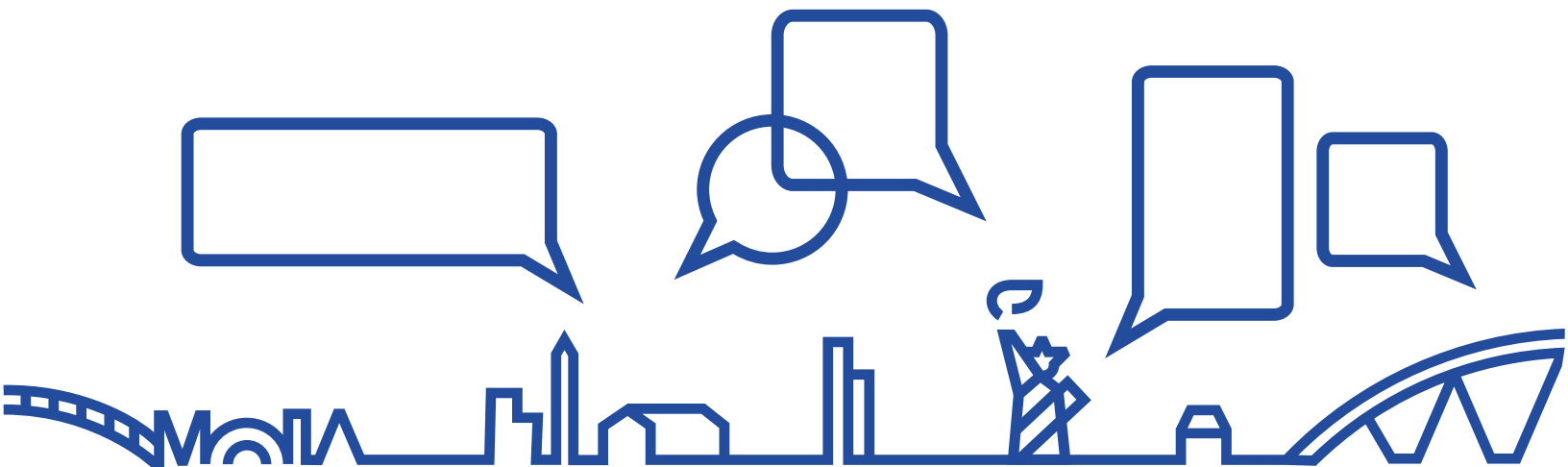


Local Law 6 Update

May
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Acknowledgment

The New York City Mayor's Office of Immigrant Affairs (MOIA) expresses its profound gratitude to the community leaders and City partners whose invaluable insights and contributions have been instrumental in shaping the focus group and the findings presented in this report.

We also thank the community-based organizations (CBOs) that participated in this initiative. Their willingness to candidly share their firsthand experiences, challenges, and innovative ideas has enriched our understanding of the language access landscape in New York City. Their expertise and perspective are the cornerstone of this report and will guide our future efforts.

MOIA also acknowledges with appreciation our partners from the Service Design Studio (SDS) at the Mayor's Office for Economic Opportunity. Their partnership to design and implement the focus groups, as well as their commitment to equitable community engagement provided a vital collaborative foundation for this project.

The insights gathered through this collaborative process are invaluable in our ongoing efforts to enhance language access across New York City. MOIA looks forward to continuing our partnership with these organizations and individuals as we work towards implementing the recommendations highlighted in this report.

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Executive Summary

The Mayor's Office of Immigrant Affairs (MOIA) conducted focus groups with 14 community-based organizations (CBOs) to deepen understanding of their potential role in providing language services under Local Law 6 of 2023 (LL6). This study builds upon MOIA's initial survey of 68 CBOs, which identified challenges and opportunities in integrating CBOs into the City's language access ecosystem.

