



NYC Parks

Language Access Plan

City of New York Parks & Recreation

Parks Citywide Operations
July 2018

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Introduction

This Language Access Plan for the New York City Department of Parks & Recreation (NYC Parks) has been prepared in accordance with Local Law 30 and outlines the agency's current and planned actions to improve access to programs and services by limited-English proficient (LEP) individuals.

The plan is being developed by NYC Parks' Community Outreach & Partnership Development division in coordination with units and divisions throughout the agency and with the Mayor's Office of Operations and Mayor's Office of Immigrant Affairs.

Name and title of Language Access Coordinator:

Karina Smith, Chief of Staff for the Community Outreach & Partnership Development Division

I. Agency Mission and Background

Mission

As stewards of nearly 14 percent of New York City's land, the New York City Department of Parks & Recreation (NYC Parks) builds and maintains clean, safe and accessible parks citywide and programs those parks with recreational, cultural and educational activities for people of all ages. Through this work, NYC Parks improves people's lives, providing outlets for creative expression, opportunities for healthy recreation, and exposure to the restorative beauty of the natural world.

Recreational Facilities and Pools

NYC Parks manages 36 recreation centers, 55 outdoor pools and 12 indoor pools that provide direct recreational, athletic and educational services to New Yorkers of all ages with a special stress on youth programming. Walk-in centers have regular front desk and facility staffing during all open hours.

Permit Offices and Administrative Headquarters

NYC Parks manages six permit offices, one at each borough headquarters office and a citywide permit office at the Arsenal in Central Park. The permit offices coordinate ballfield, special events, tennis and other permitted functions. Our main administrative buildings house the various units that operate the parks system, including forestry offices, which process forestry and tree-related permits.

Concessions, Non-profit Partnerships, and Special Events

NYC Parks manages a wide variety of services through private-sector concession agreements such as food carts, tennis bubbles, golf courses, and restaurants. Parks also provides services in partnership with non-profit organizations such as the Historic House Trust, the Wildlife Conservation Society, the Central Park Conservancy, the Prospect Park Alliance, and many others. Parks also hosts special events of all types citywide, both produced by in-house staff and in coordination with private sponsors and organizers. Events include performances, cultural events, holiday celebrations, athletic events and more.

Parks Enforcement and Lifeguarding

Through the Parks Enforcement Program (PEP) and our beach and pool lifeguards, Parks enforces rules and addresses quality of life infractions and keeps patrons safe.

Maintenance and Operation of Public Spaces

NYC Parks operates and maintains a wide variety of public spaces including parks, gardens, ballfields, courts, sitting areas, comfort stations, beaches, and bikeways. NYC Parks has fixed post staff at some sites but maintains most spaces with mobile crews. In most cases, there is no formal intake or assigned staffing at the entrances to Parks public spaces.

II. Agency Language Access Policy and Goals

All individuals, including those with Limited English Proficiency (LEP), who request services from NYC Parks must be treated respectfully and professionally. All LEP patrons have the right to free interpretation services provided by NYC Parks and should never be turned away – **language should not be a barrier to receiving services.**

- Language Identification Posters should be prominently placed at all walk-in facilities (recreation centers, marinas, permit offices, nature centers). “I speak” cards may also be utilized to inform patrons that interpretation services are available as well as to help identify the primary language that patrons speak.
- Phone interpretation services are always available in more than 100 languages currently through Language Line. To access phone translation services, staff are directed to call Central Communications at 646.613.1200 and request a translator for the language specified by the patron.
- Parks signs, flyers, and other printed materials should be offered in multiple languages. For translations of printed materials, please email Tiffany.Maynard@parks.nyc.gov with your request.
- Staff should make an effort to offer interpreters for meetings with patrons where needed and/or requested. To arrange an interpreter for a meeting, please email Tiffany.Maynard@parks.nyc.gov with your request.
- Patrons may bring someone to interpret for them (this person should not be a minor), but they are not required to do so.

