

Boston Housing Authority
The Four Factor Analysis for the Limited English Proficiency Policy
(10/2015)

A. Mission Statement

The goal of the Boston Housing Authority is:

- to provide stable, quality affordable housing and rental subsidies for low and moderate income persons;
- to deliver these services with integrity and mutual accountability;
- and to create living environments which serve as catalysts for the transformation from dependency to economic self-sufficiency.

B. Background

The Boston Housing Authority is the largest landlord in Boston and the largest public housing authority in New England. As such, the BHA houses approximately 10 percent of the city's residents through its programs.

In addition to providing conventional public housing, the Boston Housing Authority also provides affordable housing through the administration of several rental assistance programs, these programs include the federal Section 8 Voucher Program, as well as the state funded Massachusetts Rental Voucher Program that is overseen by the Department of Housing and Community Development.

The BHA's state and federal portfolio and rental assistance programs make it one of the top ten largest housing authorities in the nation.

C. Four Factor Analysis

1. Number or proportion of Limited English Proficient (LEP) persons served or encountered in the eligible service population.

A. Eligible Service Population

The BHA administers two main housing programs for low and extremely low income households, public housing and rental assistance, funded by both the state and federal government. The BHA administers its public housing portfolio within the City of Boston. The BHA administers its rental assistance programs within the state of Massachusetts. Applicants to these programs are primarily from the state of Massachusetts although applications from households out of state are occasionally received by the BHA.

The BHA determined that the service populations for its programs are low and extremely low income households in the state of Massachusetts. However, due to the large concentration of service provided by the BHA in Boston, the BHA compared data on LEP persons from all Massachusetts households to Boston households to determine if the language needs of these households are different. In addition, the BHA reviewed the languages spoken by residents of its public housing by development to determine if the language needs of LEP persons at individual developments are different than the city or state as a whole.

B. BHA Determination of Interpretation/Translation needs of service population

Based upon an analysis of the US Census 2014 American Community Survey data, BHA data on applicants, residents and participants, and the requests for interpreters and written translations, BHA has determined the following:

1. Vital Documents will be translated into Spanish and Chinese; and
2. Most frequent oral interpretation needs of LEP persons in service area include Spanish, Chinese (Cantonese and Mandarin), Haitian Creole, Vietnamese, Cape Verdean, Portuguese, Arabic, Somali, and Amharic. Other needs also include Russian, Albanian, French, Tigrinya, Greek, Polish, Bosnian, Italian, Khmer (Cambodian), Swahili, Bengali, Burmese, Farsi, Igbo, and Patois (Jamaican).

Data analyzed to make the above determination are attached to this document as Exhibits.

2. Frequency with which LEP persons come into contact with the program.

The following BHA departments offer direct services to public housing residents, Section 8 voucher holders and applicants. These direct service departments underwent training on the LEP Policy in 2010 and BHA housing managers had a training refresher in June 2013. Training refreshers were also provided to Leased Housing staff in January and June 2015. All direct service departments are familiar with the use of the Language Identification Card, the Language Advisory, the Interpreter Request Form, and the Translation Request Form. They are also familiar with the process of requesting interpreters and written translations online, as well as the availability of BHA's Multilingual Line for phone interpretation. In addition to the description of individual departments on page 8 of this report, *Figure 3. Interpreter Request by Department FY2015* and *Figure 4. BHA Multilingual Line Calls by Language* also illustrate the extent to which LEP persons come into contact with these departments.

