

Boston Housing Authority
The Four Factor Analysis for the Limited English Proficiency Policy
(10/2017)

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

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 2016 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, Arabic, Portuguese, Somali, Amharic, and Russian. Other needs also include Albanian, French, Italian, Polish, Farsi, Cambodian, Swahili, Luganda, Mandingo, Turkish, Bengali, and Urdu.

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 Occupancy Department staff in September 2017. 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 9 of this report, *Figure 2. FY2017 Interpreter Request by Department* and *Figure 4. FY2017 BHA Multilingual Line Calls by Department* also illustrate the extent to which LEP persons come into contact with these departments.

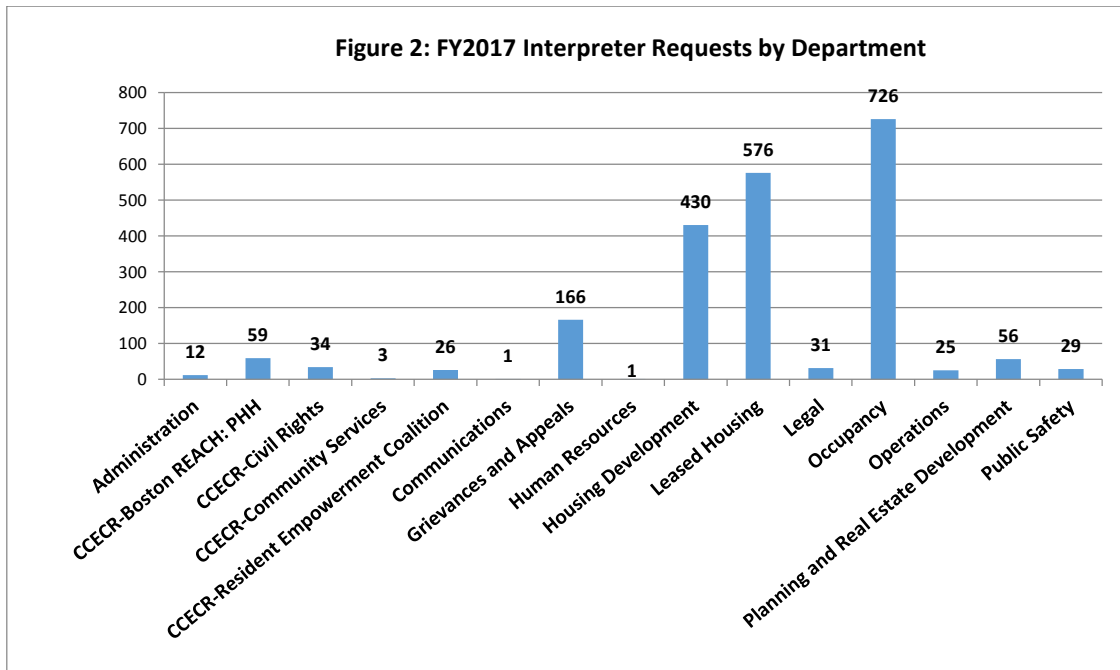
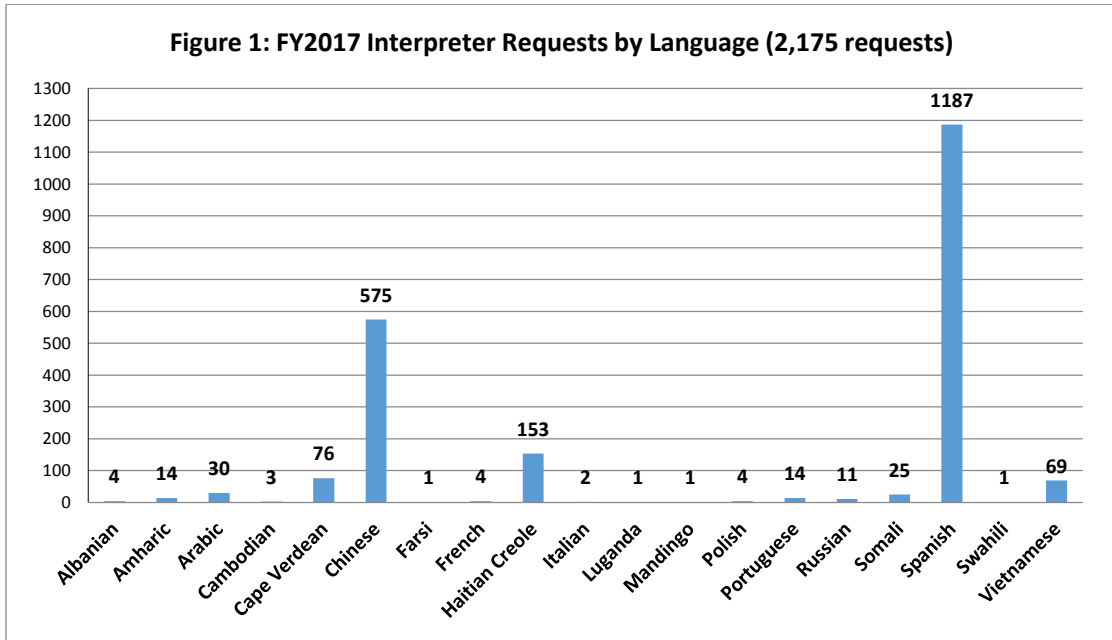
- Department of Grievances and Appeals (DGA)
- Occupancy Department
- Leased Housing Division
- Operations Department and Development Manager Offices
- Center for Community Engagement and Civil Rights (CCECR)
- Work Order Call Center
- Communications Department
- Legal Department
- Public Safety Department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

