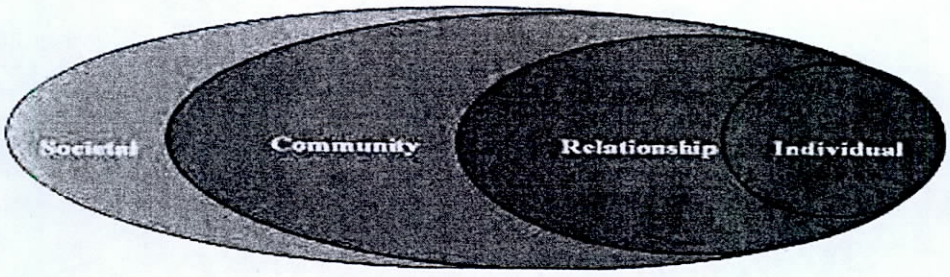
Violence Prevention Efforts

- # of community coordination meetings facilitated (violence prevention)
  - 5 per year
  - Meetings reflected in monthly report
    - Reflected in binder
      - Event, content, flyer, outreach, participation, etc.



POP QUIZ!!!!

- If an individual attends a Group Session or Violence Prevention Effort and their attendance is reflected on a sign-in sheet, what documentation needs to be placed in the Individual Clinical File (if one exists)?

ANSWER:

- COPIES OF:
  - A&O
  - Verification
  - Contact Note
  - Curriculum Outline or Flyer

*** *See file formatting instructions for details.*

Violence Prevention Efforts Forms

- If a sign-in sheet is obtained:
  - Clinical Verification Form
    - Session Date:
      - Date attended violence prevention effort
  - Activities & Outcomes Form
    - End Type:
      - Complete
        - Date of meeting
- If no sign-in sheet is obtained, place narrative in binder.

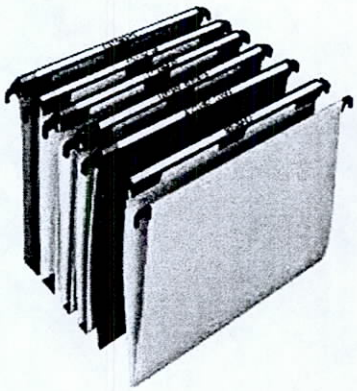
Clinical Quality Assurance Advisory

- Clinical Quality Assurance
  - Did all files score 80+ on the QA review?
    - Yes/No
  - Review will be conducted 2x/year
  - Supplemental to M&E Review

Clinical File Organization

- FamilyWorks Clinical File Organization

- 2016 Inserts to be provided
  - For new files opened in 2016, only!!
  - No need to replace 2015 inserts



Victim Assistance Program

- Any other Questions/Concerns???

THANK YOU!!!

- Ending with a RESOURCE:
  - NAMI:
    - Honest, Open, Proud to erase the stigma of mental health

EXHIBIT XV-2016

Customer Services Standards

CHA
CHICAGO HOUSING AUTHORITY

RESIDENT SERVICES
CUSTOMER SERVICE STANDARDS
2016

Service Standards are important for families, partners, employees and management of any business. They help to define expectations and to remind management and employees of the challenges and obligations that they face.

The following information addresses the customer service standard areas identified above, including our responsibility to our families and internal policies and procedures. These standards are focused on the critical areas of running a successful program. Please find standards for:

- Telephone/Voicemail
- Written Correspondence
- Face to Face Interactions
- Standards for Information
- Standards for Meetings/Training
- Standards for Gaining Customer Feedback
- Standards for Facilities

EXTERNAL – Posted for families and partners
CHA's Resident Services' Departmental Mission: *To use CHA housing as a vehicle to enhance residents' quality of life. To prepare residents to be successful in the global marketplace; for those who are able, help to transition off of housing subsidy.*

Our Responsibility to Our Families: We will continuously strive to meet and exceed the service standards set out below. In general, this is what you can expect when you make contact with us:

- We will strive to provide you with accurate information
- We will strive to respond in a timely manner.
- We will be considerate in meeting your service needs.
- In essence, we will strive to deliver quality customer service, at all times providing you with the highest level of quality and continuous improvement in our level of service.

CHA
CHICAGO HOUSING AUTHORITY

INTERNAL Customer Service Policies and Procedures

I. Standards for Telephone/Voicemail

"Our families and partners have a right to expect that..."

- The phone will be answered promptly preferably within **five** rings.
- Calls will be answered in a courteous manner (with a smile). If the person you wish to speak to is not available, we will take a message and arrange for your call to be returned by them or a designee by the **close of the next business day.**
- A person, **not voicemail**, will answer calls at the main number to an office location.
- The staff member answering the phone will listen and understand the nature of the requests before transferring the calls, inform the callers where they are being transferred to, and provide them with the phone number of the person to whom they are being transferred.
- The person answering will, before transferring the call, provide the option to go to voicemail or take a message.
- Voicemail messages will be acknowledged by the **close of the next business day.**
- The outgoing voicemail message will be kept current, and the voicemail message will be changed on days the office is closed.
- The voicemail message gives an optional phone number to call in case of emergencies.
- If there is a person at a counter and the phone rings, the employee will acknowledge the person at the counter, answer the telephone, tell the caller that someone is waiting, and give the caller the option of being placed on hold or having their call returned.
- When a person calls and asks for a specific service or department, they will be transferred to the appropriate department and will be given the telephone number in the event they are disconnected.
- There will always be telephone coverage during business hours.
- All incoming phone calls coming from external sources will be answered with a consistent greeting such as "Agency Name, [geographic location], how may I help you?"
- Staff will leave their full names, departments, phone numbers, and times available when leaving messages for families and partners.

II. Standards for Written Correspondence

(Includes Letters, Memoranda, E-mails & Faxes)

"Our families and partners have a right to expect that..."

- They will be informed of the level of services that are provided and how to obtain them

CHA
CHICAGO HOUSING AUTHORITY

- Written correspondence has been edited for accuracy (this includes case notes).
- They will receive complete, accurate, and precise information regarding their inquiries.
- A timely response to their inquiries - by the **close of the next business day**.
- If more extensive information is required, a staff person will send an interim communication explaining the delay and provide a timeline of when follow up can be expected. **This is not to extend beyond 5 business days**.
- That a fax cover sheet includes name, telephone number, and department of the sender and the name and fax number of the receiver. Fax cover sheets should be legible.

III. Standards for Face to Face Interactions

"Our Families and Partners have a right to expect that..."

- A timely, courteous acknowledgement, such as eye contact or a positive indication that the staff member knows they are there, especially if the staff member is on the phone or with another person.
- **Within 10 minutes** of walking in that they will have either the information, assistance, or follow up information.
- If they do not have an appointment we will ensure that they are able to speak to a staff person **within 10 minutes** who is able to discuss their inquiry. If that person cannot deal with their inquiry, staff will make arrangements to ensure that their query is followed up within the published standard for correspondence so that they can be given a full response.
- The staff person will listen to requests/questions and ask for clarification if needed.
- They will be treated with courtesy and respect.
- They will receive helpful, knowledgeable, and accurate information.
- Each office will be staffed during business hours or, if staff is unavailable, will have signage referring them accordingly.
- Hours of operation will be posted. Our offices and sites will be open during the established hours and that staff will set appointments to accommodate varying schedules.

IV. Standards for Information

"Our Families and Partners have a right to expect that..."

- We will provide clear and straightforward information about our services to our families and partners. This will be available upon request, including our printed information. We will supply this information in formats that ensure we accommodate the needs of our non-English speaking customers and those with special needs (per CHA's approval process).

CHA
CHICAGO HOUSING AUTHORITY

- Information will be consistently displayed in the office and at a minimum there will always be the following information in printed format: service information, workshop/training schedules, and information regarding transportation and childcare.

V. Standards for Meetings/Training

"Our Families and Partners have a right to expect that..."

- They will be given reasonable advance notice of meetings, **at least three days** except in cases of emergency.
- Meeting notifications contain accurate information (date, time, and place, point of contact, phone number, and directions).
- They will be informed of schedule changes or cancellations prior to the meeting (**at least 24 hours' notice**, if possible).
- Meetings will start on time and end on time.
- Meetings will be organized, run efficiently (proper equipment and handouts), and conducted in a professional manner.

