



New York City Campaign Finance Board
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Language Access Implementation Plan 2024

The Language Access Implementation Plan (LAIP) explains how the New York City Campaign Finance Board (CFB) will provide services to people who have limited English proficiency (LEP).

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Section 1: Agency Mission and Services

The New York City Campaign Finance Board (CFB) is an independent, nonpartisan agency that empowers New Yorkers to make a greater impact on their elections. The agency seeks to (1) eliminate barriers to civic participation by providing New Yorkers with the information and resources they need to vote or run for office and (2) reduce the corrupting influence of money in politics by enhancing the impact of New Yorkers' small-dollar contributions. The CFB believes that when every voter is empowered to participate meaningfully in elections, candidates will reflect the communities they serve, elected leaders will be accountable to the public, and New Yorkers will have a democracy they can trust.

As mandated in the City Charter, the CFB oversees NYC campaign finance activities, conducts voter education, and works to increase civic engagement among all eligible New York City residents, with a particular focus on reaching underrepresented voters. The CFB provides a variety of services and resources, outlined below:

- The CFB administers one of the strongest, most effective campaign finance systems in the country. The CFB's [matching funds program](#) amplifies the voices of average New Yorkers in City elections by matching their small contributions with public funds and encourages individuals from all backgrounds to run for office.
- The [Follow the Money](#) database enables the public to track every dollar raised and spent by candidates, which promotes transparency and accountability.
- The [NYC Votes](#) initiative engages and educates New York voters through community outreach, partnerships, marketing, and digital communications efforts, to boost democratic participation among voters and candidates.
- The Voter Guide, published in print and online, is translated into 13 languages. It provides voters with nonpartisan information about upcoming elections, including candidates, ballot proposals, and general voting information.
- The [Voter Assistance Advisory Committee](#) (VAAC) advises the CFB on its voter engagement efforts and recommends legislative and administrative changes to improve NYC elections.
- The CFB publishes [Voter Analysis Reports](#) and [Post Election Reports](#), which provide the public with comprehensive analyses and policy recommendations on election administration, voter behavior, and campaign finance trends.

Section 2: Agency Language Access Policy

The CFB's 2024 Language Access Implementation Plan (LAIP) outlines the agency's plans to effectively engage with individuals with limited English proficiency (LEP) over the next three years. [Local Law 30 of 2017](#) (LL30) requires City agencies to develop

and implement a plan that outlines current and future language access services. The LAIP demonstrates the CFB's commitment to providing consistent, inclusive, and equitable access to the democratic process for all New Yorkers, regardless of language.

The CFB is mandated under the federal Voting Rights Act to provide language access services in four languages (Bengali, Traditional Chinese, Korean, and Spanish). In addition, [Local Law 48 of 2022](#) (LL48) and other City Charter provisions expand the agency's language access requirements to 13 total languages (Arabic, Bengali, French, Haitian Creole, Hindi, Korean, Polish, Punjabi, Russian, Simplified Chinese, Spanish, Traditional Chinese, and Urdu). The CFB created a Language Access team in 2022 to manage the LL48-required expansion from four to 13 covered languages.

The Voter Guide is published in three formats—print, online, and video. Printed Voter Guides are mailed before each local election to all eligible NYC voters in English and Spanish. Bengali, Chinese, and Korean editions are also mailed in targeted areas, consistent with the federal Voting Rights Act. Beginning in 2023, the CFB also prints the Voter Guide in the remaining 13 agency languages. The online and video versions are also published in all covered languages and the videos include American Sign Language (ASL) interpretation. The CFB will offer additional languages to comply with new mandates, including required languages added to the New York State Voting Rights Act and City Charter provisions.

In accordance with [Local Law 15 of 2023](#) (LL15), candidate guidance documents are written in plain language and translated into the 11 designated citywide languages required for all City agencies that publish compliance materials (excludes Hindi and Punjabi). The CFB posts these translated documents on the CFB's Candidate Services [Guidance](#) webpage to ensure that candidates from diverse backgrounds can access critical information about running for office and managing compliant campaigns.

Additionally, the CFB translates contribution cards (required for contributions made by check, cash, or money order) into all 13 agency languages. The CFB also provides virtual simultaneous interpretation at Voter Assistance Advisory Committee (VAAC) meetings and in-person simultaneous and consecutive interpretation at some outreach events. Additional services that the agency provides are described in [Section 5: Provision of Language Access Services](#).

The CFB recently finalized a seven-year strategic plan that will guide the agency's work from 2024 through 2030. The plan includes the development of the LAIP and describes how language access relates to the agency's core values of access, accountability, equity, and transparency.

Finally, in addition to addressing language access needs, the CFB is dedicated to fostering accessibility throughout all facets of the agency, as outlined in the agency's [Five-Year Accessibility Plan](#), and finding ways to align the agency's language access and accessibility policies and practices.

Section 3: Language Access Needs Assessment

The CFB relies on research and data to identify systemic barriers, including language barriers, and develops recommendations to mitigate these disparities. The agency plans to continue to use research and data to expand language access services so that all individuals with limited English proficiency (LEP) have the resources and information necessary to participate in and be reflected in the democratic process.

As directed by LL30, the CFB uses a four-factor analysis framework to assess language access needs and the provision of language access services across NYC.

Factor One: The number or proportion of individuals with LEP in the eligible service population

The New York City Charter mandates that the CFB encourages and facilitates voter registration and voting among all eligible New York City voters, particularly within underrepresented groups.¹ The agency conducts in-depth data analysis and research to determine the eligible voting population and identify underrepresented voters, including individuals with LEP. The CFB primarily serves three populations, for which there is overlap: NYC voters and eligible voters, contributors to NYC political campaigns, and candidates running for NYC offices.