Key Findings

Our focus groups revealed that CBOs offer unique strengths in language access delivery while facing distinct challenges:

1. **CBOs fill critical language access gaps** but require appropriate resources and support to sustain these services.
2. **Deep community relationships** position CBOs to deliver culturally responsive language services built on established trust.
3. **Preserving linguistic diversity** requires supporting marginalized languages and dialects often overlooked by larger providers.
4. **Career pathways for interpreters/translators** need development through training and certification opportunities.
5. **Structural collaboration opportunities** exist for CBOs to enhance the City's language access through multiple roles beyond direct service provision.

Recommendations

Based on these findings, MOIA proposes three strategic initiatives:

1. **Target small CBOs for specialized language services** by piloting contracting opportunities for languages beyond the ten designated Citywide languages and providing technical assistance.
2. **Tailor contracting infrastructure** by developing CBO-specific quality standards and establishing a pre-qualified list of community-based language service providers for City agencies.
3. **Develop a career pipeline for language professionals** by expanding training opportunities and supporting CBOs in building capacity for professional development.

These initiatives aim to create a more inclusive, responsive language access ecosystem that leverages the unique strengths of community partners while addressing critical service gaps for New York City's diverse population.

1. Introduction

In December 2022, the New York City Council demonstrated its commitment to enhancing language access for all New Yorkers by passing [Local Law 6 of 2023](#) (LL6). This legislation aims to involve community-based organizations (CBOs) in the ecosystem of language service delivery, to support City services. Specifically, LL6 mandates that the administering agency conduct a survey of CBOs to assess their capacity to provide translation, interpretation, and other language-related services.

Initial Survey Findings

In response to the mandate, the Mayor's Office of Immigrant Affairs (MOIA) conducted an initial survey and analysis of this issue, submitting a [report](#) to the City Council in January 2024. This report, based on responses from 68 CBOs across all five boroughs, revealed several key insights:

- Many CBOs utilize bi/multilingual staff to deliver vital in-language services, but they face constraints in scaling up to professional translation/interpretation operations.
- While some in-house capabilities and foundations to provide language services exist within CBOs, there is a clear need for additional resources and training to build up their capacity as quality language service providers.
- CBOs face significant challenges in navigating the complexities of securing contracts with the City, exacerbated by a lack of internal capacity. These challenges include difficulties in finding out about contracting opportunities and navigating bureaucratic processes and paperwork.
- CBOs expressed strong interest in partnering with the City to leverage community linguists' talents in enhancing overall language access.

Based on these findings, the initial report recommended:

- Continuing the City's nonprofit contracting reforms, as recommended by the [Joint Task Force to Get Nonprofits Paid on Time](#)
- Increasing outreach regarding contracting opportunities
- Exploring procurement models to engage with community linguists
- Supporting professional development pathways for linguists

Focus Group Study

To gain a deeper understanding of these initial findings and to explore potential solutions, MOIA conducted focus group discussions with 14 CBOs. While not required by LL6, MOIA felt these discussions were crucial to fully comprehend the challenges and opportunities to creating an inclusive language service ecosystem. This approach allowed for a more nuanced exploration of the survey results and fostered dialogue that could inform both policy and practices.

Key takeaways from the focus groups:

- CBOs play a vital role in filling language access gaps but require appropriate resources and support.

- CBOs possess deep community understanding and trust, crucial for effective language access.
- There is a strong emphasis on preserving linguistic diversity, including support for marginalized languages and dialects.
- Developing a career pipeline for interpreters/translators is imperative.
- CBOs identified several opportunities for collaboration with the City in language service delivery.

This second report analyzes the findings from these focus groups, aiming to further inform and refine strategies for strengthening language access across New York City. The collaborative and participatory approach of this research underscores MOIA's commitment to supporting and enhancing language access services, recognizing the vital role that CBOs play in serving New York's diverse communities.

2. Focus Group Study

To gain deeper insights into the survey results from the first report, MOIA designed and conducted two focus group discussions with select CBOs. The focus groups were designed to gather more nuanced information about the challenges and opportunities in providing language services to the City, while also fostering dialogue that could inform both policies and practice.

