

1. Purpose

RCAP Solutions is dedicated to enhancing access to its programs and services for individuals who may not have English as their first language and those with disabilities who may face challenges in accessing standard services. RCAP Solutions has developed this policy to eliminate barriers and ensure that all individuals, regardless of their impairments, can access our services, programs, and activities meaningfully.

Failure to ensure that individuals who are non-English speakers or have limited English proficiency ("LEP") can effectively participate in or benefit from state programs and activities may constitute violations of Title VI of the Civil Rights Act of 1964, federal Executive Order 13166 and its associated Title VI regulations and guidance prohibiting national origin discrimination, the state's anti-discrimination statute – Chapter 151B of the General Laws, and Executive Order 526.

These regulations mandate that RCAP Solutions implement reasonable measures to facilitate access to programs and services for individuals who do not speak English as their primary language or need more proficiency in reading, writing, or understanding English. *Importantly, this plan is not static but dynamic, regularly reviewed, and adjusted to ensure it meets the evolving needs of the community.*

2. Description of Agency Programs

RCAP Solutions' mission is to foster personal and public self-reliance and improve the quality of life for individuals, families, and the communities in which they live. It is a comprehensive and complex 501(c)(3) non-profit corporation offering many diverse and supportive programs and services.

RCAP Solutions oversees several environmentally focused technical assistance and training programs. Through these efforts, we build capacity to ensure rural communities have access to safe drinking water, reliable wastewater, solid waste solutions, and more. These services, offered in all six New England states—New York, New Jersey, Pennsylvania, Puerto Rico, and the U.S. Virgin Islands—help communities innovate and thrive.

The Rental Assistance and Financial Services Divisions work with eligible individuals and families in Massachusetts to provide affordable housing, homelessness prevention, workforce development, family unification, and self-sufficiency programs. RCAP Solutions administers several voucher programs which help low-income renters by subsidizing a portion of their rent. We support both tenants with vouchers and landlords/property owners. In addition, we have several economic opportunity programs for voucher holders that can assist individuals and families on their path to self-sufficiency.

RCAP Solutions' Housing Consumer Education Center (HCEC) offers workshops and training to support and educate tenants, landlords, potential homebuyers, and homeowners. Our curriculum covers purchasing and maintaining a home, managing your finances, and best practices for landlords and tenants. We offer both in-person and online classes.

RCAP Solutions manages several affordable apartment complexes for seniors, families, and individuals with disabilities and mobility impairments throughout Central Massachusetts. We offer

on-site professional management, 24-hour on-call maintenance, and a resident service coordinator program to assist residents in remaining independent.

3. Analysis

All RCAP Solutions departments providing direct services to applicants, residents, and participants will utilize the 4-factor analysis, as provided by the Department of Housing and Urban Development (Federal Register/Vol. 72, No. 13/January 22, 2007, p. 2748), to determine the scope of need and services to be provided.

In determining what steps are reasonable to ensure meaningful access for persons with LEP, RCAP Solutions staff will consider the totality of the circumstances and balance the following four factors to achieve successful outcomes for all those with LEP who need our services.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or RCAP Solutions.
2. The frequency with which LEP persons interact with RCAP Solutions and its programs, activities, or services.
3. The nature and importance of the program, activity, or service provided by RCAP Solutions; and,
4. The resources available to RCAP Solutions and accompanying costs.

Assessment of LEP Populations -

Using the data from the EOHLC Language Access Plan (LAP) issued in April 2017, here is the identity by language, number, and percentage of the eligible population in RCAP’s service area that speaks the language and has limited English language proficiency. RCAP Solutions will use the HUD Safe Harbor Guidelines to determine its clients' responsibilities for providing language assistance.

Worcester County				
Languages	Spanish	Portuguese	Vietnamese	All other language
Population over 18	Total LEP:179,296.			
	61,207	49,870	21,255	19,752
	7.5%	6%	2.6%	2.4%

Agency staff has determined through frequent contact with clients that the principal language spoken is Spanish. Additionally, RCAP Solutions supports the Safe Harbor Threshold requirements for Portuguese/Portuguese Creole and Vietnamese. Therefore, translation services in identified languages will be available at the agency, although there are few requests for these interpretive services.

Annually, we request that each client who visits our office complete a voluntary language survey. This will be done during a one-week period, and the Data collected will be analyzed and

managed at the programmatic level. Data will be reviewed periodically with the LAP Coordinator and annually with all staff as changes occur. See Section 5 for Monitoring and Updating the Language Access Plan.

There are no variations in the program regarding language needs. Therefore, translation services in the three languages listed above will be available to agency clients. Information on languages spoken by clients participating in all EOHLC-supported programs, including but not limited to rental assistance programs, those who are tenants at properties owned and/or managed by RCAP Solutions, the Home Modification Loan Program, and the HCEC, is gathered routinely through application processing and re-certifications.

