

**Boston Housing Authority**  
**The Four Factor Analysis for the Limited English Proficiency Policy**  
**(November 2019)**

**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 healthy 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 9 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**

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. BHA administers its public housing portfolio within the City of Boston. 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 BHA.

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 BHA in Boston, 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, 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 2017 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, Mandarin, and Toisanese), Haitian Creole, Vietnamese, Cape Verdean, Arabic, Portuguese, Somali, Amharic, and Russian. Other needs also include Albanian, Cambodian, Edo, Farsi, French, Greek, Pashto, Polish, Swahili, Thai, and Tygrinia. 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 2017 (Occupancy), 2018 (Resident Empowerment), and 2019 (Leased Housing). BHA housing managers had a training refresher in June 2013, but we will schedule one for early 2020. . 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, *Figure 1. FY2019 Interpreter Request by Language*, *Figure 2. FY2019 Interpreter Request by Department*, and *Figure 4. FY2019 BHA Multilingual Line Calls by Department* also illustrate the extent to which LEP persons come into contact with these departments.

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

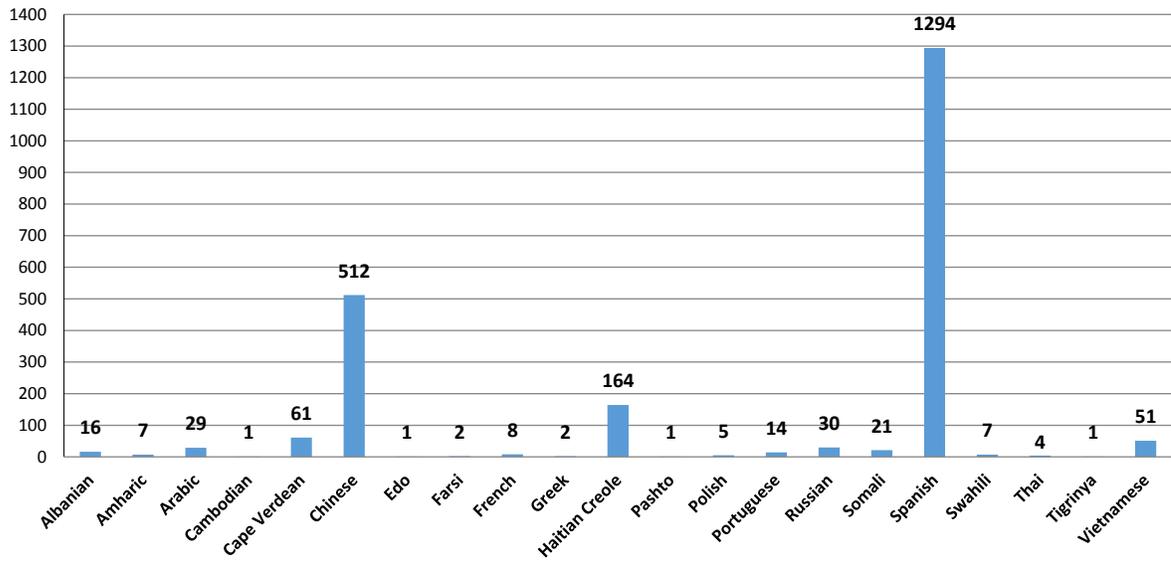
## 3. Nature and importance of the program, activity, or service provided by the program.

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.