The CFB used voter behavior data to identify “priority communities” that are underrepresented in the electoral process in terms of voter engagement, registration, and participation. These communities include:

- Voters under the age of 30
- Immigrant voters, including new Americans and those with limited English proficiency
- Voters with disabilities
- Voters impacted by the criminal legal system

Additionally, the CFB’s “priority neighborhoods” represent community districts in which there are large shares of individuals from the identified priority communities. See [Appendix A](#) for a map of priority neighborhoods in NYC. These neighborhoods receive prioritized and targeted outreach and the languages spoken in these areas determine the placement of advertisements, the languages used in advertisements, and the types of materials distributed.

For example, the CFB identified neighborhoods in the South Bronx, South Brooklyn, Northern Queens, and Central Queens as communities needing targeted in-language voter outreach due to the large number of recently naturalized citizens who speak languages previously not offered by the CFB.

¹ The CFB’s mandated responsibilities are outlined in the [New York City Charter Chapter 46, §1054](#).

Finally, the CFB's [Community Profiles](#) provide an in-depth analysis of demographic composition, voter behavior, campaign contributions, and other factors that impact civic participation across NYC, broken down by community district. The profiles include language indicators such as the percentage of naturalized citizens of voting age, citizens of voting age with limited English proficiency (CVALEP), and the top countries of origin and languages spoken. Data in these profiles support internal decision-making around in-language outreach and event strategies, and they help internal and external stakeholders identify and address potential barriers to civic participation. The Community Profiles and the identification of priority communities and neighborhoods rely on a combination of data sources, including: the U.S. Census Bureau disaggregated by Public Use Microdata Areas (PUMAs); voter files from the New York City and New York State Boards of Election; CFB campaign finance data; and data from the NYC Department of City Planning.

In New York City, individuals with LEP represent 16.4% of citizens of voting age. See [Appendix B](#) for a borough-level breakdown of CVALEP.

Factor Two: The frequency with which individuals with LEP come into contact with the agency

The CFB fulfills its mission and mandates by interacting with the public through a variety of services and resources, including direct outreach, events, and through online channels (such as social media, YouTube, and email newsletters).

As outlined in [Section 9: Goals and Action Planning](#), the agency has procured Salesforce, a Customer Relationship Management (CRM) platform, and is developing its capacity to track interactions with members of the public. This will enable staff to record the nature and frequency of interactions with members of the public, including the language(s) used. The goal is to integrate this system with voter history data from the NYC Board of Elections voter file to personalize outreach efforts.

Additionally, the agency currently tracks engagement metrics and evaluates the effectiveness of in-language online content, such as in-language social media posts and YouTube videos available in the agency's 13 languages other than English. This process helps inform decisions about future content initiatives.

While most communications with campaigns take place in English, the agency translates candidate guidance documents into designated citywide languages to accommodate candidates and campaign staff who speak languages other than English.

Factor Three: The importance of the benefit, service, information, or encounter to individuals with LEP

The CFB's mission is to eliminate barriers to civic participation by providing access to the information and resources New Yorkers need to vote or run for office and enhancing the impact of New Yorker's small-dollar contributions. A critical component of empowering underrepresented voters to engage with the political process is ensuring that outreach and educational events are in the language(s) that New Yorkers use daily.

Identifying population and language needs helps the CFB and partnering community based organizations (CBOs) develop personalized, in-language strategies to encourage and assist all eligible members of the public to participate in the electoral process, regardless of language.

Factor Four: The resources available to the agency and the costs of providing various types of language services

The CFB uses various resources to provide equitable, high-quality, and expansive language access services, including:

- Bi/multi-lingual staff, especially public-facing staff
- Translation and interpretation services and equipment, in-house and through contracted vendors
- In-language materials, including the Voter Guide, palm cards, flyers, and candidate guidance documents

Refer to [Section 5: Provision of Language Access Services](#) for information on CFB's language access services. Additionally, the New York City Charter grants the CFB budgetary independence to protect the agency from political influence. See [Section 6: Resource Planning](#) for more details on language access resources and costs.

Section 4: Notice of the Right to Language Access Services

The CFB is in the process of developing a plan to ensure that all individuals are informed and aware of the agency's language services and their right to access them. Over the next three years, the CFB plans to increase awareness of its language services to ensure accessibility for all individuals by developing the following materials in the agency's 13 languages. The CFB will offer additional languages to comply with new and updated mandates.

The agency plans to inform the public of language access services in the following ways:

- Multilingual signage: The agency will post signs around the CFB office, particularly in the reception lobby (100 Church Street, 12th floor), that inform members of the public with LEP about telephonic interpretation services offered and their right to obtain them for free.
- "I speak" cards: Staff will use "I speak" cards at outreach and educational events to help individuals with LEP identify staff who speak their language(s).
- Palm cards, pamphlets, and flyers: The agency will include information about language services and resources that the CFB offers on voter education materials distributed at events and in-person canvassing.

- Event advertisements: The agency will include information about the availability of free interpretation services in advertisements for public hearings and educational events.
- Multimedia advertisements: Voter education advertisements across different channels, including subways and community and ethnic media, will include information about the interpretation services and language resources that the agency offers.
- Text and phone bank outreach: Text and phone bank outreach efforts will reference the CFB's free interpretation services and language resources.
- Website banners: Banners on the CFB website and the NYC Votes website will inform users about the interpretation and language services available, with hyperlinks that provide detailed instructions on how to access services and resources.
- Newsletters: Newsletters sent to the public will include information about language access services, language access complaints, and the availability of free interpretation services.

