

Boston Housing Authority
The Four Factor Analysis for the Limited English Proficiency Policy
(October 2025)

A. Mission Statement

We foster sustainable communities by providing quality affordable housing, bringing stability, opportunity, and peace of mind to thousands of low and moderate-income families across Boston, and to the city as a whole.

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 BHA occasionally receives applications from households out of state.

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 from 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;
2. Most frequent oral interpretation needs of LEP persons in service area include Spanish, Chinese (Cantonese, Mandarin, and Taishanese), Haitian Creole, Vietnamese, Cape Verdean, Portuguese, Russian, Arabic French (European), and Somali.¹

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

¹ Data Source: City of Boston Planning Department Research Division 2024 Population Estimates

The below listed BHA departments offer direct services to public housing residents, Section 8 voucher holders and applicants. Some direct service departments underwent training on the LEP Policy in 2024 and 2025: Leased Housing and Operations. Trainings were provided in person and remotely, and we are currently working on updating the most frequently used documents for each department, and the Admissions Department will receive training in the Winter of 2026. We also provide training to all new BHA staff upon hiring and orientation. 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, the department of Work Orders have become familiar with the use of the Language Line Services for assistance after hours, weekends, and holidays. Admissions and Leased Housing continue their post COVID procedures in which most of their appointments are done over the phone or via mail. However, there has been an increase of in-person appointments at our main office and public housing sites. In addition to the description of individual departments, *Figure 1. FY2025 Interpreter Request by Language*, *Figure 2. FY2025 Interpreter Request by Department*, and *Figure 4. FY2025 BHA Multilingual Line Calls by Department* also illustrate the extent to which LEP persons come into contact with these departments:

- Admissions Department
- Department of Grievances and Appeals (DGA)
- Leased Housing Division
- Legal Department
- Operations Department and Development Management Offices
- Planning, Construction, & Development
- Resident Engagement
- Resident Leadership & Community Affairs
- Digital Equity
- Work Order Call Center
- Tenant Accounting
- Public Safety
- Office of Civil Rights

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. As has been the practice since the pandemic, the majority of business is conducted virtually: over the phone screenings, online recertification, and administrative hearings over Zoom. However, the number of in-person interactions have increased at our main office and at public housing sites. BHA is proud to continue responding in a consistent and helpful manner to the needs to our clients who speak limited English either orally (screenings, interviews, recertifications, administrative hearings, resident meetings) or in writing (Notices from the Administrator, notices from management offices, 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, 2024 to September 30, 2025, BHA has filled **1480 documented requests for interpreters in 22 languages** -- Albanian, Amharic, Arabic, Bosnian, Cambodian, Cape Verdean, Chinese (Cantonese, Mandarin, and Taishanese), Farsi, French, Greek, Haitian Creole, Mandingo, Polish,

Portuguese, Russian, Somali, Spanish, Swahili, Thai, Tigrinya, Urdu, and Vietnamese. *See Figure 1.* About 48.8% of the requests were to provide Spanish language interpreters, and 20% requests were for Chinese speaking interpreters.

The Language Access Division continues to provide assistance over the phone, in person, and over Zoom. Our Wellness Connect sessions with elderly residents have provided invaluable language access assistance to our residents thanks to funds awarded by the City of Boston's Age Strong Commission. Moreover, our Language Access Division has been able to continue providing services to self-sufficiency programs such as informational sessions, Job Fairs, workshops, and computer skills classes.

Figure 1: FY2025 Interpreter Requests by Language (1480 requests)