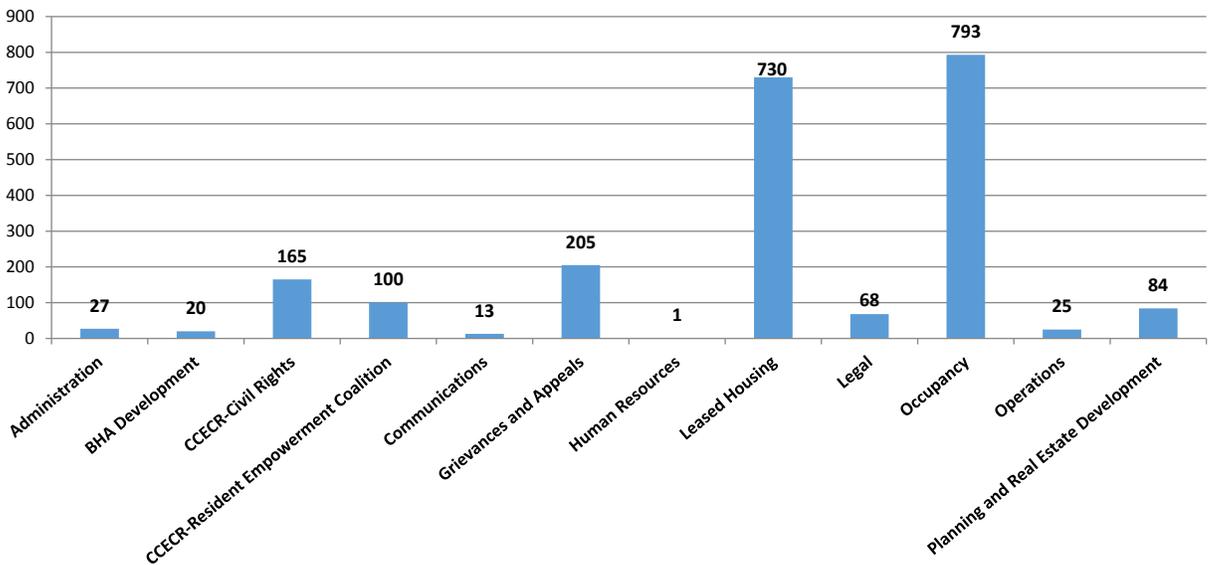
### A. Provision of Interpreter Services (Oral Language Services)

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, 2018 to September 30, 2019, BHA has filled **2,231 documented (and generally, pre-arranged) requests for interpreters in 21 languages** -- Albanian, Amharic, Arabic, Cambodian, Cape Verdean, Chinese (Cantonese, 166 Mandarin, and Toisanese), Edo, Farsi, French, Haitian Creole, Pashto, Polish, Portuguese, Russian, Somali, Spanish, Swahili, Thai, Tigrinya, and Vietnamese. *See Figure 1.* About 52.8% of the requests were to provide Spanish language interpreters.

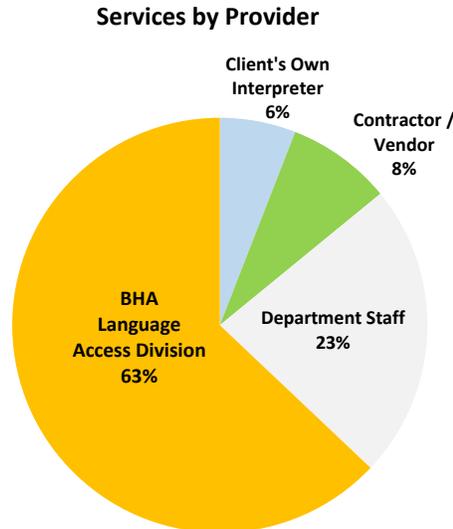
**Figure 1: FY2019 Interpreter Requests by Language (2,231 requests)**



**Figure 2: FY2019 Interpreter Requests by Department (2,231 requests)**



**Figure 3: FY2019 Interpreter Services by Provider\***



*\* Interpretation Service by Multilingual Line not included*

BHA provided interpretation services for a wide range of activities in the past year, including but not limited to the following:

- Eligibility Interviews
- Rental Interviews/Lease Signings
- Voucher Briefings
- Tenant/Applicant/Participant Hearings
- Initial, Annual and Interim Recertifications
- Private Conferences
- Fraud Investigations
- Wellness Connect Program in 6 elderly/disabled developments (82 sessions in Cantonese, Mandarin, and Toisanese, 2-4 interpreters/session)
- Redevelopment meetings
- Local Tenants Organization meetings, trainings and elections
- Residents-Management Meetings
- Citywide Public Hearings, Civil Rights Intakes, and Mediations

**Other BHA language provisions also include:**

- BHA includes on its documents a tagline (also referred as the Language Advisory) in 11 languages that an oral interpretation of the documents is available, with contact information on requesting an interpretation.
- "I speak" cards (Language Identification Sign) 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.