Methodology

Out of the 68 organizations that completed the survey, MOIA identified 24 that met the following criteria:

- Provided in-house translation and/or interpretation services
- Expressed interest in providing services to City government Indicated a willingness to participate in focus group discussions

These criteria helped identify organizations with both relevant experience in language services and readiness to engage in detailed discussions about strengthening the language access ecosystem in New York City.

Based on our analysis of their language service capacity, two distinct focus groups were organized:

	Focus Group #1	Focus Group #2
Goal	To explore how the City might support the organizational or technical systems of CBOs, to better deliver services at the appropriate scale	To explore the ways CBOs can be integrated into the City's process of delivering translation and interpretation services
Participants	Representatives from five CBOs	Representatives from nine CBOs
Organizational characteristics of selected CBOs	• Translation and/or interpretation services are at the core function of the organization	• The primary focus of the organizations was on community-focused services

	• Has promising in-house language service capabilities • Many of the participants themselves are certified interpreters/translators with vast experience in providing language services	• The CBO provides language services as an ancillary function
List of the languages that the CBOs provide for in-house language services *	• Urdu, Punjabi, Bengali, Pashto, Dari, Spanish, Tamil, Uzbek, Turkish and Ukrainian • Chinese (Translation - Simplified and Traditional; Interpretation - Cantonese, Mandarin, Fuzhounese, Toisanese) • Arabic, Bangla, Burmese, Chinese, Dari/Persian, French, German, Greek, Haitian Creole, Hindi, Hmong, Khmer, Kurdish (Sorani), Pashto, Portuguese, Punjabi, Russian, Somali, Spanish, Swahili, Swedish, Tigrinya, Turkish, Ukrainian, and Urdu. • Wolof, Pulaar, Soninke, Hassaniya, French, Arabic • Mixteco, Nahuatl, Me'phaa-Tlapanec, Mam, Mixe, K'ichwa, K'iche', Garifuna, Kaqchiquel, Totonaco	• Arabic • Bangla • Chinese • Korean • Khmer, Vietnamese • Nepali • Spanish

** The list of languages for Focus Group #1 reflects the exact languages reported by the participating CBOs in the initial survey, as these organizations provide translation and/or interpretation services as their core function. For Focus Group #2, the list represents a summary of the languages offered by the nine participating organizations, as these CBOs provide language services as an ancillary function to their primary community-focused services. This difference in presentation reflects the distinct nature and scope of services provided by the two groups of organizations.*

MOIA collaborated closely with the Service Design Studio (SDS) at the Mayor's Office for Economic Opportunity to design and implement the focus groups. This partnership ensured that the sessions were tailored to their respective goals and aligned with the best practices in community engagement.

Focus Group #1:

- This session was conducted virtually, to accommodate participants who could not attend in person, ensuring broader participation and inclusivity.
- To ensure linguistic accessibility, MOIA and SDS took proactive steps in planning and hosting the focus groups. For Focus Group #1, Spanish interpretation and translation was provided. Three professional Spanish interpreters and a technical assistant were all

involved in order to facilitate smooth communication among participants and with facilitators. Written materials were provided in both English and Spanish to ensure all participants had access to information, both before and after the session.

Focus Group #2:

- This session was conducted in person, allowing for direct interaction among participants.
- As part of the discussion, MOIA provided participants with a worksheet, designed in collaboration with the SDS, that explained the common translation and interpretation processes undertaken by the City. By providing this visual information as a foundation, this worksheet helped participants gain a base understanding of current practices, and also encouraged creative thinking about how their own organizations could fit into and enhance these processes.

By offering both virtual and in-person options, and providing appropriate language support and contextual information, MOIA ensured that a diverse range of CBOs could participate fully in these discussions. This approach demonstrates MOIA's commitment to inclusive engagement and its recognition of the varied needs of participants.

