



LANGUAGE ASSISTANCE SERVICES IMPLEMENTATION PLAN

Revised September 2015

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

A. Mission

The New York City Housing Authority (NYCHA) provides decent and affordable housing in a safe and secure living environment for low- and moderate-income residents throughout the five boroughs. To fulfill this mission, NYCHA must preserve its aging housing stock through timely maintenance and modernization of its developments. NYCHA also administers a citywide Section 8 Leased Housing Program in rental apartments. Simultaneously, we work to enhance the quality of life at NYCHA by offering our residents opportunities to participate in a multitude of community, educational, and recreational programs, as well as job readiness and training initiatives.

NYCHA is the largest public housing authority in North America. NYCHA's Conventional Public Housing Program has 177,666 (as of March 1, 2015) apartments in 328 developments throughout the City in 2,553 residential buildings containing 3,314 elevators. NYCHA comprises of 11,705 employees. NYCHA's Public Housing developments serve 175,747 families and 403,917 authorized residents (as of January 1, 2015). This total includes public housing and Section 8-assisted households in 21 federalized, former city- and state- funded developments.

A total of 607,399 New Yorkers are served by NYCHA's Public Housing and Section 8 Programs. If NYCHA were a city, it would rank 30th in population size in the United States, with New York City ranked first (as per July, 2013 U.S. Census Estimate). Based upon the 2014 NYC Housing and Vacancy Survey (HVS), NYCHA Public Housing represents 8.1 percent of the City's rental apartments and, based on the July, 2013 Census Estimate, is home to 4.8 percent of the City's population.

NYCHA residents and Section 8 voucher holders combined occupy 12.0 percent of the City's rental apartments and comprise 7.3 percent of New York City's population.

B. Overview of Language Assistance Program

NYCHA established a Language Bank in 1990 to meet the needs of individuals with limited English proficiency (LEP) to assist them in utilizing NYCHA's programs and services. The Language Bank, which continues to operate, consists of NYCHA employee-volunteers who are determined to be proficient in English and at least one other language. Language Bank participants provide language services to LEP individuals as further detailed below.

In addition to the Language Bank, NYCHA also adopted a Standard Procedure in 2009 to implement federal language access requirements for LEP persons, as outlined in a Department of Housing and Urban Development (HUD) Notice published in Volume 72 of the Federal

Register on Jan. 22, 2007, pp. 2732-2754 (HUD Guidance). NYCHA updated its Standard Procedure most recently in March 2015.

In 2009, NYCHA also appointed the Director of the Department of Equal Opportunity as the Language Access Coordinator to oversee NYCHA's Language Services Unit (LSU). As of February 1, 2010, the Department of Communications assumed LSU oversight responsibilities to further enhance resident communication.

- LSU provides interpretation and translation services to LEP individuals, including applicants, current public housing residents, and Section 8 participants, to allow them to communicate effectively with NYCHA regarding NYCHA's programs and services. LSU has six staff members, two of whom are proficient in Spanish, two in Chinese, and two in Russian, to serve NYCHA's needs in the languages most frequently encountered. In addition to providing interpretation and translation services, LSU also manages the Language Bank. The Language Bank, initially consisting of 44 NYCHA employees has over 180 employee-volunteers proficient in 37 languages. As of September 2015, NYCHA has 50 Language Bank Volunteers who are participating in the NYCertified program.

B. Direct Services

The following NYCHA departments offer direct services to public housing residents, Section 8 voucher holders and applicants.

Office of Impartial Hearings

Conducts hearings of public housing residents charged with non-desirability, chronic delinquency in the payment of rent, breach and chronic breach of resident rules and regulations, non-verifiable income, assignment or transfer of possession, and misrepresentation; conducts hearings for Section 8 residents charged with violations of a family obligation or of fraud against the program; and conducts remaining family member grievance hearings. In addition, the office conducts hearings on applicants' challenges to determinations of ineligibility for public housing or Section 8.

Applications and Tenancy Administration Department (ATAD)

Processes applications and determines the eligibility of applicants for the public housing programs. The Department also processes Inter- and Intra-development transfer requests and manages the relocation of residents at developments undergoing major modernization activity, and maintains the waiting list for public housing.

Leased Housing Department (LHD)

Provides customer service for all Section 8 participants and landlords. Conducts rental briefings; reviews rental packages and annual Recertifications. Inspects apartments for compliance with federal housing quality standards; assesses and processes transfer requests; and conducts landlord outreach activities. Determines eligibility of applicants for the Section 8 program; maintains waiting lists.