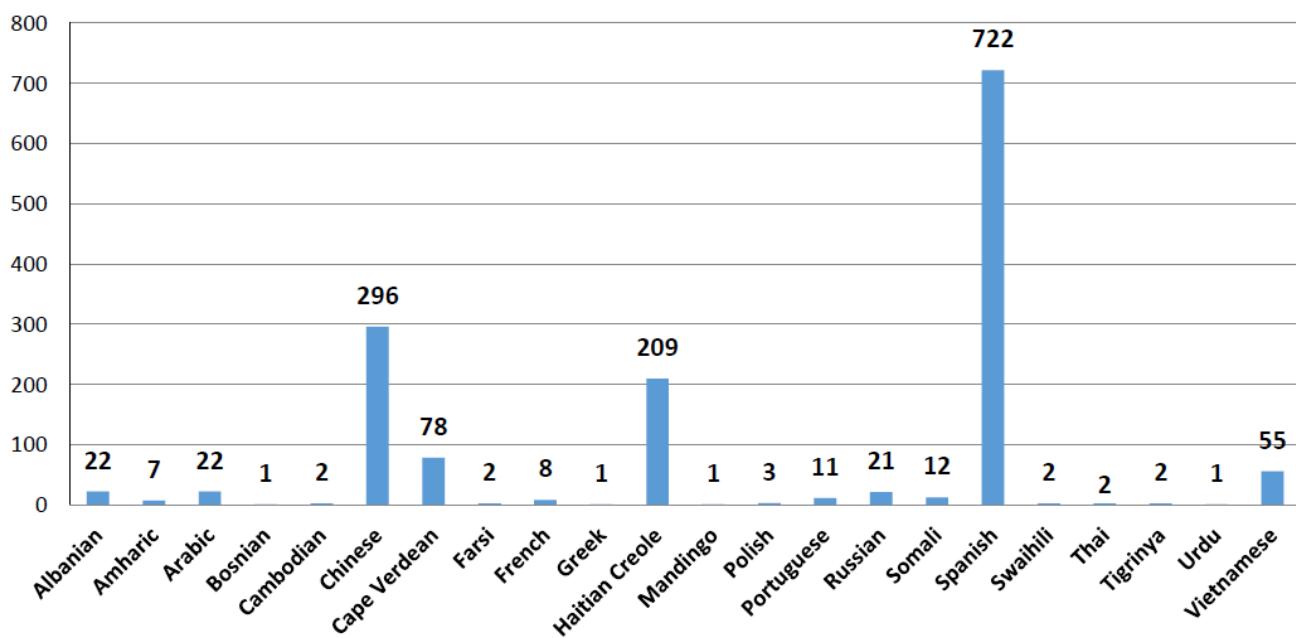


Figure 2: FY2025 Interpreter Services by Department (1480 requests)

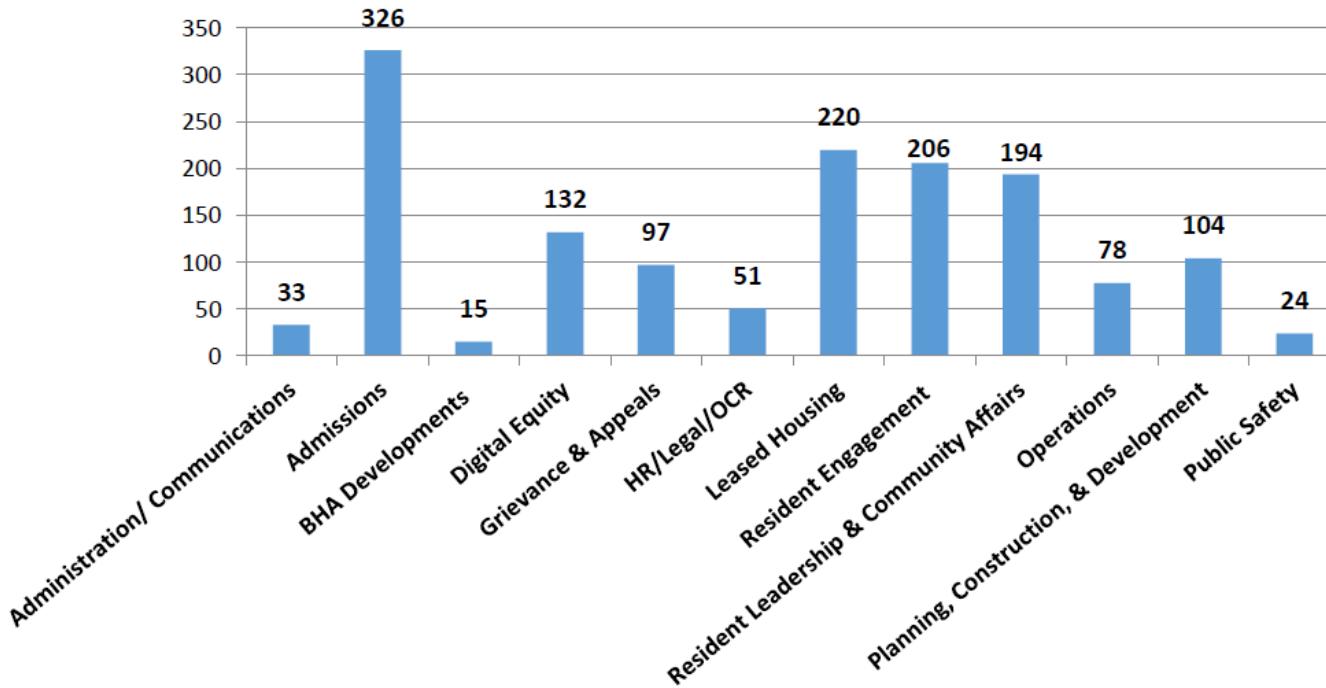
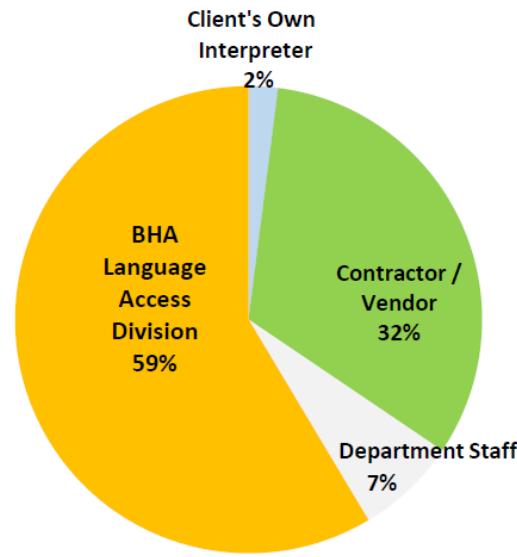