VI. Standards for Gaining Customer Feedback

"Our Families and Partners have a right to expect that..."

- Complaints will be acknowledged within **one business day**.
- We will carry out a quarterly review of our service delivery and will report on our performance against established customer service standards quarterly and provide the results to our funder.
- Problems identified at a site will be addressed appropriately and timely responses will be made as indicated. **This time is not to exceed 30 days**.
- We will acknowledge our mistakes, apologize, and do our best to prevent the same mistake in the future.

VII. Standards for Facilities

"Our Families and Partners have the right to expect..."

- The facility is clean, e.g.; the public and staff restrooms are not dirty; the carpets are not blackened from dirt; the walls are not blackened from dirt or scuff marks; the key boards on the computers are not sticky.
- The environment is inviting – e.g., warm, friendly atmosphere where staff greet customers upon arrival.
- Equipment, materials, and furniture are not broken or dirty.
- The office location has the appropriate security measures for safety that are known by all staff, including visible evacuation plans.
- The physical space itself is safe with no exposed wires; no loose ceiling tiles, etc.

EXHIBIT XVI – 2016

CHA Language Access Plan

2015

CHA

CHICAGO HOUSING AUTHORITY™

Language Access Policy

EUGENE JONES JR.
ACTING CHIEF EXECUTIVE OFFICER

EFFECTIVE DATE: MAY 1, 2015

Contents

Overview 3
General Policy 3
Limited English Proficiency Persons 4
Four Factor Analysis 4
Safe Harbor 5

Version Control

Revision Date	Approval Date	Effective Date	Change
01/13/15	N/A Draft	02/01/15	New document
01/21/15	N/A Draft	02/01/15	Edits based on 01/16/15 feedback from Chief Administrative Officer
01/27/15	N/A Draft	02/01/15	Edits based on 1/22/15 feedback received from Office of Administration leadership team
03/16/15	N/A Draft	05/01/15	Edits based on feedback received during input sessions
03/23/15	N/A Draft	05/01/15	Edits based on feedback received from CHA's Chief Legal Officer
03/24/15	N/A Draft	05/01/15	Edits based on feedback received from Deputy Chiefs
03/31/15	N/A Draft	05/01/15	Separate plan into two documents. LAP Policy and LAP Procedures
04/01/15	N/A Draft	05/01/15	Edits based on feedback received from Deputy General Counsel and Fair Housing Manager
04/07/15	N/A Draft	05/01/15	Edits based on feedback received from Deputy General Counsel
04/22/15	04/21/15	05/01/15	Approved by Board of Commissioners
08/10/15	08/10/15	09/01/15	Updated Cover Sheet

Language Access Policy

Overview

The Chicago Housing Authority [CHA] is sensitive to the needs of persons with Limited English Proficiency [LEP], including applicants, participants and the residents of the City of Chicago. CHA values differences and is committed to providing equal opportunity in its outreach practices and decisions. CHA follows all applicable federal, state, local laws and ordinances prohibiting discrimination. CHA's Language Access Plan [LAP] takes reasonable steps to ensure LEP persons have meaningful access to CHA's programs and services. The LAP includes a policy section and a procedures section. In an effort to ensure standardized processes, the implementation and enforcement of the LAP will be overseen by CHA's Office of Diversity.

General Policy

1. In accordance with federal, state and local law, CHA will take reasonable steps to ensure meaningful access to its programs by LEP persons[1]:
   a) Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination
   b) Executive Order [EO] 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development [HUD], to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice [DOJ] LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance
   c) Title VII of the Civil Rights Act of 1964 makes it illegal to discriminate against someone on the basis of race, color, religion, national origin or sex

2. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act) prohibits discrimination in the sale, rental and financing of dwellings based on race, color, religion, sex or national origin

3. Meaningful access is free language assistance in accordance with federal guidelines. To comply with these guidelines, CHA is required to:
   a) Provide LEP services based on a four-factor analysis
   b) Develop a LAP
   c) Provide appropriate language assistance

4. Refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI, VII and/or VIII[2]
   a) The requirement to provide meaningful access to LEP persons is enforced and implemented by the Department of Labor [DOL] through the procedures identified in the Title VI and Section 188 regulations. These procedures include complaint investigations, compliance reviews, efforts to secure voluntary compliance, and technical assistance
   b) The DOL's Civil Rights Center [CRC] will investigate any complaint, report or other information that alleges or indicates possible noncompliance with Title VI and Section 188

[1] HUD.GOV Portal. January 2015. HUD's LEP FAQs
[2] US Department of Labor. Volume 68, Number 103, Page 32289-32305

i. If the investigation results in a finding of compliance, CRC will inform CHA in writing of this determination, including the basis for the determination

ii. If the investigation results in a finding of noncompliance, CRC will inform CHA of the noncompliance in a Letter of Findings that sets out the areas of noncompliance and the steps that must be taken to correct the noncompliance. At this stage, CRC will attempt to secure voluntary compliance through informal means. If the matter cannot be resolved informally, compliance may be effectuated through (a) the termination of federal assistance after CHA has been given an opportunity for an administrative hearing; (b) referral to DOJ for injunctive relief or other enforcement proceedings; or (c) any other means authorized by law

Limited English Proficiency Persons

1. Persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand are defined as LEP individuals. For purposes of Title VI and the LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter[3]

2. United States citizenship does not determine whether a person is LEP. It is possible for a person who is a United States citizen to be LEP. It is also possible for a person who is not a United States citizen to be fluent in the English language. Title VI is interpreted to apply to citizens, documented non-citizens, and undocumented non-citizens. CHA's programs require recipients to document citizenship or eligible immigrant status of beneficiaries. Title VI LEP obligations apply to every beneficiary who meets the program requirements, regardless of the beneficiary's citizenship status

Four Factor Analysis

1. The actions that CHA is expected to take to meet its LEP obligations depends upon the results of the four-factor analysis, which includes delineating:
   a) the services CHA offers
   b) the community CHA serves
   c) the resources CHA possesses
   d) the cost to CHA of the translation and interpretation services provided

2. CHA four factor analysis balances the following:
   a) the number or proportion of LEP persons served or encountered in the eligible service population
      i. "served or encountered" includes those persons who would be served or encountered by CHA if the person received the adequate education and outreach and CHA provided sufficient language services
   b) the frequency with which LEP persons come into contact with CHA
   c) the nature and importance of the CHA's programs, activities or services
   d) the resources available and costs to CHA

3. CHA is required to take reasonable steps to ensure meaningful access to LEP persons
   a) This "reasonableness" standard is intended to be flexible and fact dependent
   b) It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens to CHA's strategic partners e.g. small businesses, small local governments, or small nonprofit organizations

[3] HUD.GOV Portal. January 2015. HUD's LEP FAQs

Safe Harbor

1. A "safe harbor" means that CHA has undertaken efforts to comply with respect to the needed translation of vital written materials
   a) By conducting the four-factor analysis, determining that translated documents are needed by LEP applicants or beneficiaries, adopting an LAP that specifies the translation of vital materials, and making the necessary translations, CHA provides strong evidence, in its records, that it has made reasonable efforts to provide written language assistance

2. There are no "safe harbors" for oral interpretation services
   b) CHA will use the four-factor analysis to determine the most reasonable, timely, oral language assistance provided by CHA, free of charge, to LEP households. Depending on the circumstances, reasonable oral language assistance might be an in-person interpreter or a telephone interpreter line

2015

CHA

CHICAGO HOUSING AUTHORITY™

Language Access Procedures

EUGENE JONES JR.
ACTING CHIEF EXECUTIVE OFFICER

EFFECTIVE DATE: SEPTEMBER 1, 2015

CHA
CHICAGO HOUSING AUTHORITY

Contents

Roles and Responsibilities 3

1. Office of Diversity 3
2. Internal Language Access Liaisons 3
3. External Language Access Liaisons 4
4. Translation and Interpretation Service Providers 4

