



# HOLBROOK HOUSING AUTHORITY

1 HOLBROOK COURT  
HOLBROOK, MASSACHUSETTS 02343-1825

Holbrook Housing Authority  
Language Access Plan (LAP)

October 2024



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## HOLBROOK HOUSING AUTHORITY LANGUAGE ACCESS PLAN

### I. INTRODUCTION

The Holbrook Housing Authority ("HHA") is committed to ensuring equal access to its programs and services by all residents, regardless of primary language spoken.

Pursuant to [760 CMR 4.02\(1\)\(e\)](#), Massachusetts Local Housing Authorities must adopt and enforce a Language Access Plan ("LAP") regardless of whether they receive federal funds. DHCD has provided "DHCD LAP Guidance to Program Administering Entities" as an appendix to its Language Access Plan, most recently in 2017.<sup>1</sup>

[Title VI of the Civil Rights Act of 1964](#) ("Title VI") also requires recipients of federal financial assistance to take reasonable steps to ensure meaningful access to their programs and services by individuals with Limited English Proficiency ("LEP"). Persons who do not speak English as their primary language and who have a limited ability to read, write, or understand English may be considered LEP individuals. Such reasonable steps to ensure meaningful access include language access planning.

On January 22, 2007, the U.S. Department of Housing and Urban Development ("HUD") issued Final Guidance to recipients of HUD funding concerning compliance with the Title VI prohibition against national origin discrimination affecting LEP individuals, including detailed guidance for language access planning.<sup>2</sup>

Furthermore, HUD's Final Guidance defines a four-factor self-assessment method which assists agencies receiving HUD funds in determining the extent of their obligations to provide LEP services. DHCD, in its "DHCD LAP Guidance to Program Administering Entities," has encouraged LHAs to utilize this four-factor self-assessment method regardless of whether they receive HUD funds. Based on the DHCD and HUD guidance, the LHA has completed an LEP four-factor self-assessment ("Attachment A").

Using the LEP self-assessment as a guide, the HHA has prepared this LAP, which defines the actions to be taken by the LHA to ensure HHA compliance with Title VI and/or DHCD requirements with respect to LEP individuals. The HHA will periodically review and update this LAP in order to ensure continued responsiveness to community needs and

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<sup>1</sup> <https://www.mass.gov/files/documents/2017/10/25/lapdhcd2017.docx>

<sup>2</sup> <https://www.federalregister.gov/documents/2007/01/22/07-217/final-guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against>; see also <https://www.federalregister.gov/documents/2007/03/16/E7-4794/final-guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against> (Update of Web Site Reference)

compliance with 760 CMR 4.02(1)(e), as well as Title VI and related HUD guidance as applicable.

## **II. GOALS OF THE LANGUAGE ACCESS PLAN**

The goals of the HHA's LAP include:

- To ensure meaningful access to the HHA's housing programs by all eligible individuals regardless of primary language spoken.
- To ensure that all LEP individuals are made aware that the HHA will provide free oral interpretation services to facilitate their contacts with and participation in programs administered by the LHA.
- To provide written translations of vital documents to LEP individuals speaking priority languages.
- To ensure that HHA staff are aware of available language access services and how these services need to be used when serving LEP individuals.
- To provide for periodic review and updating of this LAP and services in accordance with community needs.

## **III. LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE**

See "Attachment A" for data analysis of LEP populations.

## **IV. TYPES OF ASSISTANCE NEEDED BY LEP INDIVIDUALS**

Most contacts between the HHA and LEP individuals involve meetings, written communications, and phone calls where information is exchanged. Examples include interactions by applicants with HHA staff during the application process leading up to and including placement in housing, as well as periodic contact between residents and HHA staff related to management, maintenance, and lease compliance issues. Oral language assistance services may be needed for these contacts. Oral language assistance service may come in the form of "in-language" communication (a demonstrably qualified bilingual staff member communicating directly in an LEP person's language) or interpretation services. These services may also be necessary to communicate with LEP individuals when written materials are insufficient.

Other contacts involve the exchange and review of printed materials, some of which may be considered "vital documents." HUD's Final Guidance defines vital documents as, "any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP individuals specifically." The LHA will strive to provide translation services as necessary and as resources permit for

any document considered vital for an applicant's, tenant's, or participant's meaningful program access as provided in section V.B below ("Written Translation").

