



**L E G A L  
S E R V I C E S**

**INCORPORATED**

**TESTIMONY**

**ON**

**STRATEGIES FOR IMPROVING THE ADMINISTRATION  
OF THE SENIOR CITIZENS RENT INCREASE  
EXEMPTION (SCRIE)**

**PRESENTED BEFORE:**

**THE NEW YORK CITY COUNCIL'S  
COMMITTEE ON AGING  
AND  
COMMITTEE ON FINANCE**

**PRESENTED BY:**

**DONNA CHIU  
SENIOR STAFF ATTORNEY  
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**MAY 1, 2014**

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## **I. Introduction**

MFY Legal Services, Inc. envisions a society in which no one is denied justice because he or she cannot afford an attorney. To make this vision a reality, for 50 years MFY has provided free legal assistance to residents of New York City on a wide range of civil legal issues, prioritizing services to vulnerable and under-served populations, while simultaneously working to end the root causes of inequities through impact litigation, law reform and policy advocacy. We provide advice and representation to more than 8,000 New Yorkers each year. Of this number, MFY serves more than 3,600 tenants, including more than 2,000 who are at least 60 years old. MFY is also part of the Assigned Counsel Project, through which the Manhattan Housing Court refers cases involving tenants over 60 years of age who are facing eviction.

One of MFY's priorities is to ensure that clients who do not speak English or have limited English proficiency receive legal assistance in their native languages. Aside from the more frequently spoken languages such as Spanish and various dialects of Chinese, MFY has provided direct assistance to clients in Tagalog, Russian, Albanian, Haitian-Creole and Hindi, just to name a few.

## **II. MFY's Clients' Experiences**

MFY serves hundreds of seniors every year who are limited-English proficient (LEP). Many of these low-income LEP seniors are linguistically isolated, meaning that they do not have family or friends who can readily translate English-language materials for them. This makes it especially difficult for them to understand and timely respond to critical notices that are not in their own languages.

The importance of language access for the success of the SCRIE program was underscored when, in spring 2013, the Department of Finance (DOF) sent letters to nearly 6,000 New York City senior citizens notifying them that their SCRIE benefits had been revoked and that they had a limited time to reverse the revocation by submitting income recertification documents to DOF. Because this critical notice was sent only in English and many did not have access to informal or formal translation, thousands of LEP SCRIE recipients could not fully understand its content, and delayed or took no action. As a result, many of these LEP seniors failed to quickly recertify their SCRIE benefits.

## **III. Recommendations**

Based on this experience, on August 8, 2013, a group of community organizations consisting of MFY, Asian Americans for Equality (AAFE), Project Home at University Settlement, Good Ole Lower East Side (GOLES), and Councilmember Margaret Chin's office met with the then-DOF Commissioner and his key staff to present eight actions to improve language access for SCRIE and DRIE. We recommended that SCRIE:

1. Translate all essential documents - letters or correspondences that affect a senior's rights through a denial, loss or decrease in benefit or services - into Spanish,

Chinese and Russian, the top three most-requested languages at DOF, or any other appropriate language.

2. For all non-essential documents sent only in English, include a statement in Spanish, Chinese and Russian or any other appropriate language, informing the senior on how he/she can access that document in another language.
3. Ensure all translated documents and translation on the SCRIE website are accurate.
4. Continue to develop partnerships with community advocates, service providers and elected officials who serve as resources to DOF in providing equal language access to its LEP SCRIE customers, including direct and timely access to SCRIE staff to help resolve the clients' concerns.
5. Establish a SCRIE call center where LEP customers can access SCRIE information immediately through either bilingual staff or telephonic interpretation.
6. Ensure there is signage at the lobby of the SCRIE office at 66 John Street informing LEP customers that translation and interpretation are available. Make sure these signs are in Spanish, Chinese and Russian or any other appropriate language. Also, ensure there is directional signage with pictograms at the lobby of the SCRIE office about the specific location of the SCRIE office. Finally, ensure "I Speak" cards are available at the SCRIE office.
7. Ensure all front line staff at the SCRIE office at 66 John Street has access to telephones to provide customers with telephonic interpretation when bilingual staff is not available to translate.
8. Ensure all SCRIE staff are properly trained regarding DOF's language access policy and procedures, and trained to be culturally sensitive to LEP customers.

The DOF was hearteningly receptive, and promised to adopt several of the community groups' recommendations.

Since that meeting, DOF has improved the accessibility of the SCRIE webpage by providing translations in Spanish, Chinese and Russian alongside the English text, rather than in a separate window or link. DOF has also begun including an insert, written in Spanish, Chinese and Russian, with all critical notices, such as the Renewal Application Notices, Denial Order Notices, Revocation Notices and Pending Notices. The insert notifies the senior that the enclosed notice is important and informing him/her on how to access a translation of that notice.

DOF has also stated its intent to improve the language accessibility of its 66 John Street walk-in office by installing multi-lingual directional signage with pictograms, providing multi-lingual "I

Speak” cards for LEP customers to identify their languages, and ensuring that front-line staff has access to telephonic interpretation.

MFY applauds DOF for their receptiveness to community concerns and the steps they have taken to address language access issues. MFY hopes that DOF will continue to improve language access by following through on its commitment to implement the above recommendations. Specifically, MFY strongly urges DOF to install multi-lingual signage in its customer service center and fully translate all essential documents into Spanish, Russian, and Chinese, as more fully set forth above.

#### **IV. Conclusion**

MFY looks forward to working with the DOF and the City Council in improving access to SCRIE for LEP seniors.

MFY wishes to thank the Committee for this opportunity to testify, and for its continuing work to improve the lives of New York City’s most vulnerable seniors.