Types of Language Assistance 4

Four Factor Analysis Matrix 7

LEP Persons, Contact with CHA and Vital Documents Matrix 8

Vital Documents 8

Translations Disclosure 9

Quality Assurance 9

Training 9

Reporting LEP Violations 9

Exhibit A 10

Resident Screen Yardi Fields 10

Vendor Screen Yardi Fields 10

Applicant Screen Yardi Fields 11

Exhibit B 13

Best Practice Research Table 13

Exhibit C 14

I Speak Card 14

CHA
CHICAGO HOUSING AUTHORITY

Version Control

Revision Date	Approval Date	Effective Date	Change
01/13/15	N/A Draft	02/01/15	New document
01/21/15	N/A Draft	02/01/15	Edits based on 01/16/15 feedback from Chief Administrative Officer
01/27/15	N/A Draft	02/01/15	Edits based on 1/22/15 feedback received from Office of Administration leadership team
03/16/15	N/A Draft	05/01/15	Edits based on feedback received during input sessions
03/23/15	N/A Draft	05/01/15	Edits based on feedback received from CHA's Chief Legal Officer
03/24/15	N/A Draft	05/01/15	Edits based on feedback received from Deputy Chiefs
03/31/15	N/A Draft	05/01/15	Separate plan into two documents. LAP Policy and LAP Procedures
07/09/15	08/10/15	09/01/15	Update procedures based on feedback received by Language Access Liaisons

Roles and Responsibilities

The Office of Diversity is tasked with overseeing the agency-wide implementation and enforcement of CHA's LAP. Therefore, upon the approval of the LAP, the Office of Diversity will work with Language Access Liaisons from each department within CHA to phase-in the implementation of these procedures at a departmental level. The information included in this section is subject to change as CHA plans to conduct regular evaluations and modify procedures, as needed. The roles and responsibilities of internal and external partners are outlined below:

1. Office of Diversity

a) Lead the implementation of CHA's LAP
b) Review and revise, as needed, CHA's LAP
    i. Evaluate inputs, outputs and outcomes
c) Oversee Quality Assurance [QA] activities (see Quality Assurance section below)
    i. Monitor language data in CHA's systems of record (Yardi) (see Exhibit A)
d) Coordinate agency-wide reporting compliance efforts and prepare four-factor analysis yearly report
    i. Manage language bank resources list (list of bilingual employees/vendors and level of proficiency)
e) In collaboration with the city of Chicago, identify LEP population at a neighborhood level
f) Conduct mandatory LAP trainings (see Training section below)
g) Receive, assign and monitor interpretation and/or translations requests (including telephonic interpretation requests) submitted by Language Access Liaisons
    i. Approve final version of Spanish translations
    ii. Maintain library of translated documents
h) Monitor Spanish calls presented to HCV Call Center Line (312.935.2600) and CHA Main Line (312.742.8500)
i) Monitor non-English phone calls handled by non-bilingual staff through the telephonic interpretation line
j) Develop and maintain master copy Language Identification card/poster (see Exhibit C "I Speak Card" sample)
k) Manage contract(s) with vendors that provide translation and interpretation services

2. Internal Language Access Liaisons

CHA will elicit language service needs from all prospective beneficiaries (regardless of the prospective beneficiary's race or national origin). Internal Language Access Liaisons will play a key role capturing LEP information. Additional responsibilities are outlined below:

a) Oversee the creation and implementation of department-specific internal language procedures
b) Assist in developing a plan to capture required language data (Primary language and level of English proficiency) from CHA applicants and participants (see Exhibit A)
    i. Public Housing (Family, Scattered, Senior and Mixed Income)
    ii. Housing Choice Vouchers
c) Submit requests for translation and/or interpretation to the Office of Diversity via SharePoint "Language Access" site
d) Share CHA's LAP with internal and external partners
    a. With the assistance of the Office of Diversity, train third-party vendors
e) Attend mandatory LAP trainings
f) Upon the completion of master copy of Language Identification, display card/poster in every CHA department, satellite office, property management office, etc.

3. External Language Access Liaisons

CHA will leverage presence in the Chicagoland area and improve assistance provided to the LEP community by:

a) Collaborating with the City of Chicago Office of New Americans
b) Seeking partnerships with Community Based Organizations, and other sister agencies serving the LEP community

4. Translation and Interpretation Service Providers

CHA will continue to work with third-party vendors to provide interpretation and translation services.

g) CHA will track translations and interpretation services on the SharePoint "Language Access" site and conduct cost-benefit analysis, as needed

Types of Language Assistance

1. The types of languages assistance that CHA will provide to LEP persons includes, but are not limited to:
   a) Oral interpretation services
   b) Telephone service lines interpreter
   c) Bilingual staff
   d) Written translation services
2. Generally CHA does not rely on family members, friends of the LEP person, or other informal interpreters. As formal translation is a professional and unbiased service, CHA relies on a competent entity to provide quality and accurate interpretations. Nonprofessional translation may prohibit an LEP person in obtaining meaningful access to CHA's programs and activities
   a) However, when LEP persons choose not to utilize the free language assistance services expressly offered to them by CHA but rather choose to rely upon an interpreter of their own choosing (whether a professional interpreter, family member, or friend), LEP persons should be permitted to do so, at their own expense
   b) While HUD guidance does not preclude use of friends or family as interpreters in every instance, HUD recommends CHA use caution when such services are provided

3. The tables below outlines expected language needs, type of interaction with the LEP community and CHA's response to such language needs

Support Functions[1]:

Language Assistance Need		Type of Interaction	
		Scheduled	**Impromptu**
Interpretation	**In-person**	1. *Bilingual staff in department will assist LEP individual or non-bilingual staff will assist via telephonic interpretation line*	2. *Same as scheduled*
	Incoming call	1. N/A	2. *Assist LEP individual via telephonic interpretation line*
	Outgoing call	1. *Bilingual staff in department will assist LEP individual or non-bilingual staff will assist via telephonic interpretation line*	
Translation	**Document**	1. *Submit request for translation to Office of Diversity via SharePoint site*	

[1] Departments classified as providing "Support" include but are not limited to: HR, ITS, MTW Planning & Reporting, Communications, Finance, Budget & Management, Grants, FIC, General Services, Procurement & Contracts

Program Functions[2]:

Language Assistance Need		Type of Interaction	
		Scheduled	**Impromptu**
Interpretation	**In-person**	1. *Bilingual staff in department will assist LEP individual or non-bilingual staff will assist via in-person interpreter or telephonic interpretation line*	2. *Bilingual staff in department will assist LEP individual or non-bilingual staff will assist via telephonic interpretation line*
	Incoming call	1. N/A	2. *Assist LEP individual via bilingual staff or telephonic interpretation line*
	Outgoing call	1. *Bilingual staff in department will assist LEP individual or non-bilingual staff will assist via telephonic interpretation line*	
Translation	**Document**	1. *Submit request for translation to Office of Diversity via SharePoint site*	

[2] Departments classified as providing "Programs" include but are not limited to: HCV, Asset Management, Resident Services, Legal

Four Factor Analysis Matrix

In an effort to standardize the four-factor analysis requirement, CHA will use Table 1 LAP Compliance Matrix, to identify the services provided, the communities served, the resources available to provide services, the type of language assistance and an estimated cost to CHA for such services. CHA will release the four-factor report on an annual basis.

Table 1 LAP Compliance Matrix

Services	Community	Resources	Language Assistance	Cost
Public Housing Program Family, Scattered, Senior and Mixed Income	1. LEP Applicants 2. LEP Participants (including owners) 3. LEP Residents of the city of Chicago	1. Office of Diversity 2. Third-party interpreter and translation services 3. Language Access Liaisons	1. Translations 2. Interpretations	1. TBD
Housing Choice Voucher Program Project-Based vouchers, VASH, Homeownership, Mod-Rehab, Mainstream 5yr				

SAMPLE

To be completed in collaboration with Internal Language Access Liaisons

LEP Persons, Contact with CHA and Vital Documents Matrix

1. To maintain a current list of vital documents and their relationship to LEP persons, CHA will maintain a library of translated documents by completing Table 2 Vital Documents Matrix, in collaboration with Language Access Liaisons on an annual basis
2. CHA will translate and/or interpret vital documents by following HUD's recommendations:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notices of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required

Figure 1 HUD LEP

Vital Documents

1. A "vital" document is any document that is critical for ensuring meaningful access to CHA's major activities and programs by CHA general beneficiaries and LEP persons specifically.
2. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. For instance:
   a) Applications for auxiliary activities, such as certain recreational programs in public housing would not be considered a vital document;
   b) Applications for housing would be considered vital.
3. CHA's LAP procedures consistently determine, over time and across its various activities, what documents are vital to the meaningful access of the LEP populations served.

