

LANGUAGE ACCESS PLAN

NYC Department of
Housing Preservation and Development
May 2018 Final Plan

Name and title of Language Access Coordinator:

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I. Agency Mission and Background

The New York City Department of Housing Preservation and Development (“HPD” or “the Agency”) is the largest municipal housing preservation and development agency in the nation. The Agency's mission is to make strategic investments that will improve and strengthen neighborhoods while preserving the stability and affordability of our existing housing stock.

HPD is responsible for:

- Financing the new construction and preservation of affordable housing;
- Ensuring that the entire city's housing stock meets the health and safety requirements of the city's Housing Maintenance Code;
- Monitoring the fiscal health and ongoing affordability of close to 5,000 properties containing nearly 150,000 units in HPD’s Asset Management and Mitchell Lama portfolios; and
- Providing more than 37,000 households with rental subsidies (vouchers) that allow those families to afford a stable place to live.

Encompassing over 2,300 employees and over 40 divisions, HPD works with a variety of private, public, and community partners to strengthen neighborhoods, enable more New Yorkers to become homeowners, or to rent well-maintained, affordable housing. Currently, the Agency provides telephonic, document translation and in-person interpretation.

II. Agency Language Access Goals

The goal of all of HPD’s language access efforts is to ensure that all Limited English Proficient (“LEP”) persons have equitable access to the Agency’s services. To ensure that language is not a barrier to Agency services, HPD has in recent years prioritized training front-line staff, translating our website, public-facing online consumer systems, and essential documents into the most commonly spoken languages of our service population, and making translators and translation services available throughout the Agency. HPD recognizes this is an ongoing process and is committed to continuously improving its provision of language access services. The Agency will continue on an on-going basis to identify documents that are most commonly distributed to the public that contact or elicit important and necessary information regarding the provision of basic city services. In addition, the Agency will continue to provide language services in the ten designated Citywide languages.

The Agency's Human Resources' Division will be primarily responsible for guiding implementation of the 2018 Language Access Plan ("Plan"). Human Resources will work in conjunction with language access liaisons from the Agency's divisions to implement this Plan. Human Resources will report to the First Deputy Commissioner on progress toward these goals on an ongoing basis, and will update the Plan once every two years to reflect the Agency's progress and next steps.

III. LEP Population Assessment

Factor 1: Number or proportion of LEP persons in the eligible service population

HPD's service area covers all five boroughs and the eligible service population includes all New York City residents.

According to the Mayor's Office of Immigrant Affairs, the top ten (10) languages spoken by LEP persons in New York City are Spanish, Chinese (including Cantonese, Mandarin, Formosan), Russian, Korean, Bengali, Haitian Creole, Arabic, Urdu, French and Polish. Nearly 25% of New Yorkers are considered Limited English Proficient (LEP), which means they have a limited ability to read, speak, write or understand English.

Factor 2: Frequency with which LEP individuals come into contact with HPD programs

The Agency regularly interacts with New Yorkers seeking or receiving rental subsidies, renters and building owners, contractors working on HPD projects, construction workers working on HPD projects, and developers doing business with the City. Although there might be small differences by program area, the demographics of HPD's service population closely mirror that of the city as a whole.

The Agency has a wide range of programs that require interaction with LEP clients on a daily basis. The frequency varies greatly among divisions, it could be in-person, telephonic or public events in communities. The Agency's primary frontline divisions, the Division of Tenant Resources, Section 8 Appeals, and the Office of Enforcement & Neighborhood Services, interact with LEP persons from across the top ten languages multiple times per day. Some divisions interact rarely, if ever, with LEP persons.

The Agency is able to track interactions in most divisions by analyzing language service provider data and/or division intake forms. However, in some divisions such as the Division of Tenant Resources, we are unable to track exact interactions since some language services are provided through internal employees that speak other languages.

Factor 3: Importance of the benefit, service information or encounter of LEP individuals

As discussed above, HPD provides a wide range of programs and services. The nature and importance of these programs and services varies by office and division. The chart below describes the programs and services the Agency provides, the frequency with which LEP persons interact with such programs and services, and the significance of each program and service to the LEP population, by office and division.

