

October 2023

I. INTRODUCTION AND OVERVIEW

The city of Rochester, New York, with an estimated population of 209,352, is a diverse community located in Western New York. As with all mid-size and large cities, Rochester benefits from thousands of residents who trace their roots to countries all over the world. Whether they are first-generation immigrants or descendants of immigrants, many in the Rochester community speak a wide variety of languages, and many speak little or no English.

In addition, Rochester is home to one of the largest deaf and hard-of-hearing populations in the nation. Since 1876, when the Rochester School for the Deaf was established, and reinforced in 1965 with the opening of RIT's National Technical Institute for the Deaf, the community is a welcoming place for people who communicate through American Sign Language (ASL).

As the City provides a myriad of services to its diverse population, it is important that City staff members are capable of serving those who face barriers to understanding spoken English. The City intends for all of its residents to enjoy the services and amenities of this community and strives to make reasonable accommodations for non-English speakers.

The City of Rochester has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken by the City to ensure meaningful access to services, programs and activities on the part of persons who have limited English proficiency (LEP persons)¹.

Authority and Purpose

A LAP is required by the United States Department of Housing and Urban Development (HUD). In compliance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000), all entities receiving federal funding through HUD (or other federal agencies) must develop a plan for addressing language barriers in the delivery of service. The Executive Order states that LEP persons should have meaningful access to federally conducted and federally funded programs and activities, including services and benefits.

Additionally, under Title VI of the Civil Rights Act of 1964, LEP persons are entitled to language assistance with respect to services/benefits from or interactions with recipients of federal financial assistance. Per HUD guidance, agencies should provide reasonable accommodations for languages that consist of more than 5% of the population.

As defined by federal government, an LEP person is someone who is not able to speak, read, write, or understand the English language at a level that allows him/her to interact effectively with agency staff. A citizen maintains the right to self-identify as a LEP person.

¹ For the purposes of this document, all references to languages other than English include not just spoken and written languages, but also American Sign Language (ASL).

II. CURRENT SITUATION

Following HUD's guidance, which recommends that agencies make reasonable accommodations for languages that consist of more than 5% of the population, the City of Rochester should focus on providing Spanish-language access. No other language is spoken by more than 1% of the city's population.

However, approximately 45,000 people (3.5% of the population) across the Greater Rochester Area are deaf or hard-of-hearing. With that in mind, the City is also including ASL in its language access plan.

Translating and Interpreting Services

As of 2023, the Communications Bureau has contracts with vendors – available to every department – for Spanish translating (two approved vendors) and ASL interpreting (one approved vendor; the City is exploring expanding approved vendors for ASL).

The City translates many materials and documents and has Spanish versions readily available. In addition, nearly all City-coordinated press conferences and major speaking events (e.g., the Mayor's State of the City address) are interpreted into ASL in real time.

In addition, all City departments have access to *Language Line*, a vendor that can provide on-demand, real-time, and culturally proficient interpreting services in more than 240 languages, including ASL (Appendix A) via phone (\$0.99/min) or video (\$1.99/min.). Unfortunately, currently, most departments are not familiar with the services available through *Language Line*.

If a department cannot meet its needs for interpretation or translation services, any team in the City can leverage New York State contracts (Munis contract # 137861) with a wide variety of language access vendors (Appendix B) and engage with a vendor from this list.

The City's website is currently undergoing a comprehensive overhaul and will include highquality machine translation into a wide variety of languages, including Spanish. (Note: in addition, the new site will also significantly enhance accessibility for those with visual impairments).

Bilingual Positions

Nearly every department in City Hall has established bilingual positions, which require fluency in spoken Spanish. Eleven of the City's 12 departments (92%), plus City Council, have bilingual positions, a nearly 100% increase over a decade ago. Today, 60 City employees engage with others in Spanish as part of their job description.

Additional City employees are fluent in Spanish and other languages (including ASL), but the City does not track the number of employees fluent in other languages beyond those who serve in a bilingual position. Currently, there are no positions that require ASL fluency, and we are not aware of any employee being certified as an ASL interpreter.

III. LANGUAGE ACCESS PLAN

Action #1 Maintain contracts or memorandums of understanding for on-call translation and interpreting services City-wide.

