



LANGUAGE ASSISTANCE SERVICES IMPLEMENTATION PLAN

Revised April 2022

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

The New York City Housing Authority (NYCHA) is the largest public housing authority in North America. Its mission is to increase opportunities for low- and moderate-income New Yorkers by providing safe, affordable housing and facilitating access to social and community services.

NYCHA is home to 1 in 15 New Yorkers. Together, NYCHA public housing residents and Section 8 voucher holders occupy 11.6 percent of the city's rental apartments and comprise 6.6 percent of New York City's population. If NYCHA were a city, it would rank 33rd in population size in the United States, larger than Atlanta or Miami.

II. Overview of Language Assistance Program

It is the policy of NYCHA to take reasonable steps to ensure Limited English Proficient (LEP) individuals may effectively participate in and benefit from NYCHA programs and activities in compliance with the United States Department of Housing and Urban Development (HUD) notice entitled "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons," published on January 22, 2007, at 72 Federal Register 2732.

NYCHA's Language Assistance Services Standard Procedure, updated most-recently on February 7, 2019, provides procedures and staff responsibilities to ensure NYCHA's language access policy is achieved. Specifically, the standard procedure addresses, among other things: procedures for identifying LEP individuals with the assistance of language identification cards; staff procedures and supervisor responsibilities for obtaining translation or interpretation services for LEP individuals; the posting of notices in public areas within Development Management Offices, Borough Offices and waiting rooms informing LEP individuals of no-cost language access services; training requirements to ensure awareness of and compliance with NYCHA's language access procedures; language access reporting and oversight responsibilities; and a requirement that NYCHA's language access policies be reviewed every three years.

III. LEP POPULATION ASSESSMENT

Number or Proportion of LEP Persons Served or Encountered

According to periodic review of available language data by the New York City Mayor’s Office of Immigrant Affairs, the top three most commonly-encountered languages in New York City are (1) Spanish, (2) Chinese and (3) Russian.¹

Across NYCHA’s Public Housing and Section 8 programs, approximately 176,000 participants have provided their language preferences. Of those, 71% and 72% listed English as their preferred written and spoken language, respectively; 23% and 22% listed Spanish as their preferred written and spoken language, respectively; 4% listed Chinese as their preferred written and spoken language; 1% listed Russian as their preferred written and spoken language; and 1% listed a language other than English, Spanish, Chinese or Russian. Accordingly, the top three non-English languages reported by program participants mirror those identified by the City of New York. Figures 1 and 2 below illustrate the proportions of non-English written and spoken language preferences.

NYCHA conducted a public housing resident survey in the fall of 2021 which, among other questions, asked respondents to identify their preferred languages. Survey results confirmed NYCHA’s understanding of the language needs of residents and program participants, with nearly 72% of LEP respondents listing Spanish as their preferred language, nearly 22% preferring Chinese, 3% preferring Russian, and 3.5% preferring a non-English language other than Spanish, Chinese or Russian.



Figure 1: Proportion of available self-reported non-English written language preferences from current NYCHA program participants.



Figure 2: Proportion of available self-reported non-English spoken language preferences from current NYCHA program participants.

Frequency of Contact

NYCHA examines data from several sources, including the NYCHA Self-Service Portal translation function, NYCHA’s telephonic interpretation vendor and NYCHA’s Language Services Unit (LSU), to

¹ *Local Law 30 Report For Calendar Year 2020* (June 30, 2021), <https://www1.nyc.gov/assets/immigrants/downloads/pdf/CY2020-local-law-30-report.pdf>

determine the frequency with which NYCHA staff encounter LEP individuals. Between 2019 and 2021, NYCHA assisted approximately 460,000 individuals by providing in-person and over-the-phone interpretation and completed over 50,000 translations through in-house LSU document translation, NYCHA vendor translation or NYCHA’s Self-Service Portal translation function.

Figures 3 and 4 below illustrate the proportions of interpretation and translation services by language. Frequency data are in line with language preferences in Figures 1 and 2 above with Spanish, Chinese, and Russian the most frequently-encountered languages and a drop-off of encounters for languages outside the top three.

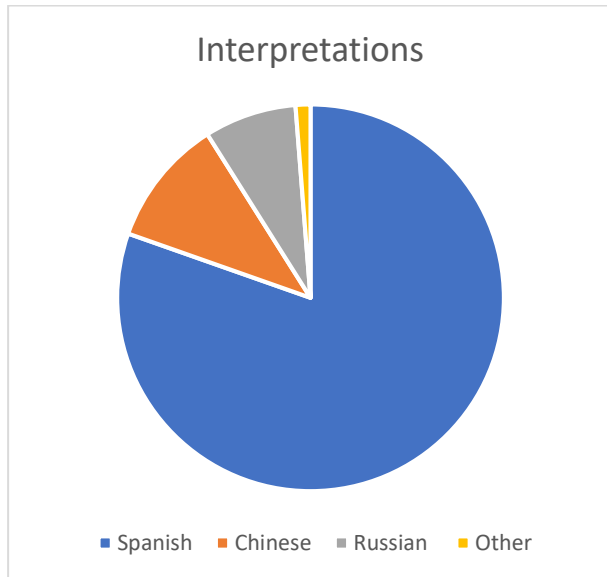


Figure 3: Proportion of interpretation services by language provided to LEP individuals for calendar years 2019 – 2021.

