

Boston Housing Authority
The Four Factor Analysis for the Limited English Proficiency Policy
(October 2021)

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 2020 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, Portuguese, French, Vietnamese, Russian, Amharic, and Somali.

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 2021: Admissions, Leased Housing, and Operations. All trainings were provided remotely, and we are currently working on updating the most frequently used documents for each department. Even though most 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. As a result of the COVID-19 pandemic the Admissions and Leased Housing have done some changes to the way they conduct their regular business which have caused a switch between the number of scheduled assignments and over the phone assistance as annual recertifications are now done mostly without appointments. In addition to the description of individual departments, *Figure 1. FY2021 Interpreter Request by Language*, *Figure 2. FY2021 Interpreter Request by Department*, and *Figure 4. FY2021 BHA Multilingual Line Calls by Department* also illustrate the extent to which LEP persons come into contact with these departments:

- Admissions 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
- Public Safety

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 continued their business remotely over the phone and through virtual communication portals. However, the Housing Service Center reopened to the public in the summer of 2021, some administrative appeals are done in person, and some residents' events are also in person following social distancing guidance. BHA is proud to continue responding 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 and resources, 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, 2020 to September 30, 2021, BHA has filled **1,015 documented requests for interpreters in 18 languages** -- Albanian, Amharic, Arabic, Cape Verdean, Chinese (Cantonese, Mandarin, and Toisanese), Farsi, French, Haitian Creole, Persian, Polish, Portuguese, Russian, Somali, Spanish, Thai, Tigrinya, Turkish, and Vietnamese. *See Figure 1.* About 52.7% of the requests were to provide Spanish language interpreters, and 24.33% requests were for Chinese speaking interpreters. As mentioned previously, because of the pandemic, BHA stopped all in-person services in mid-March 2020, and most business has been conducted over the phone. However, BHA has recently started some Administrative Appeals, resident events, and redevelopment meetings in person. While Admissions screenings are still performed over the phone, most Leased Housing recertifications are conducted via mail. Our Wellness Connect sessions with Chinese speaking elderly residents have been able to resume thanks to a grant awarded by the Massachusetts Service Alliance which allowed our staff to perform our meetings via video conference platforms. Moreover, Language Access Division has been able to continue providing services using the Zoom platform for administrative hearings, resident meetings and trainings for Local Tenant Organizations, and redevelopment updates.

Figure 1: FY2021 Interpreter Requests by Language (1,015 requests)

