



# **Landmarks Preservation Commission**

**Landmarks Preservation Commission  
Language Access Provision Plan**

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**New York City Landmarks Preservation Commission  
Meenakshi Srinivasan, Chair**

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**Intention**

In compliance with Executive Order 120, the Landmarks Preservation Commission (LPC) will provide reasonable accommodation to persons with Limited English Proficiency (LEP). LPC will notify LEP-identified individuals that interpretation and translation services are available to them at no cost through homeowner contact letters with inserts and a reasonable accommodation notice on agendas for LEP speakers. The Public Information Officer will be responsible for overseeing the implementation of all language access programs. LPC will conduct a yearly review of services requested and rendered and revise our plan accordingly.

## **Outline**

- I. Agency background;
- II. Facilities and staff breakdown;
- III. LEP population assessment;
- IV. Plan implementation logistics and service provision plan;
- V. Staff training and monitoring.

## **I. Agency Background**

The Landmarks Preservation Commission is the New York City agency responsible for identifying and designating the City's landmarks and the buildings in the City's historic districts. LPC also regulates changes to designated buildings. LPC was established in 1965 when Mayor Robert Wagner signed the local law creating the Commission in order to protect the city's architectural, historical, and cultural heritage.

The agency consists of eleven Commissioners and a full-time staff of 70 persons. To date, the Landmarks Preservation Commission has designated approximately 33,000 buildings, including 1,348 individual landmarks, 117 interior landmarks, 10 scenic landmarks, and 114 historic districts and 21 district extensions in all five boroughs.

Each year, the Commissioners and Preservation staff approve more than 13,000 applications for work on designated properties.

## **II. Facilities and Staff Breakdown**

LPC's offices are in the Municipal Building at One Centre Street, Manhattan; there are no off-site service centers. Currently, there are three main staff members administering direct services: a Receptionist, Public Information Officer, and a Director of Intergovernmental and Community Affairs.

The Receptionist is the point-of-contact for the walk-in center. Customers rarely drop in to the walk-in center; a majority of visitors have pre-arranged meetings with Commission staff or are expeditors dropping off or picking up applications and permits.

The Public Information Officer handles cold calls from the public in addition to questions from architects, expeditors, and home owners regarding permits and applications. Currently, the Landmarks Preservation Commission does not have a contract with a telephonic interpretation service, as the number of foreign-language calls received is near zero.

The Director of Intergovernmental and Community Affairs receives correspondence and calls from the public, elected officials, and advocacy groups regarding proposed projects.

### III. LEP Population Assessment

LPC will use existing data sets provided by the Mayor's Office of Immigrant Affairs (MOIA) and the Mayor's Office of Operations to determine the number of LEP persons currently served by the agency.

#### Four Factor Analysis

- Factor I – Number or Proportion of LEP Individuals

The 2007 American Community Survey notes that of the approximately 7.7 million people in New York, 52% speak only English. Roughly 48% of New Yorkers speak another language other than English, and 23.7% say they speak English less than "very well."<sup>1</sup>

According to data provided by the Mayor's Office of Operations from the U.S. Census American Community Survey, the top six languages spoken by LEPs in New York are: Spanish, Chinese, Russian, Korean, Italian, and Haitian Creole. Since LPC works in all five boroughs, we will use these most common languages for any large-scale translation or interpretation unless an alternate language is identified for a specific area, such as a proposed historic district. One percent of the top six languages, Spanish, is covered by LPCs volunteer language bank.

- Factor II – Frequency of Contact with Agency

The Landmarks Commission is a city-wide agency servicing, or potentially servicing, every population in the city of New York. LPC relies on in-house volunteer staff translators and interpreters to fulfill any language requests on an as-needed basis.

- Factor III – Nature and Importance of the Program

Landmarking affects communities and homeowners. It is very important for LPC to be able to communicate effectively with homeowners when discussing the potential designation of their property or consult with them regarding applications to make changes to a landmarked building. Language should not be a barrier to protecting the city's cultural and architectural heritage.

- Factor IV – Resources Available

LPC has a very diverse and multi-lingual staff to assist with in-house translation and interpretation. The city-wide Language Bank is another resource available to LPC for basic needs. If complex or technical documents need to be translated, LPC will work with an outside vendor to produce these documents in a timely manner.

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<sup>1</sup> U.S. Census Bureau, 2007 American Community Survey, NYC Department of City Planning

#### **IV. Plan Implementation Logistics**

The Commission's Public Information Officer will serve as the Language Access Coordinator. This person will be responsible for coordinating any contracts for translation, interpretation, and signage with the LPC Executive Director and Director of Operations.

## Service Provision Plan

LPC is prepared to provide translation or interpretation on an as-needed basis. The following parameters will be installed in the event of an LEP requiring assistance in communicating with LPC:

- Telephonic Interpretation: LPC will investigate contracting with DoITT's preferred vendor, Language Line, for all telephone-based interpretation services by the end of FY09. Language Line offers translation and interpretation services in over 170 languages 24 hours per day.<sup>2</sup>  
*As of December 15, 2010, LPC does not have a contract in place with Language Line.*
- Bilingual Staff and Staff Interpreters: LPC has a volunteer language bank among current staff members for face-to-face interpretation in the following languages:

Language	Number of Staff Supporting
<b>Spanish</b>	1
French	2
Greek	1

*Language(s) in boldface type are one of the top six languages spoken by LEPs in New York City.*

- Translation of Written Materials: The Landmarks Preservation Commission has one major publication, a book, Guide to New York City Landmarks, 4th Edition, as well as several ancillary pamphlets. These pamphlets are all published in English with the exception of a Korean-language version of "Making Changes to a Landmark Building: When a Permit is Required" and a Spanish-language version of the special rules for storefronts in the Jackson Heights district (neither are considered essential documents). At present, LPC does not see a demand for printed materials in other languages. Initial correspondence sent to owners in a LEP-identified area will receive a notice regarding interpretation services in the most commonly used languages in that area.

Until a point in time when LPC determines the need to translate any written materials or forms, translation services will be provided on an as-needed basis. LPC will contract with an outside vendor for any translations deemed necessary. LPC will continue to include "tag line" inserts in appropriate languages to correspondence sent to homeowners.<sup>3</sup> LPC will take advantage of the city-wide Volunteer Language Bank to translate the standard tag line in the top six most frequently used languages. If a community has a large population of speakers outside of these top six languages, LPC will turn again to the Volunteer Language Bank to receive translation. We will use at least two Volunteer Language Bank volunteers per document to ensure quality control.

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<sup>2</sup> [www.languageline.com](http://www.languageline.com)

<sup>3</sup> Please see Appendix II: Correspondence, Figure 1 for an example of a "tag line" insert

In June 2007, a new historic district in Sunnyside Garden was created. To reach out to homeowners for whom English is not a primary language, LPC included a “tag line” insert in Bengali, Spanish, and Chinese with materials sent to homeowners; the service was not requested.

- Signage: LPC will post signage in a conspicuous place near the reception desk notifying customers of the availability of translation and interpretation services. LPC will also place Language Identification Cards at the front desk.<sup>4</sup> Signage will be in place by the end of FY09. At Reception, LPC will also post a sign conveying free translation and interpretation service to customers by the end of FY09. *Completed 1<sup>st</sup> quarter of FY09.*
- Website: LPC will provide a website link to Google Translate, a free online translation service, by the end of FY09. There are currently no plans for full-scale website translation. As the city moves away from machine translation services, LPC will provide any translated documents to DoITT and the Mayor’s Office of Operations for inclusion on a city-wide web strategy for language access. *Completed 4<sup>th</sup> quarter FY09.*
- Plain Language: LPC will use plain language standards to the extent that its use does not interfere with any technical language essential to LPC business.

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<sup>4</sup> Please see Appendix I: Signage, Figure 1 for an example of a Language Identification Card

### **Implementation Priorities and Timeline**

Within the range of services provided, LPC understands that resources and demand will dictate the provision of services in any given area. The following parameters will be in place by the end of FY09:

- Investigate contracting with Language Line interpretation and translation service;
- Distribute Language Identification Cards to all staff;
- Post notice to public regarding availability of language services;
- Staff training.

*Completed by end of FY 09.*

## **V. Staff Training**

LPC's commitment to provide meaningful access to non-English proficient citizens requires a skilled and informed staff. LPC will institute a one-time orientation for all public-facing staff members following these parameters:

- Staff will be informed of LEP policies and procedures;
- Staff will be informed of the availability of LEP services for the public (translation and interpretation);
- Staff will be trained in the use of Language Line services and Language Identification Cards.

The depth of training will depend on the staff person's normal contact with the public. Management will also be informed of policies and procedures. LAP training will be included in new hire orientation programs. LPC will conduct a training session for current staff by the end of FY09 and include information about our Language Access Plan in new hire orientation. *Completed and instituted 1<sup>st</sup> quarter of FY09.*

**Monitoring**

LPC will conduct an annual review of its LAP program based on systematic feedback from staff. The LAP is a fluid document and will be updated as the need arises. LPC will review our language access policy at least once a year.

LPC will monitor the frequency of staff contact with LEPs through a LAP log. Staff will be asked to log each encounter with an LEP and note the language and type of service(s) requested and/or provided; a logbook is kept with the Public Information Officer.

LPC will ask its language bank volunteers to self-certify their linguistic abilities and keep this information on file. We will ask volunteers how and when they learned the language, the frequency they continue to use it, and their comfort level with spoken or written interpretation and translation.

## **Outreach**

Reaching out to homeowners is an integral part of the landmarks process. When LPC notifies a homeowner of its interest in a property, we will include an insert with the standard translated “tag line” stating interpretation and translation services are free of charge. Likewise, LPC will work with homeowners requesting language services on an as-needed basis.

LPC holds frequent public hearings. On its agendas, LPC includes a line stating that reasonable accommodation is available for anyone requesting it.

LPC will post signage at the front desk notifying customers of language access by the end of FY09. *Completed 1<sup>st</sup> quarter of FY09.*