



SOMERVILLE HOUSING AUTHORITY

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LIMITED ENGLISH PROFICIENCY PLAN (LEP)

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Dated: June 2007

SECTION 1

DETERMINING NEEDS AND IDENTIFYING INDIVIDUALS

Number of Persons Eligible or likely to be encountered by the Somerville Housing Authority:

The Somerville Housing Authority (SHA) has identified the primary languages spoken by persons with Limited English Proficiency (LEP) within its jurisdiction and will continue a process to determine needs of additional LEP populations using the following methods;

- SHA'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 SHA shall provide I Speak Cards to individuals.
- At all points of entry and contact, the SHA will post notices in identified languages that individuals have the right to request FREE interpretation services.
- SHA will periodically review its own data, census data and State and City generated data indicating languages spoken within our geographic area.

Currently SHA has determined that the main languages spoken by LEP populations within its geographic area are;

- Haitian Creole
- Spanish
- Portuguese
- Vietnamese
- Cantonese

Importance of Program / Service

SHA has determined the following to be the priority programs/services where interpretation/translation is most needed and desirable.

- Application for Housing Assistance including Federal, State, Housing Choice Voucher (Section 8), Family or Elderly.
- Public Safety Procedures
- Maintenance Procedures and inspections
- Transfer Policies and Procedures
- Rent Re-determinations
- Private Conference and Grievance Hearings
Informal Hearings (Section 8)

While the above constitute priority programs and services where interpretation/translation services are most important, interpretation services will be provided, upon reasonable request, for any SHA activity.

Existing Resources

SHA has made a concerted effort to hire multi-lingual staff throughout the various divisions of our agency.

At the critical points of entry into our programs and services, we have staff able to assist LEP individuals in the following languages.

- Spanish
- Portuguese
- Haitian Creole
- Cantonese

SECTION 2

LANGUAGE ASSISTANCE MEASURES

Implement On-Going Identification Measures.

The Somerville Housing Authority (SHA) will continue a process to determine the interpretation/translation needs of LEP applicants and residents using the following methods;

- SHA 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.
- SHA's Tenant Selection Department will maintain file information indicating applicant language and preference of communication and relay this to tenant's manager or Section 8 coordinator when the applicant is selected for housing assistance. In addition, if technically feasible, the SHA will add language preference to the main tenant/participant data base.
- At all points of entry and contact as defined herein, the SHA shall provide I Speak Cards to individuals.
- At all points of entry and contact as defined herein, the SHA will post notices in identified languages that individuals have the right to request FREE interpretation services.
- SHA 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.
- SHA shall work with City and local Agencies and advocates to identify LEP individuals.

Oral Interpretation Services

SHA will post signs at points of entry and contact indicating that FREE interpretation services will be made available upon request.

Points of entry and contact include:

- Main Administrative Building
- Maintenance Office
- Manager's Offices
- Tenant Selection Office
- Public Safety
- Mystic Activity Center

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

In cases where the language assistance can not be provided by staff members, the contact staff member will determine language through I Speak Cards and arrange for interpretation services at an appropriate mutually convenient date and time. At appropriate times the SHA shall use the ATT language line to assess immediate needs and/or to set up future appointments with interpreters.

The SHA shall also develop, and make available, a check-off form in primary LEP languages which allow a tenant to confirm, in writing, the reason for their visit. For example, "I lost my job and need to have my rent reduced" or "I have a maintenance problem". These forms will promptly be given to the appropriate staff persons.

If an applicant or resident is dropping off documents, the documents should be accepted and time stamped even if it is initially unclear to whom the documents should be directed. In these circumstances a copy of the documents should also be given to the tenant/applicant with a time stamp.

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

Oral Interpretation through Phone Contact

SHA's main office phone number is covered during the hours;

8:00 a.m. – 4:00 p.m. Monday thru Thursday

4:00 p.m. – 7:00 p.m. Wednesday Evenings

8:00 a.m. – 12:00 p.m. Friday

When LEP individuals call the main number, the operator will transfer caller for translation to the appropriate staff member within that division. When a language appropriate member of that division is not available, other staff members will assist in interpretation and obtain basic information regarding the individuals request or concern. Where staff are unable to communicate in the language spoken by the tenant/applicant, the ATT language line will be used where necessary to determine the basic nature of the call and to whom it should be directed.

