



Brookline Housing Authority

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Brookline, MA 02446

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FAX 877 485 5549
TTD 800-545-1833 Ext. 213

BOARD OF COMMISSIONERS

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THE BROOKLINE HOUSING AUTHORITY'S LANGUAGE ACCESS PLAN (LAP)

Adopted by the Board of the Brookline Housing Authority on: MARCH 14, 2023

**BROOKLINE HOUSING AUTHORITY
LANGUAGE ACCESS PLAN (LAP)**

TABLE OF CONTENTS

SECTION 1: PURPOSE OF THE LAP

SECTION 2: DEFINITION OF TERMS

SECTION 3: DETERMINING NEEDS

SECTION 4: LANGUAGE ASSISTANCE MEASURES

SECTION 5: TRAINING STAFF

SECTION 6: COMMUNICATIONS OF SERVICES

SECTION 7: REPORTING, MONITORING, AND
UPDATING THE LAP PLAN

SECTION 1

PURPOSE OF THE LAP PLAN

The purpose of this LAP Plan is to assist the staff members of the Brookline Housing Authority (“BHA”) in providing meaningful access to the BHA's programs and activities to those who come in contact with the BHA with Limited English proficiency (“LEP”).

The BHA is committed to complying with federal requirements in providing free meaningful access to its programs and activities for its LEP clients and prospective clients.

No LEP person in need of BHA services will be denied access to a BHA program or service because the client does not speak English or communicate in English on a limited basis.

SECTION 2

DEFINITION OF TERMS

1. Limited English Proficiency

A person will be considered of limited English proficiency if he/she does not speak English as a primary language and has a limited ability to read, write, speak, or understand English. The focus is on the client's lack of English proficiency. A client who proficiently speaks English is not an LEP client.

2. Client

A Client is:

- a. A person who is an applicant for or participant in the BHA's public housing programs, Housing Choice Voucher Program, and other BHA managed programs; and/or
- b. A person who may be eligible for a BHA program but is underserved and may benefit from an outreach program.

3. Effective Communication

Effective communication occurs when BHA staff have taken reasonable steps to provide meaningful access to a LEP client. Effective communication also means that the LEP client is able to provide and receive required or necessary information.

SECTION 3

DETERMINING NEEDS

The Brookline Housing Authority has identified the Priority Languages spoken by persons with Limited English Proficiency within its jurisdiction and will continue a process to determine needs of additional LEP populations using the following methods:

- BHA's Tenant Selection Department has reviewed existing files to identify LEP individuals and will maintain file information indicating applicant language and preference of communication.
- At all points of entry, the BHA shall provide "*I Speak... Language Identification Flashcards:*" to individuals to help identify LEP individuals and determine the appropriate language spoken. The BHA will further post and make available "*I Speak... Language Identification Flashcards:*" upon request. Applicants and residents can use these guides to indicate their primary language.
- At all points of entry and contact, the BHA will post notices in Priority Languages that "Interpretive services, if required, may be arranged."
- The BHA will periodically review its own data census data and State and City generated data indicating languages spoken within our geographic area.

Priority Languages

Currently the BHA has determined that the main language spoken by LEP populations within its geographic area is Spanish and Chinese.

Secondary languages that the BHA will address in translations as feasible are:

- Haitian Creole
- Russian
- Hebrew
- Portuguese
- Vietnamese
- Japanese
- Korean

The BHA has determined the following to be the priority programs/services where interpretation/translation is most needed and desired:

1. Application for Housing Assistance including Federal, State, Housing Choice Voucher (Section 8), Family Programs, or Elderly Programs;
2. Public Safety Procedures: including Fire Safety procedures, procedures for exiting buildings in emergencies, and training in emergency procedures;
3. Maintenance Procedures and inspections;
4. Transfer Policies and Procedures;
5. Rent Re-Determination;
6. Private Conference and Grievance Hearings;
7. Tenant Handbook.

