

Limited English Proficiency (LEP) Accommodations Statement

Introduction and Purpose

Living and working in a multicultural community is a challenge for many residents of subsidized housings in New England. Recently adopted LEP regulations impose further obligations to provide an adequate level of communication with people who are not native English-speakers. 2Life Communities Inc is committed to complying with all civil rights laws, including Title VI of the Civil Rights Act of 1964 (Title VI), which requires us to make sure individuals with limited English proficiency (LEP) have meaningful access to our housing programs and activities. At 2Life, we are proud of being ahead of many other sites, because we have already implemented many of these procedures.

The purpose of this plan is to ensure that we provide individuals with LEP meaningful access to our housing programs and activities, in accordance with HUD's Safe Harbor Guidelines. In order to identify the specific needs for LEP applicants and resident at 2Life we conducted a needs assessment using the four-factor analysis provided in the Department of Housing and Urban Development's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons.

In accordance with this four-factor analysis, 2Life's assessment balanced the following:

- 1) The number or proportion of LEP persons served or encountered in the eligible service population;
- 2) The frequency with which LEP persons come into contact with each department;
- 3) The nature and importance of the program, activity or service provided by 2Life; and
- 4) The resources available and costs to the site.

LEP Populations to be Served or Encountered and the Frequency of Encounters

2Life provides affordable and safe housing to a low-income elderly population. 2Life finds that the LEP populations typically represented may speak Russian, Chinese (Mandarin/Cantonese/Toishanese), Bulgarian, Romanian, Hungarian, French, Spanish, Albanian and Korean.

2Life keeps records on all of the residents and those records include primary and second languages that the individuals speak and understand. This information is provided when the individuals move to our housing, it is kept in electronic form, and also, monthly, a list of tenants is printed out and distributed among staff with the indication of the language or languages each tenant speaks. This list makes the access to the language information very easy. Tenants also list their emergency contacts which are usually children and friends. The English proficiency of those is often higher.

The nature and importance of the program, activity or service provided by 2Life

2Life recognizes that its staff has, and will continue to have, significant contact with LEP persons who speak and read mostly Russian and Chinese throughout the occupancy cycle: application, occupancy and move-out process (and, when applicable, eviction). This includes the following:

1. The application process, including telephone communication, assistance in filling out the application, the interview, and the signing of all requisite forms and the lease;
2. Standard interactions with a resident, including but not limited to, recertification, maintenance checks, standard maintenance requests and emergencies, newsletters, notifications of events, lease violation notices, recreational activities and social events;
3. The move-out process; and, when applicable
4. Eviction proceedings.

Language Assistance Measures

The type of language assistance necessary to provide meaningful access will vary depending on the type of communication staff is having with the LEP person (e.g. phone, in person or written communication) and in some circumstances more than one method will work. Regardless of how the language assistance is provided, 2Life recognizes the importance of providing such services in a timely manner and in an appropriate place. Failure to do so would effectively delay or deny LEP applicants and tenants access to our housing, programs and services. 2Life understands that the extent of its obligation to provide both oral and written translation is dependent on the four-factor analysis that was conducted at this site, that is, number of LEP residents, frequency of their encounters with the staff in various departments, importance of activities and services, and available resources.

Competent Bilingual Staff

2Life makes every effort to hire staff that can communicate with residents. A significant consideration when hiring staff for a site is whether the job applicant can competently provide language assistance to LEP residents at the site. A large percentage of our site staff is bilingual and every effort has been made to match their language skills with the needs of LEP residents.

2Life properties are typically staffed with an Executive Director, Resident Services Coordinator staff and Maintenance staff. Every effort is made to hire bilingual candidates that will match the languages of prospective residents. In addition, 2Life's Brighton campus, the largest campus, has a Russian/English and English/Russian staff translator/interpreter and part-time English/Chinese and Chinese/English translator/interpreter (Mandarin/Cantonese/Toishanese). They perform supplemental written (and sometimes - oral) translations to meet the needs of other communities.

2LIFE COMPLIANCE DEPARTMENT: Five Compliance office staff speak Russian, three speak Chinese, one speaks French, one speaks Hebrew and one speaks Albanian.

2LIFE RESIDENT SERVICES: 6 Resident Service coordinators are bilingual. Four speak Russian and two speak various dialects of Chinese, among them most widely-spoken Cantonese, Mandarin and Toishanese. One speaks some German. One speaks some Yiddish and Hebrew.

2LIFE MAINTENANCE DEPARTMENT: Three employees speak Russian, one speaks Chinese, two speak Spanish, one speaks Greek, and three emergency live-in staff speak Russian.

