



Language Access Implementation Plan

Agency name: New York City Department of Housing Preservation and Development

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Signatures

Robert Turbiak

Robert Turbiak
Director of Operations Human Resources
NYC Department of Housing Preservation and Development

Date: June 10th, 2024

Adolfo Carrión Jr.

Adolfo Carrión Jr.
Commissioner
NYC Department of Housing Preservation and Development

Date: June 12, 2024

Section 1. Agency Mission and Services

The Department of Housing Preservation and Development's (HPD) mission is to promote quality and affordability in the city's housing, and diversity and strength in the city's neighborhoods.

We do this by maintaining building and resident safety and health, creating opportunities for New Yorkers through housing affordability, and engaging New Yorkers to build and sustain neighborhood strength and diversity. Because every New Yorker deserves a safe, affordable place to live in a neighborhood they love.

HPD works to ensure the physical safety and quality of homes across the city to maintain the health and well-being of those who live in them. Examples of our work:

We enforce the New York City Housing Maintenance Code on behalf of tenants, inspecting homes for housing quality and safety, training and educating property owners, bringing cases in Housing Court, requiring emergency repairs, and more. Learn more about [Code Enforcement](#).

We work to ensure that existing affordable housing stays affordable and in good physical condition into the future by helping owners stabilize their buildings with tax-exemptions, repair loans, outreach, and education; and working with qualified community partners to rehabilitate properties in distress. Learn more about [Home Repair and Preservation Financing](#).

Our investment in affordable housing is also an opportunity to achieve better health outcomes for residents especially in a changing climate. We set high standards for designing quality, healthy, sustainable, equitable, and resilient affordable housing and help property owners make much needed repairs. Learn more about our [Design Guidelines](#).

Section 2. Agency Language Access Policy

The goal of all 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 application systems, and essential documents into the most 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 to identify documents that are most frequently distributed to the public that contain important information regarding the provision of basic city services. In addition, the Agency will continue to provide language services in the ten designated Citywide languages. Additionally, by pulling quarterly data from our Language Access services HPD can make the determination to expand beyond the ten designated Citywide languages as needed.

Section 3. Language Access Needs 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 Department of City Planning's (DCP) Census of 2022, there are more than 3 million foreign-born residents from over 200 different countries who reside in New York. Nearly one-half of all New Yorkers speak a language other than English at home and around 1.8 million persons are not English proficient.

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.

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

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

As discussed above, HPD provides a wide range of programs and services. The nature of these programs and services varies by office and division. In 2023, HPD was able to provide telephonic translation services to 1,149 members of the public via our Language Line Contract.

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 dedicated for use by specific programs, and others which are available for use throughout the Agency. HPD has two multi-year contracts for document translation, video 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. 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 2024.

Section 4. Notice of the Right to 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.

Section 5. Provision of Language Access Services

A. Interpretation

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.

B. Translation

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 by use of our vendor Language Line, 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 documents available in 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.

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.

C. Digital 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.

D. Emergency communications

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), so translation requests can be made.

Section 6. Resource 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.

A. Bi-/multi-lingual staffing

HPD's Bi/multi-lingual staff are advised to utilize our Language Access Contracts first when talking to members of the public or to utilize the Language Bank. If they are unable to access those resources, they should reach out to a staffer who speaks the requested language if possible and assist the members of the public. The staffer should then create a record of what transpired so that we have an accurate account of events.

B. Language service vendor contracts

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.

Vendor name	Procurement method	Purpose of the contract	Language(s) provided by the vendor	Period of contract	Total award amount of contract
Language Line Services INC.	Task Order	Document Translation Services	Over 200 language translation services are provided by this vendor	4/18/2022 to 5/17/2025	\$425,000.00
Language Line Services INC.	Task Order	Telephonic and Video Interpretation Services	Over 200 language translation services are provided by this vendor	4/18/2022 to 4/17/2025	\$196,000.00

C. Partnership with CBOs

Currently as part of the current Language Access Plan for HPD we do not partner with CBO's since our current contracted vendors provide Language Access Support for our agency needs.

Section 7. Training

HPD will develop a general training curriculum for all new and existing applicable employees in FY 25 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, who then tracks staff and division participation.

Example:

Training topic	Target staff	Training method & frequency	Trainer
What is Language Access	Public Facing Staff	In-person and Virtual to be conducted quarterly	Robert Turbiak
How to utilize our Language Access Contracts	All Staff	In-person and Virtual to be conducted quarterly	Robert Turbiak

Section 8. Continuous Improvement Planning

A. Data collection and monitoring

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B. 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.

Section 9. Goals and Actions Planning

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 FY 25 HPD will be developing a working group among each program area to:

- 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 2024 Language Access Plan:

Priority Language Access Need	Root Cause(s)	Language Access Goal
<i>In-person Interpretation Contract</i>	<i>Currently In process</i>	<i>To have registered in FY25 and for term of three years</i>