Goals of Parks’ Language Access Plan

Guided by Local law 30, NYC Parks’ main goals and timetables for its language access plan are as follows:

- To use 2010 Census data to do a new population needs assessment. This population assessment will help ensure the agency is providing appropriate language services in city parks and ark facilities.
- To provide clear access for LEPs at all of our in-house managed recreation centers, pools, and permit offices through signage, translated documents, and interpretation services. NYC Parks currently provides signage in the following seven languages: English, Spanish, Russian, Chinese, Haitian Creole, Korean, and Italian. Surveys of customers and staff, and specific requests will be used to determine the languages used on signage and which materials are most effective to translate.
- To train all staff, especially staff at recreation centers, pools and permit offices, to assist LEP patrons and to understand the goals and tools involved with this plan. Currently, all newly hired staff participate in an orientation, which includes language access training. Agency Parks Opportunity Program participants (POP workers) also receive a training in language access services as part of their onboarding. The Parks Enforcement Patrol division will be encouraged to participate in the Cultural Sensitivity Training offered by DCAS. NYC Parks aims to train and/or provide a refresher course to all front-line staff

where needed, and the Director of Training at NYC Parks will manage this effort.

- To promote the availability of interpretation services by posting standard signage developed by the Mayor's Office of Immigrant Affairs.
 - To promote the availability of translation services to Parks managers and supervisors and encourage the development of targeted local signage, program flyers, and other materials based on the needs of specific communities.
 - To translate essential documents into 10 languages, translate main rules signs, facility information and volunteer information into multiple languages, and to host this material on the Parks website.
 - To encourage more staff to sign up to be volunteer translators in the NYC Parks Volunteer Language Bank. There are currently 12 Parks employees serving in the Volunteer Language Bank; of those, 5 have received NYC Certification by the Mayor's Volunteer Language Bank.
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- To update this Language Access Plan triennially each January.

III. LEP Population Assessment

NYC Parks will take the following steps to assess the LEP populations we serve and to offer the widest level of language access possible:

- NYC Parks will provide park, playground, recreation center, and pool and beach signs in Spanish, Russian, Chinese, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, French and English.
- NYC Parks will provide interpretation services in all available languages, including Spanish, Russian, Chinese, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, French, and English, through its in-house Language Bank, Accurate Communications, and/or Language Line (where more than 100 languages are available telephonically).
- NYC Parks will provide translation services in all available languages, including Spanish, Russian, Chinese, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, French, and English, through its in-house Language Bank and/or Geneva Worldwide.
- For other translated materials, NYC Parks will use surveys of customers and staff, and specific requests, to determine which materials and languages are the most effective to translate.

NYC Parks will utilize the US Department of Justice “Four Factor Analysis” to guide which LEP populations to prioritize:

- DOJ Factor 1: Based 2010-2014 U.S Census Bureau American Community Survey Public Use Microdata Analysis (PUMA) compiled by the NYC Department of City Planning, NYC Parks has summarized for park and facility managers the percentage of LEP populations in each community district. Park sites and facilities are open to the general public for free or minimal cost and we estimate that our service populations mirror the demographics of the general public in these community districts. Accordingly, Parks uses this information to target translation services and local signage in each borough. *See Appendices 1 – 5 for borough community district breakdowns.*
- DOJ Factor 2: NYC Parks will use data from translation/interpretation vendor usage, customer and staff requests, and other requests to determine actual demand for language access services. NYC Parks will adjust our specific services as necessary to meet actual demand and encourages park managers, administrators and outreach coordinators to meet with local community and partnership groups to tailor access services in local parks and communities.
- DOJ Factor 3: NYC Parks will and has been assessing the nature and importance of services in prioritizing language access services.
- DOJ Factor 4: As discussed more below, NYC Parks will leverage its current scope and diversity of resources to expand language access services. NYC Parks has its own sign-making shops, new media offices, partnerships and community outreach programs, central communications, telecommunications and training divisions. All of these resources will be involved in the Language Access Plan. Parks will also call upon the diversity of full-time staff to help provide on-site and Language Bank interpretation and translation services. Parks will coordinate with other City agencies and our non-profit partners to improve these services as well.

