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## Language Access Implementation Plan

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (or LEP).

Agency name: Landmarks Preservation Commission

Language Access Coordinator name: Courtney Clark Metakis

Language Access Coordinator title: Director of Communications

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This Plan includes information about:

1	Agency mission and services	
2	Agency language access policy	
3	Language access needs assessment	How the agency assesses the language access needs of the people it serves
4	Notice of the right to language access services	How the agency notifies the public about their right to language access services
5	Provision of language services	What language services the agency provides
6	Resource planning	How the agency ensures that it has the internal and external resources to provide language services
7	Training	How the agency trains the staff to provide language services
8	Continuous improvement planning	How the agency ensures ongoing improvement of language access
9	Goals and actions planning	How the agency will put the plan into action

*[Please hyperlink the table of content to each section for easy navigation]*

## Signatures

*[NOTE: In this section, include the signature of the LAC and the agency head/ commissioner, and attach LAIP. The signatures signify that agencies will take necessary steps to advance equity and inclusion of individuals with LEP.]*



7/1/24

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[Courtney Clark Metakis]  
[Director of Communications, Landmarks Preservation Commission]

Date



7/1/24

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[Sarah Carroll]  
[Chair, Landmarks Preservation Commission]

Date



## Section 1. Agency mission and services

### **Mission and Background**

The Landmarks Preservation Commission (LPC) is the New York City agency responsible for protecting New York City's architecturally, historically, and culturally significant buildings and sites by granting them landmark or historic district status and regulating them after designation. Potential landmarks and historic districts are identified by LPC through surveys and other Commission-initiated research. This may include properties suggested by members of the public.

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 who are appointed by the mayor and a full-time staff of approximately 80 preservationists, researchers, architects, historians, attorneys, archaeologists, and administrative employees.

There are more than 38,000 designated buildings and sites in New York City, most of which are located in 158 historic districts and historic district extensions in all five boroughs. The total number of protected sites also includes 1,464 individual landmarks, 123 interior landmarks, and 12 scenic landmarks. LPC evaluates and considers dozens of potential landmarks and historic districts each year. Commissioners and Preservation staff approve over 12,000 applications for work on designated properties each year.

### **Direct Services**

As the agency responsible for protecting the City's architecturally, historically, and culturally significant buildings and sites, LPC evaluates and considers dozens of potential landmarks and historic districts each year. The landmark designation process includes outreach to property owners, public meetings and public hearings. During public hearings, anyone can testify about a proposed designation before the Commission. The Commission also works with elected officials and community groups to ensure these historically significant sites are preserved for future generations.

In order to preserve its designated buildings and sites, LPC regulates changes made to their significant features. This includes reviewing permit applications and issuing permits for certain kinds of work. For more information on the types of work that require permits go to [LPC's permit types page](#).

LPC's offices are located in 253 Broadway, Manhattan. This is where public hearings and meetings are held. Preservation staff generally meet with applicants virtually, but if in-person is requested, are also available to meet with applicants at LPC's offices. All applications are now accepted via LPC's web-based permit portal, Portico; LPC also has computers available in the agency's offices at 253 Broadway should applicants need help submitting via Portico.

Currently, there are four main staff members who serve as the front line with the public: the Receptionist, the Public Information Officer, the Director of Intergovernmental and Community Affairs, and the Intergovernmental and Community Affairs Coordinator.

- The Receptionist is the first point of contact for visitors.
- The Public Information Officer handles cold calls from the public in addition to questions from architects, expeditors, and property owners regarding permits and applications.
- The Director of Intergovernmental and Community Affairs and the Intergovernmental and Community Affairs Coordinator receive correspondence and calls from the public, elected officials, and advocacy groups regarding proposed projects.

The following LPC departments offer direct services to the public:

#### Preservation Department

The Preservation Department reviews permit applications for work on designated properties and communicates with a variety of applicants, including property owners, business owners, architects, contractors, and attorneys.

#### Enforcement

The Enforcement Department investigates complaints about work that may have been performed without LPC permits or in noncompliance with LPC permits and communicates with civic and neighborhood groups, property owners and general members of the public.

## Section 2. Agency language access policy

The Landmarks Preservation Commission (LPC) is committed to providing equitable service to the population it serves, including persons with Limited English Proficiency (LEP). LPC has taken and continues to take reasonable steps to ensure LEP persons have access to the agency's programs and services. LPC's Language Access Provision Plan, which has been in place since 2009 in compliance with Executive Order 120 of 2008, outlines how the agency provides translation and interpretation services on an as-needed basis.

