

Boston Housing Authority
The Four Factor Analysis for the Limited English Proficiency Policy
(Revised 12/2014)

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 2010 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 (Cantonese and Mandarin), Haitian Creole, Vietnamese, Cape Verdean, Somali, Arabic, and Amharic. Other needs also include Russian, Portuguese, Albanian, French, Italian, Bosnian, Tigrinya, Bengali, Farsi, Fulani, German, Greek, Hindi, Japanese, Patois (Jamaican), Polish, Serbian, 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. 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 (an expanded operation of the former Spanish and Chinese Lines) which provides timely interpretation to BHA clients in 7 languages over the phone.

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 continues to partner with providers to connect residents to social, educational, vocational, health and other critically needed services. CCECR also 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.

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, volunteers through the BHA Volunteer Interpreters Program, and contract vendors. From October 1, 2013 to September 30, 2014, BHA has filled 1,594 documented (and generally, pre-arranged) requests for interpreters in 21 languages (Albanian, Amharic, Arabic, Bengali, Bosnian, Cape Verdean, Chinese [160 Cantonese, 65 Mandarin, and 1 Toisanese], Farsi, French, Greek, Haitian Creole, Hindi, Italian, Polish, Portuguese, Russian, Somali, Spanish, Tigrinya, Urdu, and Vietnamese). From August 1, 2013 to August 31, 2014, BHA utilized the commercial AT & T Language Line in 273 occasions to provide swift coverage in 21 languages, including Fulani and Jamaican Patois.

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

- Housing Application Briefing (began in July and in 7 languages)
- Making Connections Survey interview at elderly/disabled developments (7 languages)
- 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
- Local Tenants Organization Meeting and/or Election
- Citywide Public Hearing

- 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. Since April 2014, BHA has also designated 617-988-4001 as the Multilingual Line with Language Access staff and volunteers interpreting over the phone in Spanish, Chinese (Mandarin and Cantonese), Arabic, Haitian Creole, Cape

Verdean, Somali, and Vietnamese. The staff and volunteers have assisted over 10,300 calls from October 1, 2013 to September 30, 2014.

- 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.
- 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
- Needs Assessment Surveys for the Making Connections Project and the Mass LEAP FSS Program

Between October 1, 2013 to September 30, 2014, BHA has translated over 363 pages of Vital Documents from English to Spanish and Chinese, and cumulatively, over 1,300 pages since the inception of the Language Access Division in April 2010. BHA also continues to expand its trilingual (English-Spanish-Chinese) glossary of frequently-used housing terms, which serves as a useful tool for its volunteer interpreters.

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 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 the Local Tenants Organizations.
- Through its new Multilingual Line, BHA provides quick interpretation over the phone.
- BHA utilizes the commercial AT & T Language Line to provide interpretation for residents requesting emergency repairs or other information related to their tenancy, and to provide backup 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'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.
- 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.

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, BHA's Language Access Division (which is now part of CCECR) will continue to build its language resources by recruiting and training bilingual volunteers from local communities and educational institutions, and exploring partnerships with those institutions. The Volunteer Interpreters Program sustains a pool of 147 active volunteers who have in 2014, provided 995 hours of service (or 644 occasions of interpretation and translation) in 16 languages. The pool currently has the capacity to cover 25 languages.