After Hours Phone Operation;

SHA will implement a multi-language phone system allowing a caller to leave messages for language appropriate staff. Messages will be reviewed by appropriate staff and referred as needed in a timely manner.

Written Translation

SHA has determined the following to be the priority documents, programs and services where written translation is most needed and desirable.

SHA will translate the following documents and/or provide a document summary indicating the purpose and importance of the document.

SHA will begin the process in April 2007 and has set a goal to have completed summaries / translations of the following-documents by October 2007.

- Application for Housing Assistance including Federal, State, Housing Choice Voucher (Section 8), Family or Elderly.
- Lease (Federal and State)
- Public Safety Procedures
- Maintenance Procedures
- Transfer Policies and Procedures
- Private Conference Notices and summary of private conference including rights.
- Notices regarding housekeeping, insect and pest controls inspections.
- Recertification appointments and important documents needed to complete process.
- Notices re: changes in rent amount
- Section 8 termination notices
- Notice To Quit (cause and non-payment)
- Consent Forms
- Inspection Notices and results.
- Rights and Responsibilities and Family obligations

NOTE: SHA will continue to identify additional documents commonly used and determine translation opportunities. SHA's goal is to provide a brief accurate summary of important and useful documents.

Resident Participation Program: Hosting Resident Meetings

SHA in cooperation with Tenant Associations will implement a Resident Participation Program (RPP). The RPP will be designed to achieve maximum access and participation in available programs and services by LEP individuals and will establish resident opportunities to assist LEP individuals. All participants and users will be advised of confidentiality concerns and issues. Participation will be strictly voluntary.

SECTION 3

STAFF TRAINING

The goal of staff training is to ensure that all SHA employees understand LEP policies, procedures and requirements and to ensure that the procedures set forth in this Plan are utilized by SHA staff when working with the public and residents. In addition, it is the goal of the SHA to ensure that staff persons providing interpretation services to SHA applicants and tenants are sufficiently trained to provide high quality interpreter services.

The Somerville Housing Authority (SHA) will ensure proper training using the following methods;

- SHA shall include a discussion of SHA responsibilities and procedures under the LEP in the orientation process for new hires. Each new employee will receive a copy of the LEP plan.
- SHA will schedule two (2) mandatory training sessions for all employees in which it shall discuss SHA responsibilities and procedures under this LEP.
- SHA shall identify local and regional training opportunities for appropriate staff regarding how to best perform interpreter services. Staff persons providing interpreter services shall be required to attend such training opportunities where reasonable. SHA will continue to identify local language service resources.
- SHA will select appropriately trained staff members and implement an on-going staff to staff training program.

SECTION 4

PROVIDING AND PROMOTING NOTICES AND ACCESS TO SHA SERVICES FOR TO LEP PERSONS

In order to ensure that those LEP persons who are current SHA residents and those who potentially may be beneficiaries of available services have the maximum access to SHA programs, the SHA will implement the following;

- Post signs as described in Section 2
- Distribute outreach documents in appropriately translated languages to appropriate community agencies
- Partner with local agencies, groups and individuals
- Update telephone voice mail
- Conduct presentations at tenant association meetings
- Work with tenant associations to ensure greater accessibility of services.

SECTION 5

MONITORING AND UPDATING THE LEP PLAN

In order to ensure that the SHA LEP Plan continues to address the changing needs of the clients we serve, SHA will periodically review the plan and focus on the following;

- **Frequency of Contact:** How often LEP persons use the services available and how often and which individual staff members come in contact with LEP persons.
- **Availability of Resources:** Are the current resources adequate to address the identified needs? Is SHA utilizing the resources efficiently and are resources responding appropriately?
- **How quickly are bilingual staff responding to LEP's requests for assistance? How quickly are appointments set up for those in need of interpretation?**
- **Needs of Beneficiaries:** Through ongoing contact with residents and multiple groups including various service providers, the SHA will monitor and adjust with changing needs.
- **Written Translation of Important Documents:** Continue to work diligently on written translation of important documents identified in this plan in Section 2 into all primary LEP languages identified in this Plan.