- Department of Grievances and Appeals (DGA)
- Occupancy Department
- Leased Housing Division
- Operations Department and Development Manager Offices
- Center for Community Engagement and Civil Rights (CCECR)
- Work Order Call Center
- Communications Department
- Legal Department
- Public Safety Department

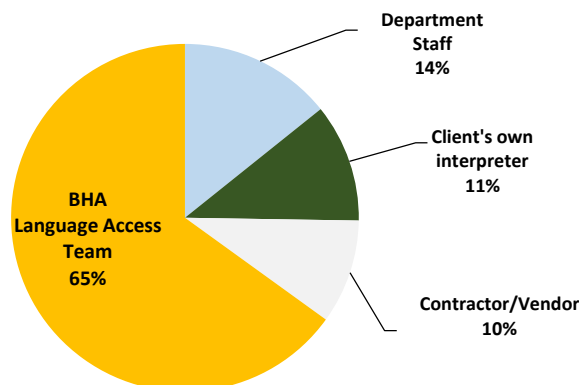
3. Nature and importance of the program, activity, or service provided by the program.

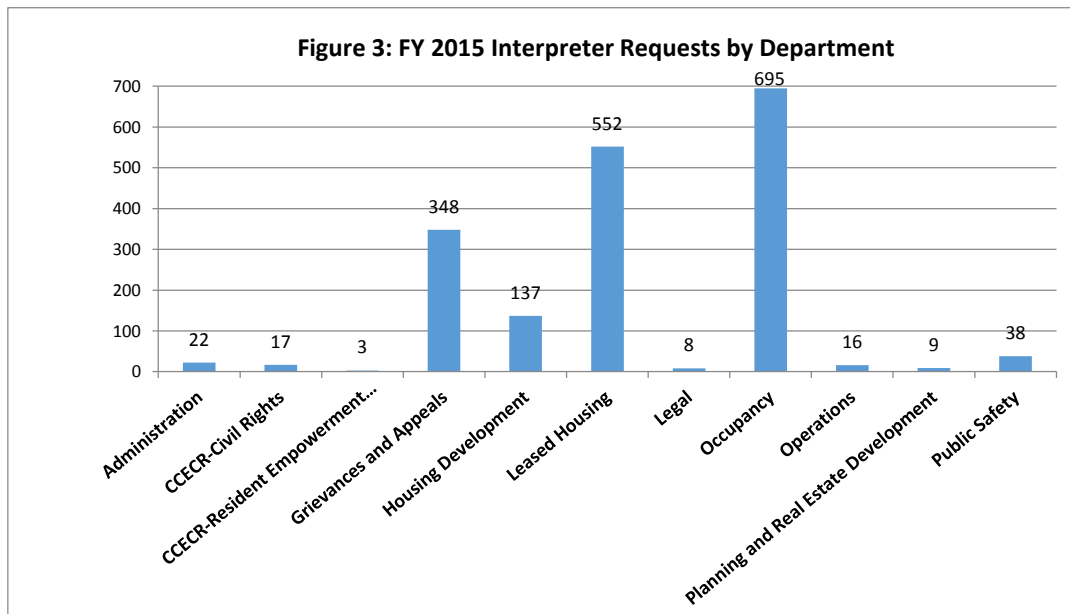
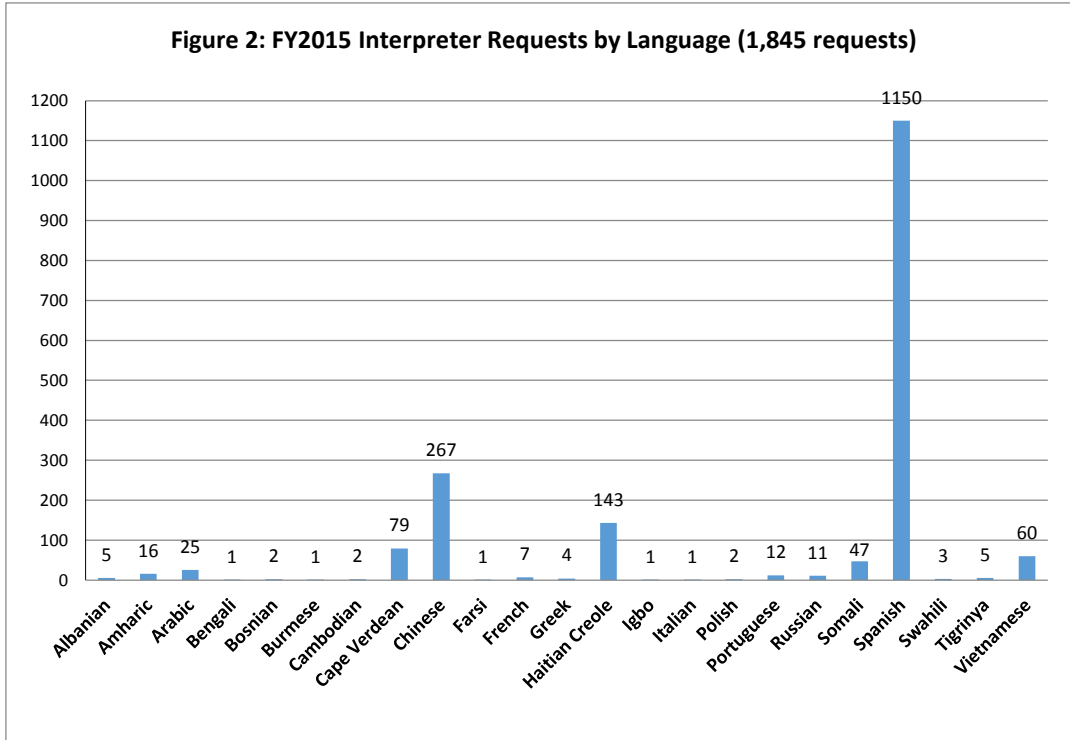
The BHA has focused, and will continue to focus, its efforts on providing language services in the areas of eligibility for public housing and section 8, recertification of eligibility and termination of these benefits, because these aspects of BHA's operations are most likely to have the greatest impact on LEP persons.

