

**NEW YORK CITY HOUSING AUTHORITY
LANGUAGE ASSISTANCE SERVICES IMPLEMENTATION PLAN
May 13, 2009**

I. NEW YORK CITY HOUSING AUTHORITY'S MISSION AND BACKGROUND

A. Mission

The New York City Housing Authority (NYCHA) provides decent and affordable housing in a safe and secure living environment for low- and moderate-income residents throughout the five boroughs. NYCHA also administers the Housing Choice Voucher program (Section 8), which provides rental subsidies to enable low-income individuals to rent apartments in the private sector.

NYCHA is the largest public housing authority in North America. As of July 3, 2008 NYCHA's Public Housing Program has 178,137 apartments in 343 developments throughout the city in 2,636 residential buildings. NYCHA has 12,600 employees serving 173,808 public housing families, 87,000 Section 8 voucher holders and 31,462 Section 8 participating-private landlords.

Based on the 2000 Census, NYCHA public housing represents 8.3% of the City's rental apartments and is home to 5.05% of the City's population. NYCHA residents and Section 8 voucher holders combined occupy 12.6% of the City's rental apartments and comprise 7.8% of the New York City's population.

B. Direct Services

The following NYCHA departments offer direct services to public housing residents, Section 8 voucher holders and applicants.

Office of the Secretary

In addition to other responsibilities, the Office of the Secretary manages the Authority's bi-monthly Board meeting which are open to the public, keeps records of the proceedings and all votes cast at meetings and maintains and issues "true copies" of official documents for the Authority. In addition, the Secretary handles calendaring and disposition of decisions made at Authority meetings, issues minutes and maintains an index of all Resolutions for consideration by the Board, issues notifications of all Authority meetings and of all adjournments or postponements whenever required. The following offices report directly to the Office of the Secretary:

Office of Impartial Hearings

Conducts hearings of public housing residents charged with non-desirability, chronic delinquency in the payment of rent, breach and chronic breach of resident rules and regulations, non-verifiable income, assignment or transfer of possession, and misrepresentation; conducts hearings for Section 8 residents charged with violations of a family obligation or of fraud against the

program; and, conducts remaining family member grievance hearings.

Applicant Appeals Unit

Conducts hearings on applicant's challenges to a determination of ineligibility for public housing or Section 8.

Applications and Tenancy Administration Department

(ATAD) - distributes and accepts public housing and Section 8 applications; provides information to the public regarding programs; responds to status inquiries; conducts eligibility Interviews; and determines eligibility for housing programs.

Leased Housing Department

(LHD) - provides customer service for all Section 8 tenants and landlords. Conducts rental briefings; reviews rental packages and annual recertifications. Inspects apartments for compliance with federal housing quality standards; assesses and processes transfer requests; and conducts landlord outreach activities.

Borough Management Departments

Process rentals, move-outs, and annual income and family composition reviews; process request for transfers or to add household members; respond to resident requests for information and assistance; meet with residents regarding tenancy matters; initiate referrals for social services or for legal proceedings where appropriate; participate in tenant meetings.

Social Services Department

Provides a variety of social services to NYCHA residents including: services for seniors, assistance with tenant related issues; transitional and supportive services; domestic violence intervention; crisis response outreach and referrals to community based organizations; preventive services for substance abuse, child abuse, and elder abuse; assistance and referrals for mental health services.

Department of Equal Opportunity

(DEO) - Services for People with Disabilities; Serves applicants, and residents with disabilities and/or their advocates, by responding to inquiries on the status of applications and transfer requests; provides assistance regarding reasonable accommodation requests. DEO's Office of Employment and Fair Housing Investigations; investigates complaints of alleged employment and housing discrimination from employees, applicants for employment, residents, and applicants for public housing and Section 8.

Resident Employment Services

(RES) - Assists residents who are recipients of public assistance, unemployed, or underemployed to become economically self-sufficient by

providing job placement, training, business development, supportive services and educational opportunities. Conducts recruitment and outreach, intake and assessment and subsequent referrals for education job training, employment and business development opportunities.

Community Operations

Currently has four borough offices operating 111 community centers and 43 senior centers. These facilities provide educational, recreational, cultural and social programs, including; after school programs for 6-12 year olds, teen programs for 13-19 year olds, adult programs for 20-59 year olds and senior programs for individuals 60 and older. The department also serves as the direct liaison for local resident associations. There are currently 229 active resident associations citywide to which the boroughs provide technical assistance, including leadership training and assistance with the resident leader election process.

