



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lt. Governor ♦ Jennifer D. Maddox, Undersecretary

PHN 2021-21

To: All Local Housing Authorities
From: Ben Stone, Director, Division of Public Housing
Date: October 27, 2021
Re: **Template Language Access Plan**

This Public Housing Notice provides updated information and resources on matters relating to Language Access Plans (“LAP”) and provides the Language Access Plan template promised in [PHN 2021-14](#).

State-aided public housing regulations require that Massachusetts local housing authorities adopt and enforce a LAP regardless of whether they receive federal funds. Pursuant to [760 CMR 4.02\(1\)\(e\)](#), LHAs are required to adopt and enforce anti-discrimination policies, including a LAP. Starting with the Fiscal Year End (FYE) 6/30/22 LHAs, DHCD will assess whether an LHA has adopted this required plan as part of Performance Management Review (PMR). DHCD will determine that the LHA has a board-approved LAP but will not review the contents of this plan as part of PMR. To assist LHAs in adopting and enforcing LAPs, DHCD has created a **Template Language Access Plan, Attachment A to this PHN**, that LHAs can use in implementing and enforcing LAPs. LHAs may alter this template or draft their own policy, but they will need to adopt a board-approved LAP to receive “No Findings” on this PMR criteria. The first year (four FYEs starting with FYE 6/30/22) will be a planning year with no ratings for this criteria.

Whether or not an LHA intends to utilize the DHCD-provided Template LAP, the LHA should, prior to implementing a Language Access Plan, complete a Four-Factor Self-Assessment Analysis by which the LHA determines the prevalence of languages spoken within the area it serves and identifies the resources available to assist Limited English Proficiency (LEP) individuals and the costs associated with those resources. LHAs should utilize [Attachment A](#) contained within the Template LAP (the Template LAP is Attachment A to this PHN) in completing their Four-Factor Self-Assessment Analysis and include the completed Four-Factor Self-Assessment Analysis as an attachment to the LHA’s finalized LAP.

DHCD has provided a data tool to assist LHAs in assessing the prevalence of languages spoken by LEP individuals in an LHA’s geographic area: <https://hed-lha-languages.azurewebsites.net/default.aspx>. The data tool relies on U.S. Census Bureau data on languages spoken at home among LEP individuals age 5 years or older. Select an LHA from the dropdown menu to display Census data on the number and proportion of language speakers among the LEP population in an LHA’s county or city/town.

DHCD has also provided data on CHAMP system languages by LHA in Attachment B to this PHN. Attachment B contains data on all applicants who have an active application at an LHA and an

attached user account in CHAMP. The data measures what language an applicant selected when using CHAMP online.

The Census data and CHAMP data are intended to serve as resources for LHAs, whether or not they are using the DHCD-provided Template LAP, to complete the requirements of the Four-Factor Self-Assessment in order to prioritize which languages are needed most for translation services and other resources to support LEP individuals specific to an LHA's location.

Whether or not the LHA utilizes the DHCD-provided Template LAP, the LHA's LAP must be reviewed and adopted by the LHA Board before use and should be updated periodically to account for changing demographics. LHAs are encouraged to consult with their attorneys prior to adoption of its LAP.

If you have questions related to this PHN or the attached Template Language Access Plan, please contact your Housing Management Specialist. Completed plans DO NOT need to be submitted to DHCD at this time.

Attachment A: Template Language Access Plan

Attachment B: CHAMP System Languages