A. Provision of Interpreter Services (Oral Language Services)

1. BHA provides and will continue to provide interpretation services in person, through bilingual employees, interns, volunteers through the BHA Volunteer Interpreters Program, and contract vendors. From October 1, 2014 to September 30, 2015, BHA has filled 1,845 documented (and generally, pre-arranged) requests for interpreters in 23 languages (Albanian, Amharic, Arabic, Bengali, Bosnian, Burmese, Cape Verdean, Chinese [137 Cantonese, 129 Mandarin, and 1 Toisanese], Farsi, French, Greek, Haitian Creole, Igbo, Italian, Khmer, Polish, Portuguese, Russian, Somali, Spanish, Swahili, Tigrinya, and Vietnamese). The number of requests is 16% higher than the year before.

Figure 1: Services by Provider



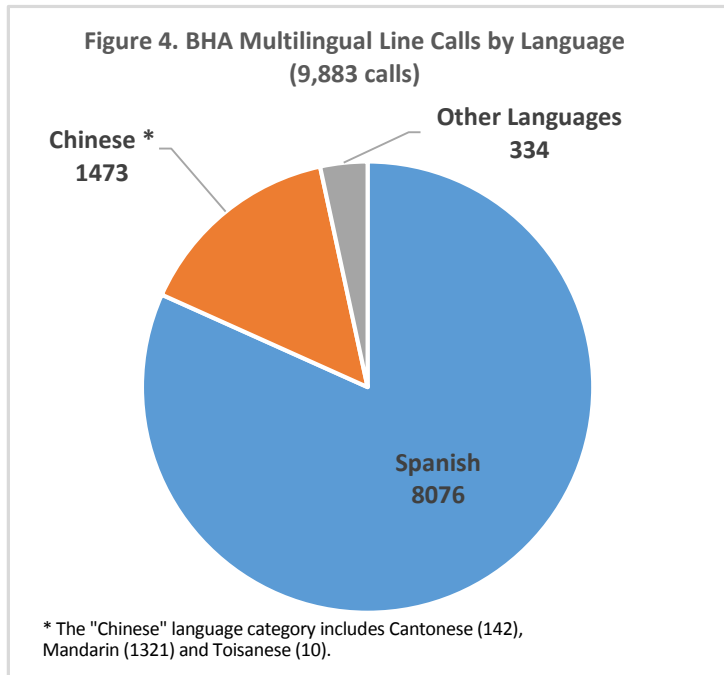


Interpretation Service by Phone

BHA provides phone prompts in Spanish and Chinese for current and prospective applicants, voucher holders, and residents who wish to contact BHA through its main number 617-988-4000. BHA has also designated 617-988-4001 as the Multilingual Line with Language Access staff and volunteers interpreting over the phone in (7) languages -- Spanish, Chinese (Mandarin and Cantonese), Arabic, Haitian Creole, Cape Verdean, Somali, and Vietnamese.

This past year the Multilingual Line has actually assisted in 14 languages. Some of these additional languages are Albanian, Amharic, Russian, and Tigrinya, and all of which were provided by BHA volunteers. The Multilingual Line assisted 9,883 calls from October 1, 2014 to September 30, 2015.

2015 Summary by Language	# of Calls	%
Spanish	8076	81.72%
Chinese *	1473	14.90%
Other Languages:	334	3.38%
Albanian	3	0.03%
Amharic	3	0.03%
Arabic	14	0.14%
Cambodian	1	0.01%
Cape Verdean	24	0.24%
French	3	0.03%
Haitian Creole	149	1.51%
Portuguese	20	0.20%
Russian	15	0.15%
Somali	3	0.03%
Tigrinya	2	0.02%
Vietnamese	97	0.98%
Total Calls	9883	100.00%



From September 1, 2014 to July 31, 2015, BHA utilized the commercial AT & T Language Line in 173 occasions to provide swift coverage in 18 languages, representing a **37% decrease** that is directly resulted from BHA's expanded language capacity through its Multilingual Line.

BHA provides interpretation services for a wide range of activities, including but not limited to the following:

- Housing Application Briefing (61 sessions in 11 languages in 2015)