Section 5: Provision of Language Access Services

The CFB established its Language Access team in 2022 to ensure that the agency could meet the new mandates and growing demand for language access services. Since the creation of the Language Access team in 2022, the CFB's language services have grown remarkably. In 2023, for instance, the CFB's NYC Votes initiative expanded language coverage from four languages (Bengali, Korean, Spanish, and Traditional Chinese) to 13 languages other than English (adding Arabic, Simplified Chinese, French, Haitian Creole, Hindi, Polish, Punjabi, Russian, and Urdu). Soon after, the CFB translated four million target words in all 13 agency languages and published the 2023 Primary and General Election Voter Guides in all 13 languages. The agency translates the print, online, and video Voter Guides and most voter education materials into these 13 languages. The CFB will offer additional languages to comply with new and updated mandates.

Interpretation is currently available at some events, and the agency has bolstered its capacity to continue expanding services through measures such as securing new contracts and hiring staffers to lead multilingual events. Members of the public can contact the CFB for language access support, comments, complaints, or inquiries at info@nyccfb.info (see [Section 8: Continuous Improvement Planning](#)).

Interpretation

Simultaneous, consecutive, and American Sign Language interpretation

In 2024, the CFB expanded its provision of language services to include interpretation services at public-facing events. To facilitate these services, the CFB procured an interpretation contract with Eriksen Translation and an American Sign Language (ASL) contract with SignNexus. Vendors are asked to assign interpreters who have experience interpreting high-profile community and government events, knowledge of virtual interpretation tools (such as Zoom interpretation), and experience utilizing interpretation equipment for in-person events (for more details on contracted services, see [Section 6: Resource Planning](#)). Events are posted on the NYC Votes [online calendar](#) and members of the public can filter events by availability of interpretation and can also make specific accommodation requests. The CFB advertises its events through multiple channels, including newsletters, the NYC Votes website, the CFB website, social media channels, and direct outreach with community partners. Some of these events include:

- *Voter Assistance Advisory Committee (VAAC) public meetings*: Held virtually every two months. Spanish simultaneous and consecutive interpretation, and ASL and Communication Access Real-Time Translation (CART) interpretation are offered at all meetings, and members of the public can email press@nyccfb.info to request additional language interpretation or other accessibility accommodations.
- *Outreach and educational events with community partners*: The CFB recently expanded its interpretation services to include outreach events. The agency's Language Access team leads the provision of these services.

Telephonic interpretation

The CFB does not currently have a telephonic interpretation contract. Any phone calls that the CFB receives from LEP members of the public are fielded to bilingual staff members. The CFB plans to secure its first contract for telephonic interpretation by the end of 2024 (see [Section 9: Goals and Action Planning](#)).

Translation

Since 2022, the Language Access team has processed over 216 translation and localization requests and has translated approximately four million target words in all 13 agency languages. In addition to the Voter Guides that the agency translates into 13 languages for local elections, the Language Access team also translates essential voter education materials such as palm cards, posters, flyers, one-pagers, presentations for voter outreach events, and out-of-home advertisements for paid media campaigns.

In accordance with LL30, the agency translates the most commonly distributed candidate guidance documents into the 11 designated citywide languages and posts them on the [CFB website](#). Additionally, the Language Access team translates the

“Glossary” section of the Campaign Finance Handbook into the 13 languages, although these are currently used internally for translation consistency and accuracy purposes. The CFB plans to publicly post the translated versions of the Handbook’s “Glossary” section on the CFB website (see [Section 9: Goals and Action Planning](#)).

The CFB’s Language Access team has adopted language industry best practices, including the use of Computer-Assisted Translation (CAT) tools, building a body of translation memories and term bases to improve the quality and consistency of multilingual content. Additionally, the Language Access team created a multilingual language glossary (consisting of 277 terms) and a style guide, both of which have been translated in the 13 languages. The Language Access team plans to continue maintaining, updating, and expanding the language glossary (see [Section 9: Goals and Action Planning](#)).

The agency contracts with two language services providers, Eriksen Translations and Human Touch Translations. In 2022, the Language Access team hired a Spanish language specialist, who translates, reviews, and vets all Spanish language content. All linguistic resources are integrated into the agency’s translation management systems and shared with the translation teams, after which the Language Access team conducts extensive internal post-typesetting reviews for all translated materials.

Digital communications

The CFB made considerable advances in multilingual digital communications over the past two years. The CFB website contains human translations of key materials, such as the candidate guidance documents, and has Google translate integration for the remaining content. The NYC Votes website, which receives most of the website traffic, is translated by professional human linguists through the Smartling integration platform. This website is regularly tested for accessibility and navigation. In March 2024, the NYC Campaign Finance Board won the prestigious [Reed Award for “Best Spanish Language Website – Independent or Non-Partisan”](#) for prioritizing language accessibility for NYC voters.

Additionally, the CFB created four educational videos on key voting and election topics, each of which is translated into the agency’s 13 languages and is fully localized with subtitles and voiceovers. All videos are uploaded to the CFB’s [YouTube channel](#), embedded in the NYC Votes website, and shared with community partners and through social media channels. The agency has broadened its presence to a larger audience of speakers of languages other than English by sharing infographics and voter education toolkits with partner organizations prior to each election.

