

Language Access Implementation Plan

Language Access Coordinator:
Zodet Negrón
Director of Communications

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I. Agency Name and Agency Language Access Coordinator

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.

LPC's Language Access Coordinator is the Director of Communications, Zodet Negrón. This information can be found on the agency's Language Access page <https://www1.nyc.gov/site/lpc/about/language-access.page>.

II. Agency Mission and Background

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 37,000 designated buildings and sites in New York City, most of which are located in 151 historic districts and historic district extensions in all five boroughs. The total number of protected sites also includes 1,439 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.

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. Prior to the pandemic, this was where public hearings and meetings were held, and where applicants dropped off or

picked up applications and permits. Preservation staff would also meet with applicants at LPC's offices. LPC offices have been closed since the pandemic started in March 2020, and all agency staff have been working remotely. Public hearings and meetings are being held virtually via Zoom and all applications are accepted by email and permits issued electronically. The agency is currently working on its return-to-office plans.

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.

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, who is the agency’s Language Access Coordinator (LAC) will be responsible for overseeing the implementation of the plan and revising it accordingly.

IV. Agency language access accomplishments and progress on goals from previous LAIP

Since Local Law 30’s inception, LPC has secured contracts with interpretation and translation service vendors, has added a tagline to include in all of its public hearing/meeting agendas and property owner outreach letters translated into the 10 designated citywide languages, has posted new signage (language identification posters) regarding availability of language services in all prominent areas of the office, including reception and the public hearing room, has updated its permit application forms so that they are in plain language, and has trained staff on language access and how to connect with our contracted vendors and distributed language identification cards.

The agency has also translated instructions for participating in virtual public hearings and for filing applications electronically. For community outreach meetings, the agency provides interpretation services and translates presentations and materials when needed.

Language access goal	Update
Secured contracts with interpretation and translation service vendors	Completed
Created tagline and translated it into the 10 designated citywide languages to include in public hearing/meeting agendas and letters to property owners	Completed
Posted new notices (language identification posters) to public regarding availability of language services	Completed
Created an email for the public to submit language access complaints and post on the website	Completed
Trained staff on language access and how to connect with our contracted vendors and distributed language identification cards	Completed

V. LEP Population Assessment

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

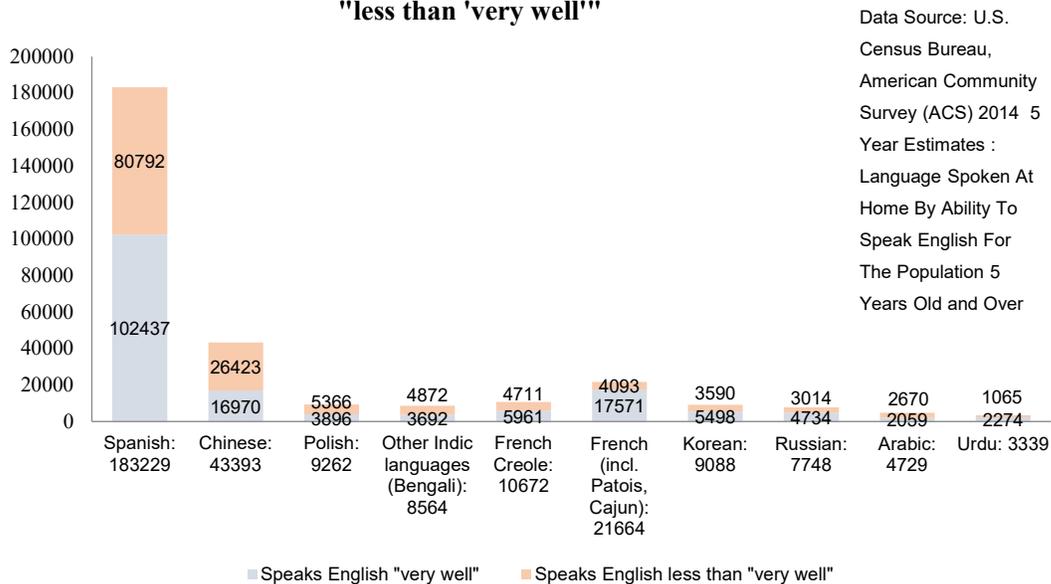
Factor 1: Number or Proportion of LEP Individuals

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 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 37,000 designated buildings and sites in New York City, most of which are located in 151 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 approximately 14,000 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.

VI. Provision of Language Access Services

Translation Services

- LPC uses agency-contracted services (Accurate Communications, Inc) to translate documents on an as needed-basis. The agency also uses 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.

- LPC determined that its most commonly distributed documents are its permit application forms and Historic Preservation Grant Program forms. There are four types of permit application forms: 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 now accepts these forms electronically by email. LPC has translated instructions for filing these forms electronically into Chinese and Spanish, which are the top two languages spoken within its designated historic districts. The agency plans to translate the instructions into the remaining languages this year and is also going to add information on the website translated into the top 10 languages instructing applicants to contact LPC if they need assistance filling out the form in another language. The agency is also translating the permit application forms into Chinese and Spanish this year. There are two Historic Preservation Grant Program forms: the Homeowner Application Form and the Not-for-Profit Application Form. LPC plans to translate these forms into Chinese and Spanish this year and is going to add information on the website translated into the top 10 languages instructing applicants to contact LPC if they need assistance filling out the form in another language. The agency is committed to translating all six forms into the remaining top 10 languages, pending additional resources.
- 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.
- 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.