- Eligibility Interview
- Rental Interview/Lease Signing
- Voucher Briefing
- Tenant/Applicant/Participant Hearings
- Initial, Annual and Interim Recertification
- Private Conference
- Emergency Transfer Interview
- Fraud Investigation
- Settlement Discussion
- Residents-Management Meeting
- Wellness Connect Program in 5 elderly/disabled developments (39 sessions in Cantonese, Mandarin, and Spanish)
- Project REACH -- Racial and Ethnic Approach to Community Health
- Recycling and sustainability workshops
- Local Tenants Organization Meeting and/or Election
- Citywide Public Hearing

Other BHA language provisions also include:

- BHA includes on its documents a tagline (also referred as the Language Advisory) in different languages that an oral interpretation of the documents is available, with contact information on requesting an interpretation.
- "I speak" cards (Language Identification Card) and "Interpreter Service Available" posters are posted at all areas of contact with LEP persons.
- BHA Language Access staff continues to create multilingual flyers and signage for Management Offices that facilitate communication with LEP residents.



B. Translation of Written Materials

Based on the HUD Guidance, "Vital Documents" are documents that solicit or contain information for establishing or maintaining eligibility to participate in BHA's programs or services, or documents that create or define legally enforceable rights or responsibilities; BHA's Vital Documents have been or will be translated into Spanish and Chinese on an ongoing basis as allowed by available appropriated funds. BHA's Vital Documents include, but are not limited to:

- Applications to receive services, benefits or participate in programs or activities
- Annual Reviews/Income Recertifications
- Notices of public hearings
- 48 Hours Notices for management office
- Notices containing information regarding eligibility or participation criteria
- Notices advising of free language assistance
- Public Housing Leases
- Generic 14 and 30-day Notices to Quit
- Generic notices of rights, denial, loss, or reduction of benefits or services
- Hearing notices
- Discrimination complaints
- Resident Grievance Procedure
- Transfer Guide
- Policy updates (VAWA)
- Needs Assessment surveys (Making Connections Project, Mass LEAP FSS Program, etc.)