Lastly, for each election cycle, the CFB’s Marketing and Digital Communications team conducts multilingual paid media ad campaigns that are comprised of both out-of-home placements and digital assets, translated into the top languages spoken in the CFB’s priority communities. The digital campaign contains assets that are placed on YouTube, Facebook, Instagram, and website banners. Since these campaigns began, engagement in digital content in languages other than English has increased

tremendously; advertisements in languages other than English now comprise approximately half of all views (impressions) across all NYC Votes content. In an effort to reach younger immigrant voters, the team partnered with its first Spanish language influencer in Spring 2024 and plans to expand influencer campaigns to additional languages for the 2024 November general election and future election cycles.

Emergency communications

The agency has clauses in its contracts with its language services providers to provide quick turnaround for urgent communications in languages other than English. Furthermore, the agency's online presence is set up to share information in real time and teams can share that information directly with partners and the general public. As outlined in [Section 9: Goals and Actions Planning](#), the CFB plans to formalize the ways in which the agency communicates with and supports the needs of individuals with LEP during an emergency. In the event of an emergency that impacts NYC elections, the CFB will share information it receives from the NYC and NYS Boards of Election.

Section 6: Resource Planning

The CFB is committed to expanding language access resources and initiatives to ensure that individuals with LEP are empowered to meaningfully participate in and are reflected in the democratic process.

The New York City Charter designates the CFB as an independent agency with budgetary independence. When the agency created the Language Access team in 2022, it allocated \$5 million towards language access needs over five years, through 2026. The agency plans to allocate funds for additional LAIP resources from within the current budget but is prepared to request additional funds from the City Council if necessary.

Bi/multi-lingual staffing

In 2022, the CFB established a centralized Language Access team to create high-quality translations of print and digital materials. Since then, the team has expanded its capacity and now consists of an Associate Director of Language Access, a Language Access Coordinator, and a Language Access Specialist (Spanish), who translates and approves all Spanish content. Combined, the Language Access team is fluent in four languages in addition to English (Hindi, Korean, Spanish, and Tibetan). Additionally, in 2024, the CFB hired two production project managers who are fluent in Mandarin and Urdu, as well as a Spanish-speaking Assistant Press Secretary who will work to engage with community and ethnic media, specifically Spanish press outlets. The Candidate Services Unit consists of individuals who speak Spanish, Mandarin, and Korean, all of whom support campaigns with individuals who speak those languages.

The CFB is dedicated to embedding and advancing diversity, equity, and inclusion in its core functions and in the agency's workplace. The agency continues to cultivate a

mission-driven, passionate workforce that reflects the diverse communities we serve in an environment in which people from all backgrounds and cultures can thrive.

The CFB plans to enhance bi/multi-lingual staffing by:

- Developing a standardized hiring framework to establish equitable qualifications for in-language positions, including a language proficiency assessment to evaluate proficiency of job candidates when bi/multi-lingual skills are required
- Creating agency guidelines for fair and equitable internal language access practices to prevent overreliance on bi/multi-lingual staff
- Working with CFB's People Operations division to hire more bi/multi-lingual staff members, particularly in public-facing roles, with a concerted effort to hire from CFB's priority communities
- Developing mandatory language access trainings for new and current staff (further details in [Section 7: Training](#))

Language service vendor contracts

The CFB recognizes the critical role external vendors play in ensuring high-quality and efficient language services when the agency's internal capacity is limited. The CFB plans to expand and improve procurement with vendors by:

- Procuring vendors to assist with offering canvassing outreach in different languages via phone banking, text banking, and in-person canvassing
- Creating a standardized quality control system for evaluating external vendors, including quality control for third-party translations
- Building the capacity to track interactions with individuals with LEP through the agency's CRM platform

CFB's Current Language Access Contracts

Vendor name	Procurement method	Purpose of contract	Language(s) provided	Period of contract	Total award amount of contract
Eriksen Translations, Inc	RFP	Translation services for Voter Guide, print materials, graphic design support, video voiceovers, and online communication Interpretation: in-person and virtual (simultaneous and consecutive)	Arabic, Bengali, French, Haitian Creole, Hindi, Korean, Polish, Punjabi, Russian, Simplified Chinese, Spanish, Traditional Chinese, and Urdu,	10/1/2022 – 9/30/2025	\$5,000,000
Human Touch Translations Ltd.	RFP	Voter Guide translation. The original contract included Spanish, Chinese, Korean, and Bengali, with additional languages added as necessary.	Arabic, Bengali, French, Haitian Creole, Hindi, Korean, Polish, Punjabi, Russian, Simplified Chinese, Spanish, Traditional Chinese, and Urdu	4/1/2022 – 3/31/2025	\$1,500,000
Lc Interpreting Services LLC dba SignNexus	Small purchase M/WBE	American Sign Language for public-facing events and video voter guide	American Sign Language	3/1/2023 – 4/30/2025	\$99,999
Questel-Orbit Inc	RFP	Voter Guide translation	Bengali	4/1/2022 – 3/31/2025	\$400,000
Blue State Digital	Negotiated	Design and	English, CMS	7/1/2022 –	\$600,000

	Acquisition	development of NYC Votes website	(Umbraco & VGSA) integrated into Smartling for all 13 languages other than English	6/30/2025	
Bellwether Capital Management LP	RFP	Two Contracts: 1) Design and formatting for the Voter Guide 2) Creation of multilingual advertisement assets	1) Voter Guide: English, Spanish, Chinese, Korean, and Bengali 2) Advertisements: English, Spanish, Chinese	4/1/2022 – 3/31/2025	1) \$1,500,000 2) \$2,396,438
Smartling	Subscription	Website translation and localization systems	Arabic, Bengali, French, Haitian Creole, Hindi, Korean, Polish, Punjabi, Russian, Simplified Chinese, Spanish, Traditional Chinese, and Urdu	5/31/2024 – 5/31/2025	\$ 44,007
RWS Trados	Subscription	Translation management system for Spanish translation	Spanish	10/7/2023 – 10/7/2024	\$ 17,470