Centralized Call Center

Processes emergency services requests and schedules routine repairs, and schedules appointments for Section 8 voucher holders to see NYCHA staff regarding their Section 8 rental or transfer issues.

Department of Communications (DOC)

As NYCHA's media and public relations arm, DOC is responsible for developing, coordinating and disseminating information about NYCHA and its work to internal and external audiences including residents, employees, and the general public. DOC responds to all inquiries from the media and circulates press releases announcing newsworthy events; produces a monthly newspaper for residents, a bi-monthly employee newsletter, and a variety of publications such as annual reports and brochures. DOC also maintains NYCHA's internal and external website

II. AGENCY LANGUAGE ACCESS POLICY and GOALS

NYCHA's policy is to provide equal housing opportunities for all qualified applicants and residents. In the selection of families and in the provision of services, there shall not be discrimination against any person on the grounds of national origin.

On May 13, 2009 NYCHA adopted a Language Assistance Policy and appointed the Director of the Department of Equal Opportunity as the Language Access Coordinator, to assess annually the language assistance needs of the NYCHA; to monitor NYCHA's delivery of language assistance services, in conjunction with NYCHA's department that provide programs, services and activities for residents, applicants and Section 8 voucher holders; and to recommend modifications to the Executive Department, as required, regarding NYCHA's delivery of language assistance services to persons with limited English proficiency.

The Language Assistance Services Policy is to take reasonable steps to ensure that persons with limited English proficiency ("LEP persons") have meaningful access to

NYCHA's programs, services and activities.

NYCHA currently provides and will continue to provide language assistance services to LEP persons. NYCHA is standardizing its processes and Language Services Unit (LSU) is capturing language data to assist in targeting its language services and maximizing its use of available resources.

NYCHA currently provides the following language services to its residents, Section 8 participating families and applicants:

- Department of Equal Opportunity's Language Services Unit (LSU) provides language assistance services to NYCHA departments to enable them to communicate information about their services, activities and programs.
- LSU translates NYCHA documents
- LSU has on-staff interpreters, and manages a Language Bank of over 200 employee-volunteers who collectively speak 45 languages. These volunteers provide language assistance services as needed.
- LSU evaluates and trains Language Bank volunteers.
- LSU performs quality control assessments of NYCHA's delivery of language services.
- Bilingual housing assistants, LSU, and Language Bank volunteers provide interpretation and translation services.
- Interpretation Services are scheduled when needed for eligibility interviews, rental appointments, termination of tenancy hearings, and applicant appeals of ineligibility determinations. Interpretation services are provided at NYCHA's Town Hall meetings and public hearings in Spanish, Chinese, and Russian.
- NYCHA's Centralized Call Center utilizes Language Line, a contract vendor, to provide interpretation for residents requesting emergency services and repairs, and for Section 8 voucher holders to schedule appointments related to rentals or transfer issues.
- ATAD utilizes Language Line for its Section 8 Transition Program to permit current LEP Section 8 voucher holders to register their interest in renting an apartment with a voucher at one of NYCHA's City or State developments.

NYCHA will:

- Update its Language Assistance Services Standard Procedure to include guidelines and standards on accessing language services for all employees who provide direct services.
- Train staff involved in providing services to residents, applicants and Section 8 voucher holders on NYCHA's Language Assistance policy and Standard Procedure for delivering language assistance services to the LEP population NYCHA serves.
- Develop a system to track language assistance needs of LEP persons utilizing NYCHA's programs.

NYCHA's plan for the future is to ensure that services are provided to LEP persons, including capturing language data, expanding the Language Bank, standardizing the delivery of language services, training staff, conducting ongoing evaluations of emerging languages and translating documents as needed.

Language Access Coordinator

NYCHA has appointed the Director of DEO as the Language Access Coordinator (LAC). Each department that provides direct customer services has designated a Language Liaison (LL). The LL will meet with the LAC quarterly to coordinate and facilitate the delivery of language services and address issues related to language services.

The LAC's responsibilities include:

- Monitoring the implementation of NYCHA's Language Assistance plan, and updating it annually.
- Meeting with the Language Liaisons to ensure departments are complying with the requirements for providing language assistance services.
- Annually assessing the language assistance needs of the agency by reviewing data on the provision of language services and the prior year's provision of language assistance services, and recommending modifications of the plan to NYCHA's Executive Department, as required.
- Monitoring the translation of vital documents.
- Overseeing quality control assessment of language services.

Language Liaisons will:

- Work with Department Director and LAC to address issues related to language services.
- Provide information to LAC to help identify emerging languages and changes in the proportion of existing language groups.
- Provide Department Director and LAC with reports on language assistance services provided.
- Identify staff requiring training on the delivery of language services.
- Provide Department Director and LAC with updated language assistance services needs of the department.