While the above constitutes priority programs and services where interpretation/translation services are most important, interpretation services will be provided, upon reasonable request for other BHA activities.

Existing Resources

The BHA has made a concerted effort to hire multi-lingual staff throughout the various divisions of its agency. However, the BHA cannot and does not guarantee the availability of staff members in all various languages.

SECTION 4

LANGUAGE ASSISTANCE MEASURES

The Brookline Housing Authority will continue to determine the interpretation/translation needs of LEP applicants and residents using the following methods:

- The BHA will summarize initial applications for identified LEP individuals and insert a LEP identifier with all English language applications. All applications and accompanying documents must be completed and submitted in the English language.
- BHA's Tenant Selection Department will maintain digital records indicating applicant language and preference of communication and relay this to Housing Managers or Section 8 Coordinators when the applicant is selected for housing assistance. In addition, the BHA will add language preference to the main tenant/participant data base to the extent identified.
- At all points of entry and contact as defined herein the BHA shall provide "*I Speak... Language Identification Flashcards*" to individuals.
- At all points of contact as defined herein, the BHA will post notices in Priority Languages that individuals have the right to request free interpretation services.
- BHA will periodically review its own data, census data and State and City generated data indicating languages spoken within our geographic area.
- Upon Income Recertification, each manager and Section 8 coordinator shall enter and maintain information on language spoken and language preference in the database and paper file to the extent identified.
- The BHA shall work with local Agencies to identify and support LEP individuals.

Oral Interpretive Services

At all points of entry and contact as defined herein, the BHA will post notices in Priority Languages that FREE interpretation services will be made available upon request.

Points of contact include:

- Main Administrative Building/ Tenant Selection Office
- Managed Property Notice Boards
- Manager's Offices
- Resident Advisory Board (RAB)
- Section 8/Housing Choice Voucher Briefing Sessions

When LEP individuals make contact through points of entry, the contacted staff member will refer the individual to a language appropriate staff member within that division. When a language appropriate staff member of that division is not available, other staff members will assist in interpretation and obtain basic information regarding the individual's request or concern.

In cases where the language assistance cannot be provided by a staff member, the contacted staff member will determine the individual's language through "*I Speak... Language Identification Flashcards*" and arrange for interpretation services at an appropriate mutually convenient date and time. At appropriate times the BHA shall use contracted language services, online translation services, and phone lines to assess immediate needs and/or to set up future appointments with interpreters.

Applications for housing programs should allow applicants to request an interpreter for tenant selection appointments.

Oral Interpretation – Use of Interpreters other than those provided by the BHA:

As noted above, LEP individuals will be informed that the BHA will provide them with free access to oral interpretation services via bilingual BHA staff or qualified, trained contractors as needed. LEP individuals may provide, at their own expense, their own qualified, trained interpreter. LEP individuals may use their own family members and/or friends as interpreters. In such instances, BHA staff are advised to be alert to the potential for any conflict of interests or competency issues that may arise from the involvement of using family or friends as interpreters. If BHA staff have reason to believe that there may be a conflict of interest or an issue as to the LEP's interpreters' competency, the BHA staff may: (1) record the conversation; and/or (2) retain their own interpreter to be a party to any conversations between the BHA and the LEP individual.

Oral Interpretation - Telephone Support:

The BHA's main office phone number is 617-277-2022. This line is staffed from 8:30 A.M. to 4:30 P.M., Monday through Friday, excluding holidays and noticed closures.

Subject to budget constraints and in consideration of the Priority Languages Identified in **Section 3**, if qualified bilingual BHA staff are unavailable to communicate with an LEP individual who is requesting assistance, or, there is no BHA staff member that speaks that language, the BHA will use the services of a professional telephone interpretation service, including when an LEP individual uses an "*I Speak... Language Identification Flashcard*" to signify that they speak a non-English language.