Partnerships with Community Based Organizations

In 2023, the CFB partnered with 81 organizations to ensure that the public, including individuals with LEP, received information about upcoming elections, the importance of voting, and general government functions. Partnering with CBOs in priority neighborhoods is essential for reaching communities that have historically been left out of the elections and democracy space and may face additional barriers to civic engagement and participation. These partnerships help the CFB center the lived experiences of individuals in underrepresented communities and build trust as a government agency. For details on priority neighborhoods, see [Section 3: Language Access Needs Assessment](#).

The CFB also recognizes that many CBOs often face barriers due to limited capacity, funding, and resources. To address some of these challenges and reduce barriers to community attendance, the agency provides compensation to CBO partners and offers transportation, refreshments, and children's activities at educational events. Furthermore, the agency plans to develop a civic engagement fellowship pilot program that would place CFB fellows in local CBOs to expand the reach of the CFB's existing voter education and civic engagement programs, thereby increasing the capacity of CBOs to partner on the work. For details, see [Section 9: Goals and Action Planning](#).

The CFB plans to enhance partnerships with CBOs by:

- Partnering with five to ten CBOs in every priority neighborhood
- Establishing standardized quality control criteria to ensure that partner CBOs accurately educate their communities based on the trainings outlined in [Section 7: Training](#)
- Implementing fair and equitable compensation for CBOs through a civic engagement fellowship program to build capacity for in-language and in-community outreach
- Creating a standardized feedback loop with partner CBOs to ensure that CFB outreach, materials, and in-language efforts are culturally sensitive and effective

Section 7: Training

The CFB will develop and implement mandatory trainings over the next three years to ensure that CFB staff and partner CBOs provide meaningful, equitable, and high-quality language access services for New Yorkers. The Language Access team will collaborate with the CFB's Equal Employment Opportunity/Diversity, Equity, and Inclusion (EEO/DEI) office and Learning and Development unit to create and lead these training sessions, with guidance from the Mayor's Office of Immigrant Affairs (MOIA), the Mayor's Office of People with Disabilities (MOPD), and the Department of Citywide Administrative Services (DCAS). The trainings will be accessible, inclusive, and tailored to accommodate the different learning styles and specific needs of staff members,

including options for hybrid formats, live transcriptions, closed captioning, and other accommodations.

Trainings will include overviews of the following language access topics:

- The CFB’s legal language access obligations under the federal Voting Rights Act, the New York City Charter, and Local Law 30
- The CFB’s internal language access guidelines and practices (for further details, see [Section 9: Goals and Action Planning](#))
- Language access services and resources offered by the CFB
- Workflow processes for collaborating with the Language Access team and requesting translations and other language access services
- The importance of language justice and cultural sensitivity, particularly how language access relates to the CFB’s core values of equity, accessibility, transparency, and accountability

CFB Trainings to Develop for CFB Staff and Partner CBOs

Target Staff	Frequency	Format	Training Topics
New employees	Ad-hoc as new employees onboard	Video, similar to other mandated trainings for new NYC employees	An introduction to language access and accessibility obligations, guidelines, services, and resources at the CFB
Existing employees agency-wide	Annually	Hybrid (in-person and virtual)	An introduction to language access and accessibility obligations, guidelines, services, and resources at the CFB
Public-facing staff	Biannually	Hybrid (in-person and virtual)	Guidance on helping individuals with LEP access the CFB’s language services, requesting vendor services, using telephonic interpretation, and training CBOs on sharing CFB information
Technical training for staff who regularly use language access equipment and software	Ad-hoc as needed	Hybrid (in-person and virtual)	Specific trainings on using language access equipment, software, and services

Community-based organizations	Ad-hoc for events and upcoming elections	Hybrid (in-person and virtual)	Trainings on sharing accurate information for educating voters about upcoming elections and civic participation in their languages spoken
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Section 8: Continuous Improvement Planning

The CFB uses research and data to develop strategies to improve community outreach services and identify recommendations to bridge service gaps. The agency will establish monitoring and evaluation systems using various data collection methods to produce effective, high-quality language access services and inform future initiatives and policies.

Data collection and monitoring

In Summer 2024, the CFB hired two Data Scientists whose responsibilities include collaborating with units across the agency to develop internal metrics for monitoring and evaluation, establishing data collection systems, and collecting and analyzing relevant data. Some of the current and future mechanisms for data collection and monitoring are outlined below.

Online Content Tracking: Once developed, this tracking system will evaluate the effectiveness and engagement rates of in-language online content, such as social media posts and YouTube videos. The CFB currently tracks engagement metrics but plans to formalize this process by identifying engagement rates for in-language content and its reach in specific communities.

Community Profiles: The Community Profiles use U.S. Census data and data from the NYC BOE voter file analyze civic participation in NYC’s community districts (for further details, see [Section 3: Language Access Needs Assessment](#)). In addition to language access metrics such as the percentage of individuals with LEP and the top languages spoken in each district, each profile includes a “voting participation score,” which represents the average rate of voter participation in each community district. This enables the agency to identify areas in need of targeted outreach, particularly in areas with high concentrations of individuals who speak languages other than English. The Community Profiles are updated every four years and changes in the voting participation score will be monitored to help evaluate successful efforts and develop future initiatives.