In order to adhere to Local Law 30 of 2017, which expands on Executive Order 120, LPC has developed a Language Access Implementation Plan (LAIP) to reflect the new provisions required under LL30, which include new designated citywide languages. This plan will ensure New York City's diverse population continues to have meaningful access to all of the agency's programs and services.

LPC will update its Language Access Implementation Plan at least every three years and post it on the agency website.

The Director of Communications, who is the agency's Language Access Coordinator (LAC) will be responsible for overseeing the implementation of the plan and revising it accordingly. The LAC works alongside LPC's Disability Service Facilitator (DSF), Stephanie Yang, to ensure LPC's language access policy aligns with LL12 Disability Access Plans, including coordinating during development of those plans.

**Section 3. Language access needs assessment**

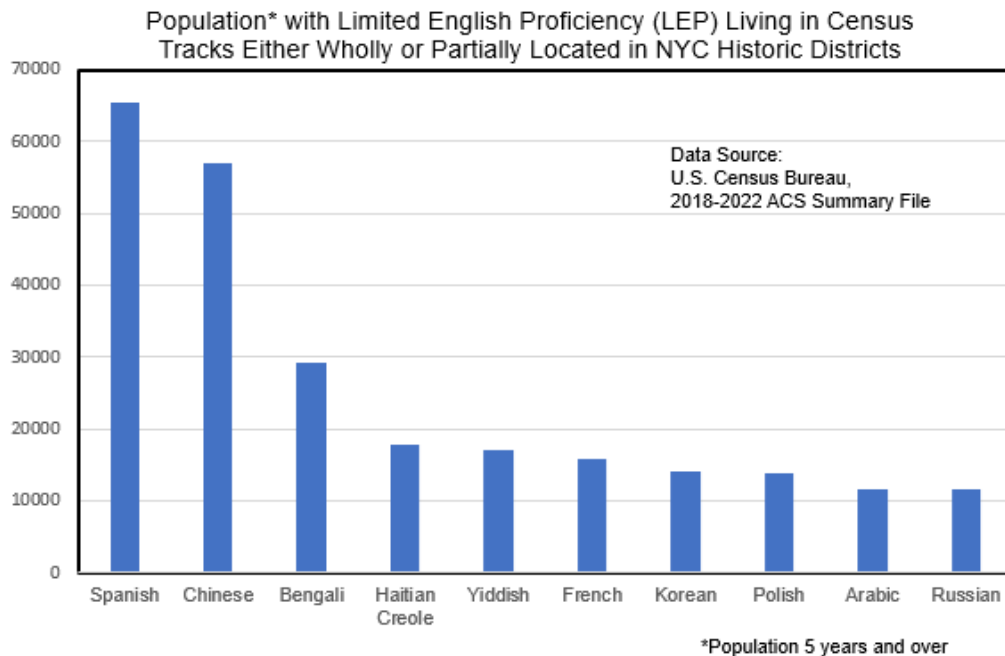
LPC used the “four-factor analysis” to determine the language access needs of the population it serves; this plan is based on this analysis.

**Factor 1: Number or Proportion of LEP Individuals**

LPC used existing agency data and information provided by the Mayor’s Office of Operations to evaluate the language access needs for LEP persons served by the agency.

According to data provided by the Mayor’s Office of Operations and the Mayor’s Office of Immigrant Affairs (MOIA) from the U.S. Census American Community Survey and the Department of Education, the top 10 languages spoken by LEP persons New York City are: Spanish, Chinese, Russian, Bengali, Yiddish, Haitian Creole, Korean, Arabic, French, and Polish. Since LPC works in all five boroughs, we will use these most common languages for any large-scale translations or interpretation needs unless an alternate language is identified for a specific area.

LPC also conducted its own language analysis to determine the primary languages spoken other than English in its designated historic districts. This language analysis utilized 2020 U.S. Census Bureau American Community Survey language data at the census tract level. The Census tracts analyzed were either wholly or partially within the boundaries of designated historic districts. The ACS dataset – Language Spoken At Home By Ability To Speak English For The Population 5 Years Old and Over – enabled LPC to determine the most commonly spoken languages. The population numbers for each language group were totaled and the top 10 languages as identified by the city were isolated and analyzed as a group. See chart below.