Between October 1, 2014 to September 30, 2015, BHA has translated over 262 pages of Vital Documents from English to Spanish and Chinese, and 43 pages in Haitian Creole, Somali, Vietnamese, and Cape Verdean. Cumulatively, over 1,600 pages of English documents have been translated into multiple languages since the inception of the Language Access Program five years ago.

Figure 5. Translation Requests (# of Pages) by Department 2015/Cumulative Since 2010			
Department Name	2015	Cumulative since 2010	
Administration Department	13	210	12.9%
BHA Developments	15	129	7.9%
Capital Construction	N/A	5	0.3%
CCECR	29	52	3.2%
Communications Department	5	7	0.4%
Community Services	4	25	1.5%
Grievances and Appeals	N/A	37	2.3%
Leased Housing	9	53	3.3%
Leased Housing - Heritage PBV	N/A	36	2.2%
Legal Department	N/A	201	12.3%
LEP	N/A	1	0.1%
Local Tenant Organization	10	37	2.3%
Occupancy Department	135	584	35.9%
OCR	1	8	0.5%
Operations	19	95	5.8%
Operations - Work Orders	N/A	31	1.9%
Public Safety	N/A	2	0.1%
Purchasing Department	N/A	2	0.1%
Real Estate Development	20	81	5.0%
Risk Management	N/A	7	0.4%
Section 3	N/A	6	0.4%
Smoke-Free	2	19	1.2%
Total	262	1628	100.0%

While program staff and volunteers continue to expand the trilingual (English-Spanish-Chinese) glossary of frequently-used housing terms, which serves as a useful tool for its volunteer interpreters, they will also have the glossary available in Haitian Creole by December 2015.

4. Resources available to the recipient and costs to the recipient.

BHA currently provides and will continue to provide without charge the following language services to its residents, Section 8 participating families and applicants:

- Bilingual employees, interns, vendors, and volunteers provide interpretation and translation services for applicants, residents and Section 8 participants.
- Interpretation services are scheduled when requested for application briefings, eligibility interviews, rental appointments, termination of tenancy or rental assistance hearings, and applicant appeals of ineligibility determinations.

- Interpretation services are provided when requested for BHA's public hearings.
- Interpretation services are provided at residents meetings when requested by management office.
- Through its Multilingual Line, BHA provides quick interpretation over the phone. BHA also utilizes the commercial AT & T Language Line to provide backup and emergency language coverage for BHA programs and for Section 8 voucher holders.
- BHA provides public housing leases in Spanish, Chinese, Haitian Creole, Russian, and Vietnamese.
- BHA utilizes Boston Housing Court interpreters to provide interpretation and translation services for residents involved in court action with the BHA.
- CCECR provides interpretation and translation to resident empowerment coalition events and initiatives.
- CCECR's Office of Civil Rights utilizes bilingual staff, interns, and vendors to assist residents, applicants and Section 8 participants in the filing and investigation of Civil Rights complaints.
- Section 8 briefing sessions on both the voucher and Family Self Sufficiency Program are conducted in Spanish and Chinese. (Briefings have also been conducted in Cape Verdean.)
- CCECR's Community Service Department track language service requests for its Public Housing Family Self Sufficiency Program, and provides trilingual (English, Spanish, and Chinese) program briefing sessions and info notices for its other services.
- Occupancy Department tracks languages spoken and read by applicants to all BHA programs and language services provided.
- Operations Department tracks languages spoken and read by residents in BHA's public housing developments.
- Leased Housing tracks language spoken and read by households which it serves.

Summary

BHA will continue to translate Vital Documents and utilize available translation resources from HUD and other agencies. Through its Bilingual Internships and Volunteer Interpreters Program and service learning partnerships with Northeastern University, Bunker Hill Community College, UMass Boston, Kaplan International College, Fenway High School, and Boston Cares, BHA's Language Access Division (which is now part of CCECR) will continue to build language resources by recruiting and training bilingual volunteers from our communities and schools, and exploring new partnerships with additional institutions. It will also continue to share vision and practices with other city departments and housing agencies to broaden language access to the greatest extent possible.