IV. Provision of Language Access Services

NYC Parks is taking the following steps to provide interpretation services:

- NYC Parks will work to have foreign language proficient staff assigned to front desks at recreation centers and permit offices to the extent possible, matching the most in-demand languages, including Spanish, Russian, Chinese, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, and French. Parks already possesses a high level of bilingual staff capacity at many centers.
- NYC Parks will continue to provide interpretation and translation services at public events by request, as well as preemptively where possible.
- NYC Parks will continue to develop its internal Language Bank by soliciting volunteers from employees throughout the agency.
- NYC Parks will also provide access to Language Line at walk-in facilities using dual handset phones. Central Communications will act as a clearinghouse for these requests as well, ensuring a one-stop location for attaining interpretation services.
- NYC Parks will continue use of “I speak” cards and Language Identification posters to identify the primary language of LEP customers and will instruct staff on how to communicate that primary language effectively to Central Communications if resources outside the facility are needed.
- In the event of an emergency declared by the NYC Office of Emergency Management (OEM), Parks will communicate and continue to provide services to LEP customers by updating our website with directions and content distributed by OEM. Parks provides access to website translation, and where possible, we will send staff to sites to provide onsite services in customer languages. For calls that come into our Central Communications office, we will use our current telephonic language translation vendor (Language Line) to translate accordingly.

NYC Parks will take the following steps to translate essential documents.

- NYC Parks’ list of essential documents for implementation in this plan include: permit application instructions; targeted special event notices; key information in the service, facility and FAQ materials.
- To the extent possible and in consultation with the Parks Legal Office, NYC Parks will work to simplify documents using plain language, symbols, and other graphics to make information as readily accessible as possible. Parks will work to provide access to maps through our website with symbols for features and services like basketball courts or bathrooms in each park.
- Parks will target for implementation translations of documents and languages determined in surveys of staff and customers to be most critical and likely to be utilized.
- NYC Parks will contract for translation services with Geneva Worldwide, Accurate Communications, and Language Line, and also provide translation services and quality control using its internal Language Bank.

NYC Parks will take the following steps to develop signage relating to the Language Access Plan:

- NYC Parks produces its own signs at in-house sign shops and also through sign contract services. NYC Parks will continue to produce signage in the following eleven languages: English, Spanish, Russian, Chinese, Haitian Creole, Korean, Italian, Bengali, Arabic, Urdu, and French, and incorporate utilization of universal symbols.
- NYC Parks will use “I speak” cards and Language Identification posters at walk-in facilities, and also post standard signage developed by other agencies to promote the presence of interpretation services.
- NYC Parks has installed enclosed post boards at over 500 outdoor park locations. Under the supervision of local park managers, Parks will continue to post appropriate foreign language event notices and other materials on those boards.

NYC Parks will take the following steps to create public awareness of the language assistance services and to reach out to LEP communities:

- Parks has translated its main rules and entry signs in the most common languages, including English. This, in conjunction with LEP posters and “I speak” cards, will ensure a wide public dissemination of these offerings.
- NYC Parks includes language access in training for all staff, especially staff at recreation centers, pools and permit offices, as both a refresher training and ongoing customer service training.
- NYC Parks will include language access training as a part of agency EEO training, and annual recertification training for Urban Park Service Parks Enforcement staff, and as well as Park Rangers.
- NYC Parks will continue to work with its Park Administrators and non-profit partner organizations to promote language access initiatives in our largest parks and will encourage all park managers and outreach coordinators to meet with local community and partnership groups to promote the availability of these services in local parks and communities.
- NYC Parks will work with the Partnerships for Parks program to promote language access services and encourage and support volunteerism by LEPs.
- NYC Parks will promote language access through multilingual special events and public programs.

