



LANGUAGE ACCESS PLAN

FY2024

JANUARY 30, 2023
CHELMSFORD HOUSING AUTHORITY
10 Wilson Street, Chelmsford, MA 01824

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I. INTRODUCTION

The Chelmsford Housing Authority (“LHA”) 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 2017.¹

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.²

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 LHA has prepared this LAP, which defines the actions to be taken by the LHA to ensure LHA compliance with Title VI and/or DHCD requirements with respect to LEP individuals. The LHA will periodically review and update this LAP in order to ensure continued responsiveness to community needs and 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 LHA’s LAP include:

- To ensure meaningful access to the LHA’s housing programs by all eligible individuals regardless of primary language spoken.

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

² <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)



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- To ensure that all LEP individuals are made aware that the LHA 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 LHA 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 LHA and LEP individuals involve meetings, written communications and phone calls where information is exchanged. Examples include interactions by applicants with LHA staff during the application process leading up to and including placement in housing, as well as periodic contact between residents and LHA 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 LHA 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 LHA will post

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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, LHA staff will make appropriate arrangements for interpretation services generally, using either a bilingual staff person or a telephone interpretation service.³

Notices of Oral Interpretation Services: Subject to budget constraints and in consideration of the four-factor self-assessment described on Attachment A, the LHA will provide free access to language assistance for staff contact with LEP individuals. The LHA will prominently post multi-language notices in common areas and on its website indicating that free language assistance is available upon request (see “Attachment B”). The LHA 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 LHA staff will be utilized to communicate with LEP individuals in their native languages and to assist them in reviewing LHA materials, answering questions about LHA programs, and responding to LHA forms and information requests. Currently, LHA employs staff members who speak **Spanish, Mandarin, Italian, and Portuguese.**

Oral Interpretation - Telephone Support: Subject to budget constraints and in consideration of the four-factor self-assessment described on Attachment A, if qualified bilingual LHA staff are unavailable to communicate with an LEP individual who is requesting assistance, the LHA 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 LHA forms and procedures, the LHA will schedule the call so that the telephonic interpreter has the opportunity to first review the relevant form or procedure. The LHA will only utilize interpretation services that demonstrate a high degree of training and professionalism among the interpreter staff. The **International Translation Company (ITC)** is a service that provides trained and certified interpreters and coverage for a multitude of languages. LHA 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 LHA staff are determined insufficient to ensure meaningful access, the LHA 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

³ “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/crc1-i-speak-booklet.pdf>

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who employ or contract with qualified and trained interpreters. Examples of contacts where in-person assistance may be requested include 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 LHA 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 LHA, the LEP individual may provide their own qualified interpreters at their own expense.

Oral Interpretation - Use of Other Interpreters not provided by the LHA: As noted above, LEP individuals will be informed that the LHA will provide them with free access to oral interpretation services via bilingual LHA 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 LHA 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.⁴ Priority languages for translation are identified in Attachment A. Vital documents are those that are critical for ensuring meaningful access to the LHA'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. 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
-
- *Non-vital or Non-translated written documents:* For documents not considered "vital documents" or not immediately translated, a notice must be placed on the

⁴ 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.

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document that states in the most frequently encountered languages identified under the administering entity's LAP, "This is an important document. Please contact **Chelmsford Housing Authority at (978) 256-7425** 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 that 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 LHA program documents, including those that are highly individualized (such as ineligibility, termination or appeal notices), the LHA 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 LHA waitlist.
- *Review and updating:* The LHA will periodically review and update the list of vital documents to reflect those documents that 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 LHA 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 LHA has designated the **Senior Director of Property Management and Compliance** 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.

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D. Providing Notice to LEP Individuals

To ensure that LEP individuals are aware of the language services available to them, the LHA will post LEP notices in multiple languages in the LHA's common areas, on the LHA'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 **Middlesex 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 Chelmsford Housing Authority on: March 13, 2023

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

Attachment B: Language Assistance Protocols

Attachment C: Important Document Notice

Attachment D: Legal Notice Translation

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Attachment A: LHA’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 **American Community Survey (U.S. Census Bureau), 2014-2019** of citizens of **Middlesex** County aged 5 years and over for which English is spoken “less than very well.”

