

Boston Housing Authority
The Four Factor Analysis for the Limited English Proficiency Policy
(November 2020)

A. Mission Statement

The goal of the Boston Housing Authority is:

- to provide stable, quality, and 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, and the state funded Massachusetts Rental Voucher Program, which 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 funded by both the state and federal government: public housing and rental assistance. 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 data from all Boston households in order 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 2019 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, Amharic, and Russian.

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

The below listed 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). Due to the pandemic, most of our scheduled trainings had to be postponed. We will be providing training to the Operations staff (Management Offices) in December 2020, and for the new Leased Housing and Occupancy staff in early 2021. Even though all BHA services are provided remotely, 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. FY2020 Interpreter Request by Language*, *Figure 2. FY2020 Interpreter Request by Department*, and *Figure 4. FY2020 BHA Multilingual Line Calls by Department* also illustrate the extent to which LEP persons come into contact with these departments.

- Admissions Department (Formerly known as Occupancy Department)
- Center for Community Engagement and Civil Rights (CCECR)
 - Office of Civil Rights
 - Resident Empowerment Coalition
- Department of Grievances and Appeals (DGA)
- Leased Housing Division
- Legal Department
- Operations Department and Development Management Offices
- Planning and Real Estate Department
- Work Order Call Center
- Tenant Accounting

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, as these aspects of BHA's operations are most likely to have the greatest impact on LEP persons. Due to the COVID-19 pandemic, BHA ceased in-person operations and conducts all business remotely: over the phone and through virtual communication portals. However, BHA saw an enormous increase in calls from applicants and residents looking for information related to their housing. BHA is proud to have responded in a great manner to the needs to our clients who speak limited English either orally (screenings, interviews, recertifications, administrative hearings) or in writing (Notices from the Administrator, COVID updates, changes in the housing programs, etc.)

A. Provision of Interpreter Services (Oral Language Services)

1. BHA provides, and will continue to provide interpretation services through bilingual employees, interns, volunteers through the BHA Volunteer Interpreters Program, and contract vendors. From October 1, 2019 to September 30, 2020, BHA has filled **1,360 documented (and generally, pre-arranged) requests for interpreters in 21 languages** -- Albanian, Amharic, Arabic, Bosnian, Bengali, Cambodian, Cape Verdean, Chinese (213 Cantonese, 87 Mandarin, and 1 Toisanese), Farsi, French, Haitian Creole, Hindi, Nepali, Polish, Portuguese, Russian, Somali, Spanish, Swahili, Tigrinya, and Vietnamese. *See Figure 1.* About 58.2% of the requests were to provide Spanish language interpreters. As mentioned previously, because of the pandemic, BHA stopped all in-person services in mid-March 2020. This caused many of pre-arranged appointments to be cancelled or rescheduled. While Admissions screenings have been performed over the phone, many Leased Housing recertifications are conducted via mail. Our Wellness Connect sessions with Chinese speaking elderly residents were also cancelled as were the in-person resident meetings and events. Nevertheless, the Language Access Division has been able to continue providing services using the Zoom platform for administrative hearings, resident meetings for Local Tenant Organizations, and redevelopment updates.

Figure 1: FY2020 Interpreter Requests by Language (1,360 requests)