Written and Oral Language Services available to residents

2Life's goal is to provide meaningful access to our programs for individuals with limited English proficiency during the whole occupancy cycle. Here is what is being done to achieve this goal:

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CPA-CDBG-HOME Application Materials**

1) From application to the move-in:

Any person can obtain an application to our housing. The application is in English only, but states that persons are entitled to free interpretations services. 2Life will provide LEP assistance as needed. The interview with potential residents is conducted either in their native language or with the help of an interpreter. Lately we started to ask Resident Service Coordinators who speak appropriate language to be present at the interviews. If we are unable to meet the language needs, 2Life will use phone interpretations services providing access to over 200 languages within minutes, 24 hours per day, every day.

All new tenants receive a 2Life Tenant Handbook available in English, Russian and Chinese; and/or will be made available to languages whose count exceeds 50 in number, and more than 5% of the population. The Handbook describes procedures for moving in and moving out, as well as special programs and services available to the tenants. It also lists relevant staff names, the languages they speak and their telephone numbers. The Handbook is updated as needed and latest version is available to all tenants.

2) After the move-in.

2Life wants new tenants to feel at home and overcome the stress of moving in. Besides providing new tenants with a Tenant Handbook, a Resident Service Coordinator will visit the new resident to assess the newcomers' needs for services and to explain 2Life's programs and services. If necessary, a bilingual staff person will interpret during this meeting.

3) Recreational activities.

2Life considers recreational activities to be a very important part of community life and does its best to provide access to those activities to all residents in the building. There will be bulletin boards throughout the building advertising activities in the languages that exceed the 5% threshold among 2Life residents. 2Life will also post multilingual flyers about important events and recreational programs.

4) Maintenance issues.

2Life keeps a pictorial list of common maintenance problems with Russian, Chinese and Haitian Creole translation. If one cannot communicate their request in English, they can point out the problem on the list.

5) Compliance.

Rent recertification interviews, documents and lease signing is conducted in the residents' native languages. When new House Rules are enforced, appropriate meetings are conducted in English, Russian, and Chinese, as well as any other language exceeding the threshold.

6) Emergency and building issues.

Multilingual flyers will be distributed by a staff member directly to residents for any emergency and all building issues. An Emergency Preparedness Handbook which is part of the Welcome package will be made available in multiple languages.

7) Tenant Building Meetings.

Tenant meetings are conducted in two languages at a time, e.g. in English and Chinese and in English and Russian. Occasionally 2Life conducts the meetings in three languages to accommodate all tenants.

Written Translation Services

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2Life provides the following HUD/MassHousing documents, which are given to the tenants and applicants as needed:

Vital Documents currently include the following:

Tenants Rights and Responsibilities
EIV and You
120 day Notice
Occupancy Agreement

Staff Training Regarding LEP Policies and Procedures

2Life staff is trained on their obligation to provide meaningful access to information and services for LEP persons. Training on this topic is part of our company's orientation for new Employees. The training seeks to make all employees aware of the following:

- A) Our site's obligation to provide meaningful access to individuals with LEP;
- B) LEP policies and procedures; and
- C) Protocol in responding to LEP callers, written communications from LEP persons and in-person contact with LEP persons.

In addition, staff persons who have contact with our applicants and residents are trained to work effectively with in-person and telephone interpreters, and the various modes of interpretation.

Staff Continuous Oversight of the LAP- Monitoring and Updates

2Life will monitor and update this LAP on an ongoing basis.

- 2Life will annually review the demographics of our residents to make sure their language assistance needs are adequately met.
- If new demographic data is released by the federal or state government, 2Life will review the data and implement accordingly.

2LIFE PROCEDURES ON ADDRESSING NEEDS OF TENANTS WITH LEP

Current procedures are part of 2Life Language Assistance Plan. All new and current staff should be trained on LEP policies.

Dealing with Russian and Chinese speaking population

During normal working hours, in situations where a Russian-speaking or Chinese-speaking tenant seeks assistance and their English skills are limited, their needs can be met by bilingual Resident Service Coordinators or Translator/Interpreter on site or at 2Life's Brighton campus.

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In addition, we will identify bilingual residents who are willing to volunteer to help with translation in an emergency situation.

Accommodating 2Life tenants speaking other languages

All sites should have unified tenants list with indication of primary and secondary language each tenant speaks. Such lists could be printed from property management software. The lists will be updated on a regular basis.

Staff on site should familiarize themselves with such lists and identify tenants with primary language that is not English, Chinese or Russian, so we can plan in advance how 2Life staff can meet their needs in case of emergency and at other times.

Each site should have a list of tenants with "other" primary language whose English language skills are very limited or non-existing. "Other" means we would have to resort to the services of a translation or interpretation agency.

Some people may require staff to take additional efforts to communicate with them - from asking staff that usually do not work directly with tenants to looking for outside sources.

Suggestions:

- Identify languages
- Use cards with emergency situations -word and pictures. Copies of the cards are stored with RSCs, Compliance, Maintenance, and Site Reps.
- Whenever any 2Life staff use outside translation resources for written materials, a copy of these materials (in English and target language) should be kept on SHARE Drive for possible additional use by other sites.
- Ready-to-make notices (just in case) for water shut-offs, electricity out, etc. with space for day and time.