



## LANGUAGE ASSISTANCE PLAN

The Language Assistance Plan (LAP) applies to both the Leased Housing Programs and Public Housing Programs:

### I. INTRODUCTION

The Salem Housing Authority (SHA) is committed to ensuring equal access to its programs and services by all residents, regardless of primary language spoken. Title VI and Executive Order 13166 require recipients of federal financial assistance to take reasonable steps to ensure meaningful access to their programs and services by Limited English Proficient (LEP) persons. Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be considered LEP persons.

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 Title VI prohibition against national origin discrimination affecting LEP persons. 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. Based on the Final Guidance and the Voluntary Compliance Agreement dated September 27, 2007, the SHA completed an LEP four-factor self assessment ("[Attachment A](#)").

Using the LEP self assessment as a guide, the SHA has prepared this Language Assistance Plan (LAP) which defines the actions to be taken by the SHA to ensure Title VI compliance with respect to LEP persons. The SHA will periodically review and update this LAP in order to ensure continued responsiveness to community needs and compliance with Title VI.

### II. GOALS OF THE LANGUAGE ASSISTANCE PLAN

The goals of the SHA's Language Assistance Plan (LAP) include:

- To ensure meaningful access to the SHA's Public Housing and Housing Choice Voucher (HCV) programs by all eligible individuals regardless of primary language spoken.
- To ensure that all LEP individuals are made aware that the SHA will provide free oral interpretation services to facilitate their contacts with and participation in programs administered by the SHA.

- To provide written translations of vital documents to LEP individuals in accordance with HUD's "safe harbor" guidelines".
- To ensure that SHA staff are aware of available language assistance services and how these services need to be used when serving LEP individuals.
- To provide for periodic review and updating of language assistance plans and services in accordance with community needs.

### III. LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

Salem, Massachusetts is a diverse community in which numerous LEP households reside. Using the census information as provided American FactFinder's statistics based upon the 2009-2011 American Community Survey 3- year estimates it is estimated that 18.7% of the population of Salem 18 years of age and older speak a language other than English. Of that number 10% speak Spanish or Spanish Creole and 8.7% speak other languages.

City of Salem, MA Language Spoken at Home  
based on 2009-2011 American Community Survey 3- Year Estimates

	Total Population	% of population	Speak English "very well"	Speak English less than "very well"
			Estimate	Estimate
<b>Population 5 years and over</b>	39,162	100 %	90 %	10 %
<b>Speak only English</b>		74.4 %	(x)	(x)
<b>Speak a language other than English</b>		25.6 %	61.1 %	38.9 %
Spanish or Spanish Creole		14.6 %	58.2 %	41.8 %
Other indo-European languages		9.5 %	66.2 %	33.8 %
Asian and Pacific Island languages		1.2 %	48.8 %	51.2 %
Other languages		0.2 %	100 %	0.0 %
<b>Speak language other than English</b>				
<b>Spanish or Spanish Creole</b>	5720		58.2 %	41.8 %
5-17 years	1491		84.4 %	15.6 %
18-65 years	3854		52.9 %	47.1 %
65 years and over	375		8.3 %	91.7 %
<b>Other Indo-European languages</b>	3735		66.2 %	33.8 %
5-17 years	239		85.8 %	14.2 %
18-65 years	2630		62.4 %	37.6 %
65 years and older	866		72.1 %	27.9 %
<b>Asian and Pacific Island languages</b>	484		48.8 %	51.2 %
5-17 years	81		48.1 %	51.9 %
18-65 years	403		48.9 %	51.1 %
65 years and over	0		-	-
<b>Other languages</b>	94		100 %	0.0 %
5-17 years	0		-	-
18-65 years	94		100 %	0.0 %
65 years and over	0		-	-
<b>Citizens 18 years and over</b>				
All citizens 18 years and over	30,707		94 %	6.0 %
Speak only English		81.3 %	(x)	(x)
Speak a language other than English		18.7 %	68.1 %	31.9 %
Spanish or Spanish Creole		10.0 %	65.5 %	34.5 %
Other languages		8.7 %	71.1 %	28.9 %



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

The majority of contacts between the SHA and LEP persons are meetings, written communications and phone calls where information is exchanged. Examples include interactions by applicants with SHA staff during the application process leading up to and including placement in public housing or the leased housing program, as well as periodic contact between residents and SHA staff related to management, maintenance and lease compliance issues. Oral interpretation services may be needed for these contacts.

