

## Department of Children and Families

### Language Access Plan

May 2023

#### **I. Introduction**

The Department of Children and Families ("DCF" or "the Department") has developed this language Access Plan ("LAP" or "Plan") to define the actions DCF must take to ensure meaningful access to agency services, programs, and activities on the part of the persons who have Limited English Proficiency ("LEP"). DCF reviews and updates this LAP at least every two years to ensure continued responsiveness to community needs.

#### **II. Purpose**

The purpose of this plan is to ensure LEP clients have full access to agency services, programs and activities. Consistent with the guidance of ANF Administrative Bulletin #16 as updated on March 20, 2015, a Limