



**Department of
Housing Preservation
& Development**

HPD Language Access Plan 2009

Purpose

The purpose of this plan is to establish and provide greater access and participation in the services, programs and activities of the NYC Department of Housing Preservation & Development (HPD) for New Yorkers with limited or no-English proficiency. Pursuant to Title VI (“Title VI”) of the Civil Rights Act of 1964, and the U.S. Department of Housing and Urban Development’s Notice of Guidance to Federal Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (HUD Guidance), and the Mayor’s Executive Order 120, HPD’s policy is to provide Limited English Proficient (LEP) customers with meaningful access to housing services. This plan promotes greater access to agency services, programs and activities with the goal of attaining meaningful and understandable access at a level equal to English proficient individuals. HPD recognizes that removing language barriers is critical to achieving access to needed services.

I. Agency Mission and Background

Mission

Using a variety of preservation, development and enforcement strategies, HPD strives to improve the availability, affordability and quality of housing in New York City. As the nation's largest municipal housing agency, HPD works with private, public and community partners to strengthen neighborhoods and enable more New Yorkers to become homeowners or to rent well-maintained, affordable housing.

Services and Programs

Providing availability of quality housing

HPD improves the availability of quality housing in a variety of ways. For instance, HPD administers the fourth largest Section 8 program in the United States. HPD administers approximately 30,000 Section 8 vouchers serving New Yorkers in all five boroughs. Over 6,900 landlords currently participate in the program. HPD’s Section 8 vouchers are reserved for eligible applicants who fall within specific HPD preference categories or special admission programs. Applications are not accepted from the general public, but are submitted through designated intermediaries from different divisions within the agency, management staff from various housing providers, and staff from other governmental agencies.

Another way that HPD provides availability of quality housing is through the Office of Community Partnerships, which is comprised of three units; the Community Outreach Unit (COU), the Fair Housing Unit (FHU) and the Business Opportunity Unit (BOU). The COU is the agency's liaison to Community Boards and local community groups throughout the City. COU designs and implements counseling, educational and promotional activities that foster understanding of agency programs and encourage collaborations between communities and the agency. The FHU develops and implements agency-wide policies and programs to support City, State and Federal Fair Housing Laws. The FHU provides educational, mediation and counseling services. The BOU provides information and technical assistance to businesses about HPD and other NYC contract opportunities and conducts the Contractor Training Program, a 10 -week training curriculum for construction entrepreneurs.

HPD's Housing Education Services offers a variety of training courses for owners, property managers, housing professionals, superintendents and tenants. HES offers introductory, certificate and advanced courses in building management, systems maintenance and home health hazards. HES’ Lead Education Program is designed to increase public awareness of the City's lead paint hazard reduction law.

Preserving quality housing

The preservation of quality housing is an integral part of HPD's mission. The Division of Code Enforcement (Code) enforces compliance with the City's Housing Maintenance Code and the New York State Multiple Dwelling Law. Tenants may call the City's Citizen Service Center at 311, 24 hours a day, 7 days a week (311 can be accessed outside of New York City by dialing (212) NEW YORK) to register complaints concerning possible housing violations in their apartment, including lack of essential services (heat, hot/cold water, electricity). In response to these complaints, Code can send out Inspectors to inspect emergency conditions and issue violations to the landlord if violations are found, directing the landlords to perform the repairs within a timeframe specified by law. Code Inspectors are available to perform emergency inspections 24 hours a day, 7 days a week.

HPD's Division of Neighborhood Preservation (DNP) works to preserve quality housing by conducting site assessments of thousands of buildings each year through four borough offices. If DNP determines that a building is at-risk of deterioration, it develops a treatment plan for the building and coordinates its implementation. DNP activities also include encouraging owners to pay their taxes, entering into voluntary repair agreements with owners, referring owners to education and support programs including anti-abandonment training, providing assistance with rehabilitation loan financing, referring buildings for targeted code enforcement when necessary, and reviewing distressed properties for exclusion from DOF tax lien sales. DNP coordinates several stages of the third party transfer process to convey distressed tax delinquent buildings to new responsible owners using an in-rem foreclosure mechanism. Finally, DNP oversees the work of Neighborhood Preservation Consultants, community based organizations that extend DNP's reach into neighborhoods throughout New York City.

The Office of Housing Operations contributes to the preservation of quality housing by the efficient administration of the Division of Alternative Management Program (DAMP) and the Division of Property Management (DPM). DAMP administers rehabilitation programs in the City's occupied housing stock, such as the Tenant Interim Lease program, Neighborhood Entrepreneurs Program, Neighborhood Redevelopment Program, Neighborhood Homes Program and Special Projects buildings, where tenants are temporarily relocated while construction is being done. As such, it is necessary to communicate with tenants regarding relocation issues, income certification, Section 8 applications and other tenant issues that arise. The 7A Program, where administrators are legally appointed by the Court to operate privately owned buildings that have been abandoned by their owners, does not require tenants to relocate, but field staff regularly interacts with tenants to ensure quality housing during site visits and tenant meetings. DPM operates the Emergency Housing Services Bureau, which provides emergency relocation services to tenants displaced as a result of fires or vacate orders issued by the Department of Buildings, the Fire Department, or HPD.

Finally, the Division of Housing Supervision (DHS) is dedicated to supervising over 100 City Mitchell-Lama rental and co-op housing companies and 60 Municipal Loan projects. DHS approves rent increases, contracts, and applications for admission into Mitchell-Lama developments, financial statements, surcharge assessments, and all other aspects of the management for these buildings. DHS has much interaction with the public, including tenants, owners, vendors, developers, community groups and corporate firms. DHS also administers the Senior Citizen Rent Increase Exemption program.

Providing affordable housing

The Office of Development leads the implementation of the City's New Housing Marketplace Plan to create or preserve 165,000 units in close collaboration with other parts of HPD, other city and state agencies, and the New York City Housing Development Corporation. The Office includes the divisions of New Construction, (including Planning, Housing Production, and New Construction Finance), Special Needs Housing, Preservation Finance, and Housing Incentives. The Office of Development is responsible for building a pipeline for affordable housing development by identifying privately-owned sites and

public assemblages for housing development, collaborating with other land-holding agencies, and financing a variety of new construction and rehabilitation programs. In collaboration with developers, HPD's Marketing Unit monitors affordable housing lotteries.

Another unit that works to provide affordable housing is the Division of Management and Disposition, which manages City-owned residential, commercial properties and urban renewal properties until they can be restored to responsible owners. In addition, this unit runs the Tenant Interim Lease program, which provides cooperative apartments to low-income tenants.

II. Language Access Strategies

The following is a brief inventory of services and efforts currently made by HPD divisions to improve outreach to LEP clients:

- HPD's website has several pertinent pages translated into Bengali, French, Spanish, Chinese, Russian, Korean and Haitian Creole.
- HPD's Language Bank has 95 volunteers covering 28 languages.
- The Affordable Housing Hotline is currently offered in Spanish, Mandarin, Cantonese, Korean, Haitian Creole, and Russian.
- The Office of Communications, in collaboration with HPD's Language Access Taskforce, has developed an extensive outreach strategy to the immigrant press, sending out monthly releases to over 100 ethnic and multi-lingual press outlets.
- The Division of Code Enforcement uses the Language "I Speak" Card, which enables inspectors to identify which language an LEP customer speaks and to request appropriate interpretation services to facilitate communication while conducting an inspection.
- Agency-wide usage of the Language Line provides immediate, on-site interpretation.
- HPD employs 238 bilingual Code inspectors, who collectively speak 26 languages.
- The Office of Preservation Services' Division of Neighborhood Preservation has conducted Owners Nights (presentations for property owners) in Spanish, Creole, Chinese, and Russian.
- The Office of Preservation Services' Housing Education Services unit (HES) offers Lead, Environmental Health and Healthy Home classes in Spanish. HES also offer a seminar in Basic Spanish for all HPD employees.
- The Office of Community Partnerships' "Taking it to the Streets" campaign, where HPD representatives visit low-income and immigrant communities in New York City to distribute brochures and spread awareness of HPD programs, is another program that targets LEP populations.
- The Office of Community Partnerships' Fair Housing Unit contracts out to four community-based organizations (Chinese American Planning Council, Urban League, Brooklyn Housing and Family Services, South Bronx Action Group). These organizations help HPD reach immigrant populations with information, referral and counseling services.
- The Division of Housing Supervision provides interpretation services for Mitchell-Lama tenants at Mitchell-Lama hearings.
- The Office of Housing Operations' Division of Tenant Resources provides Spanish interpretation services for Section 8 voucher briefings.
- HPD's Language Access Taskforce meets periodically with the New York Immigration Coalition and Communities for Housing Equity to improve HPD services.

III. LEP Population Assessment

In order to determine the reasonable efforts HPD must take to provide appropriate levels of accommodation to LEP customers, the following four factors must be balanced:

1. The number and proportion of LEP persons in the eligible service population, including groups that are currently underrepresented in the service population;
2. The frequency with which LEP persons utilize the agency’s programs, taking into consideration the possibility that outreach in other languages may increase the frequency of contact;
3. The nature and importance of the program, activity or service provided by the agency; and
4. The availability and cost of additional language accommodations and resources.

Factor 1: Limited English Proficiency (LEP) Population and Assessment Chart

Unit	Approximate number of clients served in 2008	Languages provided	Determination
Office of Preservation Services: CODE	Code: Number of total complaints: 631,974 Total number of violations: 429,546	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000 from HPD’s call center and 311.
Housing Education Services	10,857 students enrolled	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000 from HPD’s call center and 311.
Division of Neighborhood Preservation	Buildings accessed: 10,778	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000 from HPD’s call center and 311.
Div. of Housing Supervision	Over 40,000 households in Mitchell Lama developments	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000.
Office of Community Partnerships	Number of participants at “Taking it to the Streets” events: 9,145	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000.
Office of Housing Operations: Division of Tenant Resources (DTR); Division of Alternative Management Program (DAMP)	DTR: total no. of families assisted: 30,000 DAMP: total units under management: 4,000	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000.

Emergency Housing Services Bureau	EHSB: Household capacity in the Shelter system: 300 families	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000.
Office of Development	300 tenants served	Spanish, Korean, Mandarin, Cantonese, Russian, French, Haitian Creole	Languages were determined based on data that HPD collected since 2000.
Office of Budget, Fiscal, Engineering Audit	Interactions internal	As requested	Accessible through Language Line if necessary
Office of Administration	Interactions internal	As requested	Accessible through Language Line if necessary
Office of Legal Affairs	Limited LEP interactions	As requested	Accessible through Language Line if necessary
Office of Intergovernmental	Limited LEP interactions	As requested	Accessible through Language Line if
Office of the Chief of Staff	Interactions internal	As requested	Accessible through Language Line if necessary

HPD prioritizes language access by utilizing the list of most spoken citywide LEP languages based on Census data and internal research. HPD provides services to LEP customers by various methods based upon the relative number of such persons and the frequency of contacts or anticipated contacts. Reasonable steps are taken to accomplish our goals, but at the point at which costs approach or exceed the benefits, it is the responsibility of the Language Access Taskforce to evaluate alternative methods of delivery of language services and to implement appropriate changes.

A. Execution of the Department of Justice’s Four-Factor Analysis

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

HPD has determined the proportion of LEP persons identified based on data obtained from 311 and our internal survey to determine the number of customers served citywide by borough and central unit. There has been no significant population or demographic changes in our service area since the 2000 Census. Our 2008 assessment is in line with research conducted by the NYC Department of City Planning and the Mayor’s Office of Immigrant Affairs as well as the agency’s own Housing Vacancy Survey report (*Housing New York City*) from 2005.

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

Frontline HPD units interact with LEP clients on a daily basis; others have less frequent interactions. HPD uses Language Line to provide translation and over-the-phone interpretation.

Factor 3: The importance of the benefit, service, information or encounter to LEP persons

Unit	Who does Division Target?	Core Service	Level of Importance to LEP Population
Office of Preservation Services: CODE, Div. of Neighborhood Preservation (DNP)	Targets complaints about housing conditions, owners of problematic buildings, owners who have to register their buildings	CODE: Enforcement of City's Housing Maintenance Code and the New York State Multiple Dwelling Law. DNP: remediation solutions for owners of problematic buildings.	CODE: High DNP: High
Housing Education Services	Property owners, superintendents, contractors.	Educational seminars and courses on property management, lead abatement, home repairs, etc.	Medium
Div. of Housing Supervision	Tenants living in City supervised Mitchell-Lama developments.	Supervision of Mitchell-Lama developments	High
Office of Community Partnerships	New Yorkers interested in HPD programs and services	“Taking it to the Streets” campaign promotes availability of agency services	High
Office of Intergovernmental Affairs: Marketing Unit	Prospective tenants/homeowners	Manages affordable housing lotteries	High
Office of Housing Operations: Division of Tenant Resources (DTR); Division of Alternative Management Program (DAMP) Emergency Housing Services Bureau (EHSB)	Targets homeless households, households displaced by HPD-funded renovation, and households residing in buildings that have been developed with financial assistance from HPD or buildings for which HPD maintains regulatory responsibility and certain tenants at risk of losing affordable housing	DTR: administers Housing Choice Voucher Program DAMP: manages buildings in urban renewal areas and buildings taken in-rem. EHSB: provides emergency housing and support services.	DTR: High DAMP: High EHSB: High
Office of Development	Targets low-moderate income residents in need of housing	Finances development for affordable housing projects	Medium

Office of Budget, Fiscal, Engineering Audit	Internal staff	Infrastructure	Low
Office of Administration	Internal staff	Infrastructure	Low
Office of Legal Affairs	Internal staff	Infrastructure	Low
Office of the Chief of Staff	Internal staff	Infrastructure	Low

Factor 4: Resources Available

Since 2006, HPD has utilized the DoITT negotiated Language Line contract, which provides services in more than 170 languages. HPD contracts with Language Line to provide over-the-phone interpretation and document translation services. HPD also contracts with Interspeak.org to provide in-person interpretation upon request in advance of administrative hearings. The Agency also maintains an internal Language Bank with 95 bilingual volunteers.

IV. Implementation Plan logistics

HPD convened an intra-agency working group in the summer of 2006 to address language assistance services. The role of the Language Access Taskforce is to increase the visibility and availability of interpretation services, coordinate the provision of LEP services within the agency, manage document translation, collaborate with other City agencies and monitor the program’s success.

Organizational commitment

The Office of Community Partnerships and the Language Access Taskforce are responsible for carrying out HPD’s policy and procedures to ensure meaningful access for limited-English-proficient customers. The Office and the Taskforce provide organizational support services to all agency offices. The Language Access Coordinator, a position located within the Office of Community Partnerships, will undertake liaison and recordkeeping responsibilities in support of the goals and strategies outlined in this Plan.

Since the fall of 2005, MOIA has convened an Interagency Task Force on Language Access, which is comprised of over 30 City agencies covering different areas of services. The taskforce meets on a bi-monthly basis for the purpose of establishing a directed and coordinated effort for the exchange of information and ideas regarding best practices among New York City agencies, with the goal of ensuring language access. HPD is a member of this Task Force.

Office of Community Partnerships Responsibilities:

- Manage the Language Access Taskforce;
- Manage Affordable Housing Multi-lingual Hotline;
- Organize internal and external trainings and meetings to discuss strategies for LEP service dissemination.

Language Access Taskforce Responsibilities:

- Provide input into the design and implementation of the policies;
- Ensure compliance;
- Design staff trainings;
- Incubate new and innovative ideas to implement LEP services;
- Disseminate LEP service information, internally and externally;

- Develop and promote language standards and translation standards;
- Members are liaisons to their respective Offices.

Language Access Coordinator Responsibilities:

- Serve as a single point of contact on Agency-wide Language Access efforts;
- Manage Language Line contracts;
- Manage website translations;
- Receive and review data from 311.

V. Service Provision Plan

Language Assistance Services

Staff will endeavor to identify the language spoken by LEP customers of the agency at the customer's first point of contact or as soon as possible thereafter. For individuals who come to HPD in person, employees will utilize the language identification card – "I SPEAK" - to help identify the primary language. The "I SPEAK" card assists employees in the identification of the clients' native language. The "I SPEAK" cards have already been distributed and HPD staff will be educated on how to utilize these cards in an all agency email memo.

HPD has procured Language Line services for both over-the-phone interpretation and written translation. Language Line phones have been installed throughout the agency for over-the-phone interpretation. The Language Line phones can provide interpretation services in 170 languages. We anticipate over 2,000 calls annually based on prior experience. For quality assurance, every document translated by Language Line will be checked by an internal volunteer.

Multilingual staff members who possess a demonstrated ability to interpret and to communicate information accurately are encouraged to join the agency's Language Bank. HPD's Office of Administration maintains and distributes the Language Bank directory of the agency's multilingual staff members, the languages they speak, their positions, and contact information. This Language Bank directory was created in 2006 and will continue to be updated annually. The Office of Administration also has access to the citywide language bank. In addition, the Mayor's Office of Immigrant Affairs is working with HPD to develop appropriate tests to ensure and standardize the quality of service provided by multilingual staff.

