

**Boston Housing Authority**  
**The Four Factor Analysis for the Limited English Proficiency Policy**  
**(October 2012)**

**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, Cape Verdean, Vietnamese, and Portuguese. Other needs also include Somali, Arabic, Amharic, Albanian, Polish, and Russian.

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 have undergone training on the LEP Policy in 2010 and are familiar with the use of the Language Identification Card, the Language Advisory, and the Interpreter Request Form. They are also familiar with the process of requesting interpreters and written translations, as well as the availability of BHA's Spanish Lines (in operation in December 2010) and its Chinese Line (in operation in July 2011), both of which provide timely interpretation to BHA clients 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.

### **Resident Services Department**

In addition to providing a variety of social services to BHA residents (e.g. services for seniors, 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, etc.), the Department also assists the residents groups in capacity building and avails training and technical resources to the resident groups so that they may fully participate.

### **Office of Civil Rights**

(OCR) - Serves applicants, and residents with disabilities and/or their advocates; provides assistance regarding reasonable accommodation requests. It 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. The Language Access Division, which implements the agency's Limited English Proficiency Policy, is also situated in OCR.

### **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 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 website, which is undergoing a major redevelopment and will include multilingual features upon completion.

### **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 occurs at grievance hearings in the BHA's DGA; at the Boston Housing Court in eviction and lease-related proceedings; 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, 2011 to September 30, 2012, BHA has filled 1,181 documented (and generally, pre-arranged) requests for interpreters in 19 languages (Albanian, Amharic, Arabic, Bosnian, Cambodian, Cape Verdean, Chinese [109 Cantonese, 85 Mandarin, and 1 Toisanese], Farsi, French, Greek, Haitian Creole, Portuguese, Russian, Somali, Spanish, Swahili, Tigrinya, Turkish, and Vietnamese). From September 1, 2011 to August 31, 2012, BHA utilized the Language Line in 85 occasions to provide swift coverage in 15 languages, namely, Albanian, Amharic, Arabic, Chinese (1 Cantonese and 2 Mandarin), French, Haitian Creole, Hindi, Indonesian, Japanese, Portuguese, Russian, Somali, Spanish, Tigrinya, 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
- Private Conference
- Fraud Investigation
- Settlement Discussion

- 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. The Work Order Call Center has Spanish speaking staff to assist LEP callers and utilizes the Language Line for other language needs.
- 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. There are 3 designated phone lines (2 Spanish and 1 Chinese) with Language Access staff and volunteers standing by to interpret for callers during BHA's business hours. The staff and volunteers have assisted over 8,300 calls from October 1, 2011 to September 30, 2012 and a handful of the calls that came through the Spanish Lines were Cape Verdean and Portuguese.
- 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
- Transfer Guide

Between October 1, 2011 to September 30, 2012, BHA has translated over 230 pages of Vital Documents from English to Spanish and Chinese, or over 630 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:

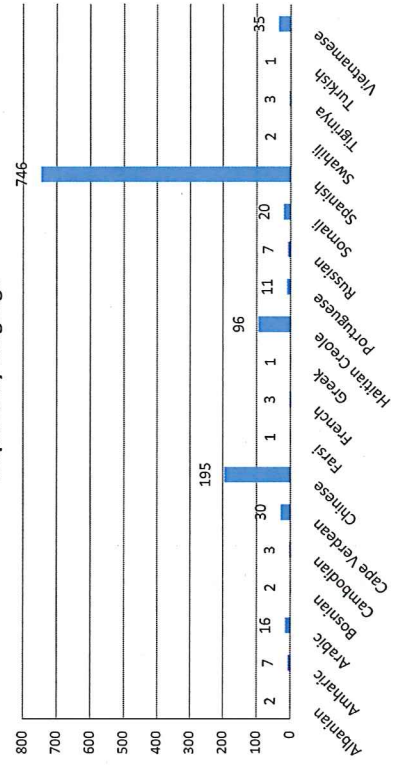
- Bilingual employees, interns, vendors, and volunteers provide interpretation and translation services for applicants, residents and Section 8 participants.
- Interpretation Services are scheduled when requested for eligibility interviews, rental appointments, termination of tenancy hearings, and applicant 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, as part of the new Limited English Proficiency Initiative-Residents Corps collaborative.
- BHA utilizes Language Line, a contract vendor, to provide interpretation for residents requesting emergency services and repairs or other information related to their tenancy, and to provide backup coverage 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 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 allocate funds, as available from appropriations, for translation of Vital Documents on an ongoing basis. The agency 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. Through its Bilingual Internships and Volunteer Interpreters Program, BHA's Language Access Division 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 94 active volunteers who have in the past year, provided 528 hours of service in 9 languages. The pool currently has the capacity to cover 22 languages.