Limitations

While the focus groups provided valuable insights, it is also important to acknowledge some limitations of the focus group discussions:

- **Time Constraints:** Given the complex nature of language access issues and the diverse experiences of participating organizations, the 90-minute sessions may have restricted the depth of the discussion on some topics. Participants' willingness to extend beyond planned time and continue the discussion indicated high engagement. Additionally, for each focus group, one participant was unable to attend due to scheduling conflicts. To mitigate this, MOIA conducted separate interviews with these participants. While this ensured that their input was captured, it also meant these perspectives were not part of the group dynamic, potentially limiting the synergistic exchange of ideas that often occurs in focus group settings.
- **Virtual vs. In-Person Format:** Different formats may have affected the dynamics of discussions, with virtual settings potentially limiting spontaneous interactions and nonverbal cues. However, the virtual option did allow for broader participation.
- **Language Considerations:** While efforts were made to accommodate linguistic diversity, such as providing Spanish language support for the first focus group, MOIA acknowledges that operating in English-dominant spaces may have impacted the full expression of ideas from non-English dominant speakers.

These limitations should be considered when interpreting the findings. Despite these constraints, however, the focus groups provided a wealth of valuable information and perspectives that will inform MOIA's strategies for improving language access services in New York City in the future.

3. Key Findings

The focus group discussions yielded valuable insights into the current landscape of language access services provided by CBOs, as well as potential avenues for collaboration with the City. These findings are organized into five main themes.

1. CBOs can fill some gaps in language access

- Both groups noted that despite strengthened requirements under City law, significant gaps still remain for people with limited English proficiency in accessing language services.
- Participants reported that they often step in when translation and interpretation services are unavailable or perceived as inadequate in city services.
- However, CBOs face capacity constraints, and they emphasized the importance of receiving the appropriate resources to support their role in providing these essential services.

"Obviously people who don't speak English and that's not their first language, they are the ones that were having the most difficulties. And unfortunately, when tragedies strike, they are the ones who get left out of that mix" - Focus Group #2 Participant

2. CBOs have deep relationships with communities

- Participants emphasized that CBOs have a deep understanding of community needs.
- The importance of community trust was also highlighted as crucial for effective language access. Several participants emphasized that CBOs often serve as trusted intermediaries and understand the cultural nuances that are crucial to effective communication.
- One Focus Group #1 participant noted that their CBO prioritizes hiring linguists with both translation/interpretation skills and lived experiences. They mentioned that having lived experiences, such as navigating our country's complex immigration system themselves, provides an added level of understanding and depth in communication.

"We see the community members who would be receiving the information and we want it to be understood in the way that it's intentional but also actually comes across as 'this is for you.'" - Focus Group #1 Participant

3. Achieving full language access requires preserving linguistic diversity

- Both groups stressed the importance of preserving mother languages and supporting marginalized languages and dialects as well.
- Participants noted the need for dialect-specific services, citing examples like regional Spanish variations and less dominant Chinese dialects like Fuzhounese and Toisanese.
- There was particular emphasis on supporting indigenous languages and variants. One Focus Group #1 participant mentioned that there is a general lack of awareness of indigenous languages and their needs, and that interpreters have taken on roles to advocate and educate the public.

"We are neglecting mother languages." - Focus Group #1 Participant

"I think that just across the board, all languages deserve the care." - Focus Group #1 Participant

4. Developing a career pipeline for interpreters/translators is imperative

- Participants expressed concerns over the perceived utilization of bi/multilingual speakers as interpreters instead of qualified language professionals, noting potential impacts on service quality.
- Both focus groups highlighted the need for City-sponsored training for interpreters/translators. Several participants expressed interest in getting CBOs involved in this effort.
- Participants also suggested creating a city-level certification system for quality control and a database of qualified and vetted interpreters and translators.

"The bottom line is creating a pipeline to the language workforce." - Focus Group #2 Participant

5. Collaboration opportunities with the City

The participants explored the structural collaboration opportunities between CBOs and the City. Focus group #1, comprised of CBOs with established language services capabilities, identified systemic barriers to formal partnerships with the City to provide their services. Meanwhile, focus group #2 explored complementary roles CBOs can play in strengthening the overall language access ecosystem beyond direct service provision.

