

LANGUAGE ACCESS PLAN FY2026

NOVEMBER 20, 2025 WOBURN HOUSING AUTHORITY 59 Campbell Street, Woburn MA 01801

WOBURN HOUSING AUTHORITY LANGUAGE ACCESS PLAN

I. INTRODUCTION

The Woburn Housing Authority ("WHA") 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)₂ 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 Local Housing Authorities such as the WHA to utilize this four-factor self-assessment method regardless of whether they receive HUD funds. Based on the DHCD and HUD guidance, the WHA has completed an LEP four-factor self-assessment ("Attachment A").

Using the LEP self-assessment as a guide, the WHA has prepared this LAP, which defines the actions to be taken by the WHA to ensure WHA compliance with Title VI and/or DHCD requirements with respect to LEP individuals. The WHA 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.

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)



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

II. GOALS OF THE LANGUAGE ACCESS PLAN

The goals of the WHA's LAP include:

- To ensure meaningful access to the WHA's housing programs by all eligible individuals regardless of their primary spoken language.
- To ensure that all LEP individuals are made aware that the WHA will provide free oral interpretation services to facilitate their contact with and participation in programs administered by the WHA.
- To provide written translations of vital documents to LEP individuals speaking Priority Languages as identified in <u>Attachment A</u>.
- To ensure that WHA 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 WHA and LEP individuals involve meetings, written communications, and phone calls where information is exchanged. Examples include interactions by applicants with WHA staff during the application process leading up to and including placement in housing, as well as periodic contact between residents and WHA 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 WHA 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 WHA programs and services by LEP individuals, the WHA 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 WHA will post and make available "I Speak... Language Identification Flashcards" upon request. Applicants and residents can use these guides to indicate their primary language. During the tenant selection screening process, WHA 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 in <u>Attachment A</u>, the WHA will provide free access to language assistance for staff contact with LEP individuals. The WHA will prominently post multi-language notices in common areas which indicate that free language assistance is available upon request (see "<u>Attachment B</u>"). The WHA 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 WHA staff will be utilized to communicate with LEP individuals in their native languages and to assist them in reviewing WHA materials, answering questions about WHA programs, and responding to WHA forms and information requests. Currently, WHA does not employ any bilingual staff members.

Oral Interpretation - Telephone Support: Subject to budget constraints and in consideration of the four-factor self-assessment described in Attachment A, if qualified bilingual WHA staff are unavailable to communicate with an LEP individual who is requesting assistance, the WHA 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 WHA forms and procedures, the WHA will schedule the call so that the telephonic interpreter has the opportunity to first review the relevant form or procedure. The WHA will only utilize interpretation services which demonstrate a high degree of training and professionalization among the interpreter staff. The WHA currently utilizes The Cross Cultural Communications Services (CCCS) – a service which provides trained and certified interpreters and coverage for a multitude of languages. WHA

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/crcl-i-speak-booklet.pdf



staff are 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 in Attachment A, in limited instances where telephone interpretation services or the use of bilingual WHA staff are determined insufficient to ensure meaningful access, the WHA 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 tenant selection interviews, informal hearings, informal reviews, grievance hearings, and pretermination conferences. 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 WHA will strive to use staff and/or telephonic assistance, as resources permit. If the LEP individual does not wish to use the free interpretation services offered by the WHA, the LEP individual may provide their own qualified interpreters at their own expense.

Oral Interpretation – Use of Interpreters other than those provided by the WHA: As noted above, LEP individuals will be informed that the WHA will provide them with free access to oral interpretation services via bilingual WHA staff or qualified, trained contractors as needed. LEP individuals may provide, at their own expense, their own qualified, trained interpreter. LEP individuals may use their own family members and/or friends as interpreters. WHA staff are advised to be alert to the potential for any conflict of interests or competency issues that may arise from the involvement of using family or friends as interpreters. If WHA staff have reason to believe that there may be a conflict of interest or an issue as to the LEP's interpreters' competency, the WHA staff may: (1) record the conversation; and/or (2) retain their own interpreter to be a party to any conversations between the WHA and the LEP individual, as described in **Section V.B**.

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

In consideration of the four-factor-self-assessment referenced in <u>Attachment A</u> and applicable HUD guidance, *priority languages* are identified in <u>Attachment A</u>. A notice shall be placed on all *vital documents* which states, in the WHA's *priority languages* as identified in this LAP: "This is an important notice. Please have it translated."



When an applicant, tenant, or participant makes it known to the WHA that they do not speak English, a notice shall be placed on all *vital documents* addressed to said applicant, tenant, or participant which states, in the WHA's *priority languages* as identified in this LAP: "This is an important document. Please contact the Woburn Housing Authority at 781-935-0818 for free language assistance." (see "Attachment C").

Vital documents include:

- Applications
- Notice of Denial of Assistance
- Notice of Eviction
- Notice of Termination
- Notice of Annual Redetermination
- Legal documents: In the case of legally binding documents, such as a lease and a notice to quit, the English version of the document shall be the only legally binding copy and shall be considered the official document. Any translated copies of such legally binding documents shall be used as a reference tool only. A brief statement shall be included on such documents, in the language which the document has been translated into, which states "This document is for informational purposes only. The English version of this document is considered the legally binding document" (see "Attachment D").
- Translation of written documents: For WHA program documents, including those that are highly individualized (such as ineligibility, termination, or appeal notices), the WHA will, to the extent feasible within administrative and fiscal limits, translate these documents based on an assessment utilizing the four-factors discussed above and specifically included in **Attachment A**.
- Review and updating: The WHA 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 WHA will provide training on LEP awareness and required assistance actions under the Language Access Plan for employees. This will include:

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



LEP Coordinator: The WHA has designated the Executive Director 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.

D. Providing Notice to LEP Individuals

To ensure that LEP individuals are aware of the language services available to them, the WHA will post LEP notices in multiple languages in the WHA's common areas, on the WHA'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. Such reviews 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 DHCD, U.S. Census, and WHA 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.

Attachment A: WHA'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: WHA'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 WHA):

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	Percent of Total
	Number	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%
Hearing Difficulty	1,334	3.70%

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

Not available.

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

Not available

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

Not available

Based on the above data sources, the following languages are Priority Languages for translation, in descending order of priority for translation [Spanish must be included]:

Spanish



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

To be determined

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

To be determined

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

To be determined



Attachment B: Language Assistance Protocols

The Cross Cultural Communications Services (CCCS)

CCCS, Inc. Contact Information:

Interpreter Service Department.

Primary Contact: Phone: 781-729-3736 and press #2

Fax: 781-729-1217

Email: InterpreterRequest@embracingculture.com

Emergency Contact (24/7): Phone: 781-729-3736 (Press #1) Emergency

Dispatcher will redirect After Business Hours: Monday-Friday, 8:00AM-5:00PM

After Hours: Monday-Friday, 5:01PM-7:59AM Weekends: Friday 5:01PM-Monday 8:00AM

Translation Services: Email: <u>TranslationRequest@embracing</u>culture.com

Phone: 781-729-3736 x112 or 108

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 *WHA* staff who can provide initial support in identifying languages and assistance needed by persons with LEP that come into direct contact with the WHA in person, by telephone, or in writing.
- 4) Utilize WHA's over-the-phone telephonic services account with ITC (see below for further information).

<u>Note</u>: 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:

Contact The Cross Cultural Communications Services (CCCS)

Protocols for Using Over-the-Phone Interpretation:

Contact The Cross Cultural Communications Services (CCCS)

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.
- 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:

Contact The Cross Cultural Communications Services (CCCS)

- 2) To the extent important documents have yet to be translated, free language assistance terminology translated in other languages shall be inserted with the documents upon request (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").

Adopted by the Board of the Woburn Housing Authority on: November 20, 2025



Attachment C: Important Document Notice

This is an important document. Please contact WOBURN HOUSING AUTHORITY at 781-935-0818 for free language assistance.