- A. Each department should identify crucial documents that should be translated into Spanish, and coordinate getting those materials translated. Priority documents would include those most frequently used and those that would result in notable hardship if not translated, i.e., contracts, notice and orders, business permit renewals, etc.
- B. Outbound voicemail greetings for each department should include a Spanish translation.
- C. All vital public announcements, public meetings, and hearings should have an ASL interpreter. Spanish translation services should be made available on-demand.
- D. Establish clear and easy billing arrangements for *Language Line* for all depts.

Action #2 Increase awareness of these services among all departmental leadership and front-line staff to ensure employees know how to access needed translation and interpreting services.

- A. Distribute hard-copy *Language Line* cards (see Appendix A) to all department leadership and front desk/front line personnel, as well as all firefighters, police officers, Crisis Intervention Team members (including PIC team members), and 911 Center employees. Ensure every City location has a copy at its front desk.
- B. Update new employee orientation materials and online DHRM resources with information about how to use *Language Line*.
- Action #3 Distribute this LAP throughout City Hall to promote availability of existing and planned resources, as well as improve service for residents/customers. Distribution should be accompanied by a brief explanation by department/ bureau/division managers of how to use the LAP, basic policies for interaction with LEP persons, and available resources.

Action #4 Continue to make hiring of bilingual employees a priority.

- A. The City currently has 60 budgeted staff positions that require fluency in Spanish. Departments should maintain or increase the number of bilingual positions and continue to view language skills as a major asset for new hires.
- B. The City should explore establishing positions that require fluency in ASL, or even certification in ASL interpreting.

Action #5 Encourage staff to learn basic Spanish, ASL, and other prominent languages; encourage those with basic skills to become more fluent and/or certified.

- A. Promote the City's employee tuition benefit as it relates to language skill development and ASL certification.
- B. Identify local organizations that offer language classes and consider establishing City cohorts.

Action #6 Implement, monitor, and update the LAP, and maintain services to ensure its success.

A. The Department of Human Resources Management (DHRM) will be tasked with implementing and monitoring the progress of the LAP. The Plan should be updated biannually. This task will entail collaboration with various departments within the City. The Language Access Coordinator will be:

Fernan Cepero Deputy Director / Language Access Coordinator Department of Human Resource Management 585-428-1374 Fernan.Cepero@CityOfRochester.gov

B. The Communications Bureau will be tasked with maintaining contracts with translation and interpreting services, and for encouraging departments to translate crucial materials into Spanish (and other languages as appropriate).

In addition, the Communications Bureau will be responsible for ensuring the translation capabilities of the City's website are fully adequate and functional.

Language Access Complaint Procedure (To be included as an attachment to LAP) You may file a complaint with the City of Rochester Language Access Coordinator if you believe you have been denied the benefits of this Plan. You must file your complaint within six months of the alleged denial. You must file a written complaint. To file a complaint with the Language Access Coordinator, submit the written complaint to: Fernan Cepero Deputy Director / Language Access Coordinator **Department of Human Resource Management** City Hall 30 Church Street Rochester, NY 14614 Fernan.cepero@cityofrochester.gov

APPENDIX A



CITY OF ROCHESTER, NY LANGUAGE IDENTIFICATION CARD					
Sgaw Karen ဒုးနဲဉ်ပူးနတၤ်ကတိၤအကိုဉ်တက္ၤ်. ကကိးန္ဉ်နၤပု၊ကတိၢကိုးထံတၤ်လီၤ.	ကညီကိုာ်	1			
Karenni/Kayah ,kHghjugh 3dJ skGg'ku GlkJ skGg lrkGglkugoJg 'ku (,fgafgedfg) lfgh	afgdfgh;ky	1			
Kinyarwanda Hitamo ururimi rwawe. Turahamagara umusemuzi.	lkinyarwanda	1			
Napalese आफ्नो भाषामा देखाउनुहोस् एक दोभासेलाई बोलाइनेछ।	नेपाली	1			
Somali Tilmann afka aad ku hadasho. Tarjumaan ayaa la wacayaaye.	Afsomali ★	1			
Spanish Señale su idioma. Se llamará a un intérprete.	Español	1			
Swahili Onyesha lugha yako. Tutamwita mtu atakayekufasiria.	Kiswahili	1			
Tigrinya ናብ ናትካ ቋንቋ አመልክ። ተርጓሚ ክድወሰሉ እዩ።	ት ግ ሬኛ	1			
Vietnamese Chỉ vào ngôn ngữ của quý vị. Chúng tôi sẽ gọi một thông dịch viên.	Tiếng Việt	1			