## **V. LANGUAGE ASSISTANCE TO BE PROVIDED**

To promote equal access to LHA programs and services by LEP individuals, the HHA will implement the following array of Language Access services:

### **A. Identification of LEP Individuals and Notices**

*Use of "I Speak... Language Identification Flashcards":* To help identify LEP individuals and determine the appropriate Language Access, the HHA will post and make available "I Speak... Language Identification Flashcards" in common areas, on its website, and by request. Applicants and residents can use these guides to indicate their primary language. During the tenant selection screening process, HHA staff will make appropriate arrangements for interpretation services generally; using either a bilingual staff person or a telephone interpretation service.<sup>3</sup>

*Notices of Oral Interpretation Services:* Subject to budget constraints and in consideration of the four-factor self-assessment described on Attachment A, the HHA will provide free access to language assistance for staff contact with LEP individuals. The HHA will prominently post multi-language notices in common areas and on its website which indicate that free language assistance is available upon request (see "Attachment B"). The HHA will also gather data on requests for language assistance by language to inform its four-factor self-assessment.

### **B. Language Access Measures**

*Oral Interpretation - Staff:* When feasible, bilingual HHA staff will be utilized to communicate with LEP individuals in their native languages and to assist them in reviewing HHA materials, answering questions about LHA programs, and responding to HHA forms and information requests.

*Oral Interpretation - Telephone Support:* Subject to budget constraints and in consideration of the four-factor self-assessment described on Attachment A, if qualified bilingual HHA staff are unavailable to communicate with an LEP individual who is requesting assistance, the HHA 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 HHA forms and

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<sup>3</sup> "I Speak..." Language Identification Flashcards are available in numerous languages from the U.S. Census Bureau: <https://www.lep.gov/sites/lep/files/media/document/2020-02/crcl-i-speak-booklet.pdf>

procedures, the HHA will schedule the call so that the telephonic interpreter has the opportunity to first review the relevant form or procedure. The HHA will only utilize interpretation services which demonstrate a high degree of training and professionalization among the interpreter staff. The HHA currently utilizes the Language Line Solution, a service which provides trained and certified interpreters and coverage for a multitude of languages. HHA staff will be trained in how to access this service, which will be available as needed for LEP applicants and residents.

*Oral Interpretation - In Person Assistance:* Subject to budget constraints and in consideration of the four-factor self-assessment described on Attachment A , in limited instances where telephone interpretation services or the use of bilingual HHA staff are determined insufficient to ensure meaningful access, the HHA may provide qualified in-person interpretation services at no cost to the LEP individual through the use of community resources and/or outside organizations or vendors who employ or contract with qualified and trained interpreters. Examples of contacts where in person assistance may be requested includes termination hearings and evictions. Due to the considerable expense often involved in providing in person assistance, unless in-person interpretation is available at low cost through community resources, the HHA will generally strive to use telephonic assistance, as resources permit. If the LEP individual does not wish to use the free interpretation services offered by the HHA, the LEP individual may provide their own qualified interpreters at their own expense.

*Oral Interpretation - Use of Other Interpreters not provided by the HHA:* As noted above, LEP individuals will be informed that the HHA will provide them with free access to oral interpretation services via bilingual HHA staff or qualified, trained contractors as needed. If the LEP individual requests their own qualified, trained interpreter this will be allowed at the individual's own expense. Use of family members and friends as interpreters is allowed. Staff will be advised to be alert to the potential for any conflict of interest or competency issue that may arise from the involvement of family or friends.

*Written Translation:* The HHA will strive to translate documents that are vital to meaningful program access as resources permit and in consideration of the four-factor-self-assessment referenced in Attachment A and applicable HUD guidance.<sup>4</sup> Priority languages for translation are identified in Attachment A. Vital documents are those that are critical for ensuring meaningful access to the HHA's major activities and programs by beneficiaries generally and LEP persons specifically. 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.

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<sup>4</sup> HUD guidance indicates that written translation of vital documents for each eligible LEP language group that constitute more than 5% (if > 50) of the eligible population in the market area or among current **beneficiaries, or 1,000 of such persons, whichever is less, will constitute strong evidence that reasonable** steps have been taken to address written translation needs.

Meaningful program access also requires awareness of rights and services; otherwise, LEP persons may effectively be denied such access.

