

# DIGHTON HOUSING AUTHORITY

## LANGUAGE ACCESS PLAN

### I. INTRODUCTION

The Dighton Housing Authority (“LHA”) is committed to ensuring equal access to its programs and services by all applicants, residents, and members of the public, regardless of primary language spoken or communication needs.

This Language Access Plan (“LAP”) addresses language access for individuals with Limited English Proficiency (LEP) and, separately, communication access for Deaf and Hard of Hearing individuals, as required under applicable federal and state civil rights laws.

Pursuant to 760 CMR 4.02(1)(e), Massachusetts Local Housing Authorities must adopt and enforce a Language Access Plan regardless of whether they receive federal funds. The Department of Housing and Community Development (DHCD) has issued “DHCD LAP Guidance to Program Administering Entities,” most recently updated in 2017.

Title VI of the Civil Rights Act of 1964 (“Title VI”) requires recipients of federal financial assistance to take reasonable steps to ensure meaningful access to programs and services by individuals with Limited English Proficiency. LEP individuals are persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.

On January 22, 2007, the U.S. Department of Housing and Urban Development (“HUD”) issued Final Guidance regarding compliance with Title VI as it relates to LEP individuals, including a four-factor analysis to guide language access planning. DHCD encourages Local Housing Authorities to utilize this four-factor self-assessment regardless of HUD funding status.

Based on this guidance, the LHA has completed an LEP Four-Factor Self-Assessment (Attachment A) and prepared this LAP to define the actions the LHA will take to ensure compliance with applicable language access requirements. The LAP will be reviewed and updated periodically to remain responsive to community needs and legal obligations.

### II. GOALS OF THE LANGUAGE ACCESS PLAN

The goals of this LAP are:

- To ensure meaningful access to LHA housing programs and services for all eligible individuals regardless of primary language spoken
- To ensure LEP individuals are informed of and provided free oral interpretation services
- To provide written translations of vital documents in priority languages as resources permit
- To ensure LHA staff are aware of language access and communication access obligations and procedures

- To provide for periodic review and updating of this LAP

---

### **III. LIMITED ENGLISH PROFICIENCY (LEP) POPULATIONS**

The LHA's assessment of LEP populations served or encountered is set forth in **Attachment A: Four-Factor Self-Assessment Analysis Regarding LEP Individuals.**

---

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

Most interactions between the LHA and LEP individuals involve in-person meetings, written communications, and telephone calls, including application processing, tenancy management, maintenance issues, and lease compliance matters.

Oral language assistance may be required for these interactions and may include communication by qualified bilingual staff or interpretation services. Written translation may be necessary for documents considered vital to meaningful program access.

---

### **V. LANGUAGE ASSISTANCE FOR LEP INDIVIDUALS**

#### **A. Identification of LEP Individuals and Notice**

The LHA will utilize "I Speak" language identification tools in common areas, on its website, and upon request. The LHA will post multilingual notices advising that free language assistance is available and will track language assistance requests to inform ongoing planning.

#### **B. Oral Interpretation Services**

Oral interpretation services for LEP individuals may include:

- Qualified bilingual LHA staff
- Professional over-the-phone interpretation services
- Qualified in-person interpreters when necessary to ensure meaningful access

Interpretation services will be provided at no cost to LEP individuals, subject to resource availability and consistent with the four-factor analysis.

#### **C. Written Translation**

The LHA will strive to translate vital documents into priority languages identified in Attachment A. Vital documents include, but are not limited to:

- Application and eligibility materials
- Lease and occupancy documents
- Rent redetermination notices

- Notices of rights, hearings, terminations, or evictions

For documents not translated, the LHA will include a notice advising individuals how to obtain free language assistance (Attachment C).

For legally binding documents, translated copies are provided for informational purposes only, and the English version remains the controlling document (Attachment D).

#### **D. Staff Training and Coordination**

The LHA will provide training to staff on LEP awareness and required assistance procedures. The Executive Director serves as the LEP Coordinator.

#### **E. Monitoring and Updating**

The LAP will be reviewed periodically to assess changes in LEP populations, document translation needs, and service effectiveness.