When these contacts involve review of BHA forms and procedures, the BHA will schedule the call so that the telephonic interpreter has the opportunity to first review the relevant form or procedure. The BHA **currently utilizes Language Line Solutions** – a service which provides trained and certified interpreters and coverage for a multitude of languages. BHA staff is trained in how to access this service, which will be available as needed for LEP applicants and residents.

Written Translation Services:

The BHA understands that some documents are critical for ensuring meaningful access to the BHA's major activities and programs by beneficiaries generally and by LEP individuals specifically. Such documents are referred to throughout this LAP as *vital documents*. Meaningful program access generally requires awareness of, and ability to participate in, procedures for applying to the program, for meeting the requirements of the program, and for enjoying important benefits of the program. Meaningful program access also requires awareness of rights and services; otherwise, LEP persons may effectively be denied such access.

In consideration of applicable HUD/DHCD guidance, Priority Languages are identified in **Section 3**. A notice shall be placed on all *vital documents* which states, in the BHA's Priority Languages as identified in this LAP: **"This is an important notice. Please have it translated."**

When an applicant, tenant, or participant makes it known to the BHA that they do not speak English, a notice shall be placed on all *vital documents* addressed to said applicant, tenant, or participant which states, in the BHA's *priority languages* as identified in this LAP: "This is an important document. Please contact the Brookline Housing Authority at 617-277-2022 for free language assistance." (See "**Attachment I**").

Vital documents include¹:

- Application for Housing Assistance including Federal, State, Housing Choice Voucher (Section 8), Family, or Elderly;
- Lease;
- Resident Handbook;
- Notice of Private Conferences.

Legal Documents:

In the case of legally binding documents, such as a lease and a notice to quit, the English version of the document shall be the **only** legally binding copy and shall be considered the official document. Any translated copies of such legally binding documents shall be used as a reference tool only. A brief statement shall be included on such documents, in the language which the document has been translated into, which states "*This document is for informational purposes only. The English version of this document is considered the legally binding document*" (See **Attachment II**).

Resident Participation and Housing Resident Meetings:

The BHA may implement efforts to utilize residents as interpreters to assist LEP individuals to take advantage of programs and services within the BHA. All participants and users will be advised of confidentiality concerns and issues. Participation is strictly voluntary and to the extent feasible.

¹ The BHA will continue to identify additional documents commonly used and determine whether such documents are vital.

SECTION 5

STAFF TRAINING

The goal of Staff Training is to ensure that all BHA employees understand LEP policies, procedures, and requirements to ensure that the procedures set forth in this LAP are utilized by BHA staff when working with the public, applicants, and residents.

The BHA will provide training on LEP awareness and required assistance actions under the Language Access Plan for employees. This will include:

Training: The BHA will make reasonable efforts to avail its staff and employees to any available trainings on Language Access. BHA employees and staff who regularly interact with BHA applicants and residents are encouraged to complete periodic refresher trainings on Language Access.

LEP Coordinator: The BHA has designated the Executive Director or his/her designee as the LEP Coordinator, responsible for ongoing updating of LEP analysis, addressing staff and public questions and issues related to LEP matters, and providing ongoing LEP training.

SECTION 6

COMMUNICATION OF SERVICES

In order to ensure that BHA residents who are LEP individuals have the maximum access to BHA programs, the BHA will implement the following:

- Post signs as described above;
- Utilize “*I Speak... Language Identification Flashcards*” as described above;
- Partner with local agencies, groups, and individuals;
- Provide training for residents and staff;
- Work with tenants to ensure greater accessibility of services.