Table 2 Vital Documents Matrix

Interaction with CHA	Community		LEP resident of the city of Chicago	Vital Documents
	LEP Applicant	LEP Participant		
Wait list openings	X	X	X	Marketing campaigns Application TBD

SAMPLE

To view a complete listing of Vital Document see Office of Diversity SharePoint site

Translations Disclosure

1. The English language document of leases, rental agreements and other housing documents of a legal nature will generally prevail in U. S. courts. HUD and CHA translated documents will carry the disclaimer:
   a) "This document is a translation of a HUD-issued or CHA-issued legal document. HUD and/or CHA provides this translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document."
2. Where both the landlord and tenant contracts are in languages other than English, state contract law governs the leases and rental agreements. Neither HUD nor CHA interpret state contract law. Therefore, questions regarding the enforceability of housing documents of a legal nature that are in languages other than English should be referred to a lawyer well-versed in contract law of the appropriate state or locality. Neither EO 13166 nor HUD LEP Guidance grants an individual the right to proceed to court alleging violations of EO 13166 or HUD LEP Guidance.
3. Current Title VI case law only permits a private right of action for intentional discrimination and not for action based on the discriminatory effects of CHA's practices. However, individuals may file administrative complaints with HUD alleging violations of Title VI because CHA failed to take reasonable steps to provide meaningful access to LEP persons.

Quality Assurance

To ensure compliance, CHA will standardize quality assurance activities and generate compliance reports. A list of QA activities, includes but is not limited to:

1. The use of a second translator to review the work of the primary translator
2. The creation of a glossary of CHA terminology that is provided to contract vendors for use when translating CHA documents
   a) CHA's glossary of terms will also be provided to the Mayor's Office to enhance the City of Chicago's Language Access Plan
      i. The City of Chicago's Office of New Americas is requiring, thru an Ordinance, that City departments implement language access plans to increase the quality and reliability of services provided to LEP individuals
3. The Office of Diversity will conduct random, and on a sample basis, reviews of LAP procedures to foster compliance

Training

1. The Office of Diversity will conduct quarterly meetings with Language Access Liaisons to:
   a) Share quarterly reports;
   b) Gather feedback; and
   c) Provide updates.
2. LAP Trainings include but are not limited to the following topics:
   a) How to use SharePoint
   b) How to use the telephonic interpretation line
   c) Culture sensitivity workshops

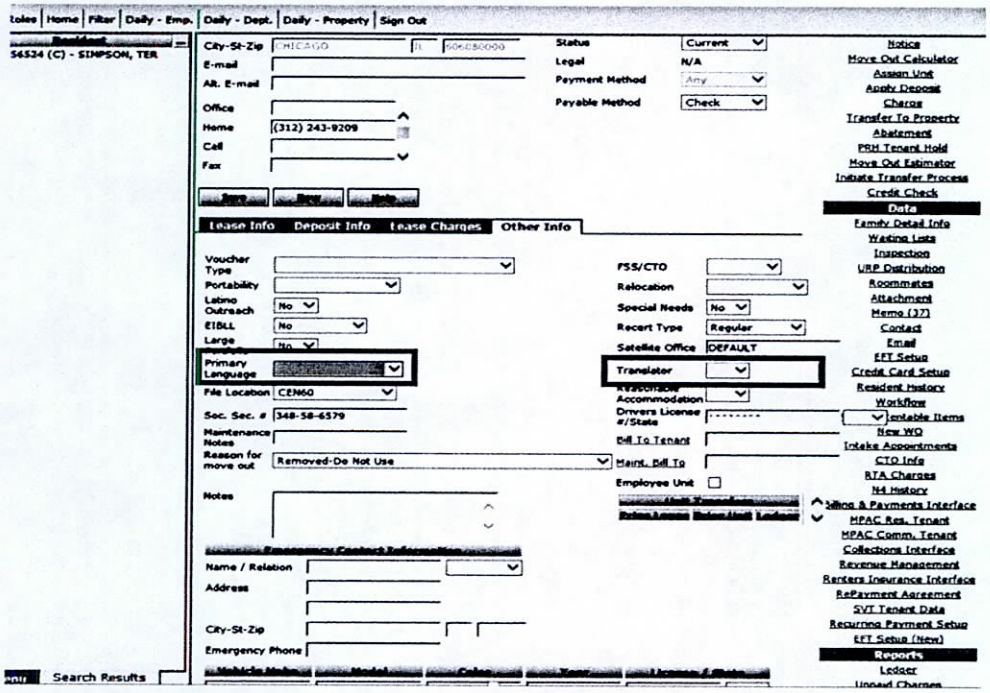
Reporting LEP Violations

1. If a person believes that a HUD federally assisted recipient (i.e. CHA) is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with:
   a) CHA's Housing Rights and Nondiscrimination Department. For contact information go to the CHA website www.thecha.org or call at (312) 913-7062.
   b) HUD's local Office of FHEO. For contact information of the local HUD office, go to the HUD website or call the housing discrimination toll free hotline at 800-669-9777 (voice) or 800 927-9275 (TTY).