Figure 3: FY2025 Interpreter Requests by Provider



* 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
- Administrative Hearings
- Annual and Interim Recertifications
- Private Conferences
- Wellness Connect Program at 11 elderly/disabled developments (67 sessions in Cantonese, Mandarin, and Spanish)
- Redevelopment meetings

- Capital Construction updates meetings
- Local Tenants Organization meetings
- Residents/Management Meetings
- Citywide Public Hearings, and Civil Rights Intakes
- In person Job Fairs
- Basic computer skills classes
- Wellness workshops

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 clients who speak a language other than English 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 residents who speak a language other than English.
- Materials have been updated with the new BHA logo.



English: Point to your language and an interpreter will be provided to you at no cost.

Armenian Արան Օռոնոն Արան կար աղադի ի լաս ուրյանն ասի սի հիպատս	French Pointez sur votre langue, un interprète vous aidera gratuitement.	Portuguese Aponte para sua língua, um intérprete gratuito te ajudará.
Albanian Shënron i gjuhës tuje dhe do t'i vishet një dispozicion që përkthyes fjalës.	German Bitte wählen Sie Ihre Sprache. Die Übersetzung in diesein Ihnen gewählte Sprache erfolgt durch einen Übersetzer und ist kostenfrei.	Spanish Señale su idioma y el intérprete lo traducirá de forma gratuita.
Azerbaijani Azərbaycan dilinə qəbul olunur. Əgər diliniz dilinə təxliş olunmazsa, dilinə qəbul olunur. Əgər diliniz dilinə təxliş olunmazsa, dilinə qəbul olunur.	Hausa Monte lang or pale a epi yo oral baw yo enterprete sar wap beyeen peye sen kòb.	Sorrelli Luuquaddaas farta ku fiic, waxaa laagueeyeyeyn nujahayd oo beeg lajan ah.
Arabic حدد لغتك وسوف تحصل على ترجمة مجاناً	Hindi द्वारा का के आपकी बाबा बातें, आपको सुनायी की जून सेवा। जान की जाती है।	Spanish Señale su idioma y recibirá los servicios de un intérprete sin costo alguno para usted.
Armenian Հայերեն թուղթ առնալիք և թերապևտիկ պայմաններու կառավագակից	Italian Indicate la lingua prescelta ed un interprete le verrà fornita gratuitamente.	Swazi Tafatshali guce laghi yao na makalimantla atukusimba bila gahama
Russian Российская настройка бесплатных предварительных сессий омогуичен.	Korean 귀여운 악어로 가리키세요. 그리고 해당 악어의 풍성한 사전 가리키는 게 비용 없이 제공됩니다.	Hausa Itut lang ang inyong wika at ma-għolhaon kienong tagħ-żejt nhaq waqt bayed.