APPENDIX B



Office of General Services **Procurement Services**

Corning Tower, Empire State Plaza, Albany, NY 12242 | https://ogs.ny.gov/procurement | customer.services@ogs.ny.gov | 518-474-6717

Contractor Information Summary

G	roup 73003 – Language Servic	es – Tempo	orary Personnel (Sta	atewide)			
Award Number: 23253 Contract Period October 25, 2022 – October 26, 2027							
OGS CONTRACT NUMBER	IIII NUT TISE THE EMATS BELOW FOR RECIRENTS		CONTRACT SPECIFICS				
PS69746 SB	Accents Language Services Inc. 400 Tree Road South Setauket, NY 11720 Federal ID: 863322565 Vendor ID: 1100261321	Contact Information Belinda Obi 631-504-1748 belinda.obi@accentinterpreters.com		Price List Quality Control <u>Procedures</u>			
PS69759 SB	American Sign Language Inc. 1412 Broadway #2118 New York, NY 10018 Federal ID: 133844996 Vendor ID: 1000006477	Contact In David Jond 212-477-07 contracts@	Ireau 775	Price List Quality Control Procedures			
PS69760	Avantpage, Inc. 523 G Street Davis, CA 95616 Federal ID: 273930611 Vendor ID: 1100091143	Joanna Os 530-750-20	Contact Information Joanna Oseman 530-750-2040 ext. 94 joanna@avantpage.com				
PS69761 SB MBE	 B&N Legal Interpreting, Inc. 745 Fifth Avenue 5th Floor New York, NY 10151 Federal ID: 753178774 Vendor ID: 1100127233 	Livingston I 866-661-10	Contact Information Livingston Buchanan 866-661-1053 Ibuchanan@bninterpreting.com				
PS69762	Baystate Interpreters Inc. 55 Lake St Suite 300 Gardner, MA 01440 Federal ID: 753204399 Vendor ID: 1100154761	Contact In Jeff LeBlan 978-632-16 rfp@baysta	С	Price List Quality Control Procedures			
PS69763 WBE	Bilingual Professional Agency, Inc. 1663 East 17th Street Brooklyn, NY 11229 Federal ID: 112880271 Vendor ID: 1000011957	Contact In Florence G 718-382-20 bpa@comp	eliebter	Price List Quality Control Procedures			



NEW YORK STATE OF OPPORTUNITY OF Procurement Services

Coming Tower, Empire State Plaza, Albany, NY 12242 | https://ogs.ny.gov/procurement | customer.services@ogs.ny.gov | 518-474-67

Contractor Information Summary

Award Number: 23253 Contract Period October 25, 2022 – October 26, 2027						
OGS CONTRACT NUMBER	DO NOT U	EQUESTS	CONTRACT SPECIFICS			
PS69764	Center for Disability Ri d/b/a Sign Language C 497 State Street Rochester, NY 14608 Federal ID: 223141275 Vendor ID: 1000017090	onnection	Contact Informa Brooke Erickson 585-286-2021 berickson@cdrny		Price List Quality Control Procedures	
PS69765	Choice Temps, Inc. 622 Third Ave 7 th Floor New York, NY 10017 Federal ID: 133526432 Vendor ID: 1100145747 Clark Media Corp. d/b/a Responsive Translation Services 655 Jersey Avenue Jersey City, NJ 07302 Federal ID: 133591255 Vendor ID: 1100074777		Contact Information Howard Chesloff 646-254-4350 hchesloff@choiceco.com		Price List Quality Contro Procedures	
PS69766 WBE			Contact Informa Yoko Clark 212-818-1102 yclark@resptrans		Price List Quality Contro Procedures	
PS69768	Corporate Translation Services, LLC d/b/a Language Link 701 NE 136 th Ave Suite 200 Vancouver, WA 98684 Federal ID: 911506430 Vendor ID: 1000047516		Contact Informa Margot Lamy 360-433-0440 rfp@language.lin		<u>Price List</u> Quality Contro <u>Procedures</u>	
PS69769 WBE	Eriksen Translations In 360 Court Street Unit 37 Brooklyn, NY 11231 Federal ID: 113067585 Vendor ID: 1000000653		Contact Informa Kevin Hudson 718-802-9010 Kevin.hudson@e		<u>Price List</u> Quality Control <u>Procedures</u>	



Corning Tower, Empire State Plaza, Albany, NY 12242 | https://ogs.ny.gov/procurement | customer services@ogs.ny.gov | 518-474-6