Language Spoken at Home	Total Number	Percent of Total Population (age 5+)
Spanish	30,153	2.10%
Portuguese	24,402	1.70%
Chinese	19,706	1.37%
Cambodian/Khmer	6,427	0.45%
Creole	6,279	0.44%

(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 **American Community Survey (U.S. Census Bureau), 2014-2019** of citizens of **Town of Chelmsford** aged 5 years and over for which English is spoken “less than very well.”

Language Spoken at Home	Total Number	Percent of Total Population (age 5+)
Chinese	267	25.80%
Vietnamese	134	12.95%
Hindi	129	12.46%
Portuguese	108	10.43%
Spanish	82	7.92%

(c). Applicant data (e.g., data on CHAMP application languages for estimating applicant LEP population served):

TOTAL APPLICANTS	English		Spanish		Haitian Creole		Cambodian/Khmer		Portuguese		Russian		Vietnamese		Chinese	
	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of
6,707	6,418	95.6%	262	3.91%	3	0.04%	0	0.00%	11	0.16%	1	0.01%	1	0.01%	11	0.16%



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(d). Tenant data (e.g., data on primary languages and communication preferences by language for estimating tenant LEP population served):

TOTAL TENANTS	English		Spanish		Haitian Creole		French		Hindi		Cambodian/Khmer		Chinese		Other (not identified)	
	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of	# of	% of
472	417	88.35%	23	4.87%	4	0.85%	1	0.21%	1	0.21%	1	0.21%	21	4.45%	4	0.85%

(e). Other (e.g., Massachusetts Department of Education, English Learners Online Dashboard (EL Data Dashboard))

School District	Most Common Language	Most Common Language %	2 nd Most Common Language	Most Common Language %
Chelmsford	Portuguese	16.6%	Spanish	14.6%
Billerica	Portuguese	33.8%	Spanish	31.2%
Lowell	Spanish	38.2%	Cambodian/Khmer	27.1%
Westford	Spanish	15.0%	Chinese	12.5%

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

1. Spanish
2. Chinese
3. Vietnamese
4. Khmer
5. Portuguese

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

This information will be obtained not only through the use of these statistics but through collection of internal data when it is available. Emphasis will be placed upon translation of documents where the population meets or exceeds 5% or 1000 consistent with HUD LEP guidance. Interpretation will always be made available on an as needed basis.

The Chelmsford Housing Authority (CHA) provides direct assistance with securing and maintaining low-income housing both by oral and written means of communication. Therefore, applicants and residents are likely to have considerable direct contact with the program and its staff.

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



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The Chelmsford Housing Authority (CHA) provides direct assistance with securing and maintaining low-income housing both by oral and written means of communication. Therefore, the nature and importance of the program, activity or service is of significant importance to the CHA's area applicants and residents.

The greater the possible consequences of the contact, the more important it is for the CHA to provide language services. The CHA will focus its efforts on providing language services in:

- (1) Important matters concerning initial eligibility for low-income housing, public housing, project based assistance and tenant based assistance;
- (2) Important matters that impact continuing eligibility in the above-referenced housing programs;
- (3) Termination of housing assistance or eviction.
- (4) Emergency work orders or other issues with continued occupancy that are determined to be critical in nature.

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

Currently, there are free websites (Google Translate) that can be utilized to translate some written materials. Additionally, CHA Staff Members have been identified to provide oral translation services at public meetings and during conversations with LEP applicants and residents during the ongoing assistance with securing and maintaining low-income housing. Furthermore, many of the common forms used in the implementation of the CHA's programs are available in multiple languages on the DHCD website. Additionally, translation activities are an available through the CHA's contract with International Translation Company (ITC).