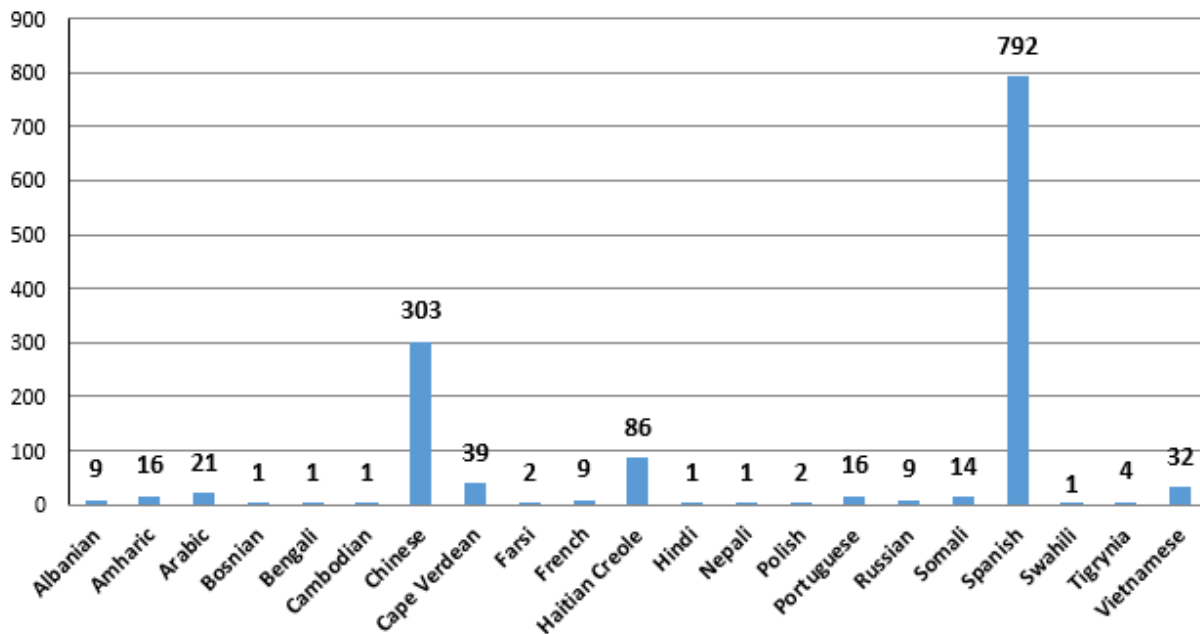


Figure 2: FY2020 Interpreter Services by Department (1,360 requests)*

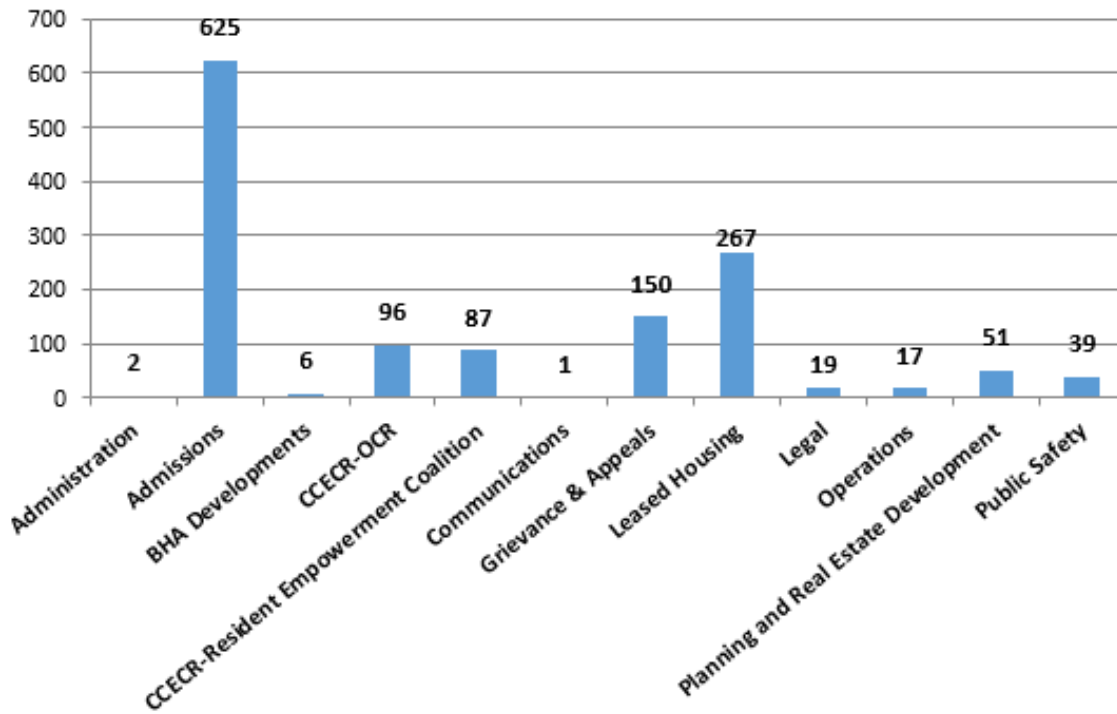
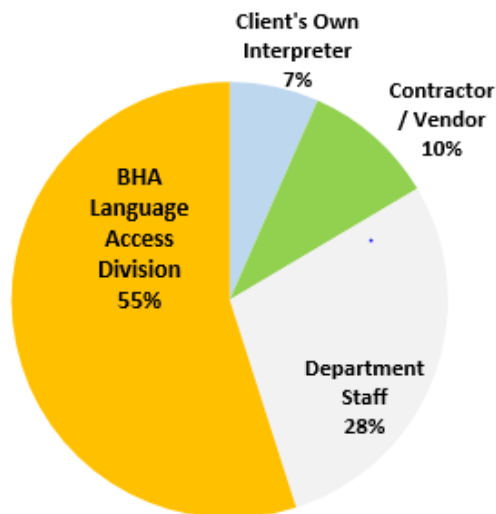


Figure 3: FY2020 Interpreter Requests by Provider



* 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 (35 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:

- On all documents, BHA includes a Language Advisory in 11 languages that an oral interpretation of the documents is available, with contact information for requesting an interpretation.
- Language Identification Sign and “Interpreter Service Available” posters are posted at all areas of contact with LEP persons at our main building and management offices.
- 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.