HPD staff will be informed by the Language Access Taskforce of other resources available to facilitate LEP customer interaction, including volunteer community interpreters, community-based organizations (CBOs) and other qualified language providers.

Pursuant to HUD Guidance, HPD's Office of Legal Affairs, in conjunction with appropriate program staff, have identified essential public documents and translated 80% of those documents into 5 languages to date. We anticipate 100% compliance by the end of 2010. Most documents that are disseminated by HPD inform tenants that they are entitled to receive the document in their native language. Language Access Taskforce members will review documents translated against the "Easy to Read NYC: Guidelines for Clear and Effective Communication" document provided by the Mayor's Office of Adult Education to ensure plain language is being used. Attached is HPD's "Inventory of translated LEP materials". We anticipate updating this inventory quarterly.

Website:

The HPD website is already translated into the seven most common languages spoken in New York City; HPD will update these websites to include information about the language assistance program.

Signs:

Signage has been developed for the below 10 NYC walk-in facilities to notify customers of free interpretation services and of the services available at each site. Signage is placed at the following HPD locations:

100 Gold Street, Manhattan (HPD headquarters)
Security (Main Lobby) – 212-863-6497
Development/ Planning (9X) – 212-863-6152
Development/ Tax Incentive (3Y-8) – 212-863-8183
OHO/ Section 8 (1O) – 212-863-5405/ 6656/ 8541
OPS (4C) – 212-863-8708
6th Floor Reception Desk – 212-863-7266

105 East 106th Street – 4th Floor, Manhattan
OPS/ CODE – 212-423-5155

560 West 133rd Street – 1st Floor, Manhattan
OPS/DNP - 212-234-2335

94 Old Broadway – 7th Floor, Manhattan
OPS/ DNP – 212-694-3259
OPS/ CODE – 212-234-7826

701 Euclid Avenue – 1st Floor, Brooklyn
OPS/ CODE – 718-348-2510
OPS/ DNP – 718-348-2515

210 Joralemon Street, Brooklyn
OPS/DNP (13th Floor) – 718-802-4511
OPS/CODE (8th Floor) – 718-802- 4113

120-55 Queens Blvd. (Queensborough Hall)
OPS/ CODE (RM #1320) – 718-286-0879
OPS/ DNP (RM #G100) – 718-286-2755

151 East Tremont, Bronx
OPS/DNP - 718-716-0313

1932 Arthur Avenue, Bronx
OPS/CODE (3rd Floor) – 718-579-6790

10 Richmond Terrace – RM #224, Staten Island (Staten Island Borough Hall)
OPS/ CODE - 718-816-2344

Outreach:

Through 2010, HPD's Taskforce will work with HPD Initiatives (e.g. "Taking it to the Streets Campaign", Neighborhood Preservation Owner's Nights, Housing Education Program Classes) that provide on-site services to LEP clients to:

- Utilize HPD's volunteer bank to provide on-site interpretation services for outreach events.
- Identify LEP clients who need language assistance through the use of census tracts.
- During HPD's promotion of events, notices of the availability of the on-site interpretation services will be disseminated.

The Language Access Taskforce will also work with interested nonprofit organizations, such as the Communities for Housing Equity and the New York Immigration Coalition, to promote the agency's Language Access services.

VI. Training

HPD's Code inspectors (who have daily interactions with LEP populations) undergo a ½ day language access and cultural sensitivity training.

The Customer Service Group is working with the Department of Administrative Services to incorporate language access and cultural sensitivity into redeveloped training for front line staff.

In the future, HPD will incorporate cultural sensitivity and language access training into new employee orientations to ensure that employees are consistent in meeting the needs of Limited English Proficient (LEP) individuals. HPD will launch a tool kit for employees available on its intranet, provide field staff with "I Speak" and other contact information, develop a customer service manual for front line staff and send selected managers that deal directly with LEP clients to MOIA workshops on language assistance issues. The HPD Language Access Plan is available to all staff on HPD's Intranet.

VII. Record Keeping and Evaluation

- HPD's Language Access Taskforce will convene every three months to discuss, review and evaluate current practices and revise the plan as necessary.
- Billing, 311 and other reports generated by HPD program offices will serve as metrics to quantify clients served.
- Primary language information is captured in HPDInfo, which is used by HPD's Office of Preservation Services. The Language Access Taskforce will cull this data into a monthly report.

VIII. Summation

HPD is deeply committed to providing language services to NYC residents. HPD will continue to update and improve this Plan.