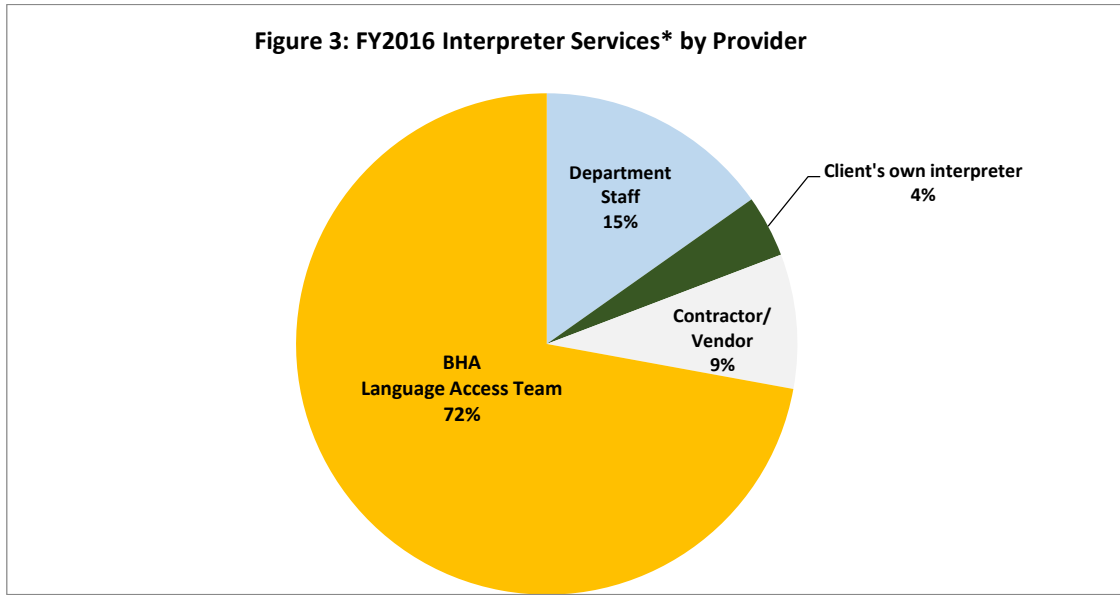
3. Nature and importance of the program, activity, or service provided by the program.

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, 2016 to September 30, 2017, BHA has filled **2,175 documented (and generally, pre-arranged) requests for interpreters in 19 languages** -- Albanian, Amharic, Arabic, Cambodian, Cape Verdean, Chinese (320 Cantonese, 246 Mandarin, 9 Toisanese), Farsi, French, Haitian Creole, Italian, Luganda, Mandingo, Polish, Portuguese, Russian, Somali, Spanish, Swahili, and Vietnamese. *See Figure 1.* About 54% of the requests were to provide Spanish language interpreters.





** Interpretation Service by Multilingual Line not included*

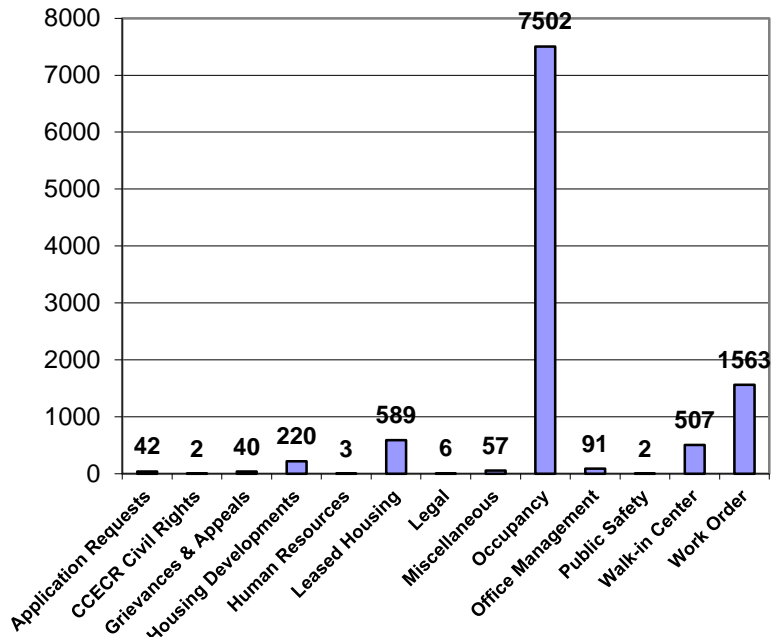
B. Interpretation Service by Phone

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), Haitian Creole, Cape Verdean, Vietnamese, Somali, and Arabic.