Office/Division	Core Public-Facing Service	Frequency of Interaction With Public/LEP Persons	Level of Importance to LEP Population
Division of Human Resources	Provides signage for HPD facilities.	Rare	Moderate
Office of HPD Tech	N/A	Rare	Low
Office of Enforcement & Neighborhood Services	Responds to complaints filed with NYC 311 regarding lack of essential services; orders and monitors the performance of emergency repairs in privately-owned buildings in response to immediately hazardous violations; provides training and outreach to property owners and communities; bring cases in Housing Court to enforce compliance with the housing quality standards contained in the New York State Multiple Dwelling Law and the New York City Housing Maintenance Code.	Multiple times per day	High
Office of Asset and Property Management	Manages and maintains city-owned residential and commercial properties; ensures the longevity and affordability of units the Agency has created and preserved; oversees the portfolio of city-sponsored Mitchell-Lama developments; implements the Senior Citizen Rent Increase Exemption (SCRIE) program for Mitchell-Lama and other subsidized developments; administers the Emergency Housing Services (EHS) program for households displaced by fire or city vacate order; assists homeless households in securing permanent affordable housing; provides intake, case management and rehousing assistance for disaster-area evacuees; oversees the marketing and lottery process for affordable units.	Multiple times per day	High
Office of Financial Management	N/A	Rare	Low
Division of Tenant Resources (within the Office of Financial Management)	Administers rental assistance programs including Section 8, Shelter Plus Care, and Moderate Rehabilitation.	Multiple times per day	High
Office of Policy and Strategy	N/A	Rare	Low
Division of	Assists in writing, vetting, and editing website and	Several times per week	Moderate

Communications	other communications channels; manages Agency social media accounts.		
Division of Regulatory Compliance (within the Office of Policy and Strategy)	Responds to fair housing complaints; assists contractors, vendors in navigating statutes, rules & regulations; conducts outreach to M/WBE vendors and contractors; monitors compliance of contractors and investigates potential wage violations on behalf of construction workers.	Daily	High
Office/Division	Core Public-Facing Service	Frequency of Interaction With Public/LEP Persons	Level of Importance to LEP Population
Office of Neighborhood Strategies	Leads HPD's engagement with tenants and landlords, community leaders and owners to identify concerns and strategies for neighborhood development and collaborates with developers to plan inclusionary housing.	Several times per week	Moderate
Office of Development	Works with developers of affordable housing; monitors progress and construction quality on construction sites.	Rare	Low
Office of Legal Affairs	N/A	Rare	Low
Division of Landlord Tenant Litigation (within the Office of Legal Affairs)	Communicates with residential and commercial tenants of City-owned properties and with persons serving legal papers on HPD.	Daily	High

Factor 4: Resources designated by agency for language assistance services

HPD allocates a combination of financial and personnel resources to the provision of language access services, some of which are restricted for use by specific programs, and others which are available for use throughout the Agency. HPD has two multi-year contracts for document translation, on-site interpretation, and telephonic interpretation. HPD has also secured private grants to support the provision of language access services, such as for the translation of the Housing Connect website. Expenses associated with the provision of language access services, such as printing and signage costs, are typically folded into the general budget for each program area. In addition, the Agency dedicates personnel resources to training, data collection, monitoring, interpretation, and translation conducted outside of the Agency's contracts (either by program-area employees or volunteers through the city-wide Volunteer Language Bank).

Based on the Agency's analysis of the frequently requested languages, we are providing telephonic interpretation beyond the top ten (10) languages issued by the Mayor's Office of Immigrant Affairs. The Agency's assessment does not allow for document translation beyond the designated ten (10), based on the four factor analysis and available resources.

However, all documents are mailed out with a “Language Assistance” coversheet to assist LEPs to request documents in their preferred language.

As set out in the Agency’s current Language Access Plan, one of the ongoing priorities is to standardize data collection and the tracking of language services across programs to help improve language access services in 2018 and 2019.

IV. Provision of language access services

HPD’s public-facing divisions interact with different members of the public in a variety of settings. These interactions may happen:

- In person at HPD offices;
- In person during field interviews, inspections, public meetings and community events;
- By phone;
- By mail or email; and
- Through HPD’s website, public-facing online systems, and social media.

As a result, HPD and its employees must tailor the provision of language access services to a wide range of settings. The Agency will continue to rely on a combination of interpretation and translation services to meet the needs of LEP persons and ensure they have equal access to HPD’s services. Some of these services will be provided by HPD employees and others by vendor contract. Employees will determine the appropriate type of language access services depending on the nature of the interaction, in consultation with resources available to each division.

Translation Services - Written Communication and Materials

In accordance with DOJ guidance, HPD prioritizes vital and/or commonly distributed documents for translation. A document will be considered vital and/or commonly distributed if it contains information that is critical for accessing the Agency’s programs or activities, or is required by law. Vital documents may include:

- Documents that must be provided by law;
- Complaint, consent, release or waiver forms;
- Claim or application forms;
- Conditions of settlement or resolution agreements;
- Letters or notices pertaining to the reduction, denial, or termination of services or programs or that require a response from the LEP person;
- Time-sensitive notices, including notice of hearing, upcoming grand jury or deposition appearance, or other investigation or litigation-related deadlines;

- Form or written material related to individual rights;
- Notice of rights, requirements, or responsibilities; and
- Notices regarding the availability of free language assistance services for LEP individuals.

The managers for each division or office will facilitate a review of its programmatic notices to determine which may be considered vital. Notices which are regularly sent and/or will be sent to a large number of recipients will be reviewed individually. All other notices, including those sent on an individual basis, will be grouped and categorized as vital or non-vital based on their purpose.

To ensure maximum accessibility of these documents, HPD will conduct the following processes.

Translate Written Documents

For each new notice or group of vital notices, or any such notices that undergo a substantial revision, managers from that division will make an initial determination as to whether the written document can and should be made available in other languages.

All vital documents will be translated. Vital documents will be translated into:

- The top ten languages spoken by LEP persons within the Agency's client service area;
- The most-frequently encountered languages of LEP groups eligible to be served or likely to be affected by the benefit, program or service, based on program-specific data; or
- The primary language spoken by the recipient, if known.

Non-vital documents may be translated, at the Agency's discretion, based on an evaluation of:

- The nature of the written document;
- The size of the potential target audience;
- Whether the primary language of the potential target audience is known;
- The time and resources available for translation; and/or
- Upon request.

Whenever possible, boilerplate language regarding translations services will be incorporated into written communications:

"If you would like assistance in a different language, please check this box. For assistance in completing this package, please call 212-863-XXXX."

The Agency plans to distribute translated documents to targeted audiences, at the Agency's discretion, based on an evaluation of:

- The nature of the written document;
- Whether the primary language of the potential target is known;
- The time and resources available for translation; and/or
- Upon request.

For divisions that interact with LEPs on a more frequent basis, which may include daily to several times per week will have commonly distributed documents available for their target audience. However, due to limited resources and storage restraints, the Agency is not able to have all commonly distributed available to all top ten (10) languages, but will have them available upon request.

Consistently Conduct Quality Assurance Reviews

To ensure the quality of the Agency's communications, whenever possible, all translated documents will be reviewed by at least one employee who is fluent in the language used in the notice, and who was not involved in drafting the notice. Members of the volunteer language bank will be asked to assist in the review as needed. The quality assurance review process will be managed by the Division's manager to ensure consistency and quality.

Encourage Use of Plain Language

To help ensure that vital notices are understandable throughout HPD's service population, the Agency will establish a training curriculum that teaches relevant employees how to incorporate the tenets of plain language into written materials and presentations. The Agency has also initiated a plain language review of all critical notices related to our Section 8 rental subsidy program, which assists over 37,000 households.

As part of the ongoing training curriculum, the Agency plans to provide guidelines on plain language. With this training, managers are expected to understand the importance of providing commonly distributed documents by using the following simple rules:

- Use short words and sentences;
- Front-load important information;
- Break up content with lists and headers;
- Use the active voice;
- Cut unnecessary words;
- And avoid jargon.

Online Communication

HPD also interacts with the public via our recently redesigned website. The website is now accessible in 91 different languages, through Google Translate.

Additionally, HPD maintains NYC Housing Connect, an online application system for affordable housing lotteries. Translated instructional materials are now available on Housing Connect. Paper applications are currently available by request to the developer.

The Agency makes efforts in providing important forms and resources in English and Spanish, and will continue to translate vital and commonly distributed forms in the top ten (10) languages.

Interpretation Services - In-person Interpretation

HPD employees frequently interact with members of the public in person at all HPD offices and through scheduled and emergency field and site visits. When possible, the Agency's public-facing divisions will make bilingual employees or volunteers from the NYC Volunteer Language Bank available to interpret for LEP persons visiting HPD's offices. When a bilingual employee or volunteer is not available for interpretation, HPD employees will rely on the Language Line for interpretation. Public-facing staff members who frequently interact with members of the public have access to Language Line phone lines in their service areas and can easily use the Language Line to accommodate LEP persons during in-person interactions. When the LEP person expresses a preference, HPD employees may rely on a friend or relative of the person seeking services to interpret.

