

WHA'S Limited English Proficiency (LEP) Policy

1. Policy

a. The WHA will take all reasonable steps to ensure that all limited English speakers have equal and meaningful access to WHA services and programs. This policy is in accordance HUD's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Person. The WHA General Counsel shall serve as the Language Access Coordinator (LAC) and will annually assess the needs of the WHA's individual department for translation and/ or interpretation services. All recommendations and/or modifications shall be recommended to the Executive Director by the LAC.

2. Applicability

a. The LEP policy applies only to departments that provide direct service to WHA residents, participants in rental assistance programs and/or applicants do those programs. The WHA will annually review all applicable documents and assess whether or not document is vital and required translation.

3. Four Factor Analysis of Language Services (See "Attachment A" for data analysis of LEP populations)

- a. Determine percentage of LEP persons eligible to be served based on the population;
- b. Each department shall track and record requests for language assistance and/or translation services;
- c. Determine nature and importance of program, activity or interaction with LEP person;
- d. Determine available and future resources and associated costs in proving such services to LEP persons;
 - Qualified WHA employees may be used to provide language assistance services where needed;
 - Determine if open positions would be better served a bilingual employee.

4. Providing Language Assistance Services

a. Interpretative Services (Oral):

- Each WHA department that provides direct services must provide oral interpretation upon request at no charge to LEP person to ensure meaningful access to WHA direct services. WHA shall notify all applicants, residents and/or participants of their right to request an interpreter for hearing, interviews, scheduled appointments and adverse action.
- The WHA will not require LEP persons to bring their own interpreter, but will allow an LEP person to have an adult family member or friend over the age of 18 to provide translation services if they wish. However, in situations where the use of family members is not appropriate, such as domestic abuse and sexual assault, an interpreter will be provided.

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b. Translation Services (Written Language)

- Documents which contain vital information or information that is critical for ensuring meaningful access to the WHA's direct services are considered Vital Documents. Each department director shall conduct a review of its written documents for the purpose of assessing whether any document contains vital information and requires translation.
- The WHA shall translate vital documents in the appropriate languages and maintain those documents for distribution. This commitment is subject to the availability of funds. The WHA will rely upon and HUD and DHCD to translate their own requires documents. Documents containing individualized facts that would be impractical to translate because of the numerosity and associated costs and time involved will not be translated (i.e. conference notices, denial letters, hearing decision etc.)

5. Outreach

- a. The WHA will post notices of the availability of translation services in offices where LEP persons interact with the WHA. Such notices will also be contained on the WHA's website.

6. Training and Monitoring

- a. The WHA will provide training and assistant to appropriate staff regarding the LEP policy and language assistance services.
- b. The LAC will monitor the WHA's language assistance services to LEP persons on an ongoing basis and review the documents translation list to ensure proper updating on a semi-annual basis.

7. Complaints

- a. WHA employees who receive a report or become aware that a LEP person believes they should have been provided with language assistance services with the LEP policy should report that information to the LAC and the Office of Civil Rights at 617-988-4383.

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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 US Census Bureau of citizens of Worcester County aged 5 years and over for which English is spoken "less than very well."

The Worcester Housing Authority will prioritize the City Census data over the County data in combination with CHAMP data and housing Authority experience in consideration of the Four Factor Analysis.

Languages spoken at home among individuals age 5+ with limited English proficiency:	City/Town Data		County Data	
	Total Number	Percent of Total Population (age 5+)	Total Number	Percent of Total Population (age 5+)
Spanish	14,101	8.20	25,019	3.31
French	393	0.23	2,080	0.27
Creole	275	0.16	781	0.10
Italian	243	0.14	515	0.07
Portuguese	1,624	0.94	5,218	0.69
German	15	0.01	151	0.02
Yiddish	0	0.00	2	0.00
Greek	523	0.30	734	0.10
Russian	364	0.21	811	0.11
Polish	558	0.32	1,453	0.19
Croatian	19	0.01	67	0.01
Armenian	23	0.01	93	0.01
Persian	105	0.06	732	0.10
Gujarati	18	0.01	101	0.01
Hindi	129	0.08	546	0.07
Urdu	76	0.04	194	0.03
Chinese	1,405	0.82	2,756	0.36
Japanese	110	0.06	146	0.02
Korean	83	0.05	577	0.08
Cambodian	140	0.08	124	0.02
Hmong	0	0.00	166	0.02
Thai	141	0.08	182	0.02
Laotian	141	0.08	381	0.05
Vietnamese	3,632	2.11	3,978	0.53
Tagalog	25	0.01	337	0.04
Hungarian	9	0.01	40	0.01
Arabic	957	0.56	1,159	0.15
Hebrew	0	0.00	22	0.00

Source: American Community Survey (U.S. Census Bureau), 2014-2019.

Note: Data on languages spoken at home are among individuals aged 5 years or older who have limited proficiency in English. "Total Number" represents the total number of people aged 5 years or older who speak a given language and who also have limited proficiency in English in a city/town or county. "Percent of Total Population" represents the number of people aged 5 years or older who speak a given language and who also have limited proficiency in English, divided by the total population aged 5 years or older (regardless of English proficiency) in a city/town or county. The U.S. Census Bureau defines "limited English proficiency" as those who report speaking English less than "very well".

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

Total Applicants: 47404

Hispanic: 13967 (29.5%)

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

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The WHA's tenant population is comprised of 62% Hispanic Heads of Households.

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

Based on the use of the Language Bank for interpretive services for applicants, 79% was for Spanish, 11.2% for Arabic, and all other languages less than 4%.

Based on the above data sources, the following languages are priority languages for translation, in descending order of priority for translation is Spanish and Arabic.

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

Each WHA department shall track and record requests for language assistance and/or translation services. Data regarding language preference is collected on an ongoing basis at annual certification.

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

The WHA will determine the nature and importance of the program, activity, or interaction with LEP persons.

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

Qualified WHA employees may be used to provide language assistance services where needed, and the WHA will determine if open positions would be better served a bilingual employee.