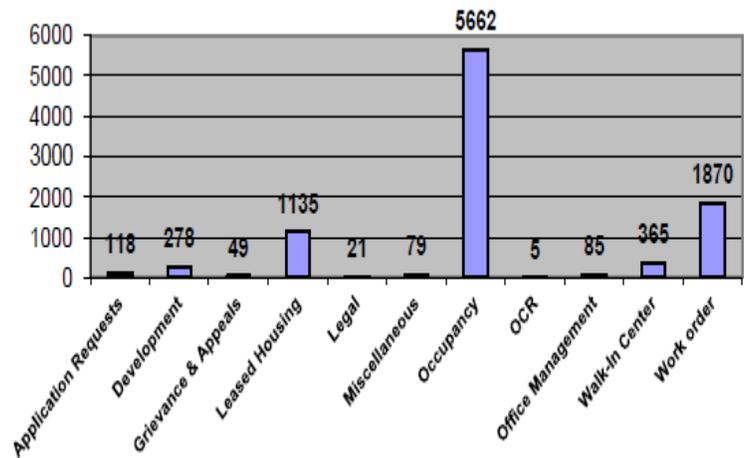
**B. Interpretation Service by Phone**

BHA provides phone prompts in Spanish and Chinese for current and prospective applicants, voucher holders, and public housing 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 with prompts in seven (7) languages -- Spanish, Chinese (Mandarin, Cantonese, and Toisanese), Haitian Creole, Cape Verdean, Vietnamese, Somali, and Arabic.

This past year the Multilingual Line assisted in 17 languages. The majority of the calls were for Spanish speaking clients (87.39%) and Chinese (7.72%). Other languages that were provided over the phone were Albanian, Amharic, Arabic, Cambodian, Cape Verdean, Farsi, French, Haitian Creole, Polish, Portuguese, Russian, Somali, Swahili, Thai, and Vietnamese. The Multilingual Line assisted **9,667** calls from October 1, 2018 to September 30, 2019.

Annual Summary	Total Calls	%
Spanish	8448	87.39%
Chinese *	746	7.72%
Other	473	4.89%
Albanian	8	0.08%
Amharic	9	0.09%
Arabic	34	0.35%
Cambodian	2	0.02%
Cape Verdean	58	0.60%
Farsi	2	0.02%
French	3	0.03%
Haitian Creole	203	2.10%
Polish	4	0.04%
Portuguese	38	0.39%
Russian	17	0.18%
Somali	9	0.09%
Swahili	1	0.01%
Thai	4	0.04%
Vietnamese	81	0.84%
<b>Total Calls</b>	<b>9667</b>	<b>100.00%</b>

Figure 4: FY2019: BHA Multilingual Line Calls by Department



The "Chinese" language category includes Cantonese (143), Mandarin (127) and Toisanese (15).

From August 1, 2018 to July 31, 2019, BHA utilized the commercial AT & T Language Line in 72 occasions to provide swift coverage in 16 languages, some of which were Amharic, Bengali, Cambodian, Farsi, Pashto, and Polish.

**C. 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 Re-certifications
- 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
- Citywide LTO training materials and outreach
- Document templates for LTO election and bylaws
- Generic notices of rights, denial, loss, or reduction of benefits or services
- Hearing notices
- Discrimination complaints
- Resident Grievance Procedure
- Transfer Guide
- Policy updates (Civil Rights Brochure, Notice of Occupancy Rights under the Violence Against Women Act, Smoke Free Policy)
- Redevelopment updates to residents

Between October 1, 2018 to September 30, 2019, BHA translated over 344 pages of Vital Documents from English to Spanish and/or Chinese. Cumulatively, over 3126 pages of English documents have been translated into multiple languages since the inception of the Language Access Program in 2010.

The 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, and it is also available in Haitian Creole. The glossaries are also available also to staff at LEP trainings and on BHA's website.