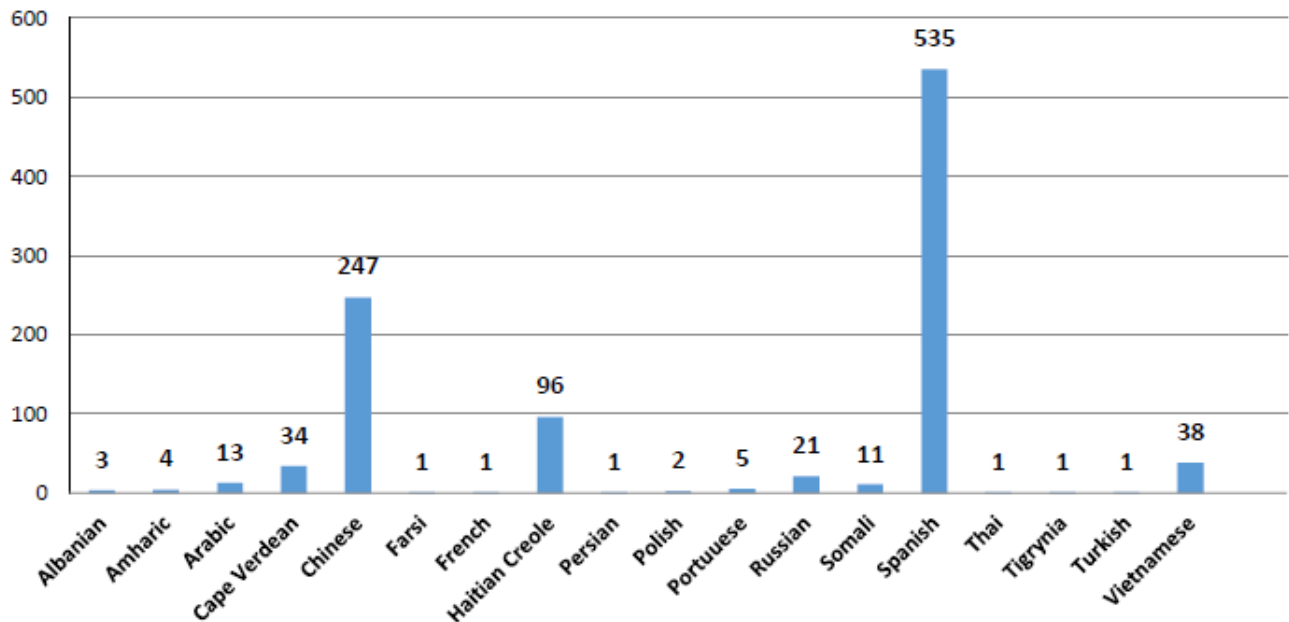


Figure 2: FY2021 Interpreter Services by Department (1,015 requests)*

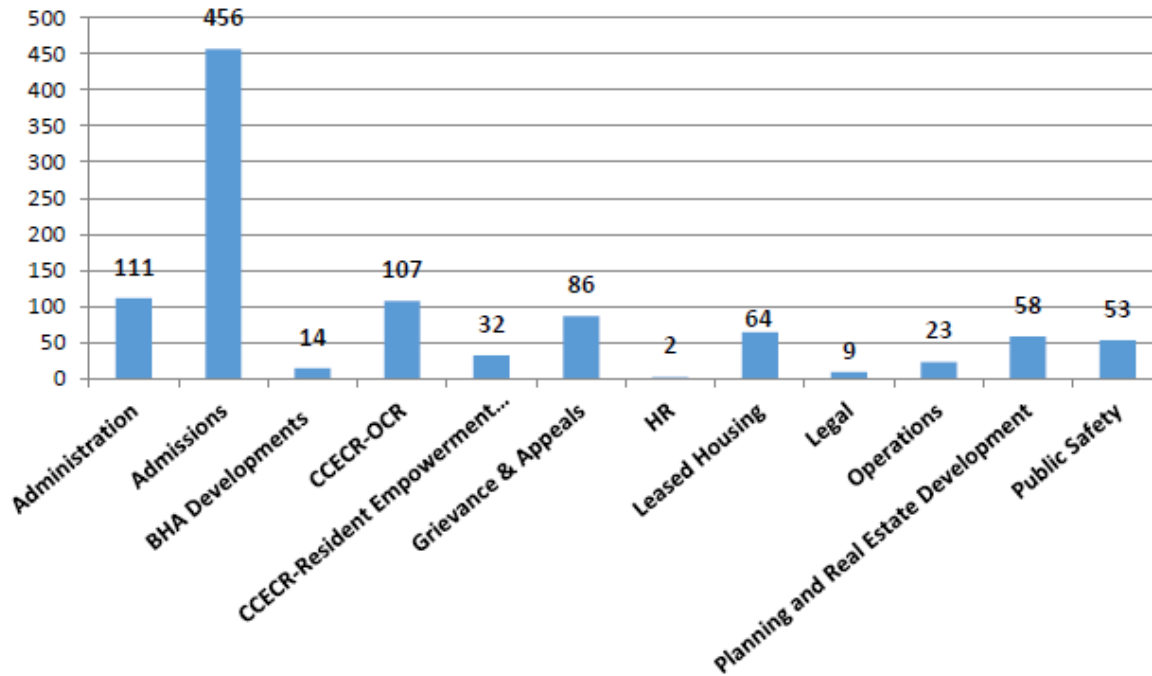
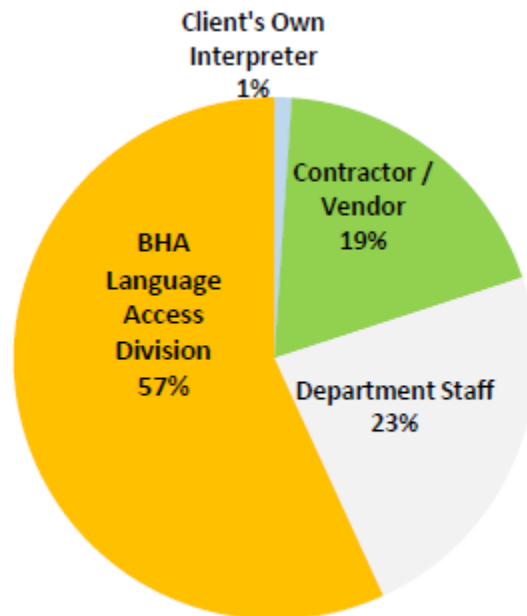


Figure 3: FY2021 Interpreter Requests by Provider



* 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
- Administrative Hearings
- Initial, Annual and Interim Recertifications
- Private Conferences
- Fraud Investigations
- Wellness Connect Program in 6 elderly/disabled developments (54 sessions in Cantonese, Mandarin, and Toisanese)
- Redevelopment meetings
- Local Tenants Organization meetings, and trainings.
- Residents-Management Meetings
- Citywide Public Hearings, and Civil Rights Intakes.
- Wellness check calls due to COVID-19
- Vaccination clinics
- Job Fairs

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.
- The Language Identification Sign has been updated to include Afaan Oromo Language.
- BHA Language Access staff continues to create multilingual flyers and signage for Management Offices that facilitate communication with LEP residents.
- Materials have been updated with the new BHA logo.