Written or "vital documents" include:

- Application-related documents
  - Lease-related documents
  - Rent-redetermination related documents
  - Consent and complaint forms
  - Written standard notices of rights, denial, loss, or decreases in benefits or services, and other notices relating to hearings/conferences/grievances
  - Notice to quit and eviction-related documents
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- *Non-Vital or Non-translated Written documents:* For documents not considered "vital documents" or not immediately translated, a notice must be placed on the document which states in the most frequently encountered languages identified under the administering entity's LAP, "This is an important document. Please contact the Holbrook Housing Authority at 781-741-1417 for free language assistance" (see "Attachment C").
  - *Legal documents:* In the case of legally binding documents such as a lease, although a translated copy of the document should be provided, the English version of the document is the one that is legally binding and considered the official document. The translated document is to be used as a reference tool only. A brief statement will be included on these 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 D").
  - *Translation of written documents:* For HHA program documents, including those that are highly individualized (such as ineligibility, termination, or appeal notices), the HHA will, to the extent feasible within administrative and fiscal limits, translate these documents based on an assessment utilizing the four-factors discussed above.
  - *Note on timing-related rights:* A person with LEP will not be penalized or denied meaningful and effective access because of an administering entity's inability to provide timely translation or interpretation services. This would include allowing additional time for translation and/or interpretation without impacting an applicant's position on the HHA waitlist.
  - *Review and updating:* The HHA will periodically review and update the list of vital documents to reflect those documents which are considered vital to applicants and/or residents and will also track existing translated documents that need to be updated for consistency with updated English-language documents.

C. Staff Training and Coordination

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

*Training:* The LHA will make reasonable efforts to avail its staff and employees of any available trainings on Language Access. LHA employees and staff who regularly interact with LHA clients will be encouraged to complete periodic refresher trainings on Language Access.

*LEP Coordinator:* The HHA has designated the Assistant Executive Director as the LEP Coordinator, responsible for ongoing updating of LEP analysis, addressing staff and public questions and issue related to LEP matters, and providing ongoing LEP training.

D. Providing Notice to LEP Individuals

To ensure that LEP individuals are aware of the language services available to them, the HHA will post LEP notices in multiple languages in the HHA's common areas, on the HHA's website, and will make LEP notices available upon request.

E. Monitoring and updating the Language Access Plan

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

- Whether there have been any significant changes in the composition or language needs of the LEP-population in Plymouth County and/or based on LHA data.
- A review to determine if additional vital documents require translation.
- A review of any issues or problems related to serving LEP individuals which may have emerged; and
- Identification of any recommended actions to provide more responsive and effective language services.

**Adopted by the Board of the Holbrook Housing Authority on: October 2024**

*Attachment A: HHA's Four Factor Self-Assessment Analysis Regarding LEP Individuals*

*Attachment B: Language Assistance Protocols*

*Attachment C: Important Document Notice*

*Attachment D: Legal Notice Translation*

**Attachment A: HHA's Four-Factor Self-Assessment Analysis Regarding Limited English Proficiency (LEP) Individuals**

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

Data estimates are based on the following data sources:

(a). Census data at the County level (for estimating potential LEP applicants encountered by the LHA):

See data graph (attached) compiled by **U.S. Census Bureau** of citizens of **Norfolk** County aged 5 years and over for which English is spoken "less than very well."

<b>County Data</b>		
<b>Languages</b>	<b>Total# of People</b>	<b>% of Total Population (age 5+)</b>
<u>Spanish</u>	<u>4,109</u>	0.64
French	966	0.15
Creole	2 954	0.46
Italian	850	0.13
<b>Portuguese</b>	<b>4,378</b>	0.68
German	153	0.02
Greek	889	0.14
Russian	2 512	0.39
Polish	420	0.07
Armenian	66	0.01
Persian	293	0.05
Gu'arati	117	0.02



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**County Data**

	<b>Total# of People</b>	<b>% of Total Population (age 5+)</b>
<b><u>Languages</u></b>		
<b>Hindi</b>	322	0.05_____
Urdu	147	0.02_____
Chinese	14 481	2.26_____
<b><u>Japanese</u></b>	792	0.12_____
Korean	808	0.13_____
Cambodian	170	0.03_____
Thai	201	0.03_____
Laotian	43	0.01_____
Vietnamese	3 761	0.59_____
<b><u>Tagalog</u></b>	350	0.05_____
<b><u>Hungarian</u></b>	21	0.00_____
Arabic	1 346	0.21_____
Hebrew	297	0.05_____

(b). Municipal Data [*For use only where the % of LEP population speaking the language in the City/Town is greater than the percentage for the County*]:

See data graph (attached) compiled by **U.S. Census Bureau** of citizens of **Holbrook** City/town aged 5 years and over for which English is spoken "less than very well."