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 persons specifically”. The SHA will provide translation services for any document considered vital as necessary for an applicant, tenant, or participant.

The SHA will periodically review and update this list to reflect those documents which are considered vital to applicants and/or residents. With respect to these vital documents the SHA will provide each in all “threshold” languages as needed.

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

In order to promote equal access to SHA programs and services by LEP individuals, the SHA will implement the following array of language assistance services.

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

**Use of “I Speak... Language Identification Guide”:** In order to help identify LEP individuals and determine the appropriate language assistance, the SHA will post and make available “I Speak... Language Identification Guide” (“[Attachment B](#)”) at its main office lobby. Applicants, public housing residents and HCV participants can use these guides to indicate their primary language. At the point of entry SHA staff will then make appropriate arrangements for interpretation services generally using either a bilingual staff person or a telephone interpretation service.

**Notices of Oral interpretation Services:** The SHA will provide free access to either bilingual staff or telephone interpretation services for all contact with LEP individuals. The SHA will prominently post bilingual notices at its central office which indicate that free oral interpretation services are available upon request.

**Language Preferences of Residents and Applicants:** The SHA will ask applicants and residents, through the use of its “I Speak... Language Identification Guide” to identify their primary language at initial application (for new applicants) and at recertification (for

existing residents/participants). The “I Speak... Language Identification Guide” will also ask the applicant, resident/participant if translations services are necessary.

#### **B) Language Assistance Measures**

- **Oral Interpretation – Staff:** When feasible, bilingual SHA staff will be utilized to communicate with LEP individuals in their native languages and to assist them in reviewing SHA materials, answering questions about SHA programs, and responding to SHA forms and information requests. Currently, SHA employs staff members who speak Spanish which is the non-English language spoken most frequently by eligible persons served by SHA.
- **Oral Interpretations – Telephone Support:** SHA will use the services of a professional telephone interpretation service whenever requested by an LEP individual and/or when an LEP person uses an “I Speak... Language Identification Guide” to signify that they speak a non-English language and a qualified staff person that speaks the appropriate language is unavailable. When these contacts involve review of SHA forms and procedures, SHA will schedule the call so that the telephone translator has the opportunity to first review the relevant form or procedure. SHA will only utilize interpretation services, which demonstrate a high degree of training and professionalization among the interpreter staff. SHA currently utilizes a service which provides trained and certified interpreters, and coverage for a multitude of languages. SHA staff will be trained in how to access this service, which will be available as needed for LEP applicants, public housing residents or HCV participants.
- **Oral Interpretation – In Person Assistance:** In limited instances where telephone interpretation services or the use of bilingual SHA staff are determined insufficient to ensure meaningful access, the SHA will provide qualified in-person interpretation services at no cost to the LEP individual through the use of an outside firm who employs or contracts with qualified and trained interpretations services. Examples of contacts where in person assistance is likely to be required includes termination hearings and evictions. Due to the considerable expense involved in providing in person assistance, the SHA will generally strive to use telephone assistance. If the LEP person does not wish to use the free interpretation services offered by the SHA, the LEP person may provide their own qualified interpreters at their own expense.
- **Oral Interpretation – Use of Other Interpreters not provided by the SHA:** As noted above, LEP individuals will be informed that the SHA will provide them with free access to oral interpretation services via bilingual SHA 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. If staff members have questions about the appropriateness of allowing family and friends as interpreters, they will consult with the SHA’s LEP Coordinator for guidance.

- **Communication with LEP Telephone Callers:** Callers to the SHA's office who speak Spanish will be transferred to bilingual SHA staff.

### **C) Staff Training and Coordination**

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

- **Mandatory training:** A mandatory training will be scheduled for all employees in order to review the Language Assistance Plan elements, to review any new procedures related to the LAP, and to inform staff of their responsibilities relative to LEP persons. On an ongoing basis, periodic refresher training will be provided to staff who regularly interact with SHA clients.
- **LEP Coordinator:** The SHA 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 Persons**

To ensure that LEP persons are aware of the language services available to them, the SHA will post LEP notices in the SHA's central office.

### **E) Monitoring and updating the Language Assistance 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 Salem;
- A review to determine if additional vital documents require translation;
- A review of any issues or problems related to serving LEP persons which may have emerged during the past year; and,
- Identification of any recommended actions to provide more responsive and effective language services.