## **Factor 2: Frequency of Contact with Agency**

There are more than 38,000 designated buildings and sites in New York City, most of which are located in 158 historic districts and historic district extensions across all five boroughs. The Landmarks Preservation Commission helps preserve these landmark properties by regulating changes made to these buildings and sites. This includes reviewing permit applications and issuing permits for certain kinds of work on designated properties. For more information on the types of work that require permits go to [LPC's permit types page](#). As such, LPC staff communicates with a variety of permit applicants, including property owners, business owners, architects, contractors, and attorneys. LPC also receives and responds to correspondence and calls from the public, elected officials, and advocacy groups regarding proposed projects.

On most Tuesdays each month, LPC holds public hearings and meetings, which are open to all members of the public. Public hearings provide an opportunity for the public to testify in person before the Commission on proposed permit applications for work on landmark properties, or on proposed landmark designations. Public meetings provide an opportunity for the public to observe subsequent discussion amongst the Commissioners on proposed permit applications for work on landmarked properties or proposed landmark designations after the hearing is closed.

Each year, the Commissioners and Preservation staff approve over 12,000 applications for work on designated properties. LPC also evaluates and considers dozens of potential landmarks and historic districts each year.

## **Factor 3: Nature and Importance of the Program:**

Landmark designation affects communities, including property owners and business owners. It is very important for LPC to be able to communicate effectively with all stakeholders involved when discussing the potential designation of a property or consult with them regarding applications to make changes to a landmarked building. Lack of language services may result in inability to get permits for work or in work that is in non-compliance with the Landmarks Law, resulting in the issuance of more Notices of Violation and unnecessary fines. Language should not be a barrier to protecting the city's cultural and architectural heritage.

## **Factor 4: Resources Available**

LPC will use agency contracted services to provide language services on an as-needed basis. The agency has secured contracts with vendors to translate its documents on an as needed basis, and for in-person and telephonic interpretation needs.



#### Section 4. Notice of the right to language access services

*Members of the public with LEP must know that the resources exist in their language and that they have the right to language access service. Agencies should have a plan to inform the public of the availability of language access services and how the members of the public with LEP can access them.*

Reaching out to property owners is an integral part of the landmarks process. When LPC sends correspondence to a property owner notifying them of the agency's interest in their property, the letters include an insert with a translated tagline 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/meetings. Notices for public hearings/meetings which include the agenda are published on the City Record and posted on the agency website. They are also sent to community boards, applicants, and property owners by email. The notices include a tagline regarding the availability of interpretation services translated into all 10 languages.

LPC also has information on the website and signage at the front desk notifying customers of language access.

## Section 5. Provision of language access services

*Language access services needs vary from agency to agency. Agencies should consider using a combination of language access services to provide meaningful access to members of the public with LEP.*

### A. Interpretation

- In-Person Interpretation: LPC uses agency contracted services to provide in-person interpretation on an as-needed basis. The agency has a contract with Accurate Communications, Inc.
- Telephonic Interpretation: LPC is equipped to provide telephonic interpretation in at least 100 languages, including the designated citywide languages. The agency has a contract with Language Line Services, Inc. for all telephone-based interpretation services.
- The Commission's Director of Communications, who serves as the Language Access Coordinator (LAC), manages translation needs and requests. Staff can also access interpretation services directly through the vendor. The LAC is responsible for training all staff so that they are aware of the agency's interpretation services and on how to request translation services and distribute language identification cards to staff so that they can identify the primary language of LEP individuals.
- The agency will provide interpretation services for walk-in applicants (in-person or over the phone, whichever is fastest), for applicants who call into the agency (telephonic interpretation), during in-person public hearings/meetings, and outreach events (in-person interpretation). and virtual hearings/meetings (telephonic interpretation).
- When telephonic and in-person interpretation services are provided, the agency will request feedback from staff and LEP individuals on the quality of the service.
- Any member of the public requiring language assistance services in order to participate in the hearing or the meeting can contact LPC so that the agency can arrange for an interpreter to be present. This information is included in the agenda in English and the 10 designated citywide languages. The LAC and/or Public Information Officer would reach out to the contracted vendor to make all the necessary arrangements.
- LPC has multilingual signage posted near the reception desk and in the public hearing room area notifying customers of the availability of translation and interpretation services. LPC also has Language Identification Cards at the front desk to help LEP individuals identify their language by pointing to it. so that staff can call an interpreter for them. We also have a language identification guide for telephonic interpretation that includes around 100 languages. If their preferred language is not listed in the language identification posters, staff can contact our telephone interpretation vendor, and they can help identify the language. Staff are trained and receive information on how to connect with our contracted vendors and distributed language identification cards. Staff will take note of what language they point to and call the telephonic interpretation service directly. All staff have been provided Language Identification Cards, as well.
- LPC also has notifications for LEP-identified individuals that interpretation and translation services are available to them at no cost on its public hearing agendas, on the website and this information is included in letters to property owners during designation outreach.