The CHA's Language Access Plan will be implemented subject to the availability of resources. The CHA has a limited budget to cover the cost of translating documents, providing oral interpretation and otherwise implementing a Language Access Plan. The CHA will continue to identify resources that may be available to support the cost of implementing this Plan.

Currently, the CHA employs staff members who speak:

Language	Staff Member			
Spanish	Yesenia Muniz	Brunilda Ruiz	Wanda Bouras	Ines Lopez
Mandarin	Di Ding			
Italian	David Hedison			
Portuguese	Jose Netto	Joao Laurencio		

The CHA will focus efforts on making certain that documents that have been translated by HUD and DHCD are available to staff and used on a regular basis and that free or low cost translation and interpretation services are made available on an as needed basis.



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- Translated HUD forms are available on the HUD portal under HUDclips forms at https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/forms
- The HUD office of Fair Housing and Equal Opportunity provides a directory of translated HUD forms at: https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep
Examples include FHEO Brochures Section - Fair Housing for All, Are You A Victim of Housing Discrimination, Equal Opportunity for All, Domestic Violence Guide, PIH Brochure - A good place to Live all translated into a minimum of 8 languages. The following are also translated into many languages : PIH Fact Sheets, How Your Rent is Determined for Public Housing and Housing Choice Voucher Programs, Authorization for the Release of Information/Privacy Act Notice, Certification of Domestic Violence, Dating Violence or Stalking, Request for Tenancy Approval, Request for Tenancy Approval, Request for Tenancy Approval, Request for Tenancy Approval, Statement of Homeowner Obligation, Family Self-Sufficiency (FSS) Program Contract of Participation, Family Self-Sufficiency Program FSS Escrow Account Credit Worksheet Housing Assistance Payments Contract and Debts Owed to Public Housing Agencies. There are also a number of translated fair housing posters available in this web site.
- Translated universal standard and emergency applications for State –Aided Public Housing are located at <https://publichousingapplication.ocd.state.ma.us/> and are available in Spanish Portuguese Haitian Creole Russian Vietnamese and Chinese.
- Translated Housing Choice Voucher Preliminary Applications are located at http://www.section8listmass.org/How_to_Apply.php and are available in Spanish, Portuguese, Haitian Creole, Russian, Vietnamese and Chinese.
- Other documents translated by DHCD are available through the PHA’s online access system for that agency. Examples include the following Common Housing Application for Massachusetts Public-Housing (CHAMP) documents which have been translated into in Spanish, Portuguese, Haitian Creole, Khmer, Russian, Vietnamese and Chinese: Application Forms (A forms), Notice Screening and Required Documents (B forms), Notice of LHA Determinations and Required Documents (C forms) and Unit Offers (D forms).

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Attachment B: Language Assistance Protocols

International Translation Company (ITC)
70 Warren Street, Boston, MA 02119

Telephone Number: (617) 989-3939

After Hours Number: (617) 606-0144

Fax Number: (617) 505-1101

Email Address: request@itctranslation.net

Website: <http://itctranslation.net/>

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 **International Translation Company (ITC)** (see below for further information).
- 5) Other: *Written translation utilizing online websites when absolutely necessary*

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:

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a. *LHA staff*

Bilingual staff names and languages spoken have been given to the CHA receptionists.

Language	Staff Member			
Spanish	Yesenia Muniz	Brunilda Ruiz	Wanda Bouras	Ines Lopez
Mandarin	Di Ding			
Italian	David Hedison			
Portuguese	Jose Netto	Joao Laurencio		

Reception staff and others that come into contact with LEP applicants, tenants and participants are trained and will continue to be trained on how to provide language services to persons with LEP who appear at CHA offices needing language assistance.

When staff are not available to interpret in the language of a person with LEP, the CHA office has contracted with a telephone interpretation service and will utilize this service in the manner deemed appropriate for the service in question. Translations available from HUD and DHCD will be utilized at this location.