V. Training

Parks will take the following steps to introduce the Language Access Plan to staff and to incorporate language access into our long-term training efforts:

- Through Parks Public Programs and Training divisions, recreation center and permit office managers, supervisors and front desk staff receive training and hands-on practice in implementing language access including interpretation services, using “I speak” cards and Language Identification posters, requesting translation services, and required signage.
- Language access has been built into Parks standard Field Operations Training, which is mandatory for all new full-time field employees, both supervisory and entry-level. Language access will be a component of an expanded customer service section.
- Language access will be taught to all Public Programs employees as part of Parks Training Academy’s Customer Service Training program. Parks will re-train all Public Programs staff, as well as other agency staff, in the revised customer-service training curriculum.
- Broadcast emails and the Parks Plant will provide introduction and regular updates and information about our Language Access Plan to all staff.
- All language access training and distributional materials will be hosted on the Parks Intranet for access by all staff.
- A monthly health and safety topic will be written to address language access and solicit participation in the agency language bank. All field staff currently participate in monthly health and safety topic reviews, and language access will be a topic one month per year.
- Targeted training and orientation will be provided for Central Communications, Public Program managers and Language Bank volunteers regarding the operation of Language Line and the internal Language Bank.
- The language access plan has been and will continue to be addressed in regular senior-level meetings.
- Parks’ EEO office currently conducts cultural sensitivity training as part of mandatory EEO training for all staff. Parks will work to incorporate language access into that training as well.

Timeline:

- Parks' Deputy Commissioner for Urban Park Services & Public Programs will organize ongoing training for Urban Parks Services Staff and Public Programs staff at recreation centers and permit offices upon hire, as well as annual staff summits and mandatory recertification.
- Parks' Director of Training has revised our Field Operations and Customer Service training curriculum and implements customer service and language access training on an ongoing basis.
- Parks' Assistant Commissioner for Equal Employment Opportunity will work to incorporate language access into ongoing mandatory training for Parks staff and new hires.
- Parks' Assistant Commissioner for Compliance and the Director of Health and Safety will prepare and finalize a health and safety topic addressing language access for all field staff and implement by Spring/Summer 2018.
- All general promotion and instruction regarding the program, including the posting of intranet materials, will be ongoing through the office of Community Outreach & Partnership Development.

VI. Record Keeping and Evaluation

Parks will take the following steps to ensure the quality of language access services:

- Parks will utilize Language Bank volunteers and community-based organizations to quality check translated materials. Parks will focus on translating documents that will most be in demand and will use surveys to determine these areas of most demand.
- Parks will formally report on the quality of language access at each walk-in facility at least once per year. Parks will develop an inspection report to cover signage, availability of translated materials, and language identification posters, and will look into the feasibility of adding this to our Operations and Management Planning (OMP) inspection program, as well as to our Agency Compliance survey program.
- Parks will work with community-based organizations to check the effectiveness of language access at walk-in facilities.

Parks will maintain the following records:

- Parks will track all language line interpretation and translation services and costs through our Central Communications and Community Outreach offices. This will be reported internally on a quarterly basis.
- Parks will track the number and type of translated signs produced annually.
- Parks Community Outreach division will, to the extent practical, maintain digital copies of all translated documents and record the number of translated documents.

Parks will monitor overall compliance with the local law by:

- The annual assessment and inspection of language access at walk-in centers.
- An annual review of translated sign production.
- Annual review of correspondence received via 311 LEP reporting.

VII. Resource Analysis and Planning

Parks will take the following steps to implement this plan using existing agency and inter-agency resources:

- Parks' in-house sign shop will prepare and produce all signage within the current signs budget.
- Parks will continue to develop its in-house Language Bank using volunteers and rewarding staff through incentives, awards, training opportunities and events.
- Parks will use "I speak" cards, Language Identification posters, and other materials in its program.
- Parks will use the Geneva Worldwide, Accurate Communications, and Language Line contract, or an equivalent, to augment translation services and provide back-up interpretation services. To monitor costs, only Parks Central Communications and Community Outreach will be able to directly spend against the contract. All Language Access vendor invoices will be sent to the Language Access Coordinator in the Office of Community Outreach. Parks will monitor monthly costs for this contract and assess program implementation accordingly. Parks will work to identify the most potential in-demand essential documents and languages and will prioritize translations accordingly.
- Parks will work with the Mayor's Office of Immigrant Affairs to access any available citywide resources to assist in its language access efforts.