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## Town of Holbrook Languages Spoken Data

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### Languages

Languages spoken at home among individuals age 5+ with limited English proficiency:	Town Total Number	Town Percent of Total Population (age 5+)	Norfolk County Total Number	Norfolk County Percent of Total Population (age 5+)
Spanish	314	2.95	4,109	0.64
Polish	103	0.97	420	0.07
Tagalog	33	0.31	350	0.05
Vietnamese	14	0.13	3,761	0.59
Italian	14	0.13	850	0.13

(c). Applicant data

English		Spanish		Haitian Creole		Khmer		Portuguese		Russian		Vietnamese		Chinese	
Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants	Number of Applicants	Percent of Applicants
5,791	97%	143	2%	10	0%	0	0%	10	0%	1	0%	1	0%	6	0%

(d). Tenant data

The HHA analyzes call logs to determine preferred communication methods for tenants with using spoken languages other than English.

(e). Other (e.g., data on telephonic or in-person interpretation usage by language, data from surveying other organizations serving LEP persons in the LHA's region)

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Based on the above data sources, the following languages are priority languages for translation, in descending order of priority for translation

Spanish

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**2. Assessing the frequency with which LEP individuals come into contact with the program, activity, or service.**

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During the application and lease-up process, recertification process, when obtaining consent and responding to complaints, requests for maintenance, to assess needs and connect individuals with local service agencies, and when addressing legal matters.

**3. Assessing the nature and importance of the program, activity, or service provided by the program.**

All of the above-noted programs and services are of equal importance.

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**4. Assessing the resources (e.g., translation services, bilingual staff, community resources, etc.) available to the HHA and costs.**

Resources include bilingual management agent staff, when possible, and the use of Language Line Solutions, a telephonic interpreter service, as well as sign language services when needed via the Commonwealth of Massachusetts at [referralspecialist.legal@state.ma.us](mailto:referralspecialist.legal@state.ma.us).

## Attachment B: Language Assistance Protocols

**Language Line Solutions**  
**1 Lower Ragsdale Drive, Building 2**  
**Monterey CA, 93940**

Telephone Number: 1-866-874-3972

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Email Address: [CustomerCare@LanguageLine.com](mailto:CustomerCare@LanguageLine.com)  
[Traoslotion@LanguageLine.com](mailto:Traoslotion@LanguageLine.com)

Website: [www.LanguageLine.com](http://www.LanguageLine.com)

LHA Authorization# 566166 (Note: Each Employee Has 4-Digit Access Code)

### Identifying Need for Language Assistance:

Persons with LEP will often be able to convey, including through third parties, their need for language assistance, although in some instances one or more of the following steps may be necessary to identify the language and the nature of the assistance sought.

- 1) Utilize "*I-Speak cards*" where walk-ins occur to identify what language the person reads or speaks. I-Speak cards are available at the following website: <https://www.lep.gov/sites/lep/files/media/document/2020-02/crcl-i-speak-booklet.pdf>.
- 2) Consult available *LHA staff* who can provide initial support in identifying languages and assistance needed by persons with LEP that come into direct contact with the LHA in person, by telephone, or in writing.
- 4) Utilize LHA's over-the-phone telephonic services account with Language Line Solutions (see below for further information).
- 5) Other: The use of sign language interpreter services through the Commonwealth of Massachusetts at [referralspecialist.legal@state.ma.us](mailto:referralspecialist.legal@state.ma.us).

Note: Persons with LEP must not be turned away or told that they must secure their own interpreter or translator. Language assistance through interpreter or translator services as appropriate must be sought as soon as possible and timing related rights must be preserved while such services are being sought.

## **Protocols and Procedures for Providing Oral Language Assistance (Interpretation):**

*Select appropriate method for providing interpretation* on a case-by-case basis depending on the nature and importance of the communication, including whether in-person interpretation is necessary for providing meaningful access to programs and services. The following are interpreter resources for consideration:

a. *HHA staff*

Ask all candidates for employment if they speak another language fluently. Once employed, identify staff who are willing to be interpreters for oral and/or written services. Notify LEP Coordinator of all staff who are interpreters. Maintain a list of staff interpreters.

b. *Community/other resources* (e.g., non-profit assistance or inter-agency partnerships)