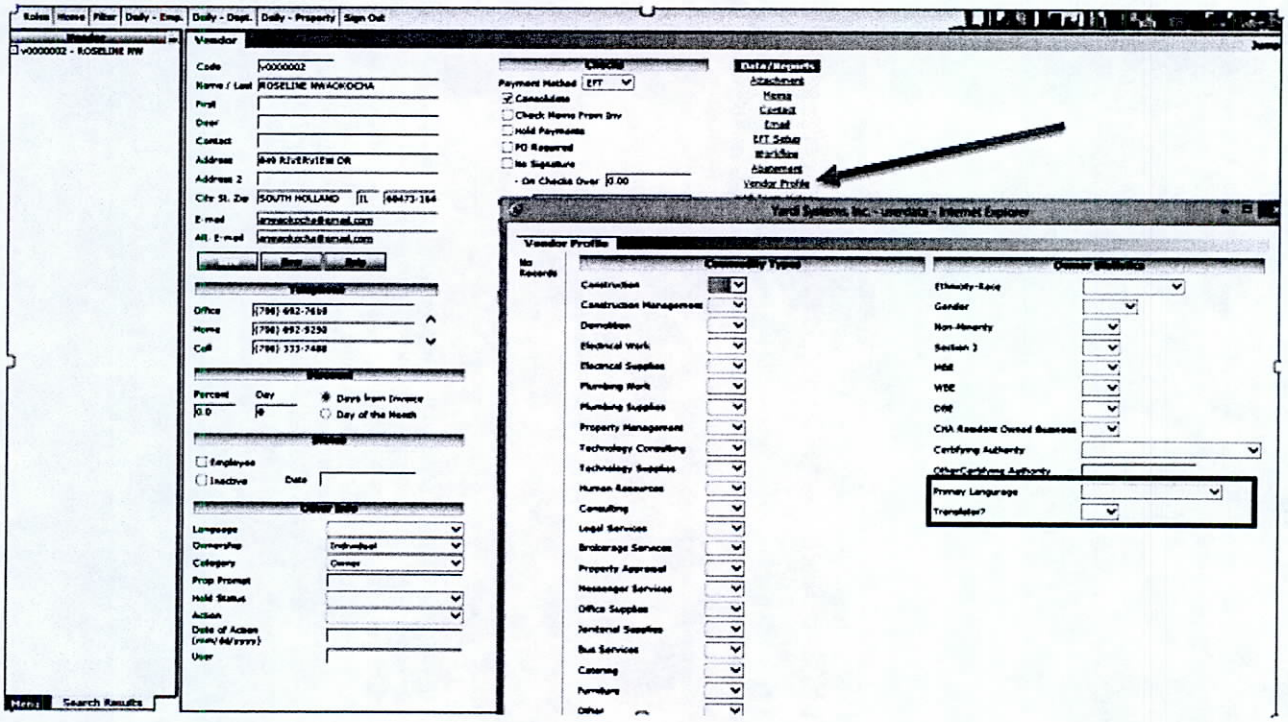
CHA
CHICAGO HOUSING AUTHORITY

Exhibit A

Resident Screen Yardi Fields



Vendor Screen Yardi Fields



Applicant Screen Yardi Fields

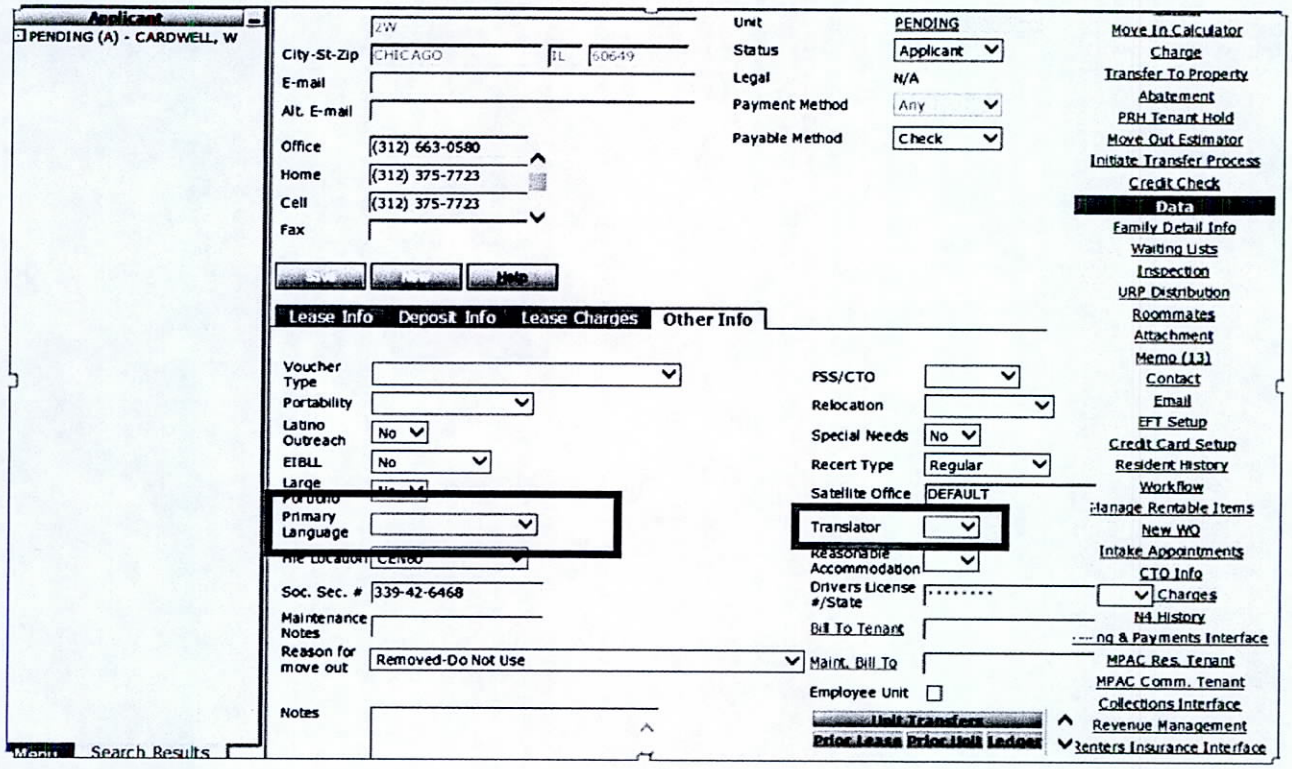


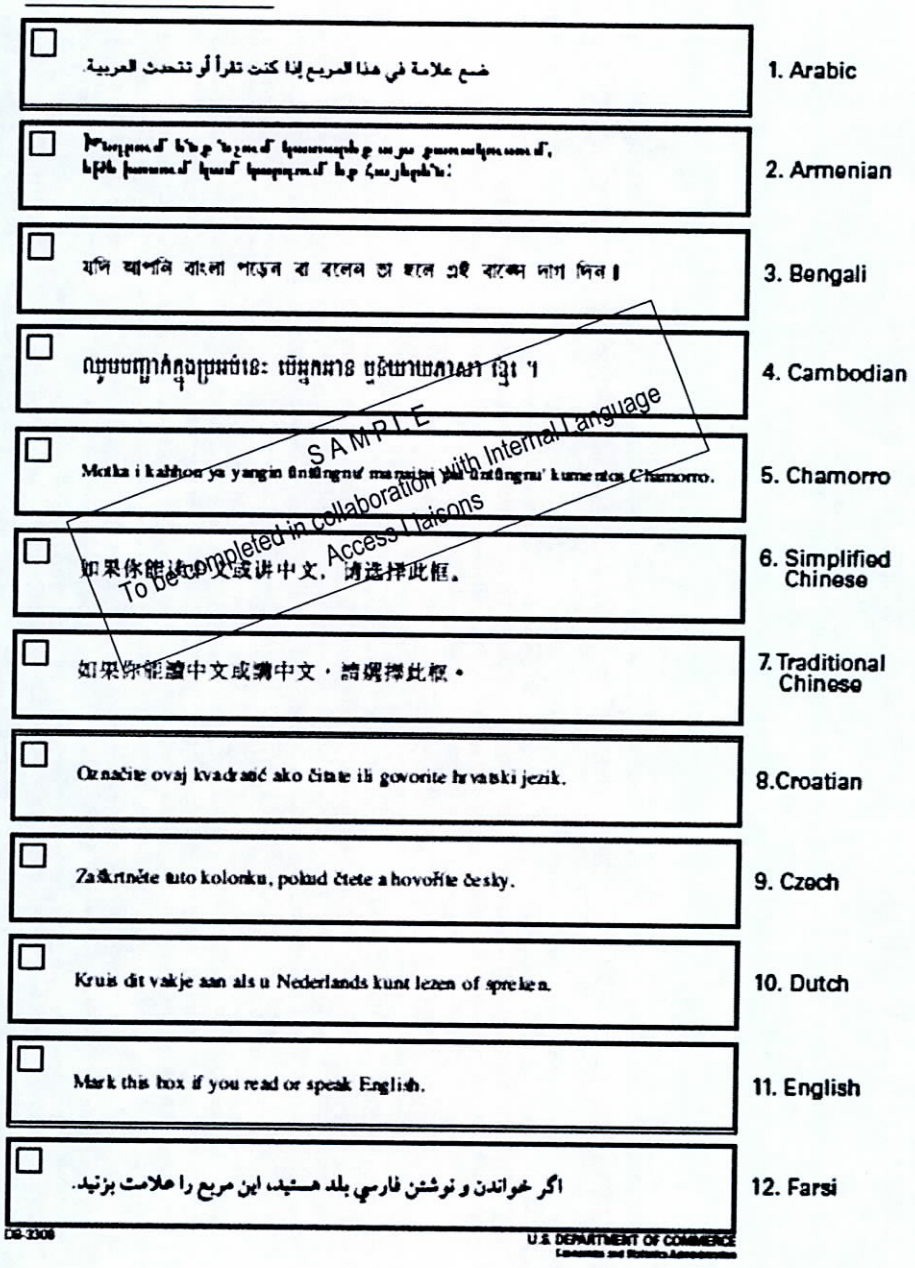
Exhibit B

Best Practice Research Table

PHA	Source	Structure	Top Languages	External Collaborations	ACOP & Admin Plan Translations
NY	NYCHA Language Access Services Implementation Plan	Language Access Unit (LAU) administered by the Department of Communications • In-house translations for 36 languages (6 staff translators, 220 employee volunteer bank, 35 employees certified language bank volunteers)	Spanish, Russian, and Chinese	Participating member of the Mayor's Office of Operations Language Council which is comprised of over 30 city agencies	Not translated
LA	HALA Limited English Proficiency Services Chapter 121:1	Director of Planning acts as the LEP Coordinator for the agency • Third party interpreters and translators • HR maintains list of employees certified as proficient in oral interpretation and/or written translation and are compensated for services	Top languages not identified	Undetermined	Undetermined
Boston	Boston Housing Authority LEP Policy	Director of Civil Rights and/or his/her designee, acts as its Language Access Coordinator ("LAC") • Language Access Unit established in 2000 • 3 full time staff and 1 intern	Spanish, Chinese, Haitian Creole, Vietnamese, Cape Verdean, Somali, Arabic and Amharic	Community organizations	Not translated
Houston	Houston Housing Authority LEP Plan	Legal Compliance Officer and/or his/her designee is responsible for ongoing updates of LEP analysis, related matters and providing ongoing LEP training • Maintains list of employees and languages spoken • Third party interpreters and translators	Spanish, Chinese and Vietnamese	Community organizations	Not translated
City of Chicago	Chicago New Americans Plan	Office of New Americans • Structure to be determined	Spanish, Mandarin, Hindi, Polish and Arabic	Mayor's Office Other City Departments Sister Agencies CBOs	N/A

