

Boston Housing Authority
The Four Factor Analysis for the Limited English Proficiency Policy
(October 2022)

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 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; and

Most frequent oral interpretation needs of LEP persons in service area include Spanish, Chinese (Cantonese, Mandarin, and Toisanese), Haitian Creole, Portuguese, Vietnamese French, Arabic, other Indo-European languages (Albanian, Lithuanian, Pashto (Pushto), Romanian, Swedish, 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. 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. In addition to the description of individual departments, *Figure 1. FY2022 Interpreter Request by Language*, *Figure 2. FY2022 Interpreter Request by Department*, and *Figure 4. FY2022 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 and Real Estate Department
- Resident Engagement
- 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. As stated previously, as result of the COVID-19 pandemic, BHA continue their business remotely over the phone and through virtual communication portals. However, the Housing Service Center has reopened since summer 2021, management offices have reopened as well, and in-person resident meetings and events are taking place (in addition to Zoom). 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, 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, 2021 to September 30, 2022, BHA has filled **923 documented requests for interpreters in 22 languages** -- Albanian, Amharic, Arabic, Bengali, Burmese, Cape Verdean, Chinese (Cantonese, Mandarin, and Toisanese), Edo, Farsi, French, Greek, Haitian Creole, Hindi, Mandinka, Nepali, Polish, Portuguese, Russian, Somali, Spanish, Swahili, and Vietnamese. *See Figure 1.* About 53.4% of the requests were to provide Spanish language interpreters, and 20.2% 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 Chinese speaking elderly residents have been able to continue thanks to a grant awarded by City Hall's Age Strong. Moreover, we have continued our Language Access Division has been able to continue providing services to self-sufficiency programs such as informational sessions for Amp-Up, Job Fair, and computer skills classes with Tech Goes Home.

Figure 1: FY2022 Interpreter Requests by Language (923 requests)