In-person interpretation is also necessary on a regular basis for field or site visits. These visits frequently involve housing maintenance code inspections, interviews of HPD's housing subsidy recipients, public events and construction site investigations. Employees conducting such visits will attempt to determine language interpretation service needs in advance. When possible, and depending on the nature of the visit, the Agency will make an effort to send a bilingual employee who will be able to conduct or interpret interviews or inspections in the language primarily spoken by the LEP person. When a bilingual employee is not available, field employees will use language translation cards to indicate the purpose of their visit and offer interpretation services. If necessary, employees will use the Language Line to communicate with the LEP person during the interview or inspection. When the LEP person expresses a preference, HPD employees will rely on a friend or relative of the person seeking agency services to interpret.

HPD employees will use a variety of formal and informal methods to identify an LEP customer's primary language. Posters and digital signage throughout our client services area and field offices advertise the availability of free language services in various languages, encouraging LEP persons to request assistance. HPD employees will also offer language access services, where appropriate, and will use posters and "I speak" cards to help determine which language services might be appropriate.

Telephonic Interpretation

HPD employees are often contacted by phone by parties interested in the Agency's services. Many of the employees in the Agency's public-facing divisions who answer phone calls from members of the public are bilingual. When a bilingual employee, fluent in the language of the LEP person seeking assistance, is not available for interpretation, HPD employees will

rely on the Language Line for interpretation. Employees who frequently interact with members of the public have access to Language Line phone lines in their service areas and can easily use the Language Line to accommodate LEP persons by phone.

In the event of an emergency, HPD would use our existing contracted language access services. Additionally, bi-lingual Residential Building Assessment Inspectors and other staff would be mobilized. If it is a large incident, the Language Access Interagency Task Force will be activated at NYC Emergency Management (NYCEM), and requests can be funneled through NYCEM.

The Agency is currently contracted with Language Line vendor, who is providing over 173 languages in addition to any other languages the Agency may request.

V. Training

HPD will develop a general training curriculum for all new and existing applicable employees to cover the tenets of good customer service and best practices for serving the Agency's varied constituencies. The trainings will specifically familiarize staff with the requirements and availability of resources pertaining to language access and limited English proficiency and help HPD standardize the provision and tracking of language access services. Trainings will be prioritized for staff in program areas that most significantly interact with the public and/or produce materials for public communication. Training will be provided to new staff and to existing front-line staff on a quarterly basis.

Tailored, program-specific trainings will also be developed and implemented depending on the needs of the division. Also, in response to Language Access Secret Shopper's report scores, HPD may provide additional refresher sessions for the locations visited by the shoppers.

All general language access training will be conducted by the Human Resources Training and Development team.

VI. Record keeping and evaluation

HPD will use vendor portals to capture and analyze the language services provided across the Agency. Tracking will include:

- Standardized quarterly reports from public-facing operations on general usage of and need for language access services;
- Quarterly assessment of Language Volunteer Bank usage;
- Quarterly assessment of third party contract usage;

- Review feedback on quality of interpretation services and provide feedback to vendor.

In order to ensure high quality language access services are provided, HPD requires the following “best practices” of all programmatic areas:

- All third party vendors used for interpretation and translation are Agency-approved; and
- All translated materials are reviewed internally whenever possible before implementation.

Additionally, HPD provides the opportunity for customers to complete a satisfaction survey in our Section 8 Customer Services center. Moving forward, HPD will seek feedback on the quality of language access services provided, if applicable. HPD also carefully reviews “Secret Shopper” scores to assess and address any issues with the services provided, and will closely review and address any language access complaints received by 311. All reports, complaints and feedback will be regularly monitored by the Agency’s Language Access Coordinator and Human Resources, who will make policy and operational recommendations accordingly to ensure ongoing compliance.

VII. Resource analysis and planning

HPD will continue to allocate Agency resources, as described above, and seek out additional opportunities to leverage private and community funds to ensure language access. In addition, the Agency will seek to provide additional training resources, hire additional bilingual staff for front-line positions, recruit and refer volunteers for the NYC Volunteer Language Bank and distribute information to ensure that program areas are aware of all of the resources available within the Agency and throughout the city.

By way of contracts, the Agency will continue to centralize all services through our vendors to ensure consistent quality language access services. The Agency will closely monitor the usage of language access to identify and close gaps in access service.