Exhibit C

I Speak Card



SAMPLE
To be completed in collaboration with Internal Language Access Liaisons

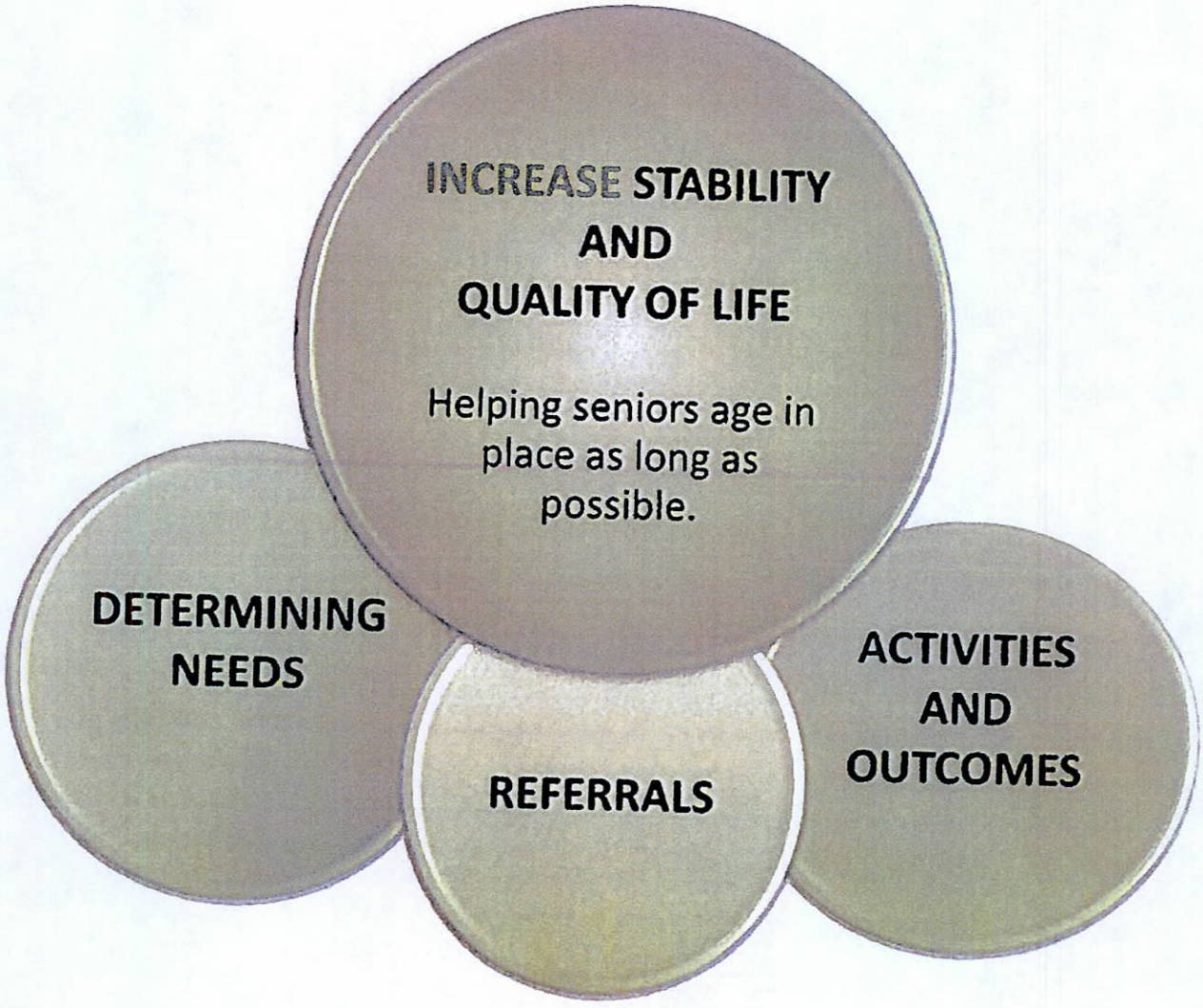
EXHIBIT XVII – 2016

Resident Service Coordination Program Guide

CHA
CHICAGO HOUSING AUTHORITY

CHA SENIOR SERVICES
RESIDENT SERVICE COORDINATION PROGRAM

PROGRAM GUIDE



NOVEMBER 2015
REVISED 12/28/2015

Table of Contents

Overview 4
RSC responsibilities: 4
Contact Information 4
Hours of Operation & Communications 6
Office hours 7
Telephone 7
Emergency Office Closures 7
Media Requests & Legal Requests 7
Changes in Personnel 7
Outreach 8
Consent to Services and Privacy Agreement and Emergency Contact Information 8
Determining Needs 8
Lawton Instrumental activities of Daily Living (IADL) Scale 8
Benefits Eligibility Checkup (BEC) 10
Referrals 10
Eviction Referrals 11
Activities/Outcomes 11
Health and Wellness Information 11
Caseload Changes 12
additions 12
Removals 12
Frail List 13
File Confidentiality 13
File Storage 13
Standard File Format 14
Program Support and Evaluation 14
Monitoring and Evaluation (M&E) 14
Reporting 15
Customer Service Chart 15
16

APPENDIX A : ADDITIONAL CHA STAFF OR REPRESENTATIVE

APPENDIX B : BENEFITS ELIGIBILITY PROGRAM

APPENDIX C : CHICAGO DFSS – 2015 SERVICE GUIDE

APPENDIX D : CHICAGO DFSS –SENIOR CENTER LOCATIONS

APPENDIX E : CITY OF CHICAGO – GOLDEN DINERS LOCATIONS

APPENDIX F : SENIOR CLINICAL REFERRAL PROCEDURES

APPENDIX G :TRACKING GRID

APPENDIX H : CHICAGO HOUSING AUTHORITY RECORDS MANAGEMENT POLICY

APPENDIX I : MAKING REPORTS TO ADULT PROTECTIVE SERVICES (APS)

APPENDIX J : VICTIM ASSISTANCE PROGRAM

FORMS

- CHA HEALTH PARTNERSHIP APPLICATION
- CHA SENIOR NEEDS ASSESSMENT
- CONSENT TO SERVICES & PRIVACY AGREEMENT
- EMERGENCY CONTACT INFORMATION
- EVICTION REFERRAL FORM
- HOMELESSNESS PREVENTION FORM
- FRAIL SELECTION FORM
- RELEASE OF INFORMATION
- RESIDENT SERVICE COORDINATOR CASE NOTE LOG
- SALESFORCE REQUEST FORM
- SIGN IN SHEET
- SENIOR SERVICES REFERRAL FORM
- VERIFICATION OF BENEFITS CHECK UP

Overview

Chicago Housing Authority's mission is to leverage the power of affordable, decent, safe, and stable housing to help communities thrive and low-income families increase their potential for long-term economic success and a sustained high quality of life.