III. LEP POPULATION ASSESSMENT

NYCHA provides and will continue to provide language services based on the needs of LEP persons it serves. NYCHA is funded by the US Department of Housing and Urban Development (HUD) and utilizes HUD's four-factor analysis stated in its Final Guidance to Federal Financial Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons dated January 22, 2007 (HUD Guidance) to determine the LEP population it serves. The HUD guidance was issued pursuant to US Department of Justice directive, and is consistent with the Department of Justice Guidance.

Frequency of Contact

Based on an assessment of data regarding language services request at LSU and the Centralized Call Center (CCC), the most frequently encountered languages at NYCHA are Spanish, Russian, and Chinese. From 2005 – 2008, 50% of all LSU language services request were for Spanish, 38% for Chinese and 8% Russian.

The CCC began using Language Line services in March 2008. CCC data indicate the top three languages serviced were Spanish 88.8 %, Russian 5.1 %, and Chinese 5.5%. During this seven-month period, CCC utilized Language Line to communicate with 28 callers in Haitian Creole, 17 Korean and 1 in Italian.

Commencing in September 2008, NYCHA has also been collecting data regarding language needs of Section 8 voucher holders who have expressed an interest in moving into NYCHA's city/state developments. The data are consistent with NYCHA's previous findings that Spanish, Chinese, and Russian are the most frequently encountered languages of LEP persons NYCHA serves.

In order to continue providing appropriate language services to LEP populations NYCHA encounters, NYCHA will do the following:

- ATAD will begin capturing language information at the eligibility interview for any applicant for public housing or Section 8 who required language services. (February 2009)
- Annual Review Booklets for public housing and Section 8 voucher holders will be modified to include language assistance questions that will permit current residents and voucher holders to identify their need for language assistance services. (Spring 2009)
- NYCHA will modify its applications for public housing and Section 8 to include language assistance questions that will permit applicants to identify their need for language assistance. (December 2009)
- NYCHA will develop a system to compile data and track the LEP population it serves or is likely to serve. (December 2009)

Importance of Program

NYCHA has focused, and will continue to focus, its efforts on providing language services in the areas of eligibility for public housing and section 8 and termination of these benefits, because these aspects of NYCHA's operations are most likely to have the greatest impact on LEP persons.

Resources

NYCHA utilizes the following resources to provide language assistance services:

- Housing Assistants (Bilingual)
- Staff interpreters at LSU and the Impartial Hearing Office
- Language Bank-200 employee volunteers,45 languages
- Language Line (Contract vendor)
- Citywide Volunteer Language Bank

IV. IMPLEMENTATION PLAN LOGISTICS

The LAC will oversee the implementation of the Language Assistance Plan.

NYCHA has identified the following milestones to enhance its current delivery of language services:

- Established Language Access Committee to assess language needs and recommend implementation strategies for language services (2006 to December 2008)
- Ongoing identification of vital documents and translation into languages encountered (on going)
- Contracted with Language Line to provide interpretation services at CCC (March 2008).
- Designate Department Language Assistance Liaisons from departments listed in section I to work with LAC to coordinate and facilitate the delivery of language services and address issues related to language services (January 2009).
- Update NYCHA's existing Language Assistance Services Standard Procedure to include guidelines and standards for employees who provide direct services (April 2009).
- Identify staff requiring language assistance training and establish tentative training schedule based on importance of service provided (December 2008)
- Add language questions to applications for public housing and Section 8 (December 2009)
- Add language questions to public housing annual review and Section 8 recertification booklet. (Spring 2009)
- Disseminate Language Identification Cards during training, to be used in each department after training has been completed. (April 2009 through December 2010)
- Office of Professional Development and Training will develop training curriculum on NYCHA's policy and Standard Procedure for providing Language Assistance Services for staff providing direct services. (March 2009)
- Train approximately 2000-2500 staff involved in providing services to residents, applicants and voucher holders on NYCHA's Language Assistance policy and Standard Procedure for delivering language assistance services to the LEP population NYCHA serves. Training for staff will commence April 2009 and is expected to be completed through December 2010.