Focus group #1 perspectives:

- Several participants mentioned a lack of administrative capacity, as well as the burdens of bureaucracy as major constraints in working with the City. They noted that CBOs often lack the cash flow to perform advance work and then have to wait for reimbursement from the City.
- A couple of participants mentioned that their CBOs provide interpretation trainings to build up the skills of bi/multilingual community members. They mentioned the need for more staff capacity and enough funding to provide trainings to meet the interests and needs of the community members.
- Participants also expressed concerns about the current language service contracting landscape. Several participants noted that language service contracts predominantly go to a few large for-profit language service providers. One suggested scaling down language service funding to allow CBOs to compete more effectively. Another suggested exploring ways to include "boutique" language service organizations that specialize in specific communities or languages in the ecosystem, rather than relying solely on a few large for-profit providers. These suggestions highlight a desire for a more diverse and inclusive contracting approach that invests in the local economy.

Focus group #2 perspectives:

Participants suggested several ways CBOs can collaborate with the City:

- By becoming involved in vendor selection and monitoring, leveraging their community knowledge to evaluate language service providers' cultural appropriateness and expertise.
- By creating or reviewing agency-specific glossaries, through community-based approaches. Glossaries serve as an important quality control tool in the language service industry. Glossaries can also help with accuracy and consistent use of terminology across different translations and interpretations.
- By participating in a quality assurance process, such as reviewing translated materials to ensure that nuances and context-specific language are accurately captured.
- By utilizing their established networks to distribute multilingual communication to the appropriate target population.
- By leading community education and outreach about language access rights and to inform and empower community members about available language services.

4. Recommended Next Steps

The focus group discussions provided deeper insights into the challenges and opportunities identified in our initial survey, allowing us to refine and expand our recommendations from the first report.

As one participant from Focus Group #2 aptly noted:

“Even if we bring up hundred different ideas, it’s not going to work out because of the system... the infrastructure is your call, and you have to open up so that those ideas can be seeded.”

With this perspective in mind and drawing on the collective insights from both focus groups, MOIA proposes the following evolved recommendations.

1. Target small CBOs for specialized language services

Initial findings: CBOs face challenges in navigating the City contracting process.

Focus group insight: CBOs face constraints in administrative capacity when navigating the current City procurement processes, which can be complex and resource-intensive, particularly for smaller organizations.

Recommended next steps:

The focus group discussions further highlighted the critical need for procurement reform, and it is imperative to continue implementing the recommendations of the Joint Task Force to Get Nonprofits Paid on Time.

Aligning with MOIA’s broader strategies, MOIA will also continue conversations with the Mayor’s Office of Nonprofit Services (MONS) and the Mayor’s Office of Contract Services (MOCS) to explore ways to integrate small CBOs into the City’s language access efforts and within the broader nonprofit ecosystem.

Given the size of the population with limited English proficiency and diversity of languages, the City has relied heavily on contracting with language service providers. However, there are areas the City can allocate some portions of language services funding to contracts specifically tailored for CBOs, particularly for specialized or marginalized language needs.

Recognizing the existing contracting challenges, the MOIA Language Service team will explore ways to contract with CBOs as language service vendors, particularly for languages that are beyond the designated ten Citywide languages. MOIA, in collaboration with MONS and MOCs, will also explore ways to provide technical assistance support to help CBOs navigate the administrative challenges.

2. Tailor contracting infrastructure

Initial finding: There is a need to explore procurement models to engage community linguists.

Focus group insight: CBOs suggested more flexible and responsive contracting approaches that acknowledge their unique position in the language access ecosystem.

Recommended next steps:

Over the years, the City has developed a foundation for contracting with language service vendors. Learning from best practices in the language service industry, MOIA will explore ways to establish quality standards specifically tailored to community-based providers, recognizing their distinctive strengths and operational models.