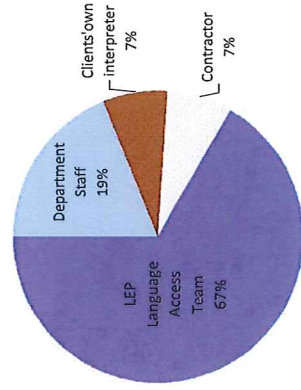
# Summary of Interpreter Requests (10/1/2011-9/30/2012)

Language Requested	Frequency	Percentage	Request Frequency by Department													Service Frequency by Provider			
			Administration	Capital Construction	Civil Rights	Finance & Accounts	Grievances & Appeals	Housing Development	Human Resources	Leased Housing	Legal	Occupancy	Operations	Planning & Real Estate	Public Safety	Risk Management	Department Staff	Clients/own Interpreter	Contractor
Albanian	2	0.17%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0
Amharic	7	0.59%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	0
Arabic	16	1.35%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	12	2
Bosnian	2	0.17%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0
Cambodian	3	0.25%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0
Cape Verdean	30	2.54%	0	0	3	0	7	0	0	0	0	0	0	0	0	0	5	0	25
Chinese	195	16.51%	10	3	1	0	18	50	0	0	0	21	0	2	0	17	2	1	175
Farsi	1	0.08%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
French	3	0.25%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Greek	1	0.08%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Haitian Creole	96	8.13%	3	0	1	0	17	5	0	0	9	0	0	1	0	11	11	11	73
Portuguese	11	0.93%	0	0	1	0	2	0	0	0	0	0	0	0	0	0	1	1	9
Russian	7	0.59%	1	0	0	0	0	0	0	0	2	0	0	0	0	0	1	5	1
Somali	20	1.69%	0	0	0	0	3	2	0	0	2	0	0	0	0	0	1	14	5
Spanish	746	63.17%	2	0	4	4	168	10	0	0	57	22	2	1	43	198	57	6	485
Swahili	2	0.17%	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	1	0
Tigrinya	3	0.25%	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	3	0
Turkish	1	0.08%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Vietnamese	35	2.96%	0	0	1	0	8	2	0	0	4	1	1	0	0	8	1	17	9
<b>Total</b>	<b>1181</b>	<b>100%</b>	<b>16</b>	<b>3</b>	<b>11</b>	<b>4</b>	<b>228</b>	<b>69</b>	<b>3</b>	<b>101</b>	<b>25</b>	<b>641</b>	<b>27</b>	<b>5</b>	<b>46</b>	<b>224</b>	<b>84</b>	<b>85</b>	<b>788</b>