Assessment of Type, Nature, and Frequency of Programmatic Contacts

Contact between agency clients and staff happens in many ways, including appointment reminder calls; appointments; assessments and reassessments; resident, applicant, and participant private conferences and hearings; counseling and advocacy; group sessions and briefings; home visits; inspections; outreach and education; workshops; telephone communication; agency website; walk-in client interactions for information and referral; reasonable accommodation requests; notice of public hearings; transfer and residual tenancy applications; notices of changes to program guidelines; and other forms of written communications.

The frequency of these contacts varies based on program requirements, regulations, and the individual needs of participants. Participants in all subsidy programs are contacted at least annually, often more frequently. Contact frequency for the HCEC program is sporadic and depends on resource availability. RCAP Solutions operates a property management division where tenants and property management staff interact very frequently. Should any tenant require interpretive assistance, it is the responsibility of the property manager to arrange for such assistance. If necessary and approved by the Director of Property Management, the cost of the service will be covered.

Effective communication with our clients and prospective clients is crucial. Many face financial hardship and strive to secure or maintain safe housing for themselves and their families. Immediate access to an advocate who speaks their language is often essential for those seeking our services. Clear communication is imperative as accurate household income and family size information are necessary to determine eligibility for most of our programs.

Occasionally, we receive funding for special short-term programs where subcontractors may assist in program delivery. In such cases, subcontractors must possess their own Limited English Proficiency (LEP) plan or adhere to the requirements outlined in our plan.

Assessment of Language Assistance Resources and Cost

Several of our staff members are proficient in delivering accurate and practical assistance in languages other than English. Addendum B provides a list of staff members along with the languages they speak and write. Regular employee surveys ensure this list remains current. The LAP Coordinator will update Addendum B at least annually.

RCAP Solutions has established formal agreements with external organizations like Ascentria Services "Language Bank" to offer oral interpretation services on a fee-for-service basis.

Staff may utilize a telephonic oral interpretation service with approval from their supervisors. The agency maintains a budget allocated for vendor services as necessary.

4. Language Access Protocols

Providing Notice to Persons with LEP

All workshop folders, briefing packets, and other relevant agency materials will include a LAP policy statement and procedures. Each client-facing staff member will possess "I Speak" cards. These cards and/or posters will be prominently displayed at RCAP Solutions offices in public areas frequented by clients. (See: Addendum A)

Interpretation

Every reasonable effort will be undertaken to provide oral interpretation assistance free of charge to any Limited English Proficient (LEP) individual who is or may become, a beneficiary of our services. This includes (1) utilizing bilingual agency staff, (2) engaging external translation services, and (3) utilizing TransPerfect for telephonic support for qualifying programs.

The agency will maintain an active TTY telephone number to ensure access to its programs and services for individuals with hearing impairments. This number will be prominently displayed in public areas of the agency, including the internet, and included on all agency documents where contact information is listed, including email signatures and business cards.

Sign-language interpretation will be arranged for public meetings and presentations where individuals requiring these services are expected to be present.

The LAP Coordinator will conduct an annual staff survey to identify languages spoken and employees willing to act as translators. A master list of all translators and interpreters will be updated annually and attached to this policy as Addendum B.

LEP individuals should not be asked to rely on family members, friends, or informal interpreters for interpretation services. However, if they choose not to use the agency's free language assistance services and prefer to select their interpreter, they may do so; in such cases, the agency will request written confirmation of their choice.

LEP individuals will not face penalties for scheduling delays resulting from the need to secure translators.

Vital Documents

Vital documents, as defined by HUD, are "...any document critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically."

For this agency, those documents will include application materials, verification and consent forms, participation agreements, and rules, notices of eviction, notices of rights, denial or decrease in benefits and related hearings, notices of free language assistance, and grievance and appeal forms.

Program Directors will be responsible for (1) determining which of their documents should be considered Vital Documents; (2) providing a list of these documents to the LAP Coordinator, who will be responsible for maintaining a master list of all such documents for the agency on a public drive; (3) and update the list as needed to reflect program changes; (4) and, for ensuring that translations of the Vital Documents associated with their program(s) are available in all of the languages determined to meet the requirements for translation described above.

The English version of the document will be considered the only version that binds the agency and the client. When signatures are required, this will be the only copy of the document to which the signatures will be affixed. Every translated document will include language prominently stating: "This document is for informational purposes only. The English version of this document is considered the legally binding document."

Staff Training

Staff communication will be reviewed annually and implemented agency-wide. Additionally, all new staff will receive a copy of the LAP and training.

Appropriate staff must attend annual Fair Housing and Language Access Plan training offered in-house and with external agencies.