The Senior Services Resident Service Coordination Program focuses on helping CHA seniors increase their quality of life. Resident Service Coordinators (RSCs) foster an environment conducive to aging in place that is welcoming to active seniors as well as those needing more support. Senior Services targets seniors age 62 and over. However, if residents age 55 to 61 request senior services, they will receive them and this will be counted toward senior services goals. *RSC's in FamilyWorks are to refer to the 2015 CHA FamilyWorks Program Guide for more information as some procedures may differ.*

RSC responsibilities

Assess needs of those seeking assistance and make appropriate referrals for services

- *Maintain daily availability for service requests.*
- *Conduct CHA standardized senior assessment with seniors who request assistance with securing services (e.g.; clinical, homemaker, chore services etc.), for those referred to the RSC because of a lease violation, and seniors with other presenting needs. Make appropriate referrals and linkages to services that meet the resident's needs and/or address their goals/interests.*
- *Follow up to determine if referrals have been effective.*
- *Document the assessment, referrals and follow up in CHA's Salesforce client tracking system.*

Create opportunities for increased activity (e.g.; health & wellness; social; educational)

- *Coordinate, at minimum, two activities per month: one social and one other.(e.g.; educational, health & wellness, safety, cultural)*
- *Create partnerships that benefit seniors (e.g.; health resources; recreational activities); establish on-going relationships with local agents/branches of public services (e.g.; Park District Supervisor; Chicago Police Senior Officer; DFSS Senior Center Director*
- *Coordinate with CHA Senior Services on CHA-wide events (e.g.; Summer Music Festival; Senior Holiday Luncheon; Mayor's Senior Fest)*
- *Provide monthly calendar reflecting the activities offered to senior residents.*
- *Documentation: Enter resident participation in Salesforce; enter event name (e.g. An Afternoon at the Opera), event type (e.g. field trip), and event detail (e.g. social event in Salesforce); maintain a binder with information on each activity/event (e.g. flier; sign-in sheet).*

Assure that senior residents are aware of the availability of services

- *Promote availability of services and events to all seniors on the caseload.*
- *Establish relationship and on-going communication with the property manager and resident leadership regarding Senior Services.*
- *Welcome new residents to the building and let them know where the office is located and the services offered.*
- *Note: It is ideal to do this at the monthly building meeting so that seniors can interact with neighbors in the building. This is also a good opportunity to collect emergency contact information.*

Other Requirements

ATTEND MONTHLY SENIOR SERVICES MEETINGS FOR PLANNING, INFORMATION AND TRAINING PURPOSES. ASSIST PROPERTY MANAGEMENT WITH MAINTAINING A FRAIL LIST AND CONDUCTING WELL-BEING CHECKS DURING EXTREME WEATHER AND /OR OTHER EMERGENCY SITUATIONS.

The CHA Senior Services Resident Coordination Program Guide is valid effective November, 2015. All previous Program Guides are considered void.

Questions regarding information contained in the Senior Services Program Guide for Resident Service Coordinators shall be directed to CHA's Senior Services staff.

Contact Information

Chicago Housing Authority
Resident Services
Senior Services Department

Andrew Teitelman, LCSW
Director of Senior Services and Health Initiatives
ateitelman@thecha.org
312-913-5842

Venis Frazier
Senior Services Supervisor
vfrazier@thecha.org
312-913-7696

Evelyn Almeida
Senior Services Coordinator
ealmeida@thecha.org
312-786-4054

For Clinical Support

Laura Gettinger, LCSW, RDDP
Assistant Director/Clinical Services
LGettinger@thecha.org312-786-3252

Senior Services Information Line
312-913-7164

Hours of Operation & Communications

Hours of Operation

Resident Service Coordinators are expected to have office hours between the hours of 8:00 AM – 5:00 PM Monday through Friday. **Office Hours must be clearly posted outside each office.** In addition, RSC's must demonstrate flexibility in serving individual residents on evenings and weekends, if necessary (e.g., an event takes place on a Saturday, an emergency situation due to weather or other building emergency.)

Telephone

Each RSC is required to have a telephone which is answered between the hours of 8:00AM – 5:00PM, Monday through Friday, and whenever there are publicly stated hours outside of this schedule (e.g. Saturday hours). When the RSC is away from his/her desk, a detailed voicemail including a timeframe for returning calls is acceptable. Each RSC must have a mobile phone when away from the office on business or field trips.

Office Closings During Business Hours

When the Resident Service Coordinator's office is not open (e.g. due to a holiday, special event, meeting/training) each senior building is to provide residents with an alternate phone number and provide a voice mail message with appropriate contact information. The outgoing message shall include a statement that if there is a medical emergency the caller dial 911. The senior building management shall notify CHA of closures five (5) days in advance or as soon as possible if due to an emergency. Closings shall be posted and the voice mail shall reflect the closing and emergency number and the next available date of office operation.

Emergency Office Closures

If there is an emergency (weather-related or other), Resident Service Coordinators must notify CHA prior to modifying office hours or closing a Resident Service Coordinator Office.

Media Requests & Legal Requests

All inquiries and requests for comment by media, research, and advocate groups *(e.g., Chicago Tribune, Business and Professional People for the Public Interest (BPI), Legal Assistance Foundation Requests (LAF)* regarding the Resident Services Coordination Program or any other CHA initiatives must be forwarded to the CHA's Communications Department: **(312) 786-6602 and to the Senior Services Supervisor (312-913-7696).** Agencies and Firms must contact CHA Communications Department **prior to the release of information** for research, media, or inquiries from advocate groups.

Changes in Personnel

All changes in personnel including but not limited to a new RSC, termination of an RSC, reassignments of an RSC must be reported immediately via email to the Supervisor of Senior Services at CHA and the Asset Manager, preferably with as much advance notice as possible. In the case of vacancies, a plan for coverage must be sent to the Supervisor of Senior Services and the Asset Manager. The plan must include the name(s) of the RSC who will provide the coverage, the days and hours of the coverage and how long the plan will be in effect.

Determining Needs (Senior Needs Assessment)

The Senior Needs Assessment (Assessment) is designed to evaluate a senior's need in order to recommend and refer services. Conduct an assessment for those who request assistance with securing services (clinical, homemaker, chore services, etc.) and for those referred by the property management company via a Referral and Disposition Report because of a lease violation.

CHA's standard senior needs assessment must be offered to all seniors in the building who present a need for services or who are referred by Property Management because of a lease violation. The senior needs assessment includes an assessment of needs and interests as well as the Lawton Instrumental Activities of Daily Living (IADL) scale, which helps to assess seniors' functional level by associating scores to areas such as mode of transportation, food preparation, and handing of finances. Resident Service Coordinators (RSC's) shall use the total score of the scale to make the most appropriate referral (e.g. to DFSS) for additional services.

A new assessment for a resident is only required when the resident has a change in need. *(e.g., several months after an assessment, a resident has a stroke and now needs homemaker services)*

If an initial assessment has already been conducted within the year and the resident has a new "service", then a new "referral" must be done for that resident. *(e.g., a resident received referral to DFSS and now would like to start going swimming at the Chicago Park District.) However if a resident's needs have significantly changed, a new assessment must be done. (e.g. a resident needs a live-in aide or homemaker after a major illness.*

An annual assessment is not required unless there is a resident need or a referral from the Property Manager (PM).

All assessments must be conducted in person and completed by the RSC. Assessments may not be completed by the resident and shall not be completed over the telephone. No areas on an assessment shall be left blank (mark N/A if a section is not applicable or if information is unknown).

All assessments must be entered into Salesforce. All fields marked as required must be completed. CHA will count all senior assessment records entered with a completion date. A print out of the completed assessment must be placed in the resident file. No signature required. *(Refer to Appendix for tracking grid)*

Please Note:

- *Before obtaining any information from a resident, a Consent to Services and Privacy Agreement must be completed. (refer to Forms – following appendix)*
- *If a resident refuses services after the RSC has received a referral from the property manager, a "Consent to Services and Privacy Agreement" form must be completed and placed in the resident file. (refer to Forms – following appendix)*
- *Assessments conducted as a result of a referral from property management must include a completed Resident Service Coordination Program Referral & Disposition Report. (refer to Forms-following appendix)*
- *When providing information such as phone number or address it is not necessary to conduct an assessment, however if the reason is because of a possible need, continue the conversation to determine if an assessment is needed.*

Emergency Contact Information

All residents must have a completed emergency contact information form in their file. The emergency contact information within the assessment must be completed for all residents. Emergency contact will only be contacted with prior written or verbal consent from the resident. *(Refer to Forms – following appendix)*

Lawton Instrumental Activities of Daily Living (IADL) scale

The Lawton Instrumental Activities of Daily Living Scale (IADL) is a research based instrument to assess independent living skills (Lawton & Brody, 1969). This tool is part of the senior assessment.