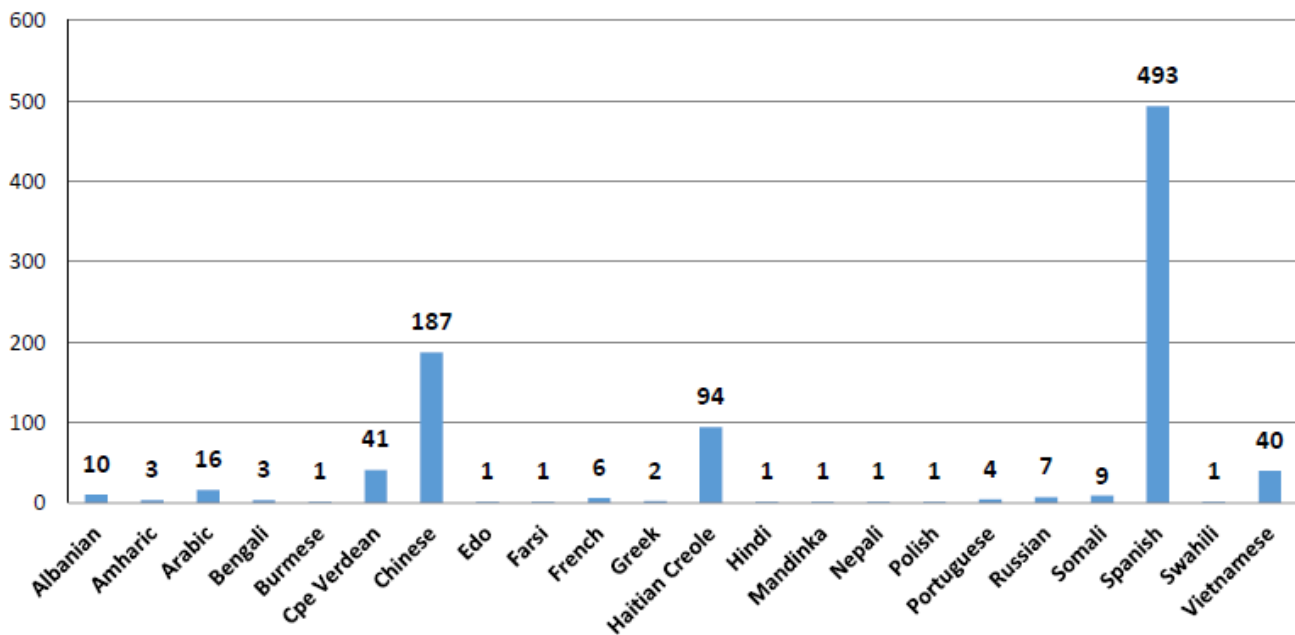


Figure 2: FY2022 Interpreter Services by Department (923 requests)*

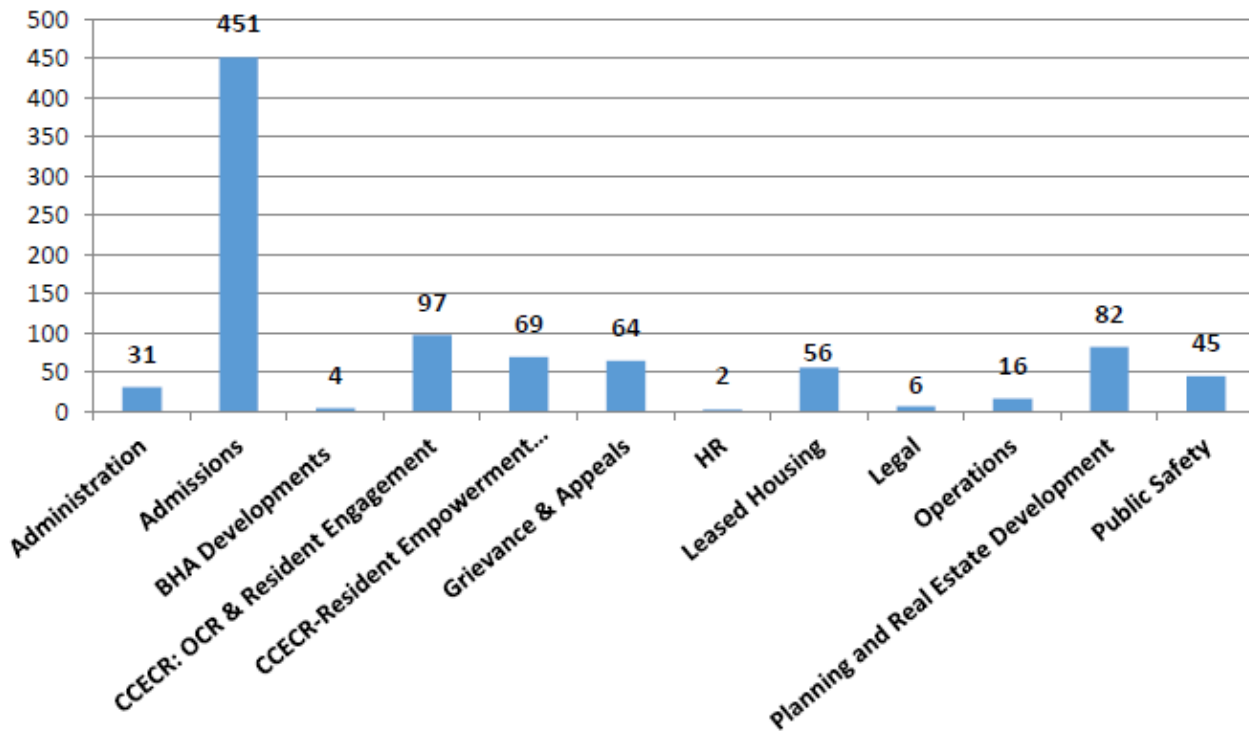
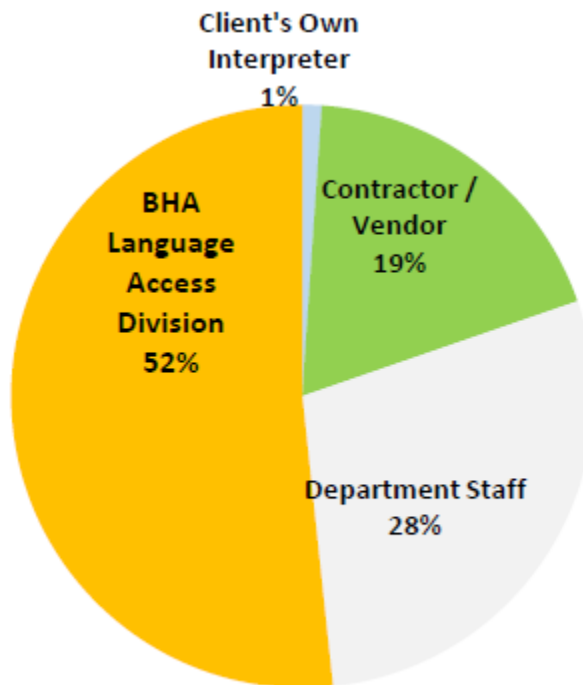


Figure 3: FY2022 Interpreter Requests by Provider



* Interpretation Service by Multilingual Line not included

- Eligibility Interviews
- Administrative Hearings
- Annual and Interim Recertifications
- Private Conferences
- Fraud Investigations
- Wellness Connect Program in 6 elderly/disabled developments (59 sessions in Cantonese, Mandarin, and Toisanese: 34 virtual and 25 in person)
- 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
- Basic computer skills classes

- 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.
- 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 residents who speak a Language other than English.
- 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.