Property Management Departments

There are five Property Management Departments; one in each borough with the exception of Queens and Staten Island combined and the Mixed Finance Asset Management Department is responsible for the daily operation and maintenance of approximately 34,000

units in Manhattan, Queens, Staten Island, and the Bronx. The Departments process rentals, move-outs, and annual income and family composition reviews; process request for transfers or to add household members; respond to resident requests for information and assistance; meet with residents regarding tenancy matters; initiate referrals for social services or for legal proceedings where appropriate; and participate in tenant meetings.

The Mixed Finance Asset Management Department portfolio includes the 21 federalized, former city- and state-funded developments and those managed from the same consolidated Asset Management Projects (AMPs), as well as selected conventional developments and NYCHA's privately managed developments.

Family Services Department

Provides a variety of social services to NYCHA residents including: services for seniors, assistance with tenant related issues; transitional and supportive services; domestic violence intervention; crisis response outreach and referrals to community based organizations; preventive services for substance abuse, child abuse, and elder abuse; assistance and referrals for mental health services.

Department of Equal Opportunity (DEO)

Serves applicants, and residents with disabilities and/or their advocates, by responding to inquiries on the status of applications and transfer requests; provides assistance regarding reasonable accommodation requests. DEO's Office of Employment and Fair Housing Investigations investigates complaints of alleged employment and housing discrimination from employees, applicants for employment, residents, and applicants for public housing and Section 8.

Office of Resident Economic Empowerment and Sustainability (REES)

REES was created in 2009 to develop and implement programs, policies and collaborations to measurably support residents' increased economic opportunities with a focus on asset building, employment, advancement and business development. The Department of Resident Employment Services (RES) is under the purview of REES.

RES assists residents who are recipients of public assistance, unemployed, or underemployed to become economically self-sufficient by providing job placement, training, business development, supportive services and educational opportunities. RES conducts recruitment and outreach, intake and assessment, and subsequent referrals for educational and job training, employment and business.

Community Programs and Development

As part of the NYCHA mission to facilitate access to social and community services, and Next Generation NYCHA's commitment to connecting residents to best in class services, Community Programs and Development facilitates residents' access to a variety of services and programs throughout New York City. Further, CP&D serves as a liaison for resident associations. There are currently 246 active resident associations' citywide representing 274 developments.

Customer Contact Center (CCC)

The Customer Contact Center provides one central point of contact for residents' apartment and development maintenance needs. CCC service representatives are available 24 hours a

day for emergency maintenance requests (including public space service requests) and from 6:00 a.m. to midnight Monday through Friday for routine repair requests. In 2010, the CCC expanded to cover customer questions that pertain to the Section 8 program and Applications process for the public housing program and Section 8

Department of Communications (DOC)

The Department of Communications manages the “face” of the New York City Housing Authority (NYCHA) to core audiences and the public at large. To that end the department is responsible for the development and dissemination of information about NYCHA to residents and Section 8 program participants; employees; NYCHA partners as well as City, State and National stakeholders. DOC creates and conducts strategic information campaigns that promote NYCHA initiatives, reinforces NYCHA’s mission, and brands its message, and actively engages the media and the general public. DOC produces and maintains a variety of multi-media communication vehicles to reach multiple audiences including the NYCHA Resident Journal, NYCHA Employee Bulletin, and NYCHA’s internal and external websites. DOC also plans and coordinates special events and ceremonies throughout the year.

II. AGENCY LANGUAGE ACCESS POLICY and GOALS

NYCHA’s policy is to provide equal housing opportunities for all qualified applicants and residents. In the selection of families and in the provision of services, NYCHA does not discriminate against any person on the grounds of national origin.

NYCHA’s language access program, originally administered by DEO, has been administered by the Department of Communications (DOC) since 2010. The Senior Manager for Events and Communication Services, who reports directly to the Chief Communications Officer, is the designated Language Access Coordinator (LAC).

NYCHA issued its language assistance policy, SP 007:09:1, *Language Assistance Services*, in 2009; the policy was most recently updated on March 16, 2015. The policy implements federal requirements to provide LEP individuals with meaningful access to NYCHA’s programs and activities.

NYCHA has taken and continues to take reasonable steps to ensure LEP persons have meaningful access to NYCHA’s programs and activities, as further described in its Standard Procedure.