<b>Figure 5. Translation Requests (# of Pages) by Department</b>			
<b>FY2019/Cumulative Since 2010</b>			
<b>Department Name</b>	<b>FY2019</b>	<b>Cumulative since 2010</b>	
Administration	32	317	10.14%
BHA Developments	21	205	6.56%
Capital Construction	1	7	0.22%
CCECR	124	867	27.74%
Communications	23	62	1.98%
Grievances and	0	38	1.22%
Leased Housing	24	117	3.74%
Legal Department	0	213	6.81%
Occupancy	32	734	23.48%
Operations	2	185	5.92%
Public Safety	0	2	0.06%
Purchasing	0	2	0.06%
Real Estate	85	366	11.71%
Risk Management	0	11	0.35%
<b>Total</b>	<b>344</b>	<b>3126</b>	<b>100.00%</b>

#### **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 provided when requested for section 8 voucher briefings, eligibility interviews, rental appointments, termination of tenancy or rental assistance hearings, applicant appeals of ineligibility determinations, resident meetings, etc.
- Interpretation services are provided for BHA's public hearings in Spanish and Cantonese. Additional languages in Haitian Creole, Cape Verdean, and Vietnamese are provided when requested.
- 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 other languages when requested.)
- 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.

#### **Notable Accomplishments and Summary**

CCECR's Language Access Division has continued building its language capacity by partnering with our communities and schools. The Division sponsored vibrant internships and service-learning projects with Northeastern University, Bunker Hill Community College, Bristol Community College, UMass Boston, Suffolk University, Boston University, and Fisher College that have provided invaluable language support to BHA applicants and residents. This year we partnered with Boston College PULSE Program and placed one student to assist Spanish speaking clients for a whole academic year. In addition, the Division's AmeriCorps VISTA Member, has continued expanding our outreach and recruitment efforts for the Volunteer interpreters Program. Volunteers not only assist with interpretation and translation services in person and over the phone, but also actively help during events at our housing sites at Unity

Days throughout the summer. Finally, even though Project REACH (Racial and Ethnic Approach to Community Health) has come to an end last year, residents still ask to continue the wellness initiatives which we have done in a smaller scale in partnership with the Boston Public Health commission, offering Smoke-Free Living and oral Health workshops. Finally, through our Wellness Connect Program, we have continued offering services to our Chinese speaking communities at elderly sites.



<b>FY2019 BHA Volunteer Contribution Highlights</b>					
<b>Number of Active Volunteers</b>	<b>Training Sessions Conducted</b>	<b>Language Capacity</b>	<b>Interpretation/ Translation Accomplished</b>	<b>Volunteer Hours in past 12 months</b>	<b>Cost Savings to BHA (Average vendor rate \$60/hr)</b>
311	23	31	1,074 assignments	1484.75 hours	\$89,000+

## **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 re-certifications and assesses and processes residual tenancy requests" Inspects apartments for compliance with federal housing quality standards and conducts landlord outreach activities.

### **Operations Department and Work Order Call Center 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. The Work Order Call Center processes emergency services requests and schedules routine repairs for public housing residents.

### **Center for Community Engagement and Civil Rights (CCECR)**

Engages public residents and Section 8 tenants in programs and services, and builds capacity of local tenant organizations by providing training and technical assistance; combines resident empowerment, language access, community services, and resident health initiatives (Boston REACH: Partners in Health and Housing; Wellness Connect) into one function, and partners with providers to connect residents to social, educational, vocational, and health services. It 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.

### **Planning and Real Estate Development**

Leads BHA's sustainability efforts, develops outside resources and partnerships, and advances strategic plans for the BHA portfolio; oversees ongoing capital improvements to BHA's portfolio of 12,000 public housing units, and oversees the transformation of Boston's most severely distressed public housing into thriving new communities through a process called Redevelopment. Each redevelopment process involves a significant amount of resident engagement, and language access is actively involved to facilitate communication during resident and community meetings. As redevelopments complete and private partners assume ownership and management, private partners take on the responsibility of providing language access resources. BHA staff will work with the private partners to ensure that there is no reduction in language access for limited English proficient households after the conversion.

### **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 media inquiries and circulates press releases announcing newsworthy events; produces newsletters, and publications such as annual reports and brochures. In addition, CD oversees 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.