Adopted by the Salem Housing Authority's Board of Directors on: November 13, 2013  
Reviewed 10-25-18

## **Attachment A**

### **SHA's Four-Factor Self Assessment Analysis With Regard to Limited English Persons (LEP)**

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

See data graph (attached) compiled by American Community Survey (ACS) from the 2009-2011 American Community Survey 3 year estimates.

Of citizens of Salem aged 18 years and over:

81.3% speak only English

18.7% speak a language other than English

10% (of the 18.7%) speak Spanish or Spanish Creole

8.7% speak "other languages" (languages not specified)

The majority of the non-English speaking and limited English speaking populations of Salem, which the SHA serves, is determined to be Spanish-speaking.

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

Tenants and participants are required to complete paperwork annually at a minimum. These individuals receive assistance through the SHA and are tenants and participants of our low income housing programs.

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

Providing public housing and rental assistance to low-income elderly, family, and handicapped persons is an important fundamental service and is essential to financial existence.

**4. Assessing the resources available to the recipient and costs**

The SHA has sufficient full time bilingual (English/Spanish) administrative employees at the main office. Interpretation services by these employees are available at the main office on a full time basis as well as to the maintenance department staff on an as-needed basis.

The SHA's state and federal budgets are able to sustain the costs associated with obtaining language interpretation translation services as well as written translation services.

HUD and DHCD have many documents available in Spanish on-line.



## Attachment B

### A

Amharic  
አኔ አማርኛ ነው ምናረው.  
Arabic  
أنا أتحدث اللغة العربية  
Armenian  
Ես խոսում եմ հայերեն

### B

Bengali  
আমি বাংলা কথা বলতে পারী  
Bosnian  
Ja govorim bosanski  
Bulgarian  
Аз говоря български  
Burmese  
ကျွန်တော်/ကျွန်မ မြန်မာလို ပြောတတ်ပါတယ်

### C

Cambodian  
ខ្ញុំនិយាយភាសាខ្មែរ

Cantonese  
我講廣東話 (Traditional)  
我讲广东话 (Simplified)

Catalan  
Parlo català  
Croatian  
Govorim hrvatski  
Czech  
Mluvím česky

### D

Danish  
Jeg taler dansk  
Dari  
من دری حرف می زنم  
Dutch  
Ik spreek het Nederlands

### E

Estonian  
Ma räägin eesti keelt

### F

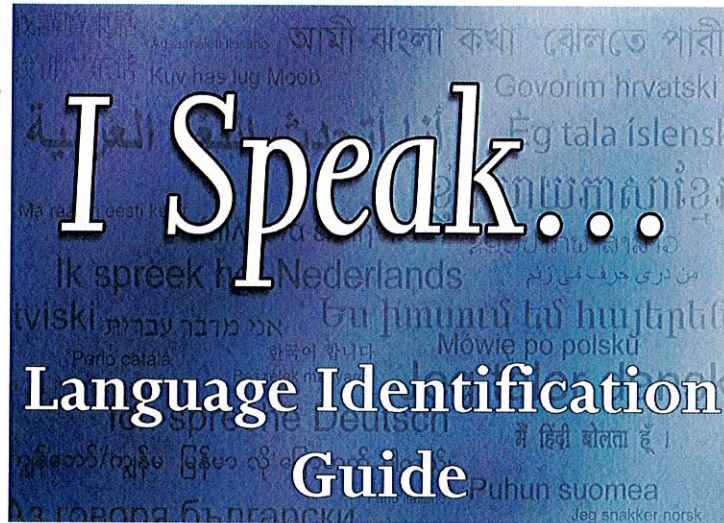
Finnish  
Puhun suomea  
French  
Je parle français

### G

German  
Ich spreche Deutsch  
Greek  
Μιλώ τα ελληνικά  
Gujarati  
હું ગુજરાતી બોલું છું

### H

Haitian Creole  
M pale kreyòl ayisyen  
Hebrew  
אני מדבר עברית  
Hindi  
मैं हिंदी बोलता हूँ ।  
Hmong  
Kuv has lug Moob  
Hungarian  
Beszélék magyarul



### I

Icelandic  
Ég tala íslensku  
Ilocano  
Agsaonak ti Ilokano  
Indonesian  
saya bisa berbahasa Indonesia  
Italian  
Parlo italiano