---

## **VI. COMMUNICATION ACCESS FOR DEAF AND HARD OF HEARING INDIVIDUALS**

### **A. Distinction from LEP Language Access**

Communication access for Deaf and Hard of Hearing individuals is a disability-based obligation governed by the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. It is distinct from LEP language access requirements.

### **B. Recognition of American Sign Language (ASL)**

The LHA recognizes that many Deaf individuals use American Sign Language (ASL) as their primary mode of communication. ASL is a distinct language and is not a form of English. Written English is not an equivalent substitute for ASL interpretation.

### **C. Auxiliary Aids and Services**

When appropriate and upon request, the LHA will provide auxiliary aids and services at no cost to ensure effective communication, which may include:

- Qualified in-person ASL interpreters
- Qualified Video Remote Interpreting (VRI), when appropriate
- Communication Access Realtime Translation (CART) or other captioning services
- Assistive Listening Devices (ALDs)
- Other auxiliary aids determined through an interactive process

### **D. Individualized, Interactive Determination**

Communication access will be determined through an individualized, interactive process that considers:

- The individual's primary communication mode

- The nature, length, and complexity of the interaction
- The setting and context

Primary consideration will be given to the individual's expressed preference while ensuring effective communication.

#### **E. Use of Video Remote Interpreting (VRI)**

VRI will not be relied upon when:

- Technology limitations interfere with communication
- The interaction is lengthy, complex, or legally significant
- An in-person interpreter is requested
- Effective communication cannot be ensured

#### **F. Notice and Coordination**

Notice of available communication access accommodations will be provided upon request and through public-facing materials. The Executive Director, or designee, will coordinate these services.

---

### **VII. NOTICE TO THE PUBLIC**

The LHA will post notices in common areas and on its website advising of the availability of language assistance for LEP individuals and communication access accommodations for Deaf and Hard of Hearing individuals.

---

### **VIII. PLAN REVIEW AND ADOPTION**

This LAP will be reviewed periodically and updated as needed to ensure compliance with applicable laws and responsiveness to community needs.

**Adopted by the Board of the Dartmouth Housing Authority on March 10, 2026.**

---

### **ATTACHMENTS**

- **Attachment A:** Four-Factor Self-Assessment Analysis Regarding LEP Individuals
- **Attachment B:** Language Assistance and Communication Access Protocols
- **Attachment C:** Important Document Language Assistance Notice
- **Attachment D:** Legal Notice Translation Statement

**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 **2023 5 Year American Community Survey** of citizens of **Bristol County** aged 5 years and over for which English is spoken “less than very well.”

**[INSERT LANGUAGES WITH CORRESPONDING NUMBER OF LEP PERSONS FOR THAT LANGUAGE AND % OF THE 5+ POPULATION FOR THE COUNTY]:**

<b>Language</b>	<b>Town Percent</b>	<b>County Percent</b>
Spanish or Spanish Creole	0.00%	2.10%
Portuguese or Portuguese Creole	0.90%	4.50%
Chinese	0.00%	0.20%
French Creole	0.00%	0.30%
Vietnamese	0.00%	0.10%
Russian	0.00%	0.00%
Arabic	0.00%	0.10%
Mon-Khmer, Cambodian	0.00%	0.20%
African languages	0.00%	0.00%
French (incl. Patois, Cajun)	0.50%	0.20%
Italian	0.00%	0.00%
Other Indic languages	0.00%	0.00%
Other Indo-European languages	0.00%	0.00%
Korean	0.00%	0.00%
Greek	0.00%	0.10%
Other Asian languages	0.00%	0.00%
Polish	0.00%	0.10%

(b). Municipal Data [*For use only where the % of LEP population speaking the language in the City/Town is greater than the percentage for the County*]:

See data graph (attached) compiled by **the 2023 5 Year American Community Survey** of citizens of **Bristol County** aged 5 years and over for whom English is spoken “less than very well.”

**[INSERT LANGUAGES WITH CORRESPONDING NUMBER OF LEP PERSONS FOR THAT LANGUAGE AND % OF THE 5+ POPULATION FOR THE CITY/TOWN]: N/A**

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

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

See data graph (attached) compiled by **the 2023 5 Year American Community Survey of citizens of Bristol County aged 5 years and over for whom** English is spoken “less than very well.”