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

Where feasible, the CHA will make an effort to partner with non-profits and community groups that can provide competent oral interpretation services to community members. Examples of such agencies are as follows: the Vietnamese American Civic Association, the Cambodian Mutual Assistance Association of Greater Lowell, Inc., the Asian American Civic Association, the Chelmsford Senior Center, and AgeSpan. The Massachusetts Department of Mental Health (DMH) has created a Multicultural Mental Health Resource Directory (updated as of 2019), which provides information on many organizations across the state that serve populations in other languages. The CHA will continue its attempt to establish relationships with appropriate entities to best serve applicants, tenants and participants that are LEP.

c. Currently, **International Translation Company (ITC)** 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 LHA staff is determined to be insufficient or inappropriate (e.g., due to a conflict of interest), the LHA may provide qualified in-person interpretation services at no cost to the LEP individual either through local community organizations, **see 5.b. above**, or through a vendor **International Translation Company (ITC)**.

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Examples of contacts where in-person, professional assistance may be required include termination and eviction hearings due to the significance of these interactions. However, in consideration of balancing costs with maximum delivery of program benefits, the CHA will generally strive to rely on the assistance of bilingual staff members or the assistance of non-profit organizations, and where appropriate and less costly, the use of telephone assistance. If the LEP person does not wish to use the free interpretation services provided by the CHA, the LEP person may provide their own interpreters at their own expense subject to the discussion in, “b (ii) LEP individual requests own interpreter” set forth below.

Protocols for Using Over-the-Phone Interpretation:

**International Translation Company (ITC), Telephone Number: (617) 989-3939,
After Hours Number: (617) 606-0144**

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 housing 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/they understand what you are saying. If in person, face the person with LEP and look at him/her/they and not the interpreter.
- Speak in short sentences and enunciate words.

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- 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. *LHA staff*

Vital documents are documents that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically. The CHA considers importance of the program, information, encounter, or service involved and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner in determining if a document should be considered a vital document.

The following are considered vital documents by the CHA:

- Notice of denial, eviction or termination;
- Notices advising LEP persons of free language assistance;
- CHA leases and tenant rules; and/or
- Applications for Housing Assistance.
- Information regarding critical matters of ongoing occupancy such as emergency work order requests.

The CHA may utilize documents translated by HUD and DHCD as made available by said agencies. Other vital documents will contain the following advisory, “this is an important document, please contact the CHA at (978) 256-7425 for free language assistance” or a similar such notice which will be translated into the commonly spoken languages.

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

Where feasible, the CHA has made an effort to partner with non-profits and community groups that can provide competent oral interpretation services to community members. Examples of such agencies are as follows: the Vietnamese American Civic Association, the Cambodian Mutual Assistance Association of Greater Lowell, Inc., the Asian American Civic Association, the Chelmsford Senior Center, and AgeSpan. The Massachusetts Department of Mental Health (DMH) has created a Multicultural Mental Health Resource Directory (updated as of 2019), which provides information on many organizations across the state that serve populations in other languages. The CHA will continue its attempt to

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maintain relationships with appropriate entities to best serve applicants, tenants and participants that are LEP.

- e. Currently, **International Translation Company (ITC)** 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 must be inserted with the document (see “Attachment C”).*
- 3) *For legally binding documents, such as a lease, the translation must be 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 (see “Attachment D”).*

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Attachment C: Important Document Notice

This is an important document. Please contact **Chelmsford Housing Authority (CHA)** at **(978) 256-7425** for free language assistance.

Este documento es muy importante. Favor de comunicarse con el CHA en 978.256-7425 para ayuda gratis con el idioma. (Spanish)

Este é um documento importante. Entre em contato com o CHA no número 978.256-7425 para obter assistência gratuita com o idioma. (Portuguese)

Dokiman sila a enpòtan. Tanpri kontakte CHA la nan 978.256-7425 pou asistans gratis nan lang. (Haitian Creole)

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 CHA 聯絡方式：978.256-7425。
(Chinese, Traditional)

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 CHA 聯絡方式：978.256-7425。
(Chinese, Simplified)

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