Croatian Српски језик и макаримајући представљају једноставан начин да постанете усавиђенији у Србији.	Lao ສິນເກມສາມາດຕັ້ງການໃຫຍ່ ການແກ່ໄຂການຕັ້ງການຕົວແທນ ການແກ່ໄຂການຕັ້ງການຕົວແທນ	Thai ມີການຕັ້ງການຕົວແທນ ການມີການຕັ້ງການຕົວແທນ ການມີການຕັ້ງການຕົວແທນ
Cape Verdean Porta pa linguas i bu ta cládu un intérprete de grasa.	Men Rūpu do aqhaq għixx nyu waqt luu yei minn baxx-imbieġġ nyet luu waqt minnha bissi minn.	Tigrinya የፋት ተስፋዬ አጥቃቻ ተስፋዬ አጥቃቻ የፋት ተስፋዬ አጥቃቻ ተስፋዬ አጥቃቻ
Chinese (Traditional) 中国香港 Cantonese 指著你所說的語言，我們將給你分配一名空置口譯人員	Pelish Wózat, jalan minnaw jexsilm am zexxewiha qiegħihekk fuq as-sa	Udi શાર, કેવિન એવ એવી વર્તમાન સંદ રૂપ કરવાની આપણિની એવી તરીકે ફરાસત કરી શકતી નથી.
Persian لطفاً به زبان موردنظر خذ شماره که کسی متوجه نهاده نماین هر دو در اخبار شما را برای خواهد گرفت	Portuguese Aponte para sua idioma, e providenciaremos-lhe um(a) intérprete sem custo algum.	Vietnamese Hãy chỉ rõ ngôn ngữ của bạn và đóng dấu tích vào để được cung cấp



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

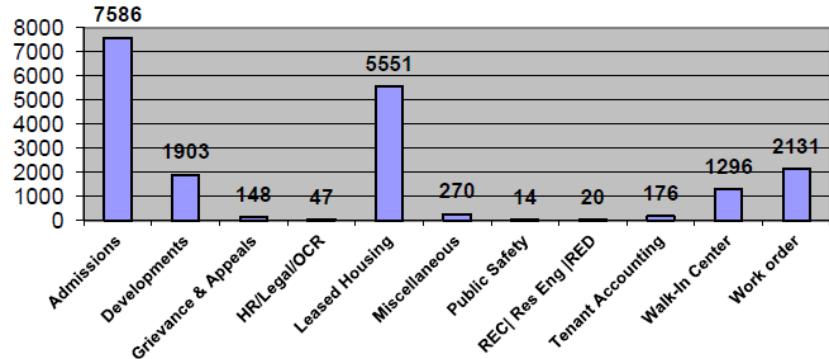
This past year the Multilingual Line assisted with calls in 21 languages. The majority of the calls were for Spanish (89.44 %) and Chinese (4.68%) speaking clients. Other languages that were interpreted by phone were Albanian, Amharic, Arabic, Cambodian, Cape Verdean, Farsi, French, Haitian Creole, Hindi, Kurdish, Oromo, Pashto, Polish, Portuguese, Russian, Somali, Swahili, Tigrinya, and Vietnamese. The Multilingual Line assisted with **19,142 calls** from October 1, 2024 to September 30, 2025.

BHA has continued to conduct the majority of its business over the phone with Admissions screenings, and Leased Housing related appointments (recertifications, interims, etc.). All scheduled appointments conducted over the phone have been counted with the Interpretation Requests.

Figure 4: FY2025: BHA Multilingual Line Calls by Department

Annual Summary	Total Calls	%
Spanish	17121	89.44%
Chinese *	897	4.69%
Other	1124	5.87%
Albanian	19	0.10%
Amharic	17	0.09%
Arabic	33	0.17%
Cambodian	5	0.03%
Cape Verdean	199	1.04%
Farsi	1	0.01%
French	12	0.06%
Haitian Creole	628	3.28%
Hindi	2	0.01%
Kurdish	2	0.01%
Oromo	2	0.01%
Pashto	3	0.02%
Polish	2	0.01%
Portuguese	50	0.26%
Russian	16	0.08%
Somali	24	0.13%
Swahili	13	0.07%
Tigrinya	2	0.01%
Vietnamese	94	0.49%
Total Calls	19142	100.00%

*The "Chinese" language category includes Cantonese (486), Mandarin (378) and Taishanese (33).