VIII. Outreach and Public Awareness of Language Access Services

With New York City as one of the most heavily populated and diverse cities in the world, NYC Parks is committed to emphasizing cultural inclusion in its policies and operations, including providing language assistive services. In order to facilitate public awareness regarding the availability of our language access services, NYC Parks will take the following steps:

- Parks will continue to use “I speak” cards, and post Language Identification posters and Free Interpretation posters in plain view at its public facilities.
- Parks will continue to train all staff, especially front-line staff at recreation centers, pools and permit offices, to assist LEP patrons, and provide translation services in a timely manner.
- Parks will continue to promote the availability of translation services to Parks managers and supervisors, and encourage the development of targeted local signage, program flyers, and other materials based on the needs of specific communities.
- Parks will continue to translate essential documents into 10 languages, translate main rules signs, facility information and volunteer information into multiple languages, and to host this material on the Parks website.
- Parks will continue to work with the Partnerships for Parks program to promote language access services and encourage and support volunteerism by LEPs.
- Parks will continue to promote language access through multilingual special events and public programs.

IX. Language Access Complaints

NYC Parks monitors and responds to public complaints, inquiries, and comments about language access submitted via 311, as well as other internal complaint processes, via our agency's Commissioner's Correspondence tracking system.

Official customer correspondences received by our Commissioner's office are fielded to the appropriate Parks division for an appropriate resolution/response. Should the correspondence inquiry arrive in a language other than English, the correspondence is forwarded to the current written translation vendor, Geneva Worldwide. Upon completion of the correspondence's translation by the vendor, the agency response is returned to the customer in the original language identified or requested.

Language Access inquiries received via the Commissioner's Correspondence tracking system is reported to the agency's Language Access Coordinator annually.

X. Implementation Plan Logistics

NYC Parks is hard at work on many aspects of the language access plan. These include translating signage, and regular trainings for both new and experienced staff.

- NYC Parks will continue to use Language Line, Geneva Worldwide, Accurate Communications, and an internal Language Bank to provide translation and interpretation services, with procedures in place for its Central Communication division to coordinate these interpretive services.
- NYC Parks will continue to update and/or replace existing park and playground rules signs in the top two languages in a Community Board based on census data, as well as English. Signs will include universal symbols to aid in translation.
- NYC Parks will continue to update and/or replace walk-in center signage in the top two languages in a Community Board based on census data, as well as English.
- NYC Parks will continue training and refresher training for all staff, especially staff at recreation centers, pools and permit offices, to assist LEP patrons and to understand the goals and tools involved with this plan.
- NYC Parks will continue formal training in language access to field-level staff as part of ongoing customer service training. The timeline for this can be found under Section V “Training.”
- NYC Parks will work with our Information Technology and Innovation Performance Management divisions to develop a database that will assist in tracking staff trained in language access services, documents most commonly requested for translation, and number of translation requests in the top 10 designated citywide languages, etc.
- NYC Parks will continue to expand the translated content provided on the website.

Parks has assigned the Chief of Staff for Community Outreach & Partnership Development to serve as our agency Language Access Coordinator. Working with the Deputy Commissioner for UPS and Public Programs, the Deputy Commissioner for Operations, the Deputy Commissioner for Administration, the Assistant Commissioner for Agency Communications, the Assistant Commissioner for Compliance, Assistant Commissioner for Budget, Fiscal Management and Personnel, and the Agency Chief Contracting Officer, the Language Access Coordinator will monitor implementation of the language access plan with the Director of Training, New Media office, the Signage Upgrade program, and other relevant staff and units. Throughout this plan, Parks has indicated the offices and/or staff titles responsible for implementing specific parts of the plan.