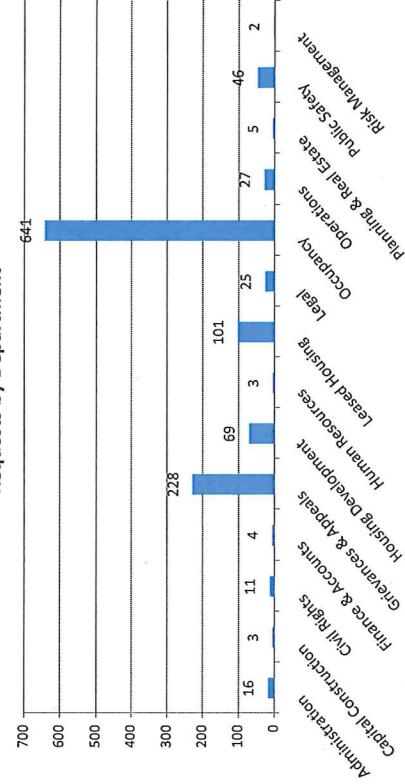
Requests by Language



Services by Provider



Requests by Department

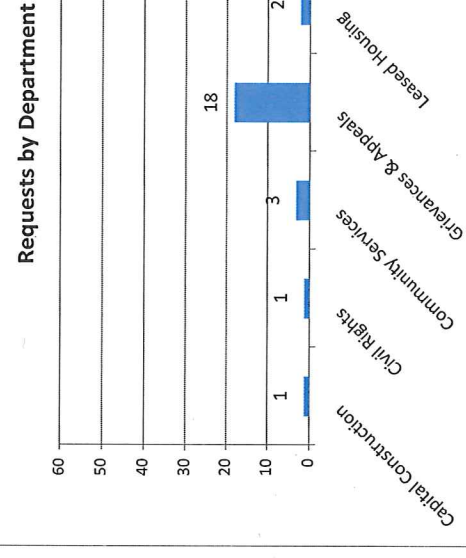
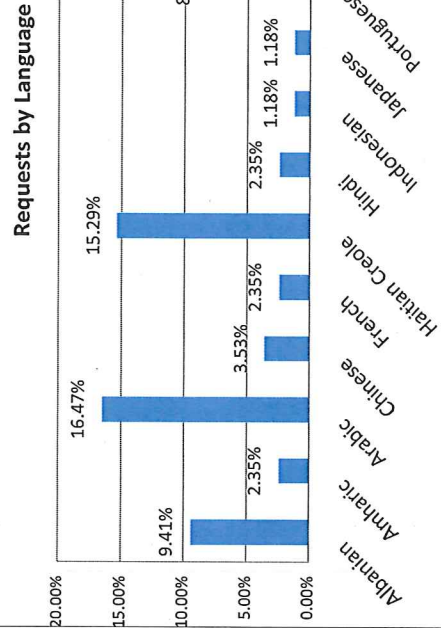


Note: The "Chinese" language category includes Cantonese(109), Mandarin(65) and Toisanese(1).

By the BHA Language Access Team 9/2012

# Use of Language Line Service (9/1/2011-8/31/2012)

Language Requested	Frequency	Percentage	Request Frequency by Department							
			Capital Construction	Civil Rights	Community Services	Grievances & Appeals	Leased Housing	Occupancy	Operations	
Albanian	8	9.41%						8		
Amharic	2	2.35%						2		
Arabic	14	16.47%				3				2
Chinese	3	3.53%						3		
French	2	2.35%						2		
Haitian Creole	13	15.29%			1	5		7		
Hindi	2	2.35%						2		
Indonesian	1	1.18%				1				
Japanese	1	1.18%								1
Portuguese	7	8.24%				2				5
Russian	8	9.41%	1				2			5
Somali	1	1.18%								1
Spanish	12	14.12%			2	6				4
Tigrinya	1	1.18%								1
Vietnamese	10	11.76%		1		1				8
<b>Total</b>	<b>85</b>	<b>100%</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>18</b>	<b>2</b>	<b>58</b>	<b>2</b>	<b>2</b>



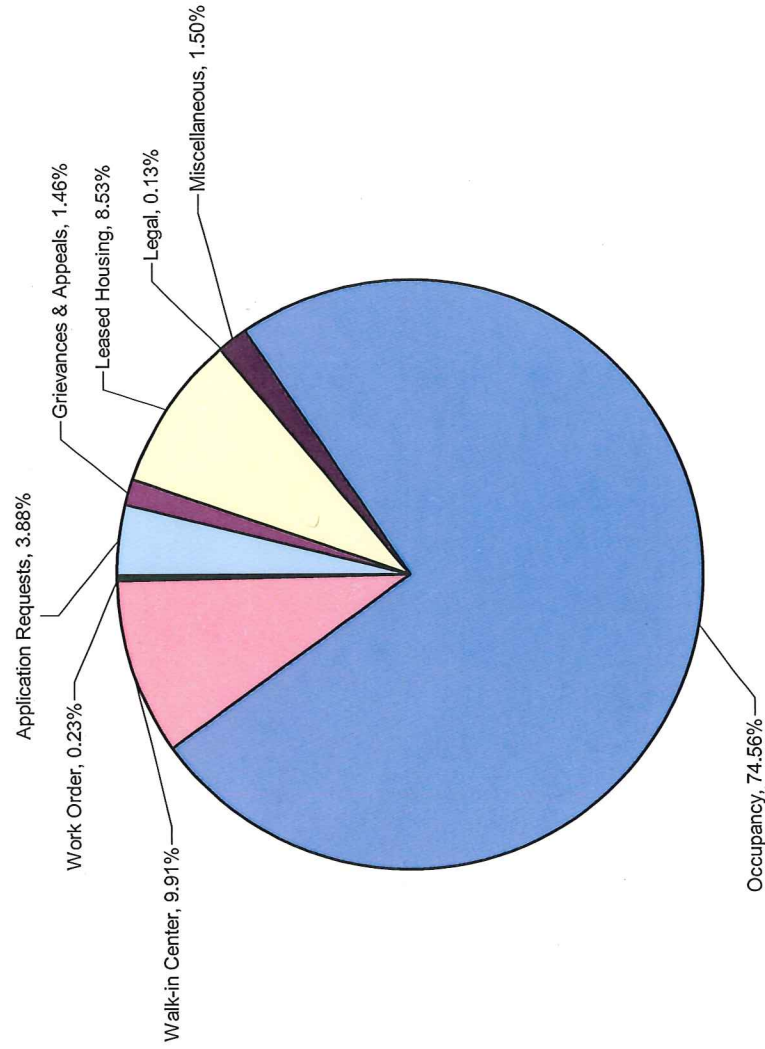
Note: The "Chinese" language category includes Cantonese(1) and Mandarin(2).