From October 1, 2024 to September 30, 2025, BHA utilized the Language Line in 958 occasions to provide coverage in 24 languages:

Language Requested	Frequency	Percentage
Albanian	21	2.19%
Amharic	4	0.42%
Arabic	23	2.40%
Bengali	1	0.10%
Chinese-Cantonese	63	6.58%
Chinese-Mandarin	43	4.49%
Cape Verdean	192	20.04%
Farsi	2	0.21%
French	8	0.84%
Haitian Creole	318	33.19%
Igbo	0	0.00%
Japanese	0	0.00%
Khmer	8	0.84%

Korean	0	0.00%
Moroccan-Arabic	8	0.84%
Oromo	2	0.21%
Pashto	6	0.63%
Portuguese	26	2.71%
Russian	17	1.77%
Somali	26	2.71%
Spanish	89	9.29%
Swahili	11	1.15%
Tigrigna	1	0.10%
Vietnamese	89	9.29%
Total	958	100%

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, 2024 to September 30, 2025, BHA translated over 548 Vital Documents (additionally 18 documents have been updated) from English to Spanish and/or Chinese, and additional languages such as Albanian, Cape Verdean Creole, Haitian Creole, Polish, Somali, Russian, and Vietnamese. Cumulatively, over 5880 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 FY2025 Cumulative Since 2010			
Department Name	FY2025	Cumulative since 2010	
Administration Department	36	534	9.08%
BHA Developments	37	342	5.82%
Capital Construction	32	138	2.35%
Resident Engagement	268	2062	35.07%
Communications Department	9	163	2.77%
Grievance & Appeals	0	50	0.85%
Leased Housing	33	368	6.26%
Legal Department	1	213	3.62%
Admissions	0	762	12.96%
Operations	16	329	5.6%
Public Safety	2	6	0.10%
Purchasing Department	0	2	0.03%
Planning & Real Estate Development	114	900	15.31%
Risk Management	0	11	0.19%
Total	548	5880	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 resident meetings when requested by management office.
- Through its Multilingual Line, BHA provides quick interpretation over the phone. BHA also utilizes the commercial 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.
- Language Access Division provides interpretation and translation to Resident Empowerment Coalition events and Self-Sufficiency initiatives (Virtually and in person)

- Language Access Division utilizes bilingual staff, interns, and vendors to assist residents, applicants and Section 8 participants in the filing and investigation of Civil Rights complaints.
- 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

BHA's Language Access Division had another great year with numerous accomplishments. We continue to assist our many clients who speak a language other than English in person, over the phone, and Zoom. We completed Language Access Training with Leased Housing and Operations, and we will have trainings with Admissions, Grievance & Appeals, and Planning and Development in 2026. Moreover, we have launched a BHA staff resource page online where staff can access to translated documents. This page has most forms available for Operations and Leased Housing. Admissions will be available in 2026.

Our Resident Engagement initiatives have also included more LEP residents. Our computer classes, in partnership with Tech Goes Home and the Digital Equity Division at BHA, have been provided in Spanish, Chinese, Haitian Creole, and Vietnamese. We had 21 events for Digital Equity initiatives such as computer skills, workshops, and tech drop-in sessions. We had other workforce development and wellness workshops which were provided in several languages: job fair, CPR classes, open houses, etc.

BHA was awarded \$19,000 from Age Strong in order to increase our outreach with our Wellness Connect Program. We are now able to include all residents from 11 elderly sites to our weekly workshops. All sessions now have Chinese and Spanish interpreters, while we also provided interpretation in additional languages such as Haitian Creole, Albanian, Russian, and Cape Verdean Creole. This grant has allowed us to provide services and fun programs such as art classes, wellness workshops, and holiday celebrations.

Finally, BHA continues participating in 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. BHA was one of the panelists at the Welcoming America Conference where the focus of the discussion was Language Access Planning: A Guide for Local, State, & Federal Entities.



FY2025 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.)
194	13	23	371 assignments	222.45 hours	\$13,000+