Contractor Information Summary

Award Number: 23253 Contract Period October 25, 2022 – October 26, 2027						
OGS CONTRACT NUMBER	TRACT DO NOT USE THE EMAILS BELOW FOR RFQ REQUESTS					
PS69770 SB	FourCorners Translat 7014 13th Avenue Suite 202 Brooklyn, NY 11228 Federal ID: 474240003 Vendor ID: 110027211		Contact Information Omid Jafarzadeh 646-761-1493 omid@fourcornerstranslation.com	<u>Price List</u> <u>Quality Contro</u> <u>Procedures</u>		
PS69771	Geneva Worldwide, In 228 Park Ave S. PMB 27669 New York, NY 10003 Federal ID: 133897160 Vendor ID: 100000136		Contact Information Amanda Broadway 212-255-8400 ext. 166 rfp@genevaworldwide.com	Price List Quality Contro Procedures		
PS69772 SB	Global Employment S 45 Ashgrove Lane Selkirk, NY 12158 Federal ID: 141802094 Vendor ID: 100001438		Contact Information Michael Coluccio 518-378-1937 mcolucc1@nycap.rr.com	Price List Quality Contro Procedures		
PS69773	Indus Translation Ser 7 Lincoln Highway #206 ¹ Edison, NJ 08820 Federal ID: 260879463 Vendor ID: 110027265		Contact Information Farah Kamran 732-889-1490 farah@industranslation.com	Price List Quality Contro Procedures		
PS69774	International Languag 515 Madison Ave 8 th Floor New York, NY 10022 Federal ID: 133732289 Vendor ID: 110006454		Contact Information Angelo Franco-DeWitt 212-856-9848 afranco@ilslanguages.com	Price List Quality Contro Procedures		



Corning Tower, Empire State Plaza, Albany, NY 12242 | https://ogs.ny.gov/procurement | customer.services@ogs.ny.gov | 518-474-6713

Contractor Information Summary

Group 73003 – Language Services – Temporary Personnel (Statewide)						
Award Number: 23253 Contract Period October 25, 2022 – October 26, 2027						
OGS CONTRACTOR INFORMATION DO NOT USE THE EMAILS BELOW FOR RFQ REQUESTS USE MAILING LIST/MATRIX LINK					CONTRACT SPECIFICS	
PS69776 SB MBE WBE	JR Language Transla 2112 Empire Blvd Suite 1C Webster, NY 14580 Federal ID: 11382260 Vendor ID: 110015223	2	Douglas E 585-935-7		<u>Price List</u> Quality Contro <u>Procedures</u>	
PS69777	Language Line Servic d/b/a LanguageLine S 1 Lower Ragsdale Driv Building 2 Monterey, CA 93940 Federal ID: 770586710 Vendor ID: 100000970	Solutions e	LeRue Ca 831-648-5		Price List Quality Control Procedures	
PS69778	Language Services A 455 Business Center D Horsham, PA 19044 Federal ID: 232831198 Vendor ID: 100000465	Drive	Tom Bento 267-962-8		Price List Quality Control Procedures	
PS69779	Michael Giammarrino d/b/a Language Toda 520 Green Mountain R Mahwah, NJ 07430 Federal ID: 262491640 Vendor ID: 110002010	y oad	Michael G 201-981-4	n formation iammarino 738 oday@aol.com	Price List Quality Control Procedures	
PS69780 SB	Liberty Translations a 502 Court St Suite #242 Utica, NY 13502 Federal ID: 843294838 Vendor ID: 110023888	3	Dzanan Bi 315-507-2		<u>Price List</u> <u>Quality Contro</u> <u>Procedures</u>	



Corning Tower, Empire State Plaza, Albany, NY 12242 | https://ogs.ny.gov/procurement | customer.services@ogs.ny gov | 518-474-6713