# Summary of OCR Spanish & Chinese Lines

(10/1/2011-9/30/2012)

Annual Summary	Application Requests	Grievances & Appeals	Leased Housing	Legal	Miscellaneous	Occupancy	Walk-in Center	Work Order	Total Calls
<b>Total Calls</b>	325	122	714	11	126	6243	830	19	<b>8373</b>
<b>Percentage</b>	3.88%	1.46%	8.53%	0.13%	1.50%	74.56%	9.91%	0.23%	<b>100%</b>



10/1/2011-9/30/2012

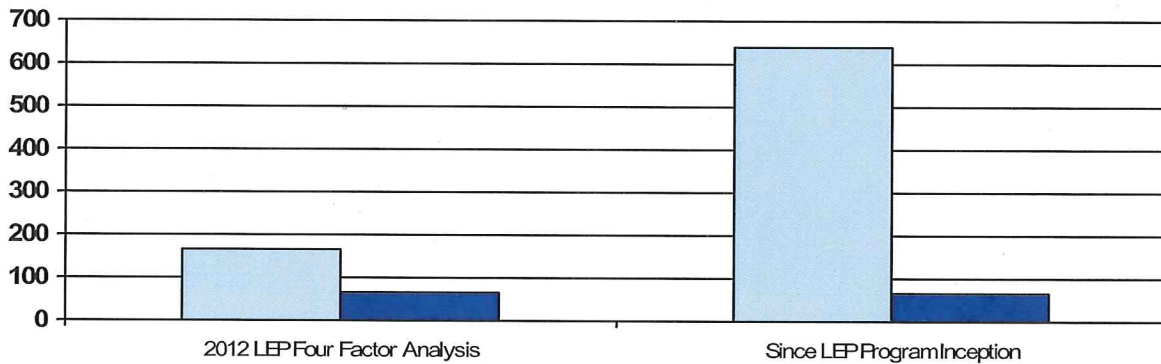
4/1/2010-9/30/2012

**2013 BHA Annual Plan  
2012 LEP Four Factor Analysis**

**Cumulative Data  
Since LEP Program Inception**

➤ **230** pages of documents translated from English to Spanish and/or Chinese (165 pages are new documents and 65 pages are previously translated documents with updates).

➤ **637** pages of documents translated from English to Spanish and/or Chinese (65 pages of previously translated documents were updated).



**Translation Summary 7/1/2010-9/31/2012**

**Total English Documents**

- 300 Documents
- 637 Pages

**Translation Summary**

**Spanish**

- 257 Documents
- 573 Pages

**Chinese**

- 260 Documents
- 594 Pages

# of Pages Translated by Department		
Occupancy Department	152	23.9%
Legal Department	139	21.8%
Administration Department	68	10.7%
Operations	58	9.1%
Housing Development	55	8.6%
Heritage Leased Housing	36	5.7%
Work Orders	30	4.7%
Leased Housing	28	4.4%
Smoke-Free	18	2.8%
Community Service	12	1.9%
Grievances and Appeals	12	1.9%
LTO	5	0.8%
Section 3	5	0.8%
Capital Construction	4	0.6%
OCR	4	0.6%
Real Estate Development	4	0.6%
Risk Management	4	0.6%
LEP	1	0.2%
Public Safety	2	0.3%
<b>Total</b>	<b>637</b>	<b>100.0%</b>



# Volunteer Interpreters Program

10/1/2011 - 9/30/2012



BOSTON HOUSING AUTHORITY

LEP Updates and Accomplishments

1	Albanian
2	Arabic
3	Cape Verdean
	Chinese-Cantonese
4	Chinese-Mandarin
	Chinese-Toishanese
5	Edo
6	Farsi
7	French
8	German
9	Haitian Creole
10	Hindi
11	Italian
12	Japanese
13	Karakh
14	Mongolian
15	Polish
16	Portuguese
17	Russian
18	Somali
19	Spanish
20	Swahili
21	Turkish
22	Vietnamese

(Table 1)

➤ Trained 102 volunteers from colleges, high schools and community organizations in 19 training sessions

➤ 94 active volunteers for 22 languages (see Table 1)