The tentative training schedule for NYCHA Departments is as follows:

Department of Equal Opportunity- April-June 2009
Applicant Appeals Unit- April-June 2009
Office of Impartial Hearings –April-June 2009
Application and Tenancy Administration Department- June – August 2009
Leased Housing Department- June-August 2009
Centralized Call Center August –September 2009
Operations Management
Queens/Staten Island- October – December 2009
Manhattan- December 2009- February 2010
Bronx- February 2010 –April 2010
Brooklyn- April 2010-June 2010
Community Operations- June 2010- August 2010
Social Services - June 2010- August 2010
Resident Employment Services- August 2010- September 2010
General Services Operators -September 2010
Make-up sessions- October –December 2010

- Develop a tool to survey LEP persons who visit NYCHA’s applications offices throughout the city. (December 2010)

V. SERVICE PROVISION PLAN

A. Provision of Interpreter Services (Oral Language Services)

NYCHA provides and will continue to provide interpretation services through LSU, Language Bank, and Language Line (see section II). NYCHA provides interpretation services for the following activities, including but not limited to the following:

- Eligibility Interview
- Rental Interview
- Voucher Briefing
- Tenant/Applicant Hearings
- Annual and Interim Recertification

NYCHA established a Centralized Call Center in November 2007 to assist in the prompt provision of emergency services and the prompt scheduling of routine repairs for public housing residents. As of March 2008, Section 8 participants may also call the CCC to schedule appointments with NYCHA staff relating to their Section 8 rentals or transfer issues. To assist LEP callers the Centralized Call Center utilizes Language Line.

Current Section 8 voucher holders who wish to reside in a Section 8 unit in one of NYCHA’s City/State development may call ATAD to register or ask questions. LEP callers are assisted through Language Line.

NYCHA’s policy and standard procedure will discourage the use of informal interpreters such as family members, children or friends, particularly where

important interests such as eligibility for or termination of public housing or Section 8 benefits are involved. However, a LEP person may utilize an adult family member or friend (18 years of age or older) as an interpreter after s/he is informed about the availability of free language assistance services and chooses not to use them.

NYCHA will begin to use its Language Identification Card, which asks “Do you speak” in 28 languages in order to facilitate LEP self-identification as training is completed in each department. (See section III for tentative training schedule.)

B. Translation of Written Material

Based on the HUD Guidance, “vital documents” are documents that solicit or contain information for establishing or maintaining eligibility to participate in NYCHA’s programs or services, or documents that create or define legally enforceable rights or responsibilities. NYCHA’s vital documents have been or will be translated. NYCHA’s vital documents include, but are not limited to:

- Applications to receive services, benefits or participate in programs or activities
- Annual Reviews/Income Recertifications
- Notices of public hearings
- Notices containing information regarding eligibility or participation criteria
- Notices advising of free language assistance
- Leases
- 30- day Notices to Vacate
- Notices of rights, denial, loss, or reduction of benefits or services
- Hearing notices
- Discrimination complaints
- Resident Grievance Procedure

On an ongoing basis the Language Services Unit is translating vital documents in Spanish, Chinese and Russian, the most frequently requested languages for language services at NYCHA. (See section III for assessment of frequently encountered languages)

NYCHA has reviewed and continues to review its documents to identify vital documents to be translated. (see section IV) To date approximately 126 vital documents have been translated into Spanish, and approximately 60 have been translated into Chinese and Russian.

NYCHA provides notices on vital documents of the availability of the document in Spanish, Chinese, and Russian. Beginning February 2009 NYCHA will include on vital documents a tagline in Korean, Haitian Creole, and Italian that an oral interpretation of the document is available, with contact information on requesting an interpretation.

C. Quality Assurance

To ensure the quality of translations, NYCHA uses a second translator to review the work of the primary translator. LSU also created a glossary of NYCHA terminology that is provided to volunteers and contract vendors for use when translating NYCHA documents.

D. Plain Language

The New York City Housing Authority's Human Resources Department's Professional Development and Training division offers an *Effective Writing* program that incorporates the principles of plain writing. The class emphasizes making writing "Clear," "Concise," "Correct," and "Complete" (the four C's of Writing). The class addresses issues such as identifying your audience, and incorporates many of the recommendations in the *Easy-to Read –NYC, Guidelines for Clear and Effective Communication*. The Effective Writing program is available to all NYCHA employees, and is mandatory for all newly promoted supervisors, assistant managers and superintendents.

E. Website

NYCHA uses its website to make information available in Spanish, Chinese and Russian. Current postings available in these three languages include the *Resident's Handbook*, executive summaries of the Agency's annual plans, *Plan to Preserve Public Housing*, *A Home to be Proud Of*, *Community Service Policy Summary*, NYCHA's *Fair Housing Non-Discrimination Policy Guide*, *Applying to Public Housing*, *Guide to Section 8 Housing Assistance Program*, *Guide to Section 8 Housing Assistance Program*, and *Frequently Asked Questions*. The website is periodically updated to include translations of new information for residents, applicants and voucher holders, such as the recent Section 8 City-State Transition program.