- As part of their training, staff receive information to help them identify an LEP over the phone. For example, if they find that a caller does not speak English or is having trouble speaking English, they should conference in an interpreter. Staff are provided information for the vendor. If they cannot identify the language, Language Line has the capacity to assist by phone and identify an interpreter who can assist.

## **B. Translation**

- The Commission's Director of Communications, who serves as the Language Access Coordinator, manages translation needs and requests. The LAC is responsible for coordinating any contracts for translation and interpretation, with the LPC Executive Director, the Director of Finance and Operations and the Director of Administration.
- LPC uses agency-contracted services (Accurate Communications, Inc) to translate documents on an as needed-basis. The agency also uses on a volunteer basis bilingual staff who are native speakers of the language and knowledgeable in the subject matter. For example, LPC will use preservation staff (when available) to translate and review content related to regulation and permitting, which are their areas of expertise.
- Previously, LPC determined that its most commonly distributed documents are its permit application forms and Historic Preservation Grant Program forms. The agency recently moved to an online permit portal and removed the application forms from its website. The permit portal offers translated text into the top 10 languages spoken by LEP persons in New York City. There are two Historic Preservation Grant Program forms: the Homeowner Application Form and the Not-for-Profit Application Form, which LPC has recently translated the updated Historic Preservation Grant Program forms into Chinese (Simplified and Traditional) and Spanish, which are the top two languages spoken within its designated historic districts. Both the translated instructions and the translated forms are available on LPC's website. The agency plans to translate the LPC Public Hearing Process fact sheet and agency brochures used in community outreach into Spanish and Chinese and make them available to the public. LPC also plans to translate an updated glossary into Spanish and Chinese and make that available to the public on the agency's website.
- In addition to planned translation of the additional written materials noted above, LPC will provide translation services for any additional written materials or forms on an as-needed basis.
- The Commission's Director of Communications, who serves as the Language Access Coordinator, manages translation needs and requests. The LAC is responsible for coordinating any contracts for translation and interpretation, with the LPC Executive Director, the Director of Finance and Operations and the Director of Administration.
- The LAC is also responsible for training staff so that they are aware of the agency's translation services and on how to request translation services.

## **C. Digital communication**

- LPC previously distributed application for permits, but has recently transitioned to an online permit portal, Portico, which offers a webpage translation into 10 languages.
- Other application materials, including information about LPC rules and technical resources (including the agency Permit Application Guide) are also available on LPC's website, which offers the standard Google Translate services.

- LPC also provides information via emails to listservs whose users have provided email addresses via applications or opting into newsletter service. The newsletter is also available on LPC's website with Google Translate.
- LPC posts regularly to its social media channels (X, Facebook, Instagram, and LinkedIn, and utilizes Alt Text to ensure agency posts meet disability accessibility guidelines. Alt Text and other best practices are also utilized for images in the agency's newsletter as well as on its website homepage for press release announcements.
- LPC will use plain language to the extent that its use does not interfere with any technical language essential to LPC business. The Director of Communications will continue to review all materials incorporate the use of plain language where necessary and in any future documents.

#### **D. Emergency communications**

LPC does not provide emergency services so notifications would be limited to announcing agency hours and postponements. The Director of Communications, who is also the LAC, is part of the Continuity of Operations Plan (COOP) implementation team and will ensure that all communications that need to be made public are translated.

#### **Licenses, Permits and Registrations (LPRs)**

- LPC issues permits for work on landmark properties. In order to obtain these permits, applicants need to submit a permit application form. There are four application forms (the form used depends on the type of work): the Standard Application Form, the Expedited Certificate of No Effect Application Form, the FasTrack Application, and the Post-Approval Application Form. These forms are available electronically through our website and LPC currently accepts these forms electronically by email. LPC has translated the permit application forms, as well as the instructions for filing these forms electronically, into Chinese (Simplified and Traditional) and Spanish, which are the top two languages spoken within its designated historic districts. Both the translated instructions the translated permit application forms are available on LPC's website.

## Section 6. Resource planning

### **A. Bi-/multi-lingual staffing**

LPC strives to only use its contracted language service vendors, and does not rely on bi-/multilingual staff to provide translation for LEP individuals. LPC has instructed its staff to reach out to the LAC with any language access needs.

### **B. Language service vendor contracts**

LPC uses the agency-contracted services of Accurate Communications Inc. and Language Line Services, Inc for all language access needs, and has found these services to be sufficient to meet the needs of the agency and the LEP individuals it serves.