The Quincy Housing Authority, as the Management Agent for the Holbrook Housing Authority, has a Support Services Department that partners with many local service agencies, including but not limited to, local YMCAs, the Council on Aging, resident service agencies like the Quincy Community Action Program, QARI, Elder Affairs, and other local community agencies who have offered services, including interpreter services. We may utilize these partnerships to offer oral interpreter services. In addition, we reach out to other LHAs who offer interpreter services.

c. Currently, **Language Line Solutions** is to be used for over-the-phone interpretation. Useful tips for using interpreter services and further protocols for telephonic interpretation are provided below.

d. *In-Person Assistance*: In limited instances where in-person assistance is necessary to ensure meaningful access and use of bilingual HHA staff is determined to be insufficient or inappropriate (e.g., due to a conflict of

interest), the HHA may provide qualified in-person interpretation services at no cost to the LEP individual either through local community organizations that have partnered with our Support Services Department, as noted above in section (b) or through our vendor, Language Line Solutions.

### **Process to Determine In-Person Assistance**

- 1) Utilize staff resources to determine the in-person assistance needed.
- 2) Determine if the LEP individual would like to schedule a call with our interpreter services vendor at the time of the in-person visit or at a later date and time.
- 3) Schedule a meeting time and call with Language Line Solutions.

### **Protocols for Using Over-the-Phone Interpretation:**

The staff utilizes the Language Line Solutions, 1-866-874-3972, Client ID #566166 (Note: Each Employee Has 4-Digit Access Code)

### **Additional Protocols for Administrative Staff**

- 1) Utilize staff resources or the service to:
  - a. Determine the LEP caller's question or issue.
  - b. Obtain the LEP caller's name, contact information, and best times when he or she can be reached.
  - c. Inform the LEP caller that the appropriate staff person will contact the caller.
- 2) After the call ends, let the appropriate staff person that would handle the caller's type of question/issue know that the caller requires follow-up with language interpretation and specify for the staff person the information corresponding to paragraph (1) (a)-(c) above as well as whether the issue appears to be time sensitive.
- 3) Assist the staff person to utilize staff resources or over-the-phone interpretation to follow-up with the LEP caller.

Note: the following are useful tips for utilizing over-the-phone interpreter services:

- Explain to the interpreter the purpose of the communication (i.e., assistance filling out a housing application). It is also helpful, particularly for more complex situations, to give the interpreter a brief overview and description of the information to be conveyed.
- Provide brief explanations of technical terms of art that may come up during the communication, such as eligibility, income limits, recertification, lease violation, etc.
- Speak as if talking directly with the person with LEP and not with the interpreter. It may be helpful to check in with the interpreter to make sure he/she is

understanding what you are saying. If in person, face the person with LEP and look at him/her and not the interpreter.

- Speak in short sentences and enunciate words.
- Express one idea at a time and allow the information to be interpreted prior to continuing.
- Avoid using acronyms, such as HUD, DHCD, etc.
- Inform the interpreter when you are no longer in need of his/her services.

### **Protocols and Procedures for Providing Written Language Assistance (Translation):**

#### 1) Translation of vital documents:

##### *a. HHA staff*

Ask all candidates for employment if they speak another language fluently. Once employed, identify staff who are willing to be interpreters for oral and/or written services. Notify LEP Coordinator of all staff who are interpreters. Maintain a list of staff interpreters.

##### *b. Community/other resources (e.g., non-profit assistance or inter-agency partnerships)*

The Quincy Housing Authority, as the Management Agent for the Holbrook Housing Authority, has a Support Services Department that partners with many local service agencies, including but not limited to, local YMCAs, the Council on Aging, resident service agencies like the Quincy Community Action Program, QARI, Elder Affairs, and other local community agencies who have offered services, including interpreter services. We may utilize these partnerships to offer oral interpreter services. In addition, we reach out to other LHAs who offer interpreter services.

##### *c. Currently, **Language Line Solutions** or other approved vendor as noted above is to be used for written translation.*



- 2) *To the extent important documents have yet to be translated, free language assistance terminology translated in other languages is provided in written form.*
- 3) *For legally binding documents, such as a lease, the translation is accompanied by a statement in the language of the translated document indicating that the translated document is for informational purposes only and that the English version is considered the legally binding document*

*Attachment C: Important Document Notice*

*Attachment D: Legal Notice Translation*

### **Attachment C: Important Document Notice**

This is an important document. Please contact the HOLBROOK HOUSING AUTHORITY at 781-741-1417 for free language assistance.

Este documento es muy importante. Favor de comunicarse con el en para ayuda gratis con el idioma. (Spanish)

### **Attachment D: Legal Notice Translation**

**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)