(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)

See data graph (attached) compiled by **the 2023 5 Year American Community Survey of citizens of Bristol County aged 5 years and over for whom** English is spoken “less than very well.”

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.**

- The Housing Authority tracks LEP clients’ language and need for an interpreter.
- LHA maintains a listing of multilingual staff capacity and contact information for interpreters and translators.
- Any language access issues should be raised with the LHA’s Executive Director, who will discuss with the staff any issues requiring review or action.

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

The number of requests for interpreters will be compared to the actual applications submitted and actual leasing to determine a percentage-based assessment.

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

The number of requests for interpreters will be compared to the actual applications submitted and actual leasing to determine a percentage-based assessment. The resulting percentage will be applied to assess cost-effectiveness.

## **Attachment B: Language Assistance and Communication Access Protocols**

### **I. Purpose and Scope**

This Attachment establishes protocols for providing:

1. **Language access services** for individuals with Limited English Proficiency (LEP), pursuant to Title VI of the Civil Rights Act and applicable HUD and DHCD guidance; and
2. **Communication access services** for Deaf and Hard of Hearing individuals, pursuant to the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and applicable state and federal civil rights laws.

These obligations are distinct and are addressed separately below.

---

### **II. Language Access Services for Individuals with Limited English Proficiency (LEP)**

#### **A. Identifying the Need for Language Assistance**

Persons with LEP may convey their need for language assistance directly or through third parties. When necessary, LHA staff will take reasonable steps to identify the individual's primary language and the nature of assistance needed, including:

1. Utilizing "I Speak" language identification cards for walk-in interactions.  
I Speak cards are available at:  
<https://www.lep.gov/sites/lep/files/media/document/2020-02/crcl-i-speak-booklet.pdf>
2. Consulting available bilingual LHA staff to assist in identifying language needs.
3. Utilizing the LHA's over-the-phone telephonic interpretation service when bilingual staff are unavailable.

Persons with LEP must not be turned away or told that they must secure their own interpreter. Language assistance must be sought as soon as possible, and timing-related rights must be preserved while services are being arranged.

---

#### **B. Oral Language Assistance (Interpretation) for LEP Individuals**

The LHA will determine the appropriate method of oral interpretation on a case-by-case basis, considering the nature, importance, and complexity of the communication.

Available resources include:

1. **Bilingual LHA Staff**  
The LHA currently employs staff members who speak Spanish and Portuguese and may utilize them when appropriate.

## 2. **Over-the-Phone Interpretation Services**

When bilingual staff are unavailable, the LHA will use professional telephonic interpretation services provided by qualified vendors, including:

- International Translation Company: 1-617-989-3939
- Language Line Solutions: 1-800-752-6096

## 3. **In-Person Interpretation for LEP Individuals**

In limited instances where telephone interpretation or bilingual staff are insufficient to ensure meaningful access (e.g., termination hearings or evictions), the LHA may arrange qualified in-person interpretation services through approved vendors or community resources, subject to budgetary considerations.

If an LEP individual declines the free interpretation services offered by the LHA, the individual may provide their own qualified interpreter at their own expense. Use of family members or friends is permitted, though staff should be alert to potential conflicts of interest or competency concerns.

---

## **C. Protocols for Using Over-the-Phone Interpretation**

When utilizing telephonic interpretation services, staff should:

- Explain the purpose of the communication to the interpreter
- Provide brief explanations of technical or housing-related terms
- Speak directly to the LEP individual, not the interpreter
- Use short, clear sentences and avoid acronyms
- Confirm understanding as needed
- Inform the interpreter when services are no longer required

Administrative staff should document the need for follow-up and assist appropriate staff in arranging interpreted communications as needed.

---

## **III. Communication Access for Deaf and Hard of Hearing Individuals**

### **A. Overview**

Communication access for Deaf and Hard of Hearing individuals is a disability-based obligation and is not considered LEP language access. Services are provided to ensure effective communication and are determined through an individualized, interactive process.

### **B. Available Auxiliary Aids and Services**

When appropriate and upon request, the LHA may provide the following communication access services at no cost to the individual:

- Qualified in-person American Sign Language (ASL) interpreters
- Qualified Video Remote Interpreting (VRI), when appropriate
- Communication Access Realtime Translation (CART) or other real-time captioning services
- Assistive Listening Devices (ALDs)
- Other auxiliary aids or services as determined through the interactive process

Requests for services may be made through the LHA, including with assistance from the Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH).