Appeals/Complaint Procedures

Senior Leadership will coordinate and monitor responses to LAP-related requests, issues, and complaints using existing agency policies and procedures, including standard grievance and program-specific procedures.

5. Monitoring and Updating LAP

RCAP Solutions Senior Leadership will review its Language Access Policy each year and update it as needed. EOHLC has created a review process that is included in their July 2009 LAP, and we will employ the same process review will also assess or include:

1. Whether there have been any significant changes in the composition or language needs of the region's population using data collected during the year by program staff;
2. A review to determine if additional vital documents require translation;
3. A review of any issues or problems related to serving LEP persons that may have emerged during the past year; and,
4. Identify recommended actions to provide more responsive and effective language services.

LAP Coordinator

The language access coordinator is responsible for ensuring the agency adheres to its language access policy and program. The coordinator will report to the agency head or be the designee for changes and new implementation processes to the policy/ plan. The LAP Coordinator will monitor the plan and ensure annual updates occur at the agency level.

The Current Language Access Coordinator is:

Lidia Benedit Addai, lbenedit@rcapsolutions.org, 978-630-6732

6. Addendums

- A. I Speak card/posters
- B. List of Staff members willing to interpret
- C. Important Document Notice for language assistance
- D. Friend/Family interpretation consent form (English, Spanish, Brazilian Portuguese)

Addendum A

“I SPEAK...”

Language Identification Guide

Your Right to an Interpreter

You have the right to an interpreter. Please point to your language and an interpreter will be called.

RCAP Solutions is an equal opportunity provider and employer and does not discriminate against qualified individuals with disabilities.

Albanian Unë flas Shqip.	Shqip 	French Je parle Français.	Français 	Khmer ខ្ញុំនិយាយខ្មែរ	ខ្មែរ 	Samoaan Ou te tautala Samoa.	Samoa
Amharic አማርኛ አናገራለሁ።	አማርኛ 	French Creole Je parle le Français Haïtien.	Français Haïtien 	Korean 나는 한국어를 할 수 있어요	한국인 	Serbian Ja govorim Srpski	Српски
Arabic أنا أتحدث العربية	عربي 	German Ich spreche Deutsch.	Deutsch 	Kurdish Min azanim Ba Kurdî Qsa bkam.	Kurdî 	Somali Waxaan ku hadlaa Somali.	Soomaali
Armenian Ես խոսում եմ հայերեն	հայերեն 	Greek Μιλάω ελληνικά.	Ελληνικά 	Kru N̄ a po Klào Win.	Klào 	Spanish Yo hablo español.	Español
Bengali আমি বাংলা বলি	বাংলা 	Gujarati હું ગુજરાતી બોલું છું	ગુજરાતી 	Lao ຂ້ອຍເວົ້າພາສາລາວ	ພາສາລາວ 	Swahili Ninaongea Kiswahili.	Kiswahili
Bosnian Ja govorim Bosanski.	Bosanski 	Haitian Creole Mwen pale Kreyòl Ayisyen.	Kreyòl Ayisyen 	Mien Yie gongv Mienh waac.	Mienh 	Tagalog Marunong akong mag-Tagalog.	Tagalog
Burmese ဗမာစကားပြောတယ်။	မြန်မာ 	Hindi मैं हिंदी बोलते हैं	हिंदी 	Nepali म नेपाली बोल्छु	नेपाली 	Thai ฉันพูดภาษาไทย	ภาษาไทย
Chinese - Traditional 我說中文	中文 	Hmong Kuv hais lus Hmoob.	Hmoob 	Polish Mówię po Polsku.	Polsku 	Ukrainian Я розмовляю українською.	українська
Chinese - Simplified 我说中文	中文 	Igbo A na m asụ Igbo.	Igbo 	Portuguese Eu falo Português.	Português 	Urdu میں اردو بولتا ہوں۔	اردو
Croatian Ja ovorim Hrvatski.	Hrvatski 	Italian Parlo Italiano.	Italiano 	Punjabi ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ ਹਾਂ	ਪੰਜਾਬੀ 	Vietnamese Tôi nói tiếng Việt.	Tiếng Việt
Dutch Ik spreek het Nederlands.	Nederlands 	Japanese 私は日本語を話します	日本語 	Romanian Cunosc limba Română.	Română 	Yiddish איך רעד יידיש	יידיש
Farsi من فارسی صحبت میکنم	فارسی 	Jamaican Creole Mi chat Jamiekan Langwjjj.	Jamiekan Langwjjj 	Russian Я говорю по-Русски.	Русский 	Yoruba Mo gbọ Yoruba.	Yoruba

(800) 488-1969

TTY: (978) 630-6754

www.rcapsolutions.org