Priority Community Districts: The CFB identifies priority communities using U.S. Census data, voter turnout data, and the proportions of identified priority communities within each community district (for more details, see [Section 3: Language Access Needs Assessment](#)). The top languages in these areas help inform decisions regarding in-language advertisements, outreach, events, and materials. The CFB will monitor changes in voter turnout and campaign donation behavior to analyze the effectiveness of past efforts and inspire future strategies.

Standardized Feedback and Quality Control Process: The CFB will develop a standardized process to evaluate language efforts from internal and external stakeholders, which will ensure that language access services are high-quality and culturally sensitive. These systems will incorporate quality control criteria based on best practices and qualitative data from community members, collected through direct conversations, surveys, and focus groups to be conducted after certain milestones (such as in-language events, elections, interacting with CBOs/vendors, and the release of the Voter Guide). Community members will be compensated for their time engaging in this process. The data will be tracked in an internal database that will be frequently updated and shared internally.

Evaluations of internal stakeholders and processes will assess CFB language services, including in-house translations, plain language, and cultural sensitivity. Event tracking will include the frequency and location of CFB in-language events to assess and ensure adequate resource allocation, especially in priority communities. Evaluations of external stakeholders will monitor the effectiveness and quality of CBOs and vendors as they relate to translating materials, interpreting content, and educating communities based on the trainings outlined in [Section 7: Training](#).

Language access complaints

The CFB will create an email and phone intake system to receive and respond to language access complaints. The system will track the requested service and/or language and all steps taken to address the issue. This data will enable the CFB to identify patterns and gaps in services and will drive service improvements. The CFB will advertise the email and phone number for the complaint system in multilingual signage in the CFB office registration lobby, print materials, digital platforms and outreach, and press releases.

The Language Access team will collaborate with the Public Relations unit and the EEO/DEI office to monitor the complaints received and distribute tasks based on expertise, so that the agency can respond to and resolve the issues in a timely and appropriate manner.

Additionally, the CFB will ensure that information and resources regarding electoral discrimination rights for individuals with LEP, such as the contact information for the New York State Attorney General, are included in in-language education.

Section 9: Goals and Actions Planning

The CFB's dedicated, passionate, and highly skilled staff are eager to continue expanding and developing language access services to serve New Yorkers in the language(s) they use every day. The implementation of the LAIP will be led by the Associate Director of Language Access, who serves as the CFB's Language Access Coordinator. The Language Access team will form a working group that will include relevant stakeholders across the agency to ensure that the implementation of the LAIP is compliant and effective. Key stakeholders will include individuals from EEO/DEI,

Learning and Development, Legal, Compliance, Policy and Research, and the Executive team.

The CFB will update the LAIP every three years to comply with LL30. Additionally, the agency will provide MOIA with annual implementation updates and progress updates on the goals to improve and expand language access services over the next three years, outlined below. The goals are grouped into five categories: internal, contracts and vendors, provision of language services, partnerships, and monitoring and evaluation.

Internal

- **Develop internal language access guidelines** that outline equitable practices and prohibited actions, particularly as they relate to the CFB's bi/multi-lingual staff.
- **Hire more bi/multi-lingual staff members**, particularly in public-facing roles, with a concerted effort to hire from CFB's priority communities. Work with the agency's People Operations division to determine staff needs. This includes developing a standardized hiring framework to establish equitable qualifications for in-language positions, including a language proficiency assessment to evaluate the proficiency of job candidates when bi/multi-lingual skills are required. For further details, see [Section 6: Resource Planning](#).
- **Develop trainings** for new and existing staff, vendors, and CBOs that educate individuals about CFB language access and accessibility services, legal requirements, cultural sensitivity, and relevant technical expertise. This includes training public-facing staff on using and incorporating telephonic interpretation into daily operations. For more details on trainings, see [Section 7: Training](#).
- **Review, update, and expand linguistic resources** such as language glossaries, style guides, and translation memories, so that the agency can scale up language access work while ensuring that the products are reliable and inclusive sources of information. For more details, see [Section 5: Provision of Services](#).
- **Establish emergency communication processes** to ensure that New York voters, regardless of language, are promptly alerted to changes that impact their ability to vote, once the CFB receives information from the NYC and NYS Boards of Election. For more details, see [Section 5: Provision of Services](#).

Contracts and vendors

- **Procure a telephonic interpretation vendor** to increase capacity for responding to individuals with LEP and campaign finance compliance and investigations in languages other than English. For further details, see [Section 5: Provision of Services](#) and [Section 6: Resource Planning](#).

- **Expand contracted services** by procuring contracts with vendors to increase available resources and services such as in-person canvassing. For more details, see [Section 6: Resource Planning](#).

Provision of language services

- **Increase translation offerings**, including translating additional candidate guidance documents, details on the matching funds program, general information for candidates and contributors, abridged versions of the Campaign Finance Handbook, and making the translated versions of the Handbook “Glossary” section publicly available. For more details, see [Section 5: Provision of Services](#).
- **Distribute and post materials** informing the public of the language services that the CFB offers, including interpretation services, voter registration in multiple languages, and in-language events, as well as posting multi-lingual signage in the office lobby and using “I speak” cards at events. For further details, see [Section 4: Notice of the Right to Language Access Services](#).
- **Increase the number of in-language community events**, particularly in priority community districts, and provide simultaneous and consecutive interpretation, including ASL. This includes developing a database to track events to ensure resources are equitably distributed. For more details, see [Section 5: Provision of Services](#).