On an ongoing basis, NYCHA will:

- Update the SP to reflect changes in law or as needed.
- Continue to train NYCHA staff with respect to language services to ensure LEP persons may effectively participate in and benefit from NYCHA’s programs and activities.
- Develop a system to track and monitor language assistance needs of LEP persons utilizing NYCHA’s programs.

NYCHA’s plan for the future is to ensure that services are provided to LEP persons, including capturing language data, expanding the Language Bank, standardizing the delivery of language services, training staff, conducting ongoing evaluations of emerging languages and making available translations of vital documents, as defined in the HUD Guidance, as needed.

Language Access Coordinator (LAC)

The LAC serves as the language access coordinator at NYCHA. The LAC's responsibilities include:

- Produce monthly reports and year-end cumulative reports on interpretation and translation services.
- Meet with Language Liaisons to ensure compliance with language assistance service requirements.
- Assess annually the language assistance needs of NYCHA by reviewing data on the provision of language services and the prior year's provision of language assistance services.
- Recommend modifications to NYCHA's Executive Department, as needed, regarding the provision of language assistance services.
- Monitor the translation of vital documents.
- Oversee quality control assessment of language services.

Each NYCHA department offering language assistance services to LEP persons designates a Language Liaison (LL) to work with the LAC to monitor and assess the language services the department provides. LLs' responsibilities include:

- Work with the LAC to address issues related to language services.
- Provide information to LAC to help identify emerging languages and changes in the proportion of existing language groups.
- Provide the LAC with reports on language assistance services provided.
- Identify staff requiring training on the delivery of language services
- Provide the LAC with updated language assistance service needs of the department.
- Participate in recruitment efforts targeting and encouraging bilingual staff to participate and become part of the Language Bank.

The responsibilities of NYCHA departments offering language assistance services to LEP persons include:

- Designating the LL.
- Conducting periodic evaluations of the quality of language assistance services provided by the department.
- Assessing the need of the department for language assistance services.
- Providing language assistance services to LEP persons, as needed, in oral interpretation and written language translation. Such services shall be provided in the following order of service delivery: civil service bilingual employees, Language Bank volunteers, and contract vendor services.
- Requesting sign language interpretation services as needed.
- Posting notices of free language assistance services in NYCHA offices used by LEP persons.
- Encouraging department employees to contact DEO if they learn that an LEP person believes she/he has not been provided with language assistance services in accordance with the Standard Procedure.
- Identifying staff members needing instruction to be familiar with the Standard Procedure.

III. LEP POPULATION ASSESSMENT

NYCHA provides and will continue to provide language services based on the needs of LEP persons it serves. NYCHA is funded by HUD and provides language services to LEP persons as outlined in the HUD Guidance.

Frequency of Contact

Based on an assessment of data regarding language services requests at LSU and the Customer Contact Center (CCC), the most frequently encountered languages at NYCHA are Spanish, Russian, and Chinese. For 2015 YTD, CCC data indicate the top three languages serviced were Spanish 89.89 % (148,102), Russian 4.12 % (6,781), and Chinese (Mandarin & Cantonese) 4.84% (7,980). During this period, CCC utilized Language Line to communicate with 310 callers in Haitian Creole, 282 in Korean and 15 in Italian.

Enhanced Customer Service for Public Housing and Section 8 Applicants

In April 2013, NYCHA initiated another feature to improve customer service for public housing and Section 8 applicants so that they can access their application status and update basic information online. NYCHA launched its Self Service Portal, an Internet-based site that gives applicants easy access to view basic information about their public housing or Section 8 application without needing to visit in-person or call the CCC. Individuals may apply online, with applications available in English, Spanish, Chinese and Russian.

NYCHA's Self-Service Portal has been enhanced to give public housing applicants and Section 8 voucher holders the ability to view and access information. Public Housing applicants can immediately update their information on their current application, such as address, telephone numbers, reasons for applying and borough of preference. Earlier improvements included being able to view their current application status; eligibility interview date; eligibility status; and verify if certified to a public housing development waiting list.

Using the Self-Service Portal also enables Section 8 participants, can access their basic tenancy information, including contract rent; annual recertification date; and inspection date. They can also reschedule their inspection date and request a special inspection for their building or unit.

IV. RESOURCE ANALYSIS AND PLANNING

NYCHA currently utilizes the following resources to provide language services to LEP persons:

The Language Services Unit 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). The Office of Impartial Hearings, has two Spanish interpreters assigned to provide services to residents and applicants. NYCHA's various Departments offering language assistance services to LEP persons determine if vacancies in direct service positions require replacement with civil service bilingual employees to better meet the needs of LEP persons they serve, in consultation with NYCHA's Human Resources Department.