Interpretation Services

- **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 LEPs on the quality of the service.

Language Access in Agency Communications

- **Public Hearings:** LPC public hearing and meeting notices include language indicating that any person who requires an interpreter to attend or participate, can contact the agency for assistance. This tagline is translated into the 10 designated citywide languages.
- **Outreach:** Property owner outreach letters include language indicating that any person who requires translation can contact the agency for assistance. This tagline is translated into the 10 designated citywide languages. During outreach meetings, LPC will provide interpretation services and translate presentation materials for LEPs on an as-needed basis. The agency will also translate flyers for community outreach events considering the population in those communities. The translated flyers are used in social media promotion as well.
- **Website:** LPC has Google Translate built into the website, which can translate the web content into the 10 designated citywide languages. LPC has information on how to use the Google Translate feature. LPC is aware that these automated translations are only an approximation and is committed to including more multilingual content on its website, including instructions on filing applications and other content related to the services it provides. The agency will also provide on-request translation of documents linked to our website, pending additional resources.

Plain Language Access

LPC will use plain language to the extent that its use does not interfere with any technical language essential to LPC business. The agency reviewed its most commonly distributed documents and determined they were the permit application forms. The agency worked with a vendor to simplify these forms and make them more plain language. The Director of Communications will continue to review all materials incorporate the use of plain language where necessary and in any future documents.

Policies and Procedures

LPC is committed to providing equitable service to the population it serves, including LEP persons. The agency takes reasonable steps to ensure LEP persons have access to the agency's programs and services. This includes providing language access services to those who need it at no cost to them.

The agency has Language Identification Cards to help LEP individuals and staff identify their language by pointing to it. Staff are also trained/receive information on how to provide these services.

Applicants

If an applicant requires a translation of a document or assistance in their language, staff would notify the LAC or the Public Information Associate to arrange for a translation of the document or an interpreter

over the phone to assist. Staff are also trained and receive information in order to arrange for a telephone interpreter themselves by conferencing them in.

Public Hearings

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.

Visits and In-person Meetings

There are language identification posters in prominent locations near the reception desk and the door as well as near the public hearing room that let people know in multiple languages that free interpretation service is available at no cost if they require it. All they need to do is point to their language, 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.

Telephone Calls

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.

Translation of Documents

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.

Notification of Free Interpretation Signage

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. All staff will have 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.

Languages beyond the Top 10

The primary languages spoken by LEP individuals within LPC’s historic districts are the 10 designated citywide languages. If the need arises to provide interpretation or translation into languages beyond the top 10, the agency will use its contracted vendors to communicate with LEPs who speak additional languages. LPC’s contracted vendors offer translation and interpretation services into languages beyond the top 10.

Emergency Preparedness and Response

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 instructions for filing these forms electronically into Chinese (Simplified and Traditional) and Spanish, which are the top two languages spoken within its 151 designated historic districts. The agency plans to translate the instructions into the remaining languages this year and is also going to add information on the website translated into the top 10 languages instructing applicants to contact LPC if they need assistance filling out the form in another language. The agency also plans to translate the forms into Chinese and Spanish this year and is committed to translating them into the remaining top 10 languages, pending additional resources.

VII. Training

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 and reminded in writing at least once a year.
- 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.

- Training includes how to identify LEPs, how to access translation and interpretation services and tips for communicating with LEPs.
- 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.

VIII. Record Keeping and Evaluation

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.

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.

IX. Resource Analysis and Planning

LPC will use agency contracted services to provide language services on an as-needed basis. The agency has contracts in place for telephonic and in-person interpretation needs and for translation of 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.

LPC's Other Than Personnel Service (OTPS) budget is \$600,000 and the current baselined amount for language services is \$6,000. This covers the contracts and the agency's commitment to translate its forms into the top two languages and instructions/notifications into the top 10 languages and providing telephonic interpretation. Language access will continue to be integrated into the agency's annual budget to cover the costs of its service contracts.

The agency will continue to explore ways to make its information and processes more accessible to all New Yorkers, pending additional resources.

X. Outreach and Public Awareness of Language Access Services

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.

XI. Language Access Complaints

LPC has a dedicated email for filing a complaint regarding the agency’s language access (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) and the 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.

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.

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, 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.

Language access goal	Milestones	Responsible staff	Deadline
Translate application forms into Spanish and Chinese and make them available to the public	Work with vendor to translate and format forms	Director of Communications	July 31, 2021
Translate instructions for e-filing applications into the remaining top 10 languages	Work with vendor to translate the instructions and post on the website.	Director of Communications	TBD pending launch of e-filing portal
Identify ways to improve the accessibility of LPC's website - beyond using	Work with vendor to translate the content and post on the website.	Director of Communications	December 31, 2022

Google Translate (i.e. adding more multilingual content.			
Translate application forms into the remaining designated citywide languages	Identify additional resources/funding to translate the forms. Work with vendor to translate the forms and post on the website	Director of Communications Executive Director Director of Finance and Operations	TBD pending additional resources