Partnerships

- **Implement the civic engagement fellowship pilot program** to establish long-term investments in CBOs within priority communities and increase capacity for voter engagement efforts for underrepresented groups, including individuals with LEP. For more details, see [Section 6: Resource Planning](#) and the CFB’s [2023 Voter Analysis Report](#).
- **Develop and strengthen relationships with community and ethnic media and in-language press outlets** to initiate proactive outreach and awareness campaigns and distribute more in-language press releases, materials, content, and narratives about the importance of civic engagement for individuals with LEP.

Monitoring and evaluation

- **Establish systems for monitoring and evaluation** using various data collection methods from internal staff, CBOs, and vendors to produce effective, high-quality language access services and inform future initiatives and policies. This includes developing a process for community organization feedback and the intake of language access complaints. For more details, see [Section 8: Continuous Improvement Planning](#).

Goals, Milestones, Stakeholders, and Anticipated Timelines

Language Access Goal	Milestones	Stakeholders		Timeline
		CFB	External	
Internal				
Develop internal language access guidelines	<ul style="list-style-type: none"> • Create internal working group • Develop evidence-based guidelines • Incorporate in agency trainings 	<ul style="list-style-type: none"> • Language Access • EEO/DEI 	<ul style="list-style-type: none"> • Mayor's Office of Immigrant Affairs (MOIA) 	January 2025
Hire more bi/multi-lingual staff	<ul style="list-style-type: none"> • Work with People Operations division to determine staffing needs • Determine funding allocation • Create hiring framework • Form interview committees • Develop job vacancy announcements using hiring framework 	<ul style="list-style-type: none"> • Language Access • Operations and Finance division • Executive team • People Operations • Legal • EEO/DEI 	<ul style="list-style-type: none"> • N/A 	June 2027
Develop trainings	<ul style="list-style-type: none"> • Determine topics to include • Solicit input and support from DCAS and MOIA • Develop scripts and recording of videos 	<ul style="list-style-type: none"> • Language Access • Operations and Finance division • Product Management and Operations 	<ul style="list-style-type: none"> • MOIA • Department of Citywide Administrative Services (DCAS) • Mayor's Office of 	December 2025

	<ul style="list-style-type: none"> • Schedule time for agency trainings 	<ul style="list-style-type: none"> • EEO/DEI • People Operations 	<ul style="list-style-type: none"> • People with Disabilities (MOPD) 	
Review, update, and expand linguistic resources	<ul style="list-style-type: none"> • Research best practices • Collect and analyze community and CBO feedback • Expand resource repository and guidelines 	<ul style="list-style-type: none"> • Language Access • Policy and Research • EEO/DEI • Product Management and Operations • Partnerships and Outreach 	<ul style="list-style-type: none"> • Partner CBOs 	February 2025
Establish emergency communication processes	<ul style="list-style-type: none"> • Research and communicate with MOIA about best practices • Develop general and targeted strategies for informing the public • Determine workflow for requesting emergency procurement and communicating with CBOs • Develop templated terms and phrases in multiple languages, including “polls closed” 	<ul style="list-style-type: none"> • Language Access • Operations and Finance division • Policy and Research • Product Management and Operations • EEO/DEI 	<ul style="list-style-type: none"> • Existing vendors • MOIA • DCAS 	January 2025
Contracts and vendors				
Procure telephonic interpretation vendor	<ul style="list-style-type: none"> • Develop quality criteria to evaluate potential vendors 	<ul style="list-style-type: none"> • Language Access • Operations and Finance 	<ul style="list-style-type: none"> • MOIA • DCAS 	December 2024

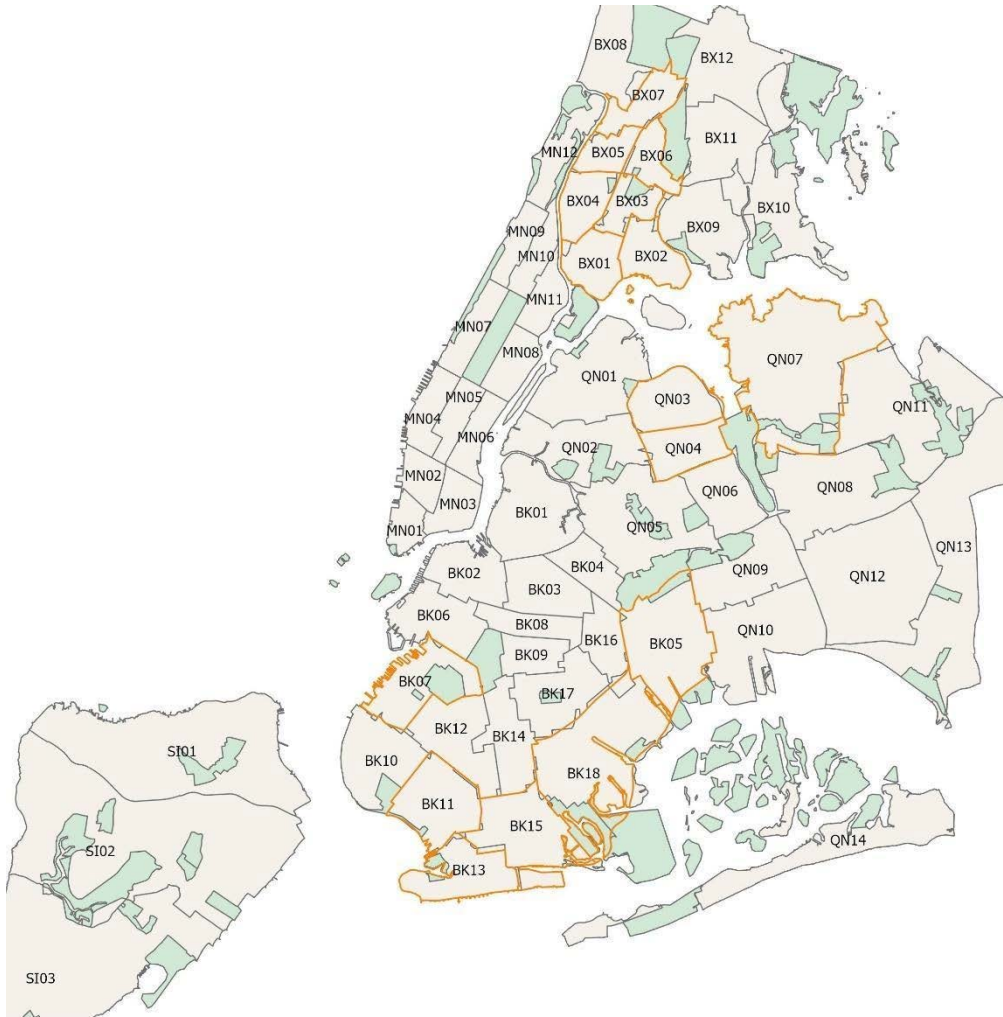
	<ul style="list-style-type: none"> • Procure vendor working with DCAS • Develop trainings for relevant CFB staff 	<ul style="list-style-type: none"> • division • Partnerships and Outreach • Product Management and Operations 		
Expand contracted services	<ul style="list-style-type: none"> • Determine resource and funding allocation • Develop quality criteria to evaluate potential vendors • Procure vendors • Train staff on new resources 	<ul style="list-style-type: none"> • Language Access • Operations and Finance division • Product Management and Operations • Partnerships and Outreach 	<ul style="list-style-type: none"> • MOIA 	February 2025
Provision of language services				
Increase translation offerings	<ul style="list-style-type: none"> • Determine staff and vendor capacity • Identify additional documents to be translated • Determine topics to include in abridged Campaign Finance Handbook • Publish translated versions of the Handbook's "Glossary" section • Add additional languages as mandates expand covered languages 	<ul style="list-style-type: none"> • Language Access • Candidate Guidance and Policy division • Policy and Research • Partnerships and Outreach • Marketing and Digital Communications 	<ul style="list-style-type: none"> • Eriksen Translations, Inc • MOIA 	Ongoing
Distribute and post materials	<ul style="list-style-type: none"> • Assign a project manager to outline priorities and timelines 	<ul style="list-style-type: none"> • Language Access • Operations and Finance division 	<ul style="list-style-type: none"> • Eriksen Translations, Inc • Bellwether 	December 2026

	<ul style="list-style-type: none"> Request services from vendor(s) Develop markups and written copy Collaborate across the agency to properly post and distribute materials 	<ul style="list-style-type: none"> Product Management and Operations Marketing and Digital Communications 	<ul style="list-style-type: none"> Fenton Smartling 	
Increase the number of in-language community events	<ul style="list-style-type: none"> Identify priority communities in need of outreach corresponding and languages spoken Develop database to track events Determine staff, CBO, and vendor capacity Develop long-term schedule for events and locations Train public-facing staff on telephonic interpretation 	<ul style="list-style-type: none"> Language Access Partnerships and Outreach Product Management and Operations Policy and Research 	<ul style="list-style-type: none"> Partner CBOs 	Ongoing
Partnerships				
Implement the civic engagement fellowship	<ul style="list-style-type: none"> Determine resource and funding availability Develop training curriculum and responsibilities for fellows Distribute Request for Expression of Interest to identify and select interested CBOs 	<ul style="list-style-type: none"> Language Access Operations and Finance division Policy and Research EEO/DEI People Operations Partnerships and Outreach 	<ul style="list-style-type: none"> Partner CBOs 	December 2026

	<ul style="list-style-type: none"> • Develop job description for fellows • Engage in hiring process for fellows • Onboard fellows and place in CBOs 			
Develop and strengthen relationships with community and ethnic media and in-language press outlets	<ul style="list-style-type: none"> • Identify community and ethnic media (CEM) outlets and primary languages • Find point of contacts and conduct outreach to CEM outlets • Develop in-language materials to distribute to CEM outlets 	<ul style="list-style-type: none"> • Language Access • Partnerships and Outreach • Public Relations • Marketing and Digital Communications 	<ul style="list-style-type: none"> • Mayor's Office of Community and Ethnic Media (MCEM) • MOIA • Civic Engagement Commission (CEC) 	January 2025
Monitoring and evaluation				
Establish systems for monitoring and evaluation	<ul style="list-style-type: none"> • Assign a project manager to guide the development of new systems, procuring vendors, and outline priorities • Research best practices on criteria and methods of feedback collection • Determine number of vendors and funding needed • Develop systems and processes for using data to drive improvements 	<ul style="list-style-type: none"> • Language Access • Operations and Finance division • Product Management and Operations • Policy and Research 	<ul style="list-style-type: none"> • Possible vendors 	December 2026

Section 10: Appendices

Appendix A. Map of CFB's Priority Community Districts



Priority community districts are outlined in orange.

Appendix B. The Percentage of Citizens of Voting Age with Limited English Proficiency (CVALEP) in NYC, by Borough

Citizens of Voting Age with Limited English Proficiency (CVALEP) in NYC, by Borough	
Bronx	19.5%
Brooklyn	16.7%
Manhattan	10.2%
Queens	20.7%
Staten Island	10.1%
New York City	16.4%