### J

Japanese  
私は日本語を話す

### K

Kachchiquel  
Quin cha g'üic'ká chábal'ruim'ri  
Korean  
한국어 합니다  
Kurdish  
man Kurdîi zaanim  
Kurmanji  
man Kurmaanjiîi zaanim

### L

Laotian  
ຂ້ອຍປາກົດພາສາລາວ  
Latvian  
Es runāju latviski  
Lithuanian  
Aš kalbu lietuviškai

### M

Mam  
Bán chiyola tuj kíyol mam  
Mandarin  
我講國語 (Traditional)  
我讲国语/普通话 (Simplified)  
Mon  
ဒဲဟိုအဂျင်အုတ်

### N

Norwegian  
Jeg snakker norsk

### P

Persian  
من فارسی صحبت می کنم  
Polish  
Mówię po polsku  
Portuguese  
Eu falo português do Brasil (for Brazil)  
Eu falo português de Portugal (for Portugal)  
Punjabi  
ਮੈ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਚਾਂ।

### Q

Qanjobal  
Ayin tí chí wal q' anjob' al  
Quiche  
In kinch'aw k'uin ch'e quiche

### R

Romanian  
Vorbesc românește  
Russian  
Я говорю по-русски

### S

Serbian  
Ja говорим српски  
Sign Language



Slovak  
Hovorím po slovensky  
Slovenian  
Govorim slovensko  
Somali  
Waxaan ku hadlaa af-Soomaali  
Spanish  
Yo hablo español  
Swahili  
Ninaongea Kiswahili  
Swedish  
Jag talar svenska

### T

Tagalog  
Marunong akong mag-Tagalog  
Tamil  
நான் தமிழ் பேசுவேன்  
Thai  
พูดภาษาไทย  
Turkish  
Türkçe konuşurum

### U

Ukrainian  
Я розмовляю українською мовою  
Urdu  
میں اردو بولتا ہوں

### V

Vietnamese  
Tôi nói tiếng Việt

### W

Welsh  
Dwi'n siarad

### X

Xhosa  
Ndithetha isiXhosa

### Y

Yiddish  
איך רעד יידיש  
Yoruba  
Mo nso Yooba

### Z

Zulu  
Ngiyasikhuluma isiZulu

Executive Order 13166 requires DHS to take reasonable steps to provide meaningful access to its programs and activities for persons with limited English proficiency and - as also required by Title VI of the Civil Rights Act of 1964 - to ensure that recipients of federal financial assistance do the same.

*I Speak* is provided by the Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL). Other resources at [www.lep.gov](http://www.lep.gov)

Contact the DHS Office for Civil Rights and Civil Liberties' CRCL Institute at [CRCLTraining@dhs.gov](mailto:CRCLTraining@dhs.gov) for digital copies of this poster or a "I Speak" booklet.

Download copies of the DHS LEP plan and guidance to recipients of financial assistance at [www.dhs.gov/crcl](http://www.dhs.gov/crcl)



**Free oral interpretation services  
are available upon request.**

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**Servicios gratis de interpretación oral  
son disponibles a petición**



# **Interpretation Services**

(as per the SHA's Language Assistance Plan)

## **Baystate Interpreters, Inc.**

32 Pleasant Street  
Gardner, MA 01440

Telephone: 888-663-8000  
Fax: 888-663-9000  
Email: [dbrooks@baystateinterpreters.com](mailto:dbrooks@baystateinterpreters.com)  
Website: [baystateinterpreters.com](http://baystateinterpreters.com)

Owner: Darrin Brooks

SHA's authorization code: **4431**

### Services

- Telephone interpretation
- In person interpretation
- Document translation

Schedule interpretations by either:

Going online at [baystateinterpreters.com](http://baystateinterpreters.com)  
or  
Calling **888-663-9002**

1. Dial **(888)663-9002**
2. When the operator answers, tell them:
  - a. Your customer code is **4431**.
  - b. You are calling from **Salem Housing Authority**
  - c. The language that you need.
  - d. Your name and phone number.
  - e. Please let the operator know if you would like to connect to multiple parties (call a patient/client at home, for example).
3. The operator will connect you with an interpreter promptly.

