our previous reports are not automatically translatable, text has been added to the webpage for every report that states: “This report can be translated into over 100 languages at no cost. Please contact us at officeadmin@advocate.nyc.gov for more information.”
- The name and title of our Language Access Coordinator has been added to our Accessibility webpage.
- A LAIP has been added to our Accessibility webpage.

The report further makes the following recommendations, which PAO accepts:

1. Periodically test website features to ensure that they are functioning as intended.
2. Ensure all frontline and managerial staff receive annual training regarding language access services as required by LL30, and maintain documentation (e.g., attendance sheets, training material) of training provided.
3. Publish reports directly on the PAO website so that the translation feature can be used to translate reports in their entirety. If this option is not feasible, include a notice on the website informing constituents that published reports can be translated upon request.
4. Ensure that its Language Access Implementation Plan incorporates all aspects identified in this report as lacking and post the plan in a conspicuous location on its website.
5. Continue to ensure that the name and title of the agency’s Language Access Coordinator is posted on its website as required.

In response, PAO states:

1. PAO will test the website’s features quarterly.
2. PAO has trained managers and frontline staff on language access services, new employees will receive the training and an annual schedule for training has been implemented. PAO will maintain documentation of such training.
3. PAO’s most recent report can be automatically translated on the website. All future reports will also have this functionality.
4. PAO has complied with this recommendation.
5. PAO has complied with this recommendation and will continue to do so.

Please let me know if you have any questions.

Very truly yours,



Matthew W. Carlin
Deputy General Counsel

cc: Jumaane D. Williams, Public Advocate for the City of New York
Elizabeth Guzmán, General Counsel
Josenia Dominguez, Deputy Chief of Staff
Josefina Soto, Executive Assistant, NYC Comptroller's Office





NEW YORK CITY COMPTROLLER
BRAD LANDER

1 Centre Street, New York, NY 10007

www.comptroller.nyc.gov

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(212) 669-3916