Este documento es muy importante. Favor de comunicarse con el para ayuda gratis con el idioma. (Spanish)	er
Este é um documento importante. Entre em contato com o para obter assistência gratuita com o idioma. (Portuguese)	no número
Dokiman sila a enpòtan. Tanpri kontakte la nan nan lang. (Haitian Creole)	pou asistans gratis
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	絡方式:
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[Phone #] [Agency Name]	.مجانيه. (Arabic)
Ce document est très important. Veuillez contacter le au d'obtenir une assistance linguistique gratuite. (French)	afir
Il presente è un documento importante. Si prega di contattare il per avere assistenza gratuita per la traduzione. (Italian)	a



This is an important document. Please contact WOBURN HOUSING AUTHORITY at 781-935-0818 for free language assistance.

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[Phone #] [Agency Name]			تماس حاصل فر مایید. (Farsi)



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)

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

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

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

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

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ឯកសារនេះគឺសម្រាប់ជូនជាព័ត៌មមានតែប៉ុណ្ណោះ។ ឯកសារនេះជាភាសាអង់គ្លេសត្រូវបានចាត់ទុកជា ឯកសារចងភ្ជាប់កាតព្វកិច្ចតាមផ្លូវច្បាប់។ (Mon-Khmer, Cambodian)

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

Dukumentigan waa mid loogu tala galay mid wargelin WHAan oo kaliya. Qeybta ku qoran afka Ingiriiska ee dukumentigan ayaa u taagan dukumentiga sharciga ah. (Somali)

(Arabic)

Ce document est fourni à titre d'information uniquement. La version anglaise de ce document a caractère obligatoire. (French)

Il presente documento ha esclusivamente scopo informativo. La versione inglese del presente documento è il documento legalmente vincolante. (Italian)



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Το παρόν έγγραφο είναι μόνο πληροφοριακό. Η Αγγλική εκδοχή του θεωρείται νομικά δεσμευτικό έγγραφο. (Greek)

Niniejszy dokument służy wyłącznie celom informacyjnym. Angielska wersja tego dokumentu jest prawnie obowiązująca. (Polish)

이 문서는 정보 제공용입니다. 이 문서의 영문판은 법적 구속을 받는 문서로 간주됩니다. (Korean)

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

Այս փաստաթուղթը տեղեկատվական նպատակների համար է միայն։ Այս փաստաթղթի անգլերեն տարբերակն է համարվում իրավաբանորեն պարտավորեցնող փաստաթուղթ։ (Armenian)

້ນີ້ແມ່ນເອກະສານໃຊ້ເພື່ອໃຊ້ໃນຈຸດປະສົງຂອງການໃຫ້ເຂົ້າໃຈຂໍ້ມູນເທົ່ານັ້ນ. ເອກະສານນີ້ທີ່ໃຊ້ເປັນສະບັບຖືກຕ້ອງຕາມ ກົດໝາຍຈະແມ່ນສະບັບພາສາອັງກິດເທົ່ານັ້ນ. (Lao)

Ovaj dokument služi samo u informativne svrhe. Verzija ovog dokumenta na engleskom jeziku se smatra zakonski obavezujućim dokumentom. (Serbo-Croatian)

یہ دستاویز صرف معلوماتی مقاصد کیلئے ہے۔ اس دستاویز کا انگریزی ورژن قانونی طور پر پابند کرنے والا دستاویز ہے۔ (Urdu)

આ દસ્તાવેજ માત્ર માહિતીના હેતુઓ માટે જ છે. આ દસ્તાવેજનું અંગ્રેજી સંસ્કરણ કાનૂની રીતે બાધ્ય દસ્તાવેજ ગણવામાં આવશે. (Gujarati)

เอกสารนี้สำหรับใช้เป็นข้อมูลเท่านั้น ฉบับภาษาอังกฤษของเอกสารนี้ถือเป็นเอกสารที่มีภาระผูกพันตามกฎหมาย (Thai)

این سند صرفا جهت اطلاع می باشد. تنها نسخه انگلیسی آن از لحاظ قانونی یک سند تعهدآور است.

(Farsi)