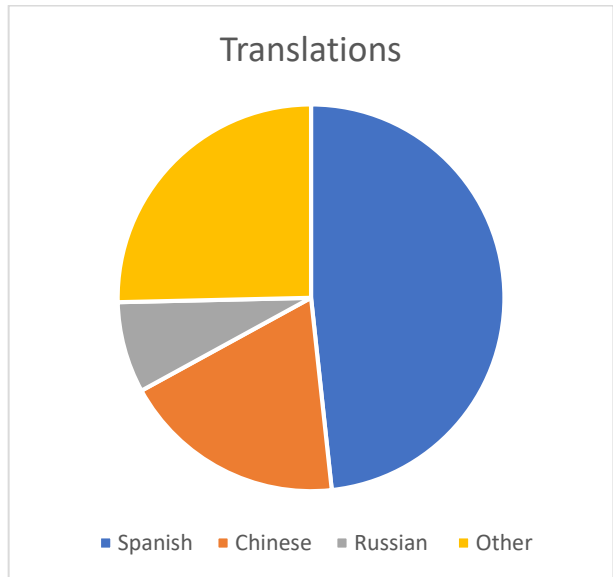


Figure 4: Proportion of translation services by language provided to LEP individuals for calendar years 2019 – 2021.

Nature and Importance of the Program, Activity, or Service Provided

To fulfill NYCHA’s mission, the agency’s language access policy requires identification and translation of “vital documents” that are critical for ensuring meaningful access to NYCHA’s major programs and activities by individuals generally and LEP persons specifically. Based on the LEP population NYCHA translates vital documents into Spanish, Traditional and Simplified Chinese, and Russian.

Available Language Access Resources

NYCHA’s Language Access Coordinator and the LSU oversee NYCHA’s language access policies. The LSU team is currently staffed by five full-time interpreters (one Spanish language interpreter, two Chinese language interpreters fluent in both Mandarin and Cantonese, and two Russian language interpreters), as well as one temporary Spanish language interpreter. In addition to providing translation and interpretation services, the LSU serves as a resource for staff in understanding and applying NYCHA’s language access procedures, coordinates requests from NYCHA departments for written translation and interpretation services, manages vendors providing language services and tracks language access metrics.

NYCHA relies on staff and vendors to provide language services including telephonic, remote meeting and in-person interpretation as well as paper, webpage or other electronic document translations. In

providing these services, NYCHA staff serve in one of three primary functions. First, bilingual staff may directly serve LEP individuals they or their departmental colleagues encounter. Second, staff may participate in NYCHA's Language Bank of volunteer interpreters and translators. Finally, departments that frequently encounter LEP individuals, including the Customer Contact Center, Department of Equal Opportunity, Office of Impartial Hearings, Operations, Public Housing Property Management, Leased Housing's Section 8 program, and Resident Economic Empowerment & Sustainability and Resident Engagement, assign a staff member to serve as the department language liaison. Liaisons serve as language access ambassadors for their department as well as identify vital documents requiring translation.

To supplement staff resources, NYCHA's language access vendors provide interpretation services as well as primary document translation and secondary quality assurance review. Through NYCHA staff and vendors, language services are available in well over 100 languages.

IV. RECORDKEEPING AND FOLLOW-UP

NYCHA tracks various metrics to monitor the agency's provision of language services. These metrics include LSU document translation and interpretation requests, telephonic interpretation and document translation vendor invoices, as well as language access complaints indicating a need for action by the Language Access Coordinator, including but not limited to, individual or group language access refresher trainings.

V. Public Awareness

In addition to postings in public areas informing LEP individuals of no-cost language services, NYCHA also posts language access policies and translated vital documents on the agency's website. Furthermore, NYCHA periodically includes information on language assistance services in articles in its digital newspaper for residents, *The NYCHA Journal*, as well as in its digital newspaper for employees, *NYCHANow*. These news sites are updated regularly with the latest information on NYCHA initiatives and other stories relevant to and about the NYCHA community.

VI. Implementation Goals

NYCHA strives to continually enhance services provided to LEP persons through, among other strategies, improving the standardization of language service delivery through staff training and reviewing available demographic data to ensure changes in the language needs of the families NYCHA serves or may potentially serve are identified and any needed changes in NYCHA's provision of language services implemented.

Moving forward, NYCHA will:

- Continue to update the Standard Procedure on a three-year cycle or as otherwise needed to reflect changes in law;
- Resume NYCHA staff language access training paused due to the COVID-19 pandemic, including new-hire training, biannual all-staff training, and individualized departmental refresher trainings upon departmental requests or in response to language complaints;
- Resume regular language liaison meetings and engagement, paused during the COVID-19 pandemic;

- Enhance the MyNYCHA resident app, currently available in English in Spanish, to include Chinese and Russian language options; and
- Execute and implement new contracts for expanded vendor-provided language services to enhance NYCHA's language access services, including through expanded remote service options.