



Emergency Assistance (EA) Protocols for Responding to Language Assistance Needs of Persons with Limited English Proficiency (“LEP”)

Purpose:

In furtherance of the Language Access Plan (“LAP”) for the EA program, and in accordance with federal and state guidance, DHCD will provide language assistance to ensure meaningful access to the EA program for persons with Limited English Proficiency (“LEP”). Such language assistance will include reasonable procurement of oral interpretation and written translation services, subject to available financial resources. Protocols for obtaining and using such services are described in further detail below.

Policy and Legal Requirements:

In accordance with state directives, DHCD must take reasonable steps to provide meaningful EA program access for persons with LEP. To that end, DHCD has created and continues to implement a Language Access Plan for the EA program, which can be found on the DHCD website. (Go to Mass.gov and enter the search term, “DHCD Language Access Plan for the EA program”). To the extent persons with LEP come into contact with the EA program, DHCD and contractor staff must be prepared to identify and respond to their language assistance needs.

Definitions:

DHCD Contractors: Shelter providers and hotel/motel providers.

Interpretation: oral communication from one language (the source language) into another (the target language).

Translation: rendering of written text from the source language into the target language.

Language Access Coordinator:

The Language Access Coordinator is:

Brenda O’Donnell
Language Access Coordinator
Dept. of Housing and Community Development
100 Cambridge Street Suite 300
Boston, MA 02114
(617) 573-1381

For questions, concerns or comments about these Protocols, please contact Brenda.

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) At the DHCD main office, at all DHCD field offices and at all shelters and hotels/motels the poster attached as Exhibit 1 should be displayed prominently so that LEP persons are aware that free language assistance is available.
- 2) Utilize “*I-Speak cards*” where walk-ins occur to identify what language the person reads or speaks. I-Speak cards are attached as Exhibit 2 and are also available at the following website: <https://www.lep.gov/ISpeakCards2004.pdf> .
- 3) Consult available DHCD or contractor staff that provide initial support in identifying languages and assistance needed by persons with LEP that come into direct contact with DHCD in person, by telephone, or in writing.
- 4) Utilize DHCD’s over-the-phone telephon interpretation services account with Transperfect (see below for further information).

Note: Persons with LEP must not be turned away or told that they have to 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.

Points of Contact:

Appropriate language assistance should be provided at the following points of contact:

1. **Application:** During intake, families should be asked their primary language and provided with language assistance to complete the application.
 - If determined eligible, families should be given a copy of the Uniform Shelter rules in their primary language (or shown where to find them on the DHCD website) if it is a language into which the documents have been translated.
 - If a family’s primary language is not English, hand the family the document entitled, “If you Don’t Speak English Well,” attached as Exhibit 3.
2. **Placement:** Shelters and hotel/motels should provide language assistance to LEP families, including for all important documents and events such as the rehousing plans, noncompliance notices, termination notices, etc.

3. **Appeal Process:** If an EA family appeals a Department action, language assistance should be provided so that the family can fully participate in the appeal process.

Protocols and Procedures for Providing 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 the EA program. s. The following are interpreter resources for consideration:

- a. DHCD and contractor staff.
- b. Non-profit assistance or inter-agency partnerships, if available, that can provide interpretation.
- c. Over-the-phone interpretation. Currently, TransPerfect is to be used for over-the-phone interpretation. Useful tips for using interpreter services and protocols for using TransPerfect are provided below.

Note: the following are useful tips for utilizing interpreter services:

- Explain to the interpreter the purpose of the communication (i.e., assistance filling out an EA 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, rules 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 s/he 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.

See Exhibit 4, attached, for additional tips for using a TransPerfect interpreter.

Protocols for Using TransPerfect Over-the-Phone Interpretation:

- 1) Dial (855) 886-2901
- 2) Provide the Client ID:
 - a. For Emergency Assistance: 7788291
 - b. Enter PIN. NOTE: If you have not been assigned a PIN, request assistance from Brenda O'Donnell.
- 3) Enter the 3 digit number for the language you are requesting, if known, or inform the operator of the language that you need interpreted.

- 4) If there is a specific interpreter that you would like to schedule ahead of time, you will need to identify the interpreter's ID number. It is helpful to ask interpreters for their ID # if you wish to schedule calls with them again in the future or if you are unhappy with their service and would like to notify TransPerfect.

Protocols and Procedures for Providing Translation of written documents:

- 1) All of the EA vital documents have been translated into Spanish, and many have been translated into other languages, as well, such as Cape Verdean Creole, Haitian Creole, Portuguese and Arabic.

The Uniform Shelter Rules, a short summary of the Rules, the Overnight Form, and the Babysitting Form have been translated into 6 languages (Amharic, Arabic, Haitian, Portuguese, Somali and Spanish), and can be found on the DHCD website at: <https://www.mass.gov/service-details/emergency-housing-assistance-resource-information>

Other documents can be found in Sharepoint as follows: Once in Sharepoint, click on "Shared Documents" in the upper left hand corner, then select "EA Forms." You will see that there are various folders containing documents for various languages. Click on the folder of the language you want, and you will see many different forms translated into that language.

- 2) If applicants or participants are given any document in a language other than English, the translated document should be accompanied by a statement indicating that the English language version of the document is the legally binding version, which is attached as Exhibit 5.
- 3) If a document has not yet been translated, DHCD and contractor staff should use bilingual staff or the over-the-phone translation service to assist the LEP person in understanding the document.

If an LEP person is provided with an English language document, the document should be accompanied by the attached Exhibit 6, which notifies the LEP person of the availability of free language assistance.

Questions: Should be directed to the Language Access Coordinator, Brenda O'Donnell.

EXHIBITS

- | | |
|-----------|---|
| Exhibit 1 | Free Language Assistance Poster |
| Exhibit 2 | I Speak cards |
| Exhibit 3 | "If You Don't Speak English Well" Document |
| Exhibit 4 | Tips for Using Transperfect Interpreter |
| Exhibit 5 | English is legally binding language |
| Exhibit 6 | Multilingual notification of free language assistance |