NYCHA also has a Language Bank with approximately 180 employee-volunteers proficient in 37 languages. As of September 2015, NYCHA has 50 Language Bank Volunteers who are participating in the NYCertified program, as described above. NYCHA currently contracts with Language Line Solutions for language services. The CCC utilizes Language Line Solutions to provide telephone interpretation services to residents and applicants if civil service bilingual employees in a NYCHA department, Language Bank volunteers, or LSU staff members are unavailable to provide interpretation.

NYCHA utilizes the Citywide Language Bank for languages not available in NYCHA's Language Bank.

Resources

NYCHA utilizes the following resources to provide language assistance services:

- Employees with civil service bilingual titles
- Staff interpreters at LSU and the Impartial Hearing Office
- NYCHA Language Bank members
- Language Line Solutions (Contract vendor)
- NYCertified - Citywide Volunteer Language Bank

V. IMPLEMENTATION PLAN LOGISTICS

The LAC will oversee the implementation of the Language Assistance Plan and the SP implementing the HUD Guidance.

NYCHA has identified the following milestones as enhancing its delivery of language services:

- Established Language Access Committee to assess language needs and recommend implementation strategies for language services (2006 to December 2008)
- Contracted with Language Line to provide interpretation services at CCC (March 2008 to present).
- Designated Department Language Assistance Liaisons from departments listed in section I to work with LAC to coordinate and facilitate the delivery of language services and address issues related to language services (present).
- Identified staff requiring language assistance training and established tentative training schedule based on importance of service provided (ongoing)
- Disseminate Language Identification Cards to be used in each department to permit LEP persons to identify their language (ongoing)
- Office of Professional Development and Training developed training curriculum on NYCHA's policy and Standard Procedure for providing Language Assistance Services for staff providing direct services. (March 2009)
- Staff involved in providing services to residents, applicants and voucher holders on NYCHA's Language Assistance policy and Standard Procedure for delivering language assistance services to the LEP population NYCHA serves. (ongoing)
- Customer Contact Center call takers and the Operators were trained in Language Assistance Services; the training will be tailored to provide more emphasis in the area of how to handle telephone calls from LEP callers. (refresher training offered ongoing basis)
- Revision of NYCHA's existing Language Assistance Services Standard Procedure to include guidelines and standards for employees who provide direct services (March 2015).

- Develop a tool to survey LEP persons who visit NYCHA’s applications offices throughout the city (4th Quarter, 2011).
- LSU utilizes wireless interpretation headsets to provide simultaneous interpretation at resident meetings, town halls and public hearings.(ongoing)
- Ongoing identification of vital documents and translation into languages encountered (ongoing)
- Bi-annually, NYCHA distributes and posts Free Interpretation and 311 Complaint process posters to various NYCHA departments serving residents, Section 8 participants, and applicants (including NYCHA’s Customer Contact Walk-In Centers) and development Property Management office located throughout the five boroughs.(Ongoing)

• **VII. SERVICE PROVISION PLAN**

A. Provision of Interpreter Services (Oral Language Services)

These services are further described in the SP and are summarized here.

1. Identify Language at Point of Contact

- Identify language at point of contact, utilizing NYCHA form 036.034, Language Identification Card (“Do you speak. . . “ in 28 languages).
- Provide free language interpretation services.
- Utilize adult family member or friend to provide interpretation only if this is LEP person’s choice. Provide interpreter even if LEP person brings family members or friends in domestic violence, elder abuse, or sexual assault situations.
- Contact supervisory staff for assistance regarding interpretation services for visitors or callers.

2. Supervisory/Managerial Staff Responsibilities

- Determine most efficient and effective means of providing interpretation/translation
- Use providers in the following order:

- (1) Civil Service Bilingual Employees within department
- (2) Language Bank Volunteers within department
- (3) Call LSU for interpreters or translation services. DOC will coordinate to seek the assistance of other Language Bank volunteers outside department
- (4) Contact department director for contract vendor services

3. Types of activities for which interpretation services shall be offered to LEP persons include, but are not limited to, the following:

- (a) Eligibility interview
- (b) Voucher briefing
- (c) Rental interview
- (d) Resident/applicant/voucher holder hearings
- (e) Interviews regarding annual and interim recertification
- (f) Termination of tenancy hearings
- (g) Customer Contact Walk-In Centers, and/or the staff in the Office of Safety and Security: Contact the LSU Hotline for assistance in directing LEP persons. Once it is determined where the call should be routed, the call taker shall transfer the interpreter and the LEP caller to begin language assistance services.

