

# Language Access Implementation Plan

**Language Access Coordinator:**  
Zodet Negrón  
Director of Communications

## Table of Contents

I. Agency Mission and Background	3
II. Direct Services	3
III. Agency Language Access Policy and Goals	4
IV. LEP Population Assessment	5
V. Provision of Language Access Services	6
VI. Service Provision Plan	7
VII. Training	8
VIII. Record Keeping and Evaluation	8
IX. Resource Analysis and Planning	9
X. Outreach and Public Awareness of Language Access Services	8
XI. Language Access Complaints	9
XII. Implementation Plan Logistics	9

## I. Agency 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 36,000 designated buildings and sites in New York City, most of which are located in 142 historic districts and historic district extensions in all five boroughs. The total number of protected sites also includes 1,413 individual landmarks, 120 interior landmarks, and 11 scenic landmarks. LPC evaluates and considers dozens of potential landmarks and historic districts each year. Commissioners and Preservation staff approve approximately 14,000 applications for work on designated properties each year.

## II. 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 the [permit applications page](#).

LPC's offices are located in the Municipal Building at One Centre Street, Manhattan. This is where public hearings and meetings are held, and where applicants drop off or pick up applications and permits. Preservation staff also meets with applicants at LPC's offices.

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

- The Receptionist is the first point of contact for visitors. The majority of visitors have pre-arranged meetings with LPC staff or are expeditors dropping off or picking up applications and permits.
- The External Affairs 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 receives 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.

### **III. Agency Language Access Policy and Goals**

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 will be responsible for overseeing the implementation of the plan and revising it accordingly.

## IV. LEP Population Assessment

LPC used the “four-factor analysis” to determine the language access needs of the population it serves.

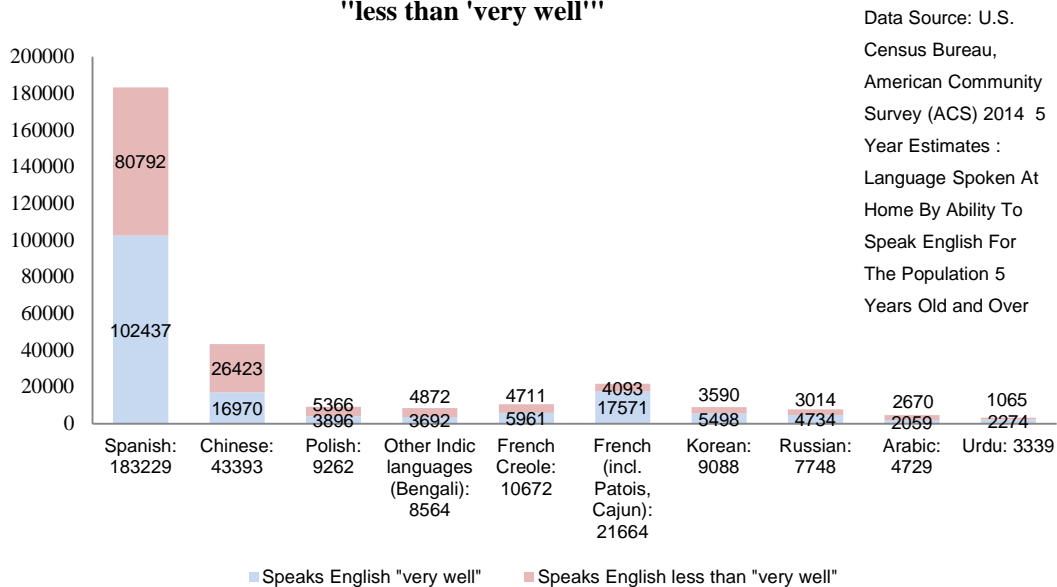
### Factor 1: Number or Proportion of LEP Individuals

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 LEPs in New York are: Spanish, Chinese, Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, 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 142 designated historic districts. This language analysis utilized 2014 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 with total tracts numbering 257. 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, as well as the percentages within those language groups that spoke English either very well or less than very well. 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.

**Top 10 Language Groups with Largest Population that Speaks English  
"less than 'very well'"**



The primary languages spoken by LEP individuals within LPC's historic districts are Spanish and Chinese, followed by Polish, other Indic languages (Bengali), French Creole, French, Korean, Russian, Arabic and Urdu.

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

There are more than 36,000 designated buildings and sites in New York City, most of which are located in 144 historic districts and historic district extensions in 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 the permit applications [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 more than 13,000 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 is working to secure contracts with vendors to translate its forms and any other future documents on an as needed basis, and for in-person and telephonic interpretation needs.

## V. Provision of Language Access Services

The Landmarks Preservation Commission (LPC) provides and will continue to provide language access services to LEP persons who require assistance.

- LPC will translate the agency's most commonly distributed documents into the 10 designated citywide languages.
- LPC will notify LEP-identified individuals that interpretation and translation services are available to them at no cost via signage and other forms of communication including but not limited to letters and notices.
- LPC will also provide telephonic interpretation in at least 100 languages, including the designated citywide languages.
- The Commission's Director of Communications will serve as the Language Access Coordinator. This person will be responsible for coordinating any contracts for translation, interpretation, and signage with the LPC Executive Director and Director of Administration.

## VI. Service Provision Plan

LPC is prepared to provide translation or interpretation on an as-needed basis.