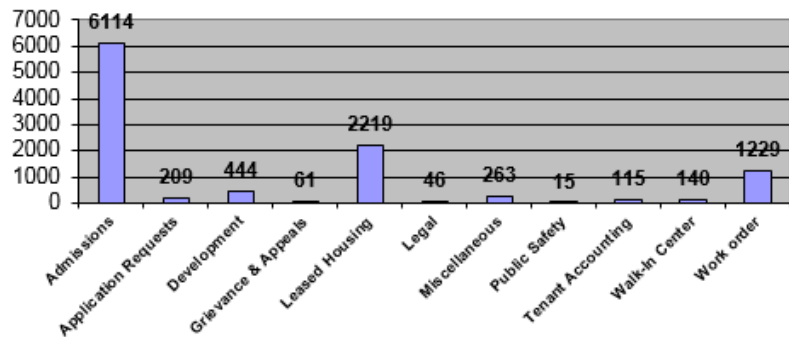
This past year the Multilingual Line assisted with calls in 15 languages. The majority of the calls were for Spanish (95.33%) and Chinese (4.67%) speaking clients. Other languages that were interpreted by phone were Albanian, Amharic, Arabic, Cape Verdean, Farsi, French, Haitian Creole, Korean, Polish, Portuguese,

Russian, Somali, and Vietnamese. The Multilingual Line assisted with **10,855 calls** from October 1, 2019 to September 30, 2020.

Since March 2020 our direct services are completely remotely, and this has caused an increase in calls from our previous year (over 1,000 from our FY2019 report). In addition to assistance needed in the departments stated in Figure 4, calls have also included wellness check-ins for residents, Census advisories, and updates for redevelopments (Counted under *Miscellaneous*). All scheduled appointments conducted over the phone have been counted with the Interpretation Requests.

Annual Summary	Total Calls	%
Spanish	9932	91.50%
Chinese *	487	4.49%
Other	436	4.02%
Albanian	4	0.04%
Amharic	5	0.05%
Arabic	32	0.29%
Cape Verdean	65	0.60%
Farsi	1	0.01%
French	1	0.01%
Haitian Creole	196	1.81%
Korean	1	0.01%
Polish	5	0.05%
Portuguese	10	0.09%
Russian	13	0.12%
Somali	19	0.18%
Vietnamese	84	0.77%
Total Calls	10855	100.00%

Figure 4: FY2020: BHA Multilingual Line Calls by Department



*The "Chinese" language category includes Cantonese (306), Mandarin (180) and Toisanese (1).

From August 1, 2019 to July 31, 2020, BHA utilized the commercial AT & T Language Line in 65 occasions to provide coverage 14 languages, some of which were Albanian, Amharic, Arabic, Bengali, Cape Verdean, Chinese, Farsi, French, Haitian Creole, Patois, Russian, Somali, Spanish, and Vietnamese.

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, 2019 to September 30, 2020, BHA translated over 293 Vital Documents from English to Spanish and/or Chinese, with a total of 335 pages translated in Spanish, Chinese, and additional languages such as Arabic, Cape Verdean, Haitian Creole, Polish, Portuguese, Russian, Somali, Urdu, and Vietnamese. Cumulatively, over 3419 pages of English documents have been translated into multiple languages since the inception of the Language Access Program in 2010. Many documents with important information for applicants and residents relating to COVID-19 are available on our website.

**Figure 5. Translation Requests (# of Pages) by Department
FY2020/Cumulative Since 2010**

Department Name	FY2020	Cumulative since 2010	
Administration Department	36	385	10.12%
BHA Developments	9	235	6.18%
Capital Construction	1	9	0.24%
CCECR	121	1112	29.22%
Communications Department	20	105	2.76%
Grievance & Appeals	3	41	1.08%
Leased Housing	47	188	4.94%
Legal Department	0	213	5.60%
Admissions	6	772	20.29%
Operations	28	215	5.65%
Public Safety	0	2	0.05%
Purchasing Department	0	2	0.05%
Planning & Real Estate Development	64	515	13.53%
Risk Management	0	11	0.29%
Total	335	3805	100.00%

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 participants 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 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.
- CCECR provides interpretation and translation to Resident Empowerment Coalition events and initiatives (Now provided virtually)
- 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.
- Admissions 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

When the COVID-19 pandemic hit the city, the Language Access Division quickly adapted to continue providing services to our clients. We adapted to be able to offer all interpretation services over the phone, and to be able to use technology to continue to contact our residents. We have been able to interpret via Zoom for resident events such as Redevelopment and Tenant Organization meetings in Spanish and Chinese. We were also able to provide quick translations to the various documents our Administrator and Operations department wanted to distribute among our various program participants to update them of changes to their respective programs.

Our Volunteer Interpreters Program has been vital in providing interpretation and translation services alongside our increased number of calls. In addition, our department assisted in scheduling volunteers to assist distributing meals at various BHA sites. Our AmeriCorps VISTA Members have kept active with our capacity building initiatives.

We have continued recruiting volunteers from the community, transitioned to hosting our training sessions via Zoom, and prioritized maintaining our partnerships with local universities. In addition, the AmeriCorps VISTA Member recently obtained a grant from the Massachusetts Service Alliance which will help us resume our Wellness Connect Program with Chinese speaking elderly residents in a virtual capacity.



FY2020 BHA Volunteer Contribution 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.)
335	13	34	670 assignments	927.15 hours	\$55,000+

BHA Departmental Descriptions

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.