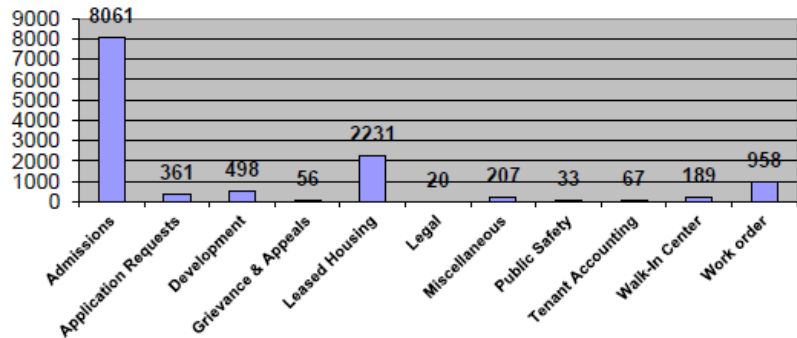
B. Interpretation Service by Phone

BHA provides phone prompts in Spanish and Chinese, and other languages 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 16 languages. The majority of the calls were for Spanish (88.18%) and Chinese (7.34%) speaking clients. Other languages that were interpreted by phone were Albanian, Amharic, Arabic, Cape Verdean, Farsi, French, Haitian Creole, Polish, Portuguese, Russian, Somali, Thai, Tigrinya, and Vietnamese. The Multilingual Line assisted with **12,681 calls** from October 1, 2020 to September 30, 2021.

In March 2020 our direct services went completely remotely, and this caused an increase in calls from our previous year (1,826 from our FY2020 report). As previously stated some departments and housing sites management offices have reopened to the public; however, the interpretation assistance is still provided over the phone. In addition to assistance needed in the departments stated in Figure 4, calls have also included wellness check-ins for residents, Civil Rights intakes, updates for redevelopments, and information about other PHAs (Counted under *Miscellaneous*). All scheduled appointments conducted over the phone have been counted with the Interpretation Requests.

| Annual Summary | Total Calls | % |
|--------------------|--------------|----------------|
| Spanish | 11182 | 88.18% |
| Chinese * | 931 | 7.34% |
| Other | 568 | 4.48% |
| Albanian | 6 | 0.05% |
| Amharic | 9 | 0.07% |
| Arabic | 51 | 0.40% |
| Cape Verdean | 70 | 0.55% |
| Farsi | 1 | 0.01% |
| French | 3 | 0.02% |
| Haitian Creole | 306 | 2.41% |
| Polish | 2 | 0.02% |
| Portuguese | 17 | 0.13% |
| Russian | 6 | 0.05% |
| Somali | 4 | 0.03% |
| Thai | 1 | 0.01% |
| Tigrinya | 1 | 0.01% |
| Vietnamese | 91 | 0.72% |
| Total Calls | 12681 | 100.00% |

Figure 4: FY2021: BHA Multilingual Line Calls by Department


*The "Chinese" language category includes Cantonese (622), Mandarin (307) and Toisanese (2).

From October 1, 2020 to September 30, 2021, BHA utilized the commercial AT & T Language Line in only 3 occasions to provide coverage in 3 languages: Albanian, Amharic, and Farsi.

C. Translation of Written Materials

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 and in person)
- 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.

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 were 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 and trainings in Spanish, Chinese, Haitian Creole, and Somali. We also provided interpretation at 2 Virtual Career Fairs hosted by the Center for Community Engagement and Civil Rights. 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, in addition to resources for residents affected by the pandemic.

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 over 400,000 meals at various BHA sites. The Language Access Division also assisted providing interpretation services at COVID-19 vaccination clinics at Family and Elderly sites in 8 languages. 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. In addition, as stated in last year's report, our AmeriCorps VISTA Member 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. With this grant we were able to provide 54 Wellness Connect sessions virtually in order to provide recreation activities for elderly residents dealing with isolation during the pandemic, while also providing wellness workshops in partnership with the Boston Public Health Commission which provided oral health and Tai Chi workshops. With a new gran from

Age Strong, we have been able to continue our virtual resident events, and we hope to expand them to more residents. Finally, BHA is also a part of the Municipal Network of Language Access, a group in which many other cities from the US exchange ideas and resources to improve Language Access services. This past year, BHA presented to the group about virtual residents meetings and Community Volunteer recruitment.



| FY2021 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.) |
| 363 | 10 | 35 | 515 assignments | 624 hours | \$37,000+ |

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.