➤ Volunteered 528.5 hours

➤ Provided coverage in 9 languages (see Table 2)

➤ Served in 224 occasions, including Spanish/Chinese Line, interpretation for screening and hearing, and written translation

Arabic
Cape Verdean
Chinese-Cantonese
Chinese-Mandarin
Haitian Creole
Portuguese
Somali
Spanish
Vietnamese

(Table 2)

Total Applicants 40201

Language	Read	% of Whole	% of Responses	Spoken	% of Whole	% of Responses
Albanian	39	0.10%	0.13%	41	0.10%	0.13%
Amharic	62	0.15%	0.20%	56	0.14%	0.17%
Arabic	165	0.41%	0.54%	170	0.42%	0.53%
Armenian	2	0.00%	0.01%	2	0.00%	0.01%
Bengla	4	0.01%	0.01%	5	0.01%	0.02%
Braille	2	0.00%	0.01%	0	0.00%	0.00%
Cambodian	7	0.02%	0.02%	9	0.02%	0.03%
Cantonese	216	0.54%	0.71%	398	0.99%	1.24%
Cape Verden	302	0.75%	0.99%	355	0.88%	1.10%
Chinese	1663	4.14%	5.43%	1730	4.30%	5.38%
English	20983	52.20%	68.55%	22401	55.72%	69.69%
Farsi	10	0.02%	0.03%	13	0.03%	0.04%
French	227	0.56%	0.74%	226	0.56%	0.70%
German	1	0.00%	0.00%	1	0.00%	0.00%
Greek	8	0.02%	0.03%	6	0.01%	0.02%
Haitian/Creole	659	1.64%	2.15%	682	1.70%	2.12%
Hindi	5	0.01%	0.02%	4	0.01%	0.01%
Italian	7	0.02%	0.02%	6	0.01%	0.02%
Korean	8	0.02%	0.03%	8	0.02%	0.02%
Kurdish	2	0.00%	0.01%	2	0.00%	0.01%
Mandarin	59	0.15%	0.19%	101	0.25%	0.31%
Other	56	0.14%	0.18%	182	0.45%	0.57%
Persian	0	0.00%	0.00%	1	0.00%	0.00%
Polish	20	0.05%	0.07%	20	0.05%	0.06%
Portuguese/Creole	264	0.66%	0.86%	231	0.57%	0.72%
Russian	234	0.58%	0.76%	241	0.60%	0.75%
Sign Language	0	0.00%	0.00%	21	0.05%	0.07%
Somalian	130	0.32%	0.42%	121	0.30%	0.38%
Spanish	5106	12.70%	16.68%	4774	11.88%	14.85%
Swahili	4	0.01%	0.01%	3	0.01%	0.01%
Thai	5	0.01%	0.02%	4	0.01%	0.01%
Tigrina	3	0.01%	0.01%	4	0.01%	0.01%
TTY	1	0.00%	0.00%	0	0.00%	0.00%
Vietnamese	358	0.89%	1.17%	326	0.81%	1.01%
<b>Sub-total</b>	<b>30612</b>			<b>32144</b>		
Unverified	9589	23.85%		8057	20.04%	

Section 8 - Federal Leased Housing - 2012

Language	Read		Spoken	
Albanian	1	0.01%	1	0.01%
Amharic	6	0.04%	6	0.04%
Arabic	7	0.05%	8	0.06%
Armenian	0	0.00%	1	0.01%
Bengla	1	0.01%	1	0.01%
Braille	1	0.01%	0	0.00%
Cambodian	11	0.08%	10	0.07%
Cantonese	48	0.35%	60	0.44%
Cape Verden	36	0.26%	36	0.26%
Chinese	113	0.82%	98	0.71%
English	10184	74.28%	10212	74.48%
Farsi	3	0.02%	3	0.02%
French	18	0.13%	16	0.12%
Greek	3	0.02%	3	0.02%
Haitian/Creole	66	0.48%	66	0.48%
Italian	16	0.12%	14	0.10%
Mandarin	4	0.03%	4	0.03%
Other	7	0.05%	4	0.03%
Portuguese/Creole	31	0.23%	29	0.21%
Russian	97	0.71%	100	0.73%
Sign Language	0	0.00%	8	0.06%
Somalian	43	0.31%	38	0.28%
Spanish	1362	9.93%	1349	9.84%
Thai	2	0.01%	2	0.01%
Tigrina	1	0.01%	2	0.01%
TTY	3	0.02%	0	0.00%
unverified	1455	10.61%	1446	10.55%
Vietnamese	191	1.39%	193	1.41%
Xoruba	1	0.01%	1	0.01%