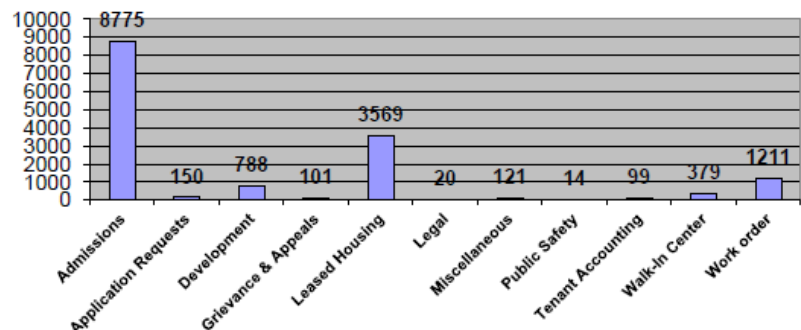
This past year the Multilingual Line assisted with calls in 16 languages. The majority of the calls were for Spanish (89.14%) and Chinese (6.10%) speaking clients. Other languages that were interpreted by phone were Albanian, Amharic, Arabic, Cape Verdean, French, Haitian Creole, Polish, Portuguese, Russian, Serbian, Somali, Thai, Tigrinya, and Vietnamese. The Multilingual Line assisted with **15,227 calls** from October 1, 2021 to September 30, 2022.

As a result of our services going mostly remotely, there has been a continuous increase on call numbers (12,546 more calls than from our FY2021 report). 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	13574	89.14%
Chinese *	929	6.10%
Other	724	4.75%
Albanian	3	0.02%
Amharic	6	0.04%
Arabic	57	0.37%
Cape Verdean	86	0.56%
French	5	0.03%
Haitian Creole	350	2.30%
Polish	1	0.01%
Portuguese	43	0.28%
Russian	5	0.03%
Serbian	1	0.01%
Somali	12	0.08%
Thai	2	0.01%
Tigrinya	1	0.01%
Vietnamese	152	1.00%

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

Figure 4: FY2022: BHA Multilingual Line Calls by Department



From October 1, 2021 to September 30, 2022, BHA utilized the commercial AT & T Language Line in 18 occasions to provide coverage in 5 languages: Cape Verdean, Chinese-Cantonese, Haitian Creole, Portuguese, and Spanish

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, 2021 to September 30, 2022, BHA translated over 407 Vital Documents (additionally 65 documents have been updated) from English to Spanish and/or Chinese, and additional languages such as Arabic, Cape Verdean, French, Haitian Creole, Polish, Portuguese, Russian, Somali, and Vietnamese. Cumulatively, over 4226 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 FY2022/Cumulative Since 2010			
Department Name	FY2022	Cumulative since 2010	
Administration Department	50	425	10.06%
BHA Developments	26	243	5.75
Capital Construction	2	10	0.24%
CCECR	160	1293	30.6%
Communications Department	37	134	3.17%
Grievance & Appeals	0	41	0.97%
Leased Housing	27	233	5.51%
Legal Department	0	213	5.04%
Admissions	5	748	17.70%
Operations	22	275	6.51%
Public Safety	0	2	0.05%
Purchasing Department	0	2	0.05%
Planning & Real Estate Development	78	596	14.10%
Risk Management	0	11	0.26%
Total	407	4226	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 residents 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 and Summary

The Language Access continues to provide services to our clients. We have been able to adapt to BHA's *new normal* day-to-day business, over the phone and now in person at the Service Center and in the field while continuing language access virtually via Zoom for some resident meetings. We have also provided interpretation at a career fair hosted virtually in the fall; with the information and materials distributed in Spanish and Chinese. Moreover, we continue to translate notices from management offices to residents in as many languages as needed. We also started basic computer skills classes in partnership with Tech Goes Home and classes has been done in English and Spanish. While we expand our TGH classes, they will be provided in additional languages. As many of our sites have resumed Unity Days in the summer, we have used these events to distribute information from programs offered by BHA and resources from local organizations in various languages as well.

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. We have fully resumed our Wellness Connect sessions in person with our elderly Chinese-speaking residents. City Hall has provided BHA with a grant which has allowed us to provide activities for socialization and incentives for participation. Finally, BHA continues our participation 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.



FY2022 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	7	34	803 assignments	655 hours	\$39,000+

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.