- In-Person Interpretation: LPC will use agency contracted services to provide in-person interpretation on an as-needed basis. The agency is working to secure a contract with a vendor.
- Telephonic Interpretation: LPC is looking to secure a contract with a vendor, for all telephone-based interpretation services by the end of FY18.
- Translation of Written Materials: LPC will use agency contracted services to translate its application forms, which include the Application Form for a Work Permit, the Expedited Certificate of No Effect Application and the FasTrack Form into all 10 designated citywide languages. The agency will also translate the Historic Preservation Grant Program application for Homeowners and Non-Profits, as well as the Requests for Evaluation forms for Individual Landmarks and Historic Districts.

Additionally, notices for public hearings/meetings and correspondence sent to property owners of potential landmarks under consideration will include a tagline regarding the availability of interpretation services in all 10 languages. LPC is in the process of securing an outside vendor to translate these documents.

Until a point in time when LPC determines the need to translate any additional written materials or forms, translation services will be provided on an as needed basis.

LPC will contract with an outside vendor for any translations deemed necessary. The agency will utilize bilingual staff and seek assistance from MOIA and its citywide Volunteer Language Bank to supplement contracted services. They will be used to review translated documents.

- Signage: LPC has multilingual signage posted near the reception desk 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.
- Public Hearings: LPC public hearing and meeting notices will include language indicating that any person who requires an interpreter to attend or participate, can contact the agency for assistance. This will include a tagline translated into the 10 designated citywide languages.
- Website: LPC has Google Translate built into the website, which can translate the web content into the 10 designated citywide languages. LPC will add information on how to use the Google Translate feature. There are currently no plans for full-scale website translation since most of the content can be translated using this feature.
- Plain Language: LPC will use plain language to the extent that its use does not interfere with any technical language essential to LPC business. The agency is reviewing its most commonly distributed documents, including its permit application forms, as well as its website. The Director of Communications will receive plain language training and develop plain language standards for staff.
- Emergency preparedness and response. The agency will post notifications to the website that can be translated via the translate feature on the site in the event of an emergency. LPC does not provide emergency services so notifications would be limited to announcing agency hours and postponements.

## VII. Training

LPC's commitment to provide meaningful access to limited English proficient citizens requires a skilled and informed staff.

- All staff will be informed of LEP policies and procedures.
- All staff will be informed of the availability of LEP services for the public (translation and interpretation) and how they can obtain these services.
- All staff will be trained on how to respond to LEP callers. 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 LEP callers. 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 LEP policies and procedures as part of their new hire orientation.

## **VIII. Record Keeping and Evaluation**

LPC will conduct an annual review of its LAIP program based on systematic feedback from staff. The LAIP is a fluid document and will be updated as the need arises. LPC will review our language access policy at least once a year.

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; a logbook is kept with the External Affairs Coordinator.

## **IX. Resource Analysis and Planning**

LPC will use agency contracted services to provide language services on an as-needed basis. The agency is working to secure contracts for telephonic and in-person interpretation needs. LPC is also securing a contract to translate its forms and any other future documents deemed necessary.

Additionally, LPC will utilize bilingual staff and seek assistance from MOIA and its citywide Volunteer Language Bank to supplement these contracted services. They will be used to review translated documents.

## **X. Outreach and Public Awareness of Language Access Services**

Reaching out to homeowners is an integral part of the landmarks process. When LPC sends correspondence to a homeowner notifying them of the agency's interest in their property, the letter will 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 notice will include a tagline regarding the availability of interpretation services translated into all 10 languages.

LPC will post information on the website and signage at the front desk notifying customers of language access by the end of FY18.

## **XI. Language Access Complaints**

LPC outreach and signage regarding the translation and interpretation services will provide information on how to file a complaint regarding the agency’s language access. A web form for language access complaints will be developed and posted on the agency website by the end of FY18. The electronic or e-form can be translated into all 10 designated citywide languages via the translate tool on the website. The agency will log these complaints and respond in a timely fashion, making any necessary changes to the plan. Language access complaints can also be made through 311. 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.

## **XII. Implementation Plan Logistics**

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 will serve as the Language Access Coordinator. This person will be responsible for coordinating any contracts for translation, interpretation, and signage with the LPC Executive Director and Director of Administration. The External Affairs Officer will work with the Director of Communications to fully maintain and update the tracking of the plan needs and complaints.

The following parameters should be in place by the end of 2018:

<b>Language access goal</b>	<b>Milestones</b>	<b>Responsible staff</b>	<b>Deadline</b>
Create logs for tracking and annual review form for feedback from staff	Work with External Affairs to create logs and draft annual review form	Director of Communications	August 31, 2018
Secure contracts with interpretation and translation service vendors	Sign contracts	Director of Administration	September 30, 2018
Create tagline for insert	Draft language for tagline	Director of Communications	August 31, 2018

	Translate tagline Insert into letter and agenda notice template		September 30, 2018
Post new notice to public regarding availability of language services	Post at reception desk and public hearing area, as well as post language on website	Director of Administration Director of Communications	September 30, 2018
Create complaint email and develop e-form for the website	Work with DoITT to implement	Director of Communications	September 30, 2018
Staff training	Develop Training Schedule Training Distribute Language Identification Cards to front-line staff	Director of Communications Director of Administration	December 31, 2018
Simplify and translate Forms and make them available to the public	Work with vendor to redesign and edit forms to make them more plain language Send to Vendor for Translation	Director of Administration Director of Communications	December 31, 2018