F. Signage at Public Service Centers

As departments complete the training of staff on language assistance services NYCHA will post notices on the availability of free language assistance services in the location where the department serves members of the public, NYCHA residents, or Section 8 participants. (See section IV for training schedule)

NYCHA will use the Citywide standard for the Welcome signs at NYCHA's walk-in facilities.

G. Outreach

Each April, as part of National Fair Housing Month, NYCHA includes information on language assistance services in an article in its official newspaper, the

“*NYCHA Journal*,” which is published monthly and features news on events, celebrations, health programs and other NYCHA happenings. This newspaper is published in Spanish and English, and is distributed to all NYCHA households. It is also available in both English and Spanish on our website. The NYCHA Journal is also distributed to 12,000 NYCHA employees, and mailed to elected officials. The Journal also goes to select press, city agencies and other interested parties.

Fair housing brochures in English, Spanish, Chinese and Russian include information on the services of the LSU and are distributed at annual conferences, housing expos, NYCHA’s annual Town Hall meetings and Public Hearings. These brochures will be revised to include notice of the availability of free language assistance services.

Beginning July 2009 NYCHA will conduct outreach on its free language assistance services through articles in the “NYCHA Journal”, as well as in the development newsletters. NYCHA will also provide information on free language assistance services on the Residents’ Corner webpage on our website.

VI. TRAINING

DEO's Office of Employment and Fair Housing Investigations is responsible for investigating claims of employment and fair housing discrimination and conducting mandatory training of all NYCHA staff on NYCHA EEO and Fair Housing policies. This training includes the Fair Housing Act’s prohibition against national origin discrimination and NYCHA’s commitment to reduce language barriers that may preclude meaningful access by LEP persons to its programs and services.

NYCHA’s Office of Professional Development and Training is currently developing a curriculum to provide training for new and existing employees (front-line, supervisory and managerial staff) who provide direct services to residents, applicants and voucher holders. Training will include:

- An overview of NYCHA's Language Assistance Policy and Standard Procedure
- How to use NYCHA's Language Identification Card to identify the language in which the customer needs assistance.
- How to access language services through bilingual staff, LSU and Language Bank.
- How to work with an interpreter.
- Cultural sensitivity

In addition, NYCHA Language Bank volunteers must participate in workshops to enhance their skills. These workshops will be expanded to include additional information on NYCHA’s Language Access Policy and Procedure. These workshops will be made available to bilingual staff hired to provide language assistance.

April 2009, LSU will make available through NYCHA’s intranet glossaries and frequently used NYCHA terminology in Spanish, Russian and Chinese.

VII. RECORD KEEPING AND EVALUATION

LSU currently tracks the following information regarding service requests it receives: the requesting department/development or city agencies, direct calls from applicant/resident; language; type of service, and who provided the service; (e.g. bilingual staff, LSU, volunteer or vendor). LSU also track translation requests.

Language Liaisons in conjunction with the LAC and NYCHA's IT Department and other departments will devise additional methods of tracking language needs and languages encountered.

NYCHA will also continue to assess language proficiency of LSU staff members, bilingual employees hired to provide language assistance and Language Bank volunteers. (see section VI)

The LAC will work with the Department Language Assistance Liaisons to monitor and ensure NYCHA's compliance with its obligations to provide language assistance services and address issues related to language services.

VIII.RESOURCE ANALYSIS AND PLANNING

NYCHA currently utilizes the following resources to provide language services to LEP persons:

LSU has 6 staff interpreters/translators – 2 Spanish, 2 Chinese and 2 Russian. Two Spanish interpreters are assigned to the Impartial Hearing Office.

NYCHA's volunteer Language Bank consists of 200 employee-volunteers who provide language services in 45 languages as follows: 94 Spanish, 36 Chinese, 24 Russian, and 44 in other languages.

Housing Assistants (Bilingual) 32 –Spanish 24, Chinese 3, Russian 4, 1 French Creole.

NYCHA's Centralized Call Center utilizes Language Line.

Applications and Tenancy Administration Department utilizes Language Line for its Section 8 Transition Program to permit current LEP Section 8 voucher holders to register their interest in renting an apartment with a Section 8 voucher at one of NYCHA's City or State developments.

NYCHA utilizes the Citywide Language Bank for languages not available in NYCHA's Language Bank.

NYCHA will also explore the possibility of establishing internship programs with local colleges offering translation and interpretation services programs.