Interpreter and CART request information:

<https://www.mass.gov/eohhs/gov/departments/mcdhh/request-an-interpreter.html>

MCDHH CART/Interpreter Line: 1-617-740-1600

### **C. Determining Appropriate Communication Access**

The LHA will determine appropriate communication access by considering:

- The individual's primary communication mode
- The nature, length, and complexity of the interaction
- The setting and context of the communication

Primary consideration will be given to the individual's expressed preference, while ensuring effective communication.

### **D. Use of Video Remote Interpreting (VRI)**

VRI may be used when appropriate but will not be relied upon when:

- Technology or connectivity limitations interfere with communication
- The interaction is lengthy, complex, or legally significant
- The individual requests an in-person interpreter
- Effective communication cannot be ensured

---

## **IV. Written Language Assistance (Translation) for LEP Individuals**

Written translation services for LEP individuals are provided in accordance with the Language Access Plan, including:

- Translation of vital documents as resources permit
- Use of notices advising of free language assistance for non-translated documents
- Provision of translated informational copies of legally binding documents, with the English version controlling

Translation services may be provided by qualified vendors or other approved resources.

---

## **V. Coordination and Oversight**

The Executive Director serves as the LEP Coordinator and is responsible for coordinating language access services for LEP individuals and communication access services for Deaf and Hard of Hearing individuals, responding to staff and public inquiries, and ensuring compliance with applicable civil rights requirements.

## Attachment C: Important Document Notice

This is an important document. Please contact Dighton Housing Authority at (508) 823-8361 for free language assistance.

Este documento es muy importante. Favor de comunicarse con el \_\_\_\_\_ en \_\_\_\_\_ para ayuda gratis con el idioma. (Spanish)

Este é um documento importante. Entre em contato com o \_\_\_\_\_ no número \_\_\_\_\_ para obter assistência gratuita com o idioma. (Portuguese)

Dokiman sila a enpòtan. Tanpri kontakte \_\_\_\_\_ la nan \_\_\_\_\_ pou asistans gratis nan lang. (Haitian Creole)

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 \_\_\_\_\_ 聯絡方式： \_\_\_\_\_。 (Chinese, Traditional)

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 \_\_\_\_\_ 聯絡方式： \_\_\_\_\_。 (Chinese, Simplified)

Это весьма важный документ. Свяжитесь с сотрудником \_\_\_\_\_ на предмет оказания бесплатной помощи по переводу на иностранный язык (\_\_\_\_\_). (Russian)  
(Phone #)

នេះគឺជាឯកសារសំខាន់។ សូមទំនាក់ទំនង \_\_\_\_\_ តាមរយៈ \_\_\_\_\_ ដើម្បីទទួលបានជំនួយ  
ផ្នែកភាសាដោយឥតគិតថ្លៃ។ [Mon-Khmer, Cambodian]

Đây là một tài liệu quan trọng. Vui lòng liên hệ \_\_\_\_\_ tại \_\_\_\_\_ để được hỗ trợ ngôn ngữ miễn phí. (Vietnamese)

Kani waa dukumentiyu muhiim ah. Fadlan \_\_\_\_\_ kala soo xiriir \_\_\_\_\_ si aad u hesho gargaar xagga luqadda oo bilaash ah. (Somali)

هذه وثيقة مهمة. يرجى الاتصال بـ \_\_\_\_\_ بـ \_\_\_\_\_ للمساعدة اللغوية المجانية.  
(Arabic) [Agency Name] [Phone #]

Ce document est très important. Veuillez contacter le \_\_\_\_\_ au \_\_\_\_\_ afin d'obtenir une assistance linguistique gratuite. (French)

Il presente è un documento importante. Si prega di contattare il \_\_\_\_\_ al \_\_\_\_\_ per avere assistenza gratuita per la traduzione. (Italian)

This is an important document. Please contact Dighton Housing Authority at (508) 823-8361 for free language assistance.

Το παρόν έγγραφο είναι σημαντικό. Παρακαλώ επικοινωνήστε με την \_\_\_\_\_ στο τηλέφωνο \_\_\_\_\_ για δωρεάν γλωσσική βοήθεια. (Greek)

Jest to ważny dokument. Proszę skontaktować się z \_\_\_\_\_ pod numerem \_\_\_\_\_ aby uzyskać bezpłatną pomoc językową. (Polish)

이것은 중요 문서입니다. 무료 언어 지원을 위해서는 \_\_\_\_\_ 에 연락하십시오. (Korean)

これは重要な文書です。無料の言語サービスについては、\_\_\_\_\_ の \_\_\_\_\_ までご連絡ください。 (Japanese)

Սա կարևոր փաստաթուղթ է: Խնդրում ենք կապվել \_\_\_\_\_ եզրկալան ձրի օգնության համար: (Armenian)

ນີ້ແມ່ນເອກະສານທີ່ສໍາຄັນອັນໜຶ່ງ. ກະລຸນາຕິດຕໍ່ກັບ \_\_\_\_\_ ທີ່ \_\_\_\_\_ ເພື່ອຂໍຄວາມຊ່ວຍເຫຼືອທາງດ້ານການແປພາສາໂດຍບໍ່ໄດ້ເສຍຄ່າ. (Lao)

Ovo je važan dokumenat. Za besplatnu pomoć vezanu za jezik, molimo vas kontaktirajte \_\_\_\_\_ na \_\_\_\_\_. (Serbo-Croatian)

یہ ایک اہم دستاویز ہے۔ زبان سے متعلق مفت مدد کیلئے براہ کرم \_\_\_\_\_ میں سے رابطہ کریں۔ (Urdu)

આ એક અગત્યની દસ્તાવેજ છે. કૃપા કરીને મફત ભાષાકીય સહાય માટે \_\_\_\_\_ પર \_\_\_\_\_ નો સંપર્ક કરો. [Gujarati]

เอกสารนี้มีความสำคัญ โปรดติดต่อ \_\_\_\_\_ ที่ \_\_\_\_\_ สำหรับบริการช่วยเหลือด้านภาษาได้ฟรี (Thai)

این سند مهمی است. لطفا جهت دریافت خدمات رایگان زبان با \_\_\_\_\_ از طریق \_\_\_\_\_ تماس حاصل فرمایید. (Farsi)

[Phone #]

[Agency Name]

## 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)

Этот документ приведен только со справочно-информационными целями. Английский вариант этого документа является юридически обязательным к исполнению. (Russian)

ឯកសារនេះគឺសម្រាប់ជូនជាព័ត៌មានតែប៉ុណ្ណោះ។ ឯកសារនេះជាភាសាអង់គ្លេសត្រូវបានចាត់ទុកជា  
ឯកសារចងក្រងបំភ្លឺកិច្ចការមន្ត្រីរដ្ឋបាល។ (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 liệu có tính ràng buộc về mặt pháp lý. (Vietnamese)

Dokumentigan waa mid loogu tala galay mid wargelin ahaan oo kaliya. Qeybta ku qoran afka Ingiriiska ee dokumentigan ayaa u taagan dokumentiga sharciga ah. (Somali)

لا يستخدم هذه الوثيقة إلا للأغراض المعلوماتية فحسب. يعتبر الإصدار الإنجليزي لهذه الوثيقة وثيقة ملزمة قانونياً.  
(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)

This document is for informational purposes only. The English version of this document is considered the legally binding document.

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 նպատակներին համար է փայլն: Այս փաստաթղթի անգլերեն տարբերակն է համարվում իրավաբանորեն պարտավորեցնող փաստաթուղթ: (Armenian)

ນີ້ແມ່ນເອກະສານໃຊ້ເພື່ອໃບໃນຈຸດປະສົງຂອງການໃຫ້ຂໍ້ໃຈຂໍ້ມູນເທົ່ານັ້ນ. ເອກະສານນີ້ທີ່ໃຊ້ບັນສະບັບຖືກຕ້ອງຕາມກົດໝາຍຈະແມ່ນສະບັບພາສາ ອັງກິດເທົ່ານັ້ນ. (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 صرفاً جهت اطلاع می باشد. تنها نسخه انگلیسی آن از لحاظ قانونی یک سند تعهدآور است. (Farsi)