Order document translation by emailing the word document (preferably in Microsoft Word)) to [dbrooks@baystateinterpreters.com](mailto:dbrooks@baystateinterpreters.com) for a price quote.

## Recommendations for Effectively Using the Services of an Over-the-Phone Interpreter

### For Outbound Calls:

- If you need to call a Limited English Proficient (LEP) party at home or need a third-party dial-out to include an additional party, please first inform the Baystate Customer Service Representative (CSR) before the interpreter is connected.
- Once the interpreter is connected, you may tell the interpreter who to ask for (the LEP's name).
- At this time, you may also tell the interpreter how to proceed if the call goes to an answering machine and what message to leave, if desired.

### For Inbound Calls:

- Explain to the LEP that all information is confidential, and encourage questions.
- Speak clearly.
- Smile and be kind; this helps the LEP feel more comfortable.
- If face-to-face and multiple people are in the room, speak to one at a time.
- Short sentences are easiest to interpret.
- Speak freely; all Baystate interpreters are sworn to confidentiality and the Interpreter's Code of Professional Ethics.
- Encourage the interpreter to clarify terms with you if necessary.

## Recommendations for Effectively Using the Services of an Over-the-Phone Interpreter

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- Encourage the interpreter to clarify terms with you if necessary.



## NEED AN INTERPRETER?

### 1. Dial (888)663-9002

2. When the operator answers, tell them:

- a. Your customer code is **4431**
  - b. You are calling from the Salem Housing Authority.
  - c. The language that you need.
  - d. Your name and phone number.
  - e. Please let the operator know if you would like to connect to multiple parties (call a patient/client at home, for example).
3. The operator will connect you with an interpreter promptly.

24 hours a day, 7 days a week

## NEED AN INTERPRETER?

### 4. Dial (888)663-9002

5. When the operator answers, tell them:

- a. Your customer code is **4431**.
  - b. You are calling from the Salem Housing Authority
  - c. The language that you need.
  - d. Your name and phone number.
  - e. Please let the operator know if you would like to connect to multiple parties (call a patient/client at home, for example).
6. The operator will connect you with an interpreter promptly.

24 hours a day, 7 days a week

## NEED AN INTERPRETER?

### 1. Dial (888)663-9002

2. When the operator answers, tell them:

- a. Your customer code is **4431**.
  - b. You are calling from the Salem Housing Authority.
  - c. The language that you need.
  - d. Your name and phone number.
  - e. Please let the operator know if you would like to connect to multiple parties (call a patient/client at home, for example).
3. The operator will connect you with an interpreter promptly.

24 hours a day, 7 days a week

## NEED AN INTERPRETER?

### 1. Dial (888)663-9002

2. When the operator answers, tell them:

- a. Your customer code is **4431**.
  - b. You are calling from the Salem Housing Authority
  - c. The language that you need.
  - d. Your name and phone number.
  - e. Please let the operator know if you would like to connect to multiple parties (call a patient/client at home, for example).
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24 hours a day, 7 days a week



John A. Boris, Chairman  
Peter K. Strout, Vice Chairman  
Frank J. Milo, Second Vice Chairman  
Maureen Call, Treasurer

Carol A. MacGown, Executive Director

EXTRACT FROM THE MINUTES OF THE  
REGULAR MEETING OF THE BOARD MEMBERS OF THE  
SALEM HOUSING AUTHORITY HELD ON  
WEDNESDAY, NOVEMBER 13, 2013 at 6:00 p.m.

The BOARD MEMBERS of the SALEM HOUSING AUTHORITY met in a REGULAR MEETING at 27 Charter Street in the City of Salem, Massachusetts on WEDNESDAY, NOVEMBER 13, 2013, the place, hour, and date duly established for the holding of such meeting.

The meeting was called to order at 6:00 p.m. by Chairman John A. Boris and upon a **roll call** the following answered present:

Present

Maureen Call  
Frank J. Milo  
Peter K. Strout  
John A. Boris

Absent

None

Frank Milo moved to approve Salem Housing Authority's Language Assistance Plan (LAP) which applies to both the Leased Housing Programs and Public Housing Program which defines the actions to be taken by the Salem Housing Authority to ensure Title VI compliance with respect to Limited English Proficient (LEP) persons. Maureen Call seconded the motion and the vote was as follows:

Ayes

Maureen Call  
Frank J. Milo  
Peter K. Strout  
John A. Boris

Nays