### **C. Partnership with CBOs**

LPC has not utilized the services of CBOs as the agency has found the agency-contracted services of its vendors to be sufficient.

## Section 7. Training

All LPC staff will be informed of language access policies and procedures.

- All staff will be informed of the availability of language access services for the public (translation and interpretation) and how they can obtain these services and reminded in writing at least once a year.
- All staff will be trained on how to respond to callers in need of language access services. The depth of training will depend on the staff person's contact with the public.
- All staff members with frequent in-person or telephone contact with the public will be trained on how to assist LEP individuals and how to respond to callers with language access needs. They will also be trained on how to use in-person and telephone interpretation services.
- All public-facing staff members will receive Language Identification Cards and instructions on how to use them, as well as contact information for all available interpretation services.
- All newly hired staff will receive information on language policies and procedures as part of their new hire orientation.
- Training includes how to identify LEP individuals, how to access translation and interpretation services and tips for communicating with individuals with language access needs.
- All staff will receive training at least once a year through in person or virtual training sessions. Attendance will be taken to keep track of who has received the training.

## Section 8. Continuous improvement planning

### A. Data collection and monitoring

LPC will track all requests for interpretation (telephonic and in-person) and will monitor the frequency of staff contact with LEPs through a Language Access 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 and inform the LAC. A logbook is kept with the Director of Communications (who is also the LAC) and the Public Information Officer. The LAC can also access vendor requests for interpretation services used by staff to track language and use.

The collected data on requests and feedback from these interactions will be used to inform the agency's decision-making processes and strategies for improving access for individuals with language access needs.

LPC will update its Language Access Implementation Plan at least every three years and post it on the agency website. The LAC will be responsible for overseeing the implementation of the LAIP and revising it accordingly.

### B. Language access complaints

LPC has a dedicated email for filing a complaint regarding the agency's language access ([access@lpc.nyc.gov](mailto:access@lpc.nyc.gov)). There is information on the website, within the agency's language access page, on how to file a complaint with the agency. The inbox for the language access complaints email is monitored by the Director of Communications (who is also the LAC), LPC's Disability Service Facilitator (DSF), and LPC's Public Information Associate, who reports to the Director of Communications. Language access complaints can also be made through 311. These complaints are sent to the Public Information Associate. The LAC is responsible for responding to these complaints.

LPC's Language Access page on the agency's website includes information on the public's right to file a language access complaint, as well as information about how to file a complaint.

The agency will log these complaints and respond in a timely fashion, making any necessary changes to the plan. The External Affairs Officer and Director of Communications will be responsible for receiving, tracking, and resolving Language Access complaints. The annual LAIP report will include a summary of complaints received during the year

## Section 9. Goals and actions planning

Within the range of services provided, LPC understands that resources and demand will dictate the provision of services in any given area.

The Commission's Director of Communications, who serves as the Language Access Coordinator, is responsible for coordinating any contracts for translation, interpretation, and signage with the LPC Executive Director, the Director of Finance and Operations and Director of Administration. The Public Information Associate will work with the Director of Communications to fully maintain and update the tracking of the plan needs and complaints.

Priority Language Access Need	Root Cause(s)	Language Access Goal
<i>Indicate the priority language access needs determined by your agency that, if resolved, will advance equity and inclusion of individuals with LEP</i>	<i>Identify the root cause(s) or contributing factors that explain the current LA needs.</i>	<i>Based on the priority needs and root causes, develop your agency's LA goals.</i>
Identify ways to improve the accessibility of LPC's online content - beyond using Google Translate (i.e., adding more multilingual content.)	Much of LPC's communications are now online vs. printed	Explore additional ways to add multilingual content within LPC's budget parameters.

Action Steps/ Milestones	Stakeholders	Timeline
<i>Based on each LA goal, identify action steps your agency will take in the next three FYs. Action plans can include new and current initiatives, which address root causes. Utilize bullet points if multiple actions are needed to achieve an LA goal.</i>	<i>Identify internal and/or external stakeholders that the agency will work with for each action steps.</i>	<i>Indicate the timeframe in which each action steps will be implemented.</i>
Translate LPC brochures for public outreach/engagement efforts into Spanish and Chinese	Director of Communications, Director of Intergovernmental Affairs	December 2024
Translate updated LPC glossary into Spanish and Chinese	Director of Communications, Deputy Director of Preservation	December 2024
Translate LPC Public Hearing Process fact sheet into Spanish and Chinese	Director of Communications, Deputy Director of Preservation	December 2024