Contractor Information Summary

G	roup 7300)3 – Languag	e Services -	- Tempora	ary Personnel (St	atewide)				
Award Number: 23253 Contract Period October 25, 2022 – October 26, 2027										
OGS CONTRACT NUMBER	ONTRACT DO NOT USE THE EMAILS BELOW FOR RFQ REQUESTS							DO NOT USE THE EMAILS BELOW FOR RFQ REQUESTS		CONTRACT SPECIFICS
PS69781 SB	LinguaLinx d/b/a Lingua 433 River Sti Suite 6001 Troy, NY 127 Federal ID: 0 Vendor ID: 1	reet 180 010749117	ns, Inc.	Contact Info Charlotte Knc 518-388-9000 CKnoll@Ling	oll 0 ext. 1034	Price List Quality Control Procedures				
PS69782	Lionbridge 1050 Winter Suite 2300 Waltham, MA Federal ID: 8 Vendor ID: 1	A 02451 361225758		Contact Info John Drugan 781-801-2929 John.Drugan(Price List Quality Control Procedures				
PS69783 MBE WBE	LM Languag 103 Carnegie Suite #300 Princeton, N. Federal ID: 2 Vendor ID: 1	J 08540 264096112		Contact Infor Veronica Meh 917-319-9932 veronica@Iml	nno	Price List Quality Control Procedures				
PS69784	Mill Neck Se d/b/a Mill Ne 40 Frost Mill Mill Neck, NY Federal ID: 1 Vendor ID: 1	ck Interpreter Ser Road / 11765 13119786	vice	Contact Infor Lindsay Byrne 516-512-6222 interpret@mill	2	Price List Quality Control Procedures				
PS69785 SB	Mohawk Val 2017 Genese Utica, NY 138 Federal ID: 8 Vendor ID: 1	501 333872343		Contact Infor Fang Dong 315-864-8006 fang@mvinter	5	Price List Quality Control Procedures				



Office of General Services Procurement Services

Contractor Information Summary

Updated: October 25, 2022						
Group 73003 – Language Services – Temporary Personnel (Statewide) Award Number: 23253 Contract Period October 25, 2022 – October 26, 2027						
OGS CONTRACT NUMBER	CONTRACTOR IN DO NOT USE THE EMAILS BE USE MAILING LIST	CONTRACT SPECIFICS				
PS69786	Para-Plus Translations, Inc. 2 Coleman Avenue Cherry Hill, NJ 08034 Federal ID: 222587968 Vendor ID: 1100127408	Contact Information Robert Santiago 856-547-3695 robsantiago@para-plus.com	Price List Quality Control Procedures			
PS69787	People Inc. 1219 North Forest Road Williamsville, NY 14221 Federal ID: 160975538 Vendor ID: 1000028496	Contact Information Jodie Chibi 716-833-1637 ext. 105 jchibi@wnydas.org	<u>Price List</u> Quality Control <u>Procedures</u>			
PS69788	Propio LS, LLC 10801 Mastin Street Suite 580 Overland Park, KS 66210 Federal ID: 463268968 Vendor ID: 1100110896	Contact Information Jared Shiffman 913-359-1691 jshiffman@propio-Is.com	Price List Quality Control Procedures			
PS69789 WBE	Sign Language Resources Inc. 400 Stony Brook Court Suite 3 Newburgh, NY 12550 Federal ID: 141734985 Vendor ID: 1000027755	Contact Information Tammy Mancinelli 845-566-7951 Tammy@slrconnect.com	Price List Quality Control Procedures			
PS69792	TransPerfect Translations International, Inc. 1250 Broadway 32 nd Floor New York, NY 10001 Federal ID: 823570718 Vendor ID: 1100273211	Contact Information Jonathan Levy 520-991-3826 jolevy@transperfect.com	Price List Quality Control Procedures			
PS69793	United Language Group Inc. 1550 Utica Avenue South Suite 420 Minneapolis, MN 55416 Federal ID: 411597895 Vendor ID: 1100245681	Contact Information Annie Sligh 612-400-6520 annie.sligh@ulgroup.com	Price List Quality Control Procedures			



Coming Tower, Empire State Plaza, Albany, NY 12242 | https://ogs.ny.gov/procurement | customer services@ogs.ny.gov | 518-474-6717

Contractor Information Summary

G	roup 73003 – Language	Services – Tempor	rary Personnel (Sta	tewide)
Award N	umber: <u>23253</u>	Contract Period	October 25, 2022 – Octo	ober 26, 2027
OGS CONTRACT NUMBER	DO NOT USE THE	TRACTOR INFORMATION EMAILS BELOW FOR RE IAILING LIST/MATRIX LIN	Q REQUESTS	CONTRACT SPECIFICS
PS69794 SDVOB	VANCRO Inc. 4730 S Fort Apache Road #300 Las Vegas, NV 89147 Federal ID: 203212926 Vendor ID: 1100253755	Contact Inf Jessica Hun 805-709-900 jessica.hunt	itzinger	Price List Quality Control Procedures