SECTION 7

MONITORING AND UPDATING THE LANGUAGE ACCESS PLAN

The LAP will be reviewed and updated periodically as needed. Such reviews will assess:

- Whether there have been any significant changes in the composition or language needs of the LEP-population in Norfolk County and/or based on DHCD, U.S. Census, and BHA data;
- A review to determine if additional or updated *vital documents* require translation;
- A review of bilingual staff members response time to an LEP individual's requests for assistance;
- A review of any issues or problems related to serving LEP individuals which may have emerged;
- A review to determine how often LEP individuals use the services available and how often/which BHA staff members come in contact with LEP persons; and
- Identification of any recommended actions to provide more responsive and effective language services.

Attachment I



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This is an important document. Please contact Brookline Housing Authority at 617-277-2022 for free language assistance.

Este documento es muy importante. Favor de comunicarse con el Brookline Housing Authority en 617-277-2022 para ayuda gratis con el idioma.
(Spanish)

Dokiman sila a enpòtan. Tanpri kontakte Brookline Housing Authority la nan 617-277-2022 pou asistans gratis nan lang.
(Haitian Creole)

Это весьма важный документ. Свяжитесь с сотрудником Brookline Housing Authority на предмет оказания бесплатной помощи по переводу на иностранный язык 617-277-2022. (Russian)

Este é um documento importante. Entre em contato com o Brookline Housing Authority no número 617-277-2022 para obter assistência gratuita com o idioma.
(Portuguese)

此文件為重要文件。如果您需要免費的語言翻譯幫助，請聯絡Brookline Housing Authority聯絡方式：617-277-2022。 (Chinese, Traditional)

此文件为重要文件。如果您需要免费的语言翻译帮助，请联络Brookline Housing Authority联络方式：617-277-2022。
(Chinese, Simplified)

Đây là một tài liệu quan trọng. Vui lòng liên hệ Brookline Housing Authority tại 617-277-2022 để được hỗ trợ ngôn ngữ miễn phí.
(Vietnamese)

これは重要な文書です。無料の言語サービスについては、Brookline Housing Authority の 617-277-2022 までご連絡ください。
(Japanese)

Attachment II



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This document is for informational purposes only. The English version of this document is considered the legally binding document.

Este documento es con el propósito de información solamente. La versión en Inglés de este documento es la que se considera válida legalmente. (Spanish)

Dokiman sila a se pou enfòmasyon sèlman. Se vèsyon angle dokiman sila a nou konsidere antanke dokiman ki angaje devan lalwa. (Haitian Creole)

Este documento é para fins informativos. Somente a versão em inglês deste documento é considerada um documento legalmente obrigatório. (Portuguese)

本檔僅供資訊瞭解之用。只有本檔的英文版本被看成具有法律效率的檔。
(Chinese, Traditional)

本文件仅供信息了解之用。只有本文件的英文版本被看成具有法律效率的文件。
(Chinese, Simplified)

Этот документ приведен только со справочно-информационными целями. Английский вариант этого документа является юридически обязательным к исполнению. (Russian)

Tài liệu này chỉ nhằm mục đích thông tin. Phiên bản tiếng Anh của tài liệu này được xem là một tài liệu có tính ràng buộc về mặt pháp lý. (Vietnamese)

この文書は情報提供のみを目的としたものです。本文書の英語版は法的効力を持つ文書となります。(Japanese)

ATTACHMENT A

BHA's Four-Factor Self-Assessment Analysis Regarding Limited English Proficiency (LEP) Individuals

Source: PHA-Web, BHA housing software; data reflects current BHA residents (n=3364).

1. Assessing the number and proportion of LEP individuals served or encountered in the eligible service population

(a) Census data at the County level (Norfolk County):

According to the U.S. Census data compiled by the Massachusetts Executive Office of Housing and Livable Communities (EOHLC) and accessed through the LEP Data Tool, the primary LEP populations aged 5 years and older in Norfolk County who speak English less than “very well” include:

Language	County Percent of LEP Population
Chinese	3.10%
Spanish or Spanish Creole	0.80%
Portuguese or Portuguese Creole	0.60%
Vietnamese	0.60%
Russian	0.50%
Arabic	0.30%
French Creole	0.50%
Japanese	0.20%
Korean	0.20%
Total	6.8%