MOIA plans to work with the Mayor's Office of Contract Services (MOCS) and the Mayor's Office of Nonprofit Services (MONS) to launch a Request for Information (RFI) to create a comprehensive central repository of CBOs that provide language services. This systematic approach will facilitate better matching between agency needs and community language expertise, particularly for languages beyond the designated citywide languages.

Ultimately, MOIA aims to establish a Citywide pre-qualified list (PQL) of community-based language service providers that City agencies and offices can easily access and contract with. This streamlined procurement mechanism will reduce administrative burdens for both CBOs and City agencies, while maintaining quality standards and expanding language coverage to better serve New York City's diverse communities.

3. Develop a career pipeline for language professionals

Initial finding: There's a need to expand opportunities and resources for local translators and interpreters.

Focus group insight: CBOs emphasize the critical need to support the developing career pipeline for language professionals. They noted some current barriers, such as lack of investment in training opportunities and certification options, particularly for marginalized languages.

Recommended next steps:

To address the need for creating career pipelines for linguists and enhancing the overall quality and breadth of language services, MOIA will expand and explore new pathways to support professional development in this field.

In 2024, MOIA has already demonstrated the value of this approach through its initiative for languages of limited diffusion. With support from the Rockefeller Brothers Fund and the Mayor's Fund, MOIA partnered with the International Child Program and Refugee Translation Project to upskill community members who speak West African languages of limited diffusion, including Amazigh, Bambara, Dioula, Hassaniya Arabic, Hausa, Pulaar, Soninke, Twi, and Wolof. These trained interpreters provided critical language capacity during emergency situations, including at shelter sites for new arrivals to New York City.

Building on this foundation, MOIA's future career pipeline development will include:

- Investigating opportunities to establish training programs through partnerships with educational institutions, professional associations, and industry partners.

- Exploring potential collaborations with philanthropic organizations and other funding sources to support building up language access initiatives.
- Supporting CBOs in building up their capacity to provide training for bilingual/multilingual community members interested in joining the expanding language services field as translators, interpreters, project manager, technologists, or other positions.
- Fostering connections between CBOs, educational institutions, and industry partners to create sustainable pathways for language professionals in New York City.

By implementing these recommendations, MOIA aims to create a more robust, inclusive, and effective language access ecosystem in New York City. These recommended next steps aim to leverage the vital role that CBOs play in bridging linguistic gaps.

MOIA is committed to ongoing collaboration with CBOs, City agencies, and other stakeholders to refine and expand these initiatives as we work towards a more linguistically accessible New York City.

Glossary

Acronyms and Terms	Definition
Community-based organization (CBO)	Nonprofit, mutual aid, collective, or volunteer group that provides services and support for a local community.
Certification (for interpreters/ translators)	A formal process, offered through a government body or professional organization, by which interpreters or translators demonstrate their professional competence and adhere to industry standards. Certification typically involves passing standardized exams that test language proficiency, translation/ interpretation skills, and knowledge of professional ethics.
Glossary	A list of specialized terms in a particular field or industry, along with their definitions or translations. In language services, a glossary is often created and used to ensure consistency in terminology across different translations or interpretations, especially for technical or domain-specific content.
In-language service	Services provided directly in the language(s) that clients speak or reads, rather than translating or interpreting from or to English.
Interpretation	The process of transferring meaning between languages in spoken words.
Language service	Service provided to aid communication across language barriers, including translation and interpretation.
Language Service Provider (LSP)	An organization that offers professional language-related services such as translation, interpretation, localization, or other linguistic support. LSPs can range from freelance translators or interpreters to large international companies.
Quality Assurance (QA)	In language services, Quality Assurance (QA) refers to the systematic process of evaluating translations or interpretations to ensure they meet specified quality standards. This may include reviewing for accuracy, consistency, cultural appropriateness, and adherence to style guides. QA processes may involve peer review, editing, or the use of specialized QA tools.
Translation	The process of transferring ideas expressed in writing from one language to another language.