This past year the Multilingual Line assisted in 15 languages. Some of these languages were Albanian, French, Portuguese, and Russian, and all of which were provided by BHA volunteers. The Multilingual Line assisted **10,624 calls** from October 1, 2016 to September 30, 2017.

FY2017 Multilingual Line Summary by Language	Total Calls	%
Spanish	9145	86.08%
Chinese *	1110	10.45%
Other Languages	369	3.47%
Albanian	7	0.07%
Amharic	7	0.07%
Arabic	18	0.17%
Cambodian	1	0.01%
Cape Verdean	42	0.40%
French	4	0.04%
Haitian Creole	192	1.81%
Italian	3	0.03%
Portuguese	26	0.24%
Russian	8	0.08%
Somali	8	0.08%
Turkish	1	0.01%
Vietnamese	52	0.49%
Total Calls	10624	100.00%

Figure 4. FY2016 BHA Multilingual Line Calls by Department



* The "Chinese" language category includes Cantonese (233), Mandarin (841) and Toisanese (36).

From August 1, 2016 to July 31, 2017, BHA utilized the commercial AT & T Language Line in 203 occasions to provide swift coverage in 19 languages, some of which were Amharic, Bengali, Farsi, Polish, Swahili, and Urdu.

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

- Housing Application Briefing (10/2016)
- Eligibility Interviews
- Rental Interviews/Lease Signings
- Voucher Briefings
- Tenant/Applicant/Participant Hearings
- Initial, Annual and Interim Recertifications
- Private Conferences
- Emergency Transfer Interviews
- Fraud Investigations
- Civil Rights Intakes and Mediations
- Settlement Discussions
- Residents-Management Meetings
- Wellness Connect Program in 8 elderly/disabled developments (189 sessions in Cantonese, Mandarin, Spanish and Cape Verdean, 2-4 interpreters/session)
- Project REACH -- Racial and Ethnic Approach to Community Health workshops
- Redevelopment meetings
- Local Tenants Organization trainings and elections
- Citywide Public Hearings
- Affirmatively Furthering Fair Housing Forums, and Assessment of Fair Housing surveys

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.



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, 2016 to September 30, 2017, BHA translated over 439 pages of Vital Documents from English to Spanish and/or Chinese, and 77 pages from English to Haitian Creole, Vietnamese, Cape Verdean, Portuguese, Russian, Arabic, and/or Somali. Cumulatively, over 2,298 pages of English documents have been translated into multiple languages since the inception of the Language Access Program in 2010.

Figure 5. Translation Requests (# of Pages) by Department FY2017/Cumulative Since 2010			
Department Name	FY2017	Cumulative since 2010	
Administration Department	27	272	11.84%
BHA Developments	23	154	6.70%
Capital Construction	1	6	0.26%
CCECR	234	499	21.71%
Communications Department	22	29	1.26%
Grievances and Appeals	0	38	1.65%
Leased Housing	0	91	3.96%
Legal Department	12	213	9.27%
Occupancy Department	2	596	25.94%
Operations	17	176	7.66%
Public Safety	0	2	0.09%
Purchasing Department	0	2	0.09%
Real Estate Development	97	209	9.09%
Risk Management	4	11	0.48%
Total	439	2298	100.0%

The BHA public housing lease was made available in Cape Verdean in September 2017. 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. The housing glossary is now available also in Haitian Creole, and the Language Access Division is working on the Cape Verdean, Vietnamese, and Arabic versions

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 application briefings, eligibility interviews, rental appointments, termination of tenancy or rental assistance hearings, and applicant appeals of ineligibility determinations.
- 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 Project REACH and 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.

Notable Accomplishments and Summary

2016-2017 has been a successful year for CCECR’s Language Access Division in 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. In addition, the Division’s AmeriCorps VISTAs, were able to expand recruitment and outreach for the Volunteer Interpreters Program, which in turn, had greatly supported residents’ participation in many programs and in the agency’s housing preservation/redevelopment efforts.

CCECR has also advanced the language access issue by sharing best LEP Policy practices at the 2017 NERO/NAHRO Conference (New England Regional Council of the National Association of the Housing and Redevelopment Officials), providing training on how to conduct a Four Factor Analysis, and by supporting the implementation of the City’s Communication Access Ordinance. Staff will continue to share vision and practices with other housing agencies to broaden language access to the greatest extent possible.



FY2017 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)
225	26	30	1,613 assignments	4,060.5 hours	\$243,600+

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.

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.