(b) Municipal data (Town of Brookline):

The Town of Brookline shows a slightly different LEP profile, with the following primary languages spoken by individuals aged 5 and older who speak English less than “very well”. In particular, Brookline has a higher proportion of Russian and Japanese speakers than the county as a whole:

Language	Town Percent of LEP Population
Chinese	2.50%
Russian	1.10%
Japanese	0.90%
Spanish or Spanish Creole	0.80%
Korean	0.40%
Arabic	0.30%
Hebrew	0.30%
Portuguese or Portuguese Creole	0.20%

Language	Town Percent of LEP Population
Vietnamese	0.10%
Total	6.8%

(c) Applicant data:

94.7% of applicants to Brookline who selected a language preference in the Common Housing Application for Massachusetts Public housing (CHAMP) chose English. This is followed by Spanish (4.1%), Chinese (0.6%), Portuguese (0.2%), Russian (0.2%), and Haitian Creole (0.1%).

(d) Tenant data:

Current BHA resident data from PHA-Web reflects the following primary languages among tenants (excluding those who did not report a language):

Language	Spoken Count	Spoken %	Written Count	Written %
English	2764	93.34%	2808	95.72%
Russian	55	1.86%	26	0.89%
Spanish	48	1.62%	35	1.19%
Chinese (Unspecified)	30	1.01%	8	0.27%
Chinese (Mandarin)	21	0.71%	0	0%
Chinese (Cantonese)	12	0.41%	0	0%
Chinese (Simplified)	0	0%	13	0.44%
Chinese (Traditional)	0	0%	16	0.55%
Haitian Creole	5	0.17%	7	0.24%
Amharic	3	0.10%	3	0.10%
Korean	4	0.14%	4	0.14%
Arabic	1	0.03%	0	0%
Farsi	2	0.07%	2	0.07%
Pashto	2	0.07%	2	0.07%
Romanian	2	0.07%	2	0.07%
Thai	1	0.03%	1	0.03%
Ukrainian	3	0.10%	3	0.10%
Vietnamese	2	0.07%	0	0%
Cape Verdean Creole	2	0.07%	0	0%

Note: Percentages are calculated excluding residents who did not report a language (“None”). This data demonstrates that English is the predominant language, with Spanish, Chinese (various forms), and Russian as the most common LEP languages among residents.

(e) Other:

BHA uses Language Line Solutions (1-866-874-3972) to provide telephonic interpretation services. Usage trends support that Spanish, Chinese, Russian, and Portuguese are the most frequently requested languages for interpretation in BHA services.

Priority Languages for Translation (in descending order):

- Spanish
- Chinese (Mandarin and Cantonese)
- Russian
- Portuguese
- Japanese
- Korean
- Arabic

2. Assessing the frequency of LEP contact with the program, activity, or service

BHA serves a diverse community, with LEP individuals regularly accessing services such as:

- Housing applications
- Lease renewals
- Rent assistance
- Community programs
- Maintenance requests

Interactions occur daily, with higher frequencies during peak application and renewal periods. Language assistance is requested multiple times per week, both in person and via telephone interpretation.

3. Assessing the nature and importance of programs and services

BHA programs are essential for safe, affordable housing and supportive community services. Clear communication is critical to ensure:

- Understanding eligibility and lease terms
- Compliance with rights and responsibilities
- Access to necessary supportive services

Language access is vital to enable LEP individuals to fully participate and prevent misunderstandings that could affect housing stability.

4. Assessing available resources and costs

BHA provides multiple resources to support LEP individuals:

- Language Line Solutions: 24/7 telephone interpretation in over 240 languages
- All resident notices contain information in several languages on how to access language services
- Bilingual staff and Resident Service Coordinators proficient in Spanish, Chinese, and Russian
- Translated documents for priority languages, including Spanish and Chinese