B. Translation of Written Material

On an ongoing basis, NYCHA identifies “vital documents” and makes translations available in the most frequently-encountered languages. Based on the HUD Guidance, vital documents are documents that are critical for ensuring meaningful access to NYCHA’s major programs and activities by beneficiaries generally and LEP persons specifically.

Vital documents include written materials soliciting or containing information for establishing or maintaining eligibility to participate in NYCHA programs or activities (for example, annual Recertifications), and documents creating or defining legally enforceable rights (for example, leases).

From time to time, on a case-by-case basis, NYCHA also makes available translations of certain non-vital documents to notify LEP persons of the availability of various services and programs.

C. Quality Assurance

To ensure the quality of translations, NYCHA uses a second translator to review the work of the primary translator. LSU also created a glossary of NYCHA terminology that is provided to volunteers and contract vendors for use when translating NYCHA documents. The NYCHA glossary of terms was also provided to the Mayor’s Office of Operations for inclusion in their Citywide Glossary project.

D. Plain Language

The New York City Housing Authority’s Human Resources Department’s Professional Development and Training division offers an *Effective Writing* program that incorporates the principles of plain writing. The class emphasizes making writing “Clear,” Concise” “Correct,” and Complete” (the four C’s of Writing). The class addresses issues such as identifying your audience, and incorporates many of the recommendations in the *Easy-to Read –NYC, Guidelines for Clear and Effective Communication*.

E. Website

NYCHA uses its website to make information available in Spanish, Chinese and Russian. Current postings available in these three languages include the *Resident’s Handbook*, executive summaries of the Agency’s annual plans, *Plan to Preserve Public Housing, A Home to be Proud Of, Community Service Policy Summary, NYCHA’s Fair Housing Non-Discrimination Policy Guide, Applying to Public Housing, Guide to Section 8 Housing Assistance Program, Guide to Section 8 Housing Assistance Program, and Frequently Asked Questions*. The website is periodically updated to include translations of new information for residents, applicants and voucher holders. The NYCHA website also offers a “translate” feature which is an additional resource for LEP persons.

F. Signage at Public Service Centers

NYCHA has posted notices on the availability of free language assistance services in the

locations where a NYCHA department serves members of the public, NYCHA residents, or Section 8 participants.

G. Outreach

On an ongoing basis, NYCHA includes information on language assistance services in articles and posters in its official newspaper, the *NYCHA Journal*, which is published monthly and features news on events, celebrations, health programs and other NYCHA happenings. This newspaper is published in Spanish and English, and is distributed to an estimated 178,400 NYCHA households. It is also available in both English and Spanish on our website. The NYCHA Journal is also distributed to 11,000 NYCHA employees, and mailed to elected officials. The Journal also goes to select press, city agencies and other interested parties.

NYCHA also continues to provide updated information on free language assistance services on the NYCHA website.

H. TRAINING

NYCHA's Office of Professional Development and Training has developed a curriculum to provide training for new and existing employees (front-line, supervisory and managerial staff) who provide direct services to public housing residents, Section 8 participants, and applicants. Training includes:

- An overview of NYCHA's SP
- How to use NYCHA's Language Identification Card to identify the language in which the customer needs assistance.
- How to access language services through bilingual staff, LSU and Language Bank.
- How to work with an interpreter.
- Cultural sensitivity.

In addition, NYCHA Language Bank volunteers must participate in workshops to enhance their skills. These workshops will be expanded to include additional information on NYCHA's Language Access Policy and Procedure. These workshops will be made available to bilingual staff hired to provide language assistance.

RECORD KEEPING AND EVALUATION

LSU currently tracks the following information regarding service requests it receives: the requesting department/development or city agencies, direct calls from applicant/resident; language; type of service, and who provided the service; (e.g. bilingual staff, LSU, volunteer or vendor). LSU also tracks translation requests.

Language Liaisons, in conjunction with the LAC and NYCHA's IT Department and other departments, will work together to devise additional tracking methods and language needs, as appropriate.

NYCHA will also continue to assess language proficiency of LSU staff members, bilingual employees hired to provide language assistance, and Language Bank volunteers to ensure the quality of language services provided.

The LAC will work with the Department Language Liaisons to monitor and ensure NYCHA's compliance with its obligations to provide language assistance services and to address related issues.