

**Boston Housing Authority**  
**The Four Factor Analysis for the Limited English Proficiency Policy**  
**(October 2010)**

**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 both the 2000 US Census data, BHA data on applicants, residents and participants, and the requests for interpreters, 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, Vietnamese, and Haitian Creole. Other needs also include Russian, Somali, Cape Verdean, and Arabic.

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:

### **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.

## **Resident Services Department**

Provides a variety of social services to BHA 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.

## **Office of Civil Rights**

(OCR) - Serves applicants, and residents with disabilities and/or their advocates; provides assistance regarding reasonable accommodation requests. Investigates complaints of alleged employment and housing discrimination from employees, applicants for employment, residents, and applicants for public housing and Section 8. 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. Conducts recruitment and outreach, intake and assessment and subsequent referrals for education job training, employment and business development opportunities.

## **Work Order Call Center**

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

## **Communications Director**

As BHA's media and public relations arm, the Communication Director (CD) 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 a quarterly newsletter for residents, a weekly employee newsletter, and a variety of publications such as annual reports and brochures" CD also maintains BHA's internal and external website.

## **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 occurs at grievance hearings in the BHA's DGA; at

the Boston Housing Court in eviction and lease-related proceedings; and with applicants at the Massachusetts Commission Against Discrimination.

### **Public Safety Department**

Provides law enforcement services in BHA's public housing developments and protective services in BHA's elderly/disabled developments which 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.

These direct service departments have undergone training on the LEP Policy (the Legal Department had an abbreviated version of the training) and are familiar with the use of the Language Identification Card, the Language Advisory, and the Interpreter Request Form.

### **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)**

BHA provides and will continue to provide interpretation services through bilingual employees, interns, Language Bank Volunteers (also referred as the Volunteer Interpreters Program), and contract vendors. From April 1 to September 30, 2010, BHA received and fulfilled 123 documented requests for interpreters for the languages of Cape Verdean, Chinese, French, Haitian Creole, Polish, Portuguese, Russian, Somali, Spanish, and Vietnamese. In addition, BHA utilized the Language Line in 76 occasions between October 1, 2009 to September 30, 2010 to provide language assistance in Armenian, Amharic, Arabic, Chinese, Haitian Creole, Italian, Korean, Portuguese, Russian, Somali, Spanish and Vietnamese.

BHA provides interpretation services for the following activities, including but not limited to the following:

- Eligibility Interview
- Rental Interview/Lease Signing
- Voucher Briefing
- Tenant/Applicant/Participant Hearings
- Initial, Annual and Interim Recertification
  
- BHA established a Work Order Call Center to assist in the prompt provision of emergency services and the prompt scheduling of routine repairs for public housing residents. To assist LEP callers the Work Order Call Center now has Spanish and

Chinese speaking staff on board and utilizes the Language Line for other language needs.

- BHA established a Status Line for applicants to all BHA housing programs. To assist LEP callers the Status Line utilizes bilingual staff members and the Language Line.
- 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.
- BHA also uses the "I speak" cards (Language Identification Card) at all areas of contact with LEP persons.

## **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
- Notices containing information regarding eligibility or participation criteria
- Notices advising of free language assistance
- Public Housing Leases
- 14 and 30- day Notices to Quit
- Notices of rights, denial, loss, or reduction of benefits or services
- Hearing notices
- Discrimination complaints
- Resident Grievance Procedure

Between April 1, 2010 to September 30, 2010, BHA has translated over 140 pages of Vital Documents from English to Spanish and Chinese, and compiled a trilingual (English-Spanish-Chinese) glossary of frequently-used housing terms.

## **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 eligibility interviews, rental appointments, termination of tenancy hearings, and applicant appeals of ineligibility determinations.
- Interpretation services are provided as requested at BHA's public hearings.
- BHA utilizes Language Line, a contract vendor, to provide interpretation for residents requesting emergency services and repairs or other information related to their tenancy, for current and prospective applicants to all 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.
- BHA's Office of Civil Rights utilizes bilingual employees, 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.
- Community Services Department tracks 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.
- Operations Department tracks languages spoken and read by residents in BHAs public housing developments.
- Leased Housing tracks language spoken and read by households which it serves.

BHA will allocate funds, as available from appropriations, for translation of Vital Documents on an ongoing basis. Through its Bilingual Internships and Volunteer Interpreters Program, BHA will continue to build its language resources by recruiting and training bilingual volunteers from local communities and educational institutions. BHA will also continue to rely upon HUD and DHCD to provide copies of translated Vital Documents that they require be utilized by the BHA in the administration of its housing programs.