Total Applicants 36201

Language	Read	% of Whole	% of Responses	Spoken	% of Whole	% of Responses
Albanian	43	0.12%	0.17%	45	0.12%	0.17%
Amharic	69	0.19%	0.27%	61	0.17%	0.23%
Arabic	132	0.36%	0.52%	132	0.36%	0.50%
Armenian	1	0.00%	0.00%	3	0.01%	0.01%
Bengai	1	0.00%	0.00%	2	0.01%	0.01%
Bengla	5	0.01%	0.02%	6	0.02%	0.02%
Braille	1	0.00%	0.00%	0	0.00%	0.00%
Cambodian	8	0.02%	0.03%	9	0.02%	0.03%
Cantonese	217	0.60%	0.85%	404	1.12%	1.53%
Cape Verden	284	0.78%	1.11%	322	0.89%	1.22%
Chinese	1719	4.75%	6.71%	1682	4.65%	6.39%
English	17247	47.64%	67.29%	17968	49.63%	68.25%
Farsi	13	0.04%	0.05%	12	0.03%	0.05%
French	184	0.51%	0.72%	167	0.46%	0.63%
German	1	0.00%	0.00%	2	0.01%	0.01%
Greek	8	0.02%	0.03%	6	0.02%	0.02%
Haitian/Creole	633	1.75%	2.47%	680	1.88%	2.58%
Hindi	5	0.01%	0.02%	3	0.01%	0.01%
Italian	4	0.01%	0.02%	4	0.01%	0.02%
Korean	4	0.01%	0.02%	4	0.01%	0.02%
Kurdish	1	0.00%	0.00%	1	0.00%	0.00%
Mandarin	87	0.24%	0.34%	123	0.34%	0.47%
Other	33	0.09%	0.13%	125	0.35%	0.47%
Persian	0	0.00%	0.00%	1	0.00%	0.00%
Polish	13	0.04%	0.05%	13	0.04%	0.05%
Portuguese/Creole	195	0.54%	0.76%	168	0.46%	0.64%
Russian	226	0.62%	0.88%	226	0.62%	0.86%
Sign Language	0	0.00%	0.00%	17	0.05%	0.06%
Somalian	112	0.31%	0.44%	105	0.29%	0.40%
Spanish	4016	11.09%	15.67%	3712	10.25%	14.10%
Swahili	4	0.01%	0.02%	5	0.01%	0.02%
Thai	1	0.00%	0.00%	1	0.00%	0.00%
Tigrina	6	0.02%	0.02%	7	0.02%	0.03%
TTY	1	0.00%	0.00%	0	0.00%	0.00%
Vietnamese	345	0.95%	1.35%	312	0.86%	1.19%
Sub-total	25629			26328		
Unverified	10572	29.20%		9873	27.27%	

Section 8 - Federal Leased Housing - 2014 - (Total: 13161)

Language	Read	% of Whole	% of Responses	Spoken	% of Whole	% of Responses
Albanian	1	0.01%	0.01%	1	0.01%	0.01%
Amharic	7	0.05%	0.06%	6	0.05%	0.05%
Arabic	8	0.06%	0.07%	8	0.06%	0.07%
Armenian	0	0.00%	0.00%	1	0.01%	0.01%
Bengla	1	0.01%	0.01%	1	0.01%	0.01%
Braille	1	0.01%	0.01%	0	0.00%	0.00%
Cambodian	11	0.08%	0.09%	10	0.08%	0.08%
Cantonese	54	0.41%	0.45%	64	0.49%	0.53%
Cape Verden	36	0.27%	0.30%	36	0.27%	0.30%
Chinese	106	0.81%	0.89%	90	0.68%	0.75%
English	9880	75.07%	82.51%	9919	75.37%	82.79%
Farsi	3	0.02%	0.03%	3	0.02%	0.03%
French	12	0.09%	0.10%	11	0.08%	0.09%
Greek	3	0.02%	0.03%	3	0.02%	0.03%
Haitian/Creole	72	0.55%	0.60%	71	0.54%	0.59%
Hindi	1	0.01%	0.01%	1	0.01%	0.01%
Italian	12	0.09%	0.10%	10	0.08%	0.08%
Mandarin	4	0.03%	0.03%	5	0.04%	0.04%
Other	6	0.05%	0.05%	4	0.03%	0.03%
Portuguese/Creole	32	0.24%	0.27%	28	0.21%	0.23%
Russian	92	0.70%	0.77%	95	0.72%	0.79%
Sign Language	0	0.00%	0.00%	10	0.08%	0.08%
Somalian	41	0.31%	0.34%	35	0.27%	0.29%
Spanish	1403	10.66%	11.72%	1382	10.50%	11.53%
Thai	2	0.02%	0.02%	2	0.02%	0.02%
Tigrina	2	0.02%	0.02%	2	0.02%	0.02%
TTY	3	0.02%	0.03%	0	0.00%	0.00%
Vietnamese	180	1.37%	1.50%	182	1.38%	1.52%
Xoruba	1	0.01%	0.01%	1	0.01%	0.01%
						0.00%
Sub-total (Responses	11974	90.98%	100.00%	11981	91.03%	100.00%
Unverified	1187	9.02%		1180	8.97%	
Total	13161	100.00%		13161	100.00%	