Figure 6. 2015 BHA Volunteer Interpreters Program (VIP) Highlights

Number of Active Volunteers	Training Sessions Conducted	Language Capacity	Interpretation/ Translation Accomplished	Volunteer Hours in past 12 months	Cost Savings to BHA (Average vendor rate \$60/hr)
216	25	30	870 assignments	2,684 hours	\$160,000+

BHA Departmental Description

Department of Grievances and Appeals (DGA)

Conducts hearings of public housing residents with disputes with the BHA frequently involving delinquency in the payment of rent, breach and chronic breach of resident lease, 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 hearing; and conducts hearings on applicants challenges to a determination of withdrawal or ineligibility for public housing or Section 8.

Occupancy Department

Distributes and accepts public housing and Section 8 applications; assesses and processes transfer and residual tenancy requests; provides information to the public regarding programs; responds to status inquiries; conducts eligibility interviews; and determines eligibility for housing programs.

Leased Housing Division

Provides customer service for all Section 8 tenants and landlords. Issues vouchers; conducts rental briefings; reviews rental packages; completes interim and annual income and family composition recertifications and assesses and processes residual tenancy requests" Inspects apartments for compliance with federal housing quality standards and conducts landlord outreach activities.

Operations Department and Development Manager Offices

Process rentals, move-outs, and interim 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; participate in tenant meetings.

Center for Community Engagement and Civil Rights (CCECR)

Newly established in March 2014, CCECR is to engage BHA public residents and Section 8 tenants in programs and services, and to build the capacity of local tenant organizations by providing training and technical assistance. It combines the functions of resident empowerment, community services, and language access, and in 2015 has added a three-year resident health initiative, Boston REACH: Partners in Health and Housing. CCECR continues to partner with providers to connect residents to social, educational, vocational, health and other critically needed services, and houses the **Office of Civil Rights (OCR)** which consists of the Fair Housing Unit and the Employment and Contract Compliance Unit. The units work together to promote diversity and ensure equal access to all BHA programs for applicants, residents and staff.

Work Order Call Center

Processes emergency services requests and schedules routine repairs for public housing residents.

Communications Department

As BHA's media and public relations arm, the Communication Department is responsible for developing, coordinating and disseminating information about BHA and its work to internal and external audiences including residents, employees, and the general public. CD responds to all inquiries from the media and circulates press releases announcing newsworthy events; produces periodic newsletters for residents and employees, and a variety of publications such as annual reports and brochures." In addition, CD has launched this year a new BHA website which includes multilingual features as well as links to social media and online blogs.

Legal Department

The Legal Department provides legal representation of the Boston Housing Authority in all aspects of BHA's operations, including litigation, contracts, development, procurement and regulatory compliance matters. Principal interaction with residents and Section 8 tenants occurs at grievance hearings in the BHA's DGA; at the Boston Housing Court in eviction and lease-related proceedings and for judicial review of Section 8 termination decisions; with applicants and participants at the Boston Housing Court on matters involving administrative action; with applicants, residents, and Section 8 tenants at the Massachusetts Commission Against Discrimination; and with tenants regarding the DHCD tenant selection appeals.

Public Safety Department

Working closely with BHA management staff, residents, community organizations and other law enforcement agencies, the Department provides public safety services throughout BHA developments that include protection of life and property; resolution of conflict; reduction of opportunities for the commission of crime; identification, apprehension, and prosecution of offenders; and preservation of the peace. It consists of two divisions. The BHA Police Division meets with residents and agency staff regarding issues of concern, and serves as an enhancement to the policing services provided by the Boston Police Department, which continues to provide emergency services to BHA residents. The Senior Safety Division provides security coverage at the BHA elderly/disabled developments, the administrative offices and at the John J. Murphy Housing Service Center in downtown Boston.