The IADL Scale assesses a person's ability to perform tasks such as using a telephone, doing laundry, shopping, transportation, food preparation, medication responsibility, housekeeping and handling finances.

When an IADL score is a 5 or lower, that triggers the need for a referral to DFSS for assessment and services. If the services needed are already in place, (or the resident refuses), you are not required to make the referral. However, while the resident may be receiving DFFS services, a follow up visit from DFSS may lead to additional services or a new level of the same service, if the situation has changed since the initial assessment. If a low score reflects danger due to inability to care for self, immediate action is required (911 or Adult Protective Services).

Note:
When using this tool with the resident, RSC's shall use a conversational interviewing approach rather than asking the questions verbatim. For example, if you have a resident that does not currently take medication, please ask in the conversation "Have you ever taken medication in the past and if so were you able to manage it on your own?" or "If you did have to take medication, would you be able to manage on your own?" If the answer is still they have never taken medication, please select "#1". There is no option to select for "no medication".

Benefits Eligibility Checkup (BEC) https://www.benefitscheckup.org

Benefits Eligibility Checkup is a free service used to assist **Chicago residents age 60 and older** to determine their eligibility for more than seventy city, state and federal benefits to which they may be entitled. These programs include:

- Taxes;
- Energy Assistance;
- Financial Assistance;
- Housing;
- Transportation;
- Health;
- Legal; and,
- Many Support Services

(Refer to Appendix B)

Conducting a Benefits Eligibility Checkup (BEC) is not mandatory however the opportunity to go through the BEC must be offered to each senior receiving an assessment along with an explanation about what it is and how it may be useful; the resident may accept or decline.

When a BEC is completed a "*Verification of Benefits Check Up*" form must be completed and placed in the resident file. *(Refer to Forms-following appendix)* All BEC's must be completed within 30 days of original date of assessment. If this does not happen, case notes must provide the reason(s) why.

Referrals

Referrals are in reference to contacting an external agency for services (e.g. DFSS; Distribution Programs, Chicago Park District) and not for any internal services such as attending bingo or going to the computer lab. All referrals made must be entered in Salesforce and require either a CHA referral form or Salesforce printout to be placed in the resident's file. The resident must always receive a copy of the completed referral form.

All senior referrals require follow-up, so always enter "Yes" for *Follow-Up Needed*. If resident is successfully contacted for follow-up, enter *Successful Follow-Up Date*, even if the resident has not received the service. If resident is not reached after three follow-up attempts, enter *Final Unsuccessful Follow-Up Date*. Once the RSC is no longer following up (either because the resident was successfully contacted or because the resident was not contacted after three attempts), enter the appropriate response for *Did Resident Receive Services* field. Case notes must show evidence of at least three follow-up attempts. *(Appendix G tracking grid)*

Eviction Referrals

An Eviction Referral Form shall be completed when a resident is served a termination notice. This form does not stop the eviction process but it allows time to report to the Department of Family and Support Services (DFSS) and the Cook County Sheriff Department so that alternative housing is offered for a senior 62+ for homelessness prevention. All Eviction Referrals must be forwarded via email to vfrazier@thecha.org as soon as the RSC is notified of an impending eviction. *(Refer to Forms – following appendix)*

If the resident being evicted is under 62 years of age, you shall complete a Homelessness Prevention Form and return to Christoria Franklin, CHFrankl@thecha.org for processing. (Refer to Forms – following appendix)

Activities/Outcomes

RSCs are required to host at minimum, one social activity/event and one "other" activity/event per month. The minimum compliance requirement is five senior social activities/events and five senior "other" activities/events during the five-month review period. Other suggested activities/events can include education, health/wellness, or other types of supportive services. Verification to support coordinated activities/events must include a flyer, monthly calendar, and a sign-in sheet must include the resident's signature and apartment number. All event documents shall be stored in a 3-ring binder by event type then separated by month and arranged in chronological date order, most current on top.

All activities and events must be entered in Salesforce. Each record must include the following information after the resident has attended a senior event:

- **EVENT NAME**
- **EVENT DATE**

A monthly calendar is required to be submitted to Senior Services Coordinator Evelyn Almeida via e-mail at ealmeida@thecha.org. The calendar must indicate all planned resident activities, field trips, meetings etc. A brief description of the event is required at the bottom the calendar. Calendars are due no later than the last day of the month for the upcoming month. (e.g. May calendar is due on or before April 30th.)

Exception:
Large scale, reoccurring services offered by partners such as Catholic Charities Commodity Box Program, Chicago Greater Food Depository etc. do not require an entry in Salesforce or a case note. A master binder shall be maintained for each of these services to include the participant information, sign-in sheets and other supporting documentation for the program. These services shall also be included in the monthly/quarterly reports. Please contact the Senior Services Supervisor in writing if you have other exceptions to be considered.

Health and Wellness Information
CHA strives to develop partnerships with both government and private health organizations to keep informed about important health issues, strategies and programs. Recent examples have included the Affordable Care Act implementation, smoking cessation resources, and asthma intervention. CHA will share relevant information, resources and updates it receives regarding resident health and health care coverage and will ask that the RSC's inform residents accordingly.

Caseload Changes
As residents move and change throughout the year, there will be additions and deletions to the caseload. The RSC must maintain an updated list of all residents and an updated list of all frail residents. These lists must be updated monthly.

Additions
New residents will be added regularly. RSC's will reach out to welcome new residents to the building and let them know where the office is located and the services offered. *This can be done by having a monthly Meet and Greet (if there are new tenants) or designating part of the monthly resident meeting as a welcome to new tenants and giving an information packet of what the RSC office has available.*

A Salesforce Request Form must be completed and submitted to Evelyn Almeida ealmeida@thecha.org for any changes to the caseload in Salesforce. *(Refer to Forms – following appendix)*

Monitoring and Evaluation (M&E)

Resident Services' Quality Assurance Monitoring Team will conduct Monitoring and Evaluation (M&E) on-site file reviews of each property management firm a minimum of two times per year. These M&E reviews will include examining the operation of the facility, development of quality systems, and file documentation that supports outcomes recorded by Resident Service Coordinators for participants residing in CHA senior properties. Program monitoring for senior case files and documentation may occur more frequently if the agency is in default of contract. Lack of acceptable progress toward file documentation may include being placed in default. Senior property management firms may appeal M&E results within five (5) business days, excluding Saturdays, Sundays, and legal holidays, upon receipt of the feedback report.

Senior Services Monitoring & Evaluation Rate Action Chart

As part of CHA Resident Services' Monitoring and Evaluation procedures, Quality Assurance staff will determine the rate by reconciling the Contractor's files with the records entered into CHA's case management database (Salesforce.com). After the conclusion of a file review, CHA will proceed in accordance with the following criteria/chart:*

Level	Rate	Action
Compliant/Meeting expectations	85-100%	No action.
Compliant/At Risk of falling below expectations	75-84%	No action needed; however, a decrease in performance may result in default of contract.
Non-Compliant/ Default	75% or less	In default of contract. Firm must correct.

Reporting

Quarterly Reports

RSC is responsible for entering data into Salesforce on a timely basis. Monthly data must be entered by the 10th business day of the following month. CHA Senior Services will pull reports from Salesforce to review the program at each building. In addition, RSC will complete a "leverage" report each quarter, indicating the number of external partners and the dollar value of the services the partners provided CHA residents.

Quarterly reports are due on the 10th day of the month following the end of a quarter (i.e. April, July, October, and January). If the 10th falls on Saturday or Sunday, the reports are due on the Friday before.

Customer Service (3.1 of PPM Procedure Manual)

The following diagram illustrates the customer service standards that should be followed by all employees of the Property Management Company when interacting with residents:

This chart outlines the descriptions of the five standards shown above:

STANDARD	DESCRIPTION
Accessibility	Available and welcoming to all customers via phone, in person, or electronically
Courtesy	Behaving in a respectful and polite manner that considers the customer's situation and perspective
Professionalism	Being knowledgeable, appropriately dressed, and articulate with customers
Responsiveness	Promptly reacting and taking the appropriate actions to resolve this customer's issue
Reliability	Providing accurate information and effective solutions to customers' issues