VIII. Outreach and public awareness of language access services

HPD currently employs a multi-pronged approach to ensuring the public is aware of language access services. Outreach efforts including signage (posters and digital boards), website features, and incorporation into relevant programmatic materials and communications. Over the next years, HPD will focus on expanding the Agency’s public outreach strategies as follows:

- Signage - HPD will improve existing signage to better engage the public and make it easier to navigate our public spaces. This initiative will include consistent, branded lobby signage for 100 Gold Street and our five field offices, and language access signage for all customer service areas.
- Website/Social Media - In addition to offering content in multiple languages, HPD will clearly and consistently articulate the availability of language access services through these mediums.
- Marketing Materials
 - HPD will create a general handout summarizing the availability of language access services. The handout will be available for multi-purpose use, including distribution at customer service centers and program/community events.
 - HPD will increase emphasis on incorporating language access information into programmatic materials and notices where applicable.

IX. Language Access Complaints

Language access complaints from NYC 311 will be routed through the First Deputy Commissioner's office to the appropriate program area for response. The Language Access Coordinator will track, monitor and respond to language access complaints whether through 311 or internally, for the Agency. The Language Access Coordinator will also be responsible for including that information on complaints as part of the annual agency reporting.

X. Implementation Plan Logistics

HPD initially convened an intra-agency working group in the summer of 2006 to address language assistance needs and implementation of services. Since that date, the task force has successfully increased the visibility and availability of interpretation and translation services and coordinated the provision of LEP services among our most public-facing operations, including the Section 8 program which assists over 37,000 households annually with rent subsidies, and the Office of Enforcement and Neighborhood Services, which ensures the entire city's housing stock meets the health and safety requirements of the city's Housing Maintenance Code.

In 2015, HPD reorganized its language access working group. The core working group includes representatives from the office of the First Deputy Commissioner, Regulatory Compliance, and Legal Affairs. Additionally, every office or division within HPD has designated a language access liaison to collaborate with the working group.

The roles and responsibilities of the working group include:

- Maintain and update the Plan every two years
- Oversee implementation and execution of the Plan
- Collaborate with city stakeholders on LEP initiatives
- Coordinate with all Agency divisions to
 - Standardize LEP policies, procedures and staff training;
 - Facilitate LEP data tracking, collection and analysis;
 - Ensure awareness of language access resources, requirements and best-practice standards;
 - Develop policy and resource recommendations as needed to better enable language access across all public-facing operations; and
 - Recruit additional volunteers for the NYC Volunteer Language Bank.

In 2017, HPD moved the language access initiative into the Division of Human Resources, in the Office of the First Deputy Commissioner. All aspects of language access roles and responsibilities are managed in Human Resources.

HPD is committed to continuously improving its provision of language access services. The Agency has prioritized the following goals for our 2018 Language Access Plan:

Language Access Goal	Milestones	Responsible Staff	Deadline
Provide telephonic interpretation services in at least 100 languages	Review all languages provided by telephonic vendor	Language Access Coordinator	End of January 2018
Standardize training across divisions	Review current training	Language Access Coordinator; Director of Training and Development	1 st Quarter 2018
Create LEP-specific emergency plan	Review current employee emergency plan	Language Access Coordinator; Emergency Preparedness Team	1 st Quarter 2018
Increase use of plain language in essential public documents	Create plain language training for divisions that send out public documents	Language Access Coordinator; public facing Division heads	2 nd Quarter 2018
Create marketing	Create sample	Language Access	3 rd Quarter 2018

materials to promote and encourage translation.	documents for review.	Coordinator, Assistant Commissioner of Human resources	(FY 2019)
Create intranet content to assist front line employees and managers with additional language access resources	Work with HPD Tech (IT department) to create an internal site for employees to access.	Language Access Coordinator; Assistant Commissioner of Human Resources; and IT department	4 th Quarter 2018 (FY 2019)
Identify an internal tracking system to capture all language access requests	Look at creating an internal tracking method/mechanism	Language Access Coordinator; Division Managers	On going
Identify and translate most-commonly used documents distributed to the public	Review all most-commonly used documents	Language Access Coordinator; public facing Division heads	On-going

Sean Soun, Executive Director of Operations, Human Resources will serve as the Language Access Coordinator for HPD. He will report to the Assistant Commissioner of Human Resources and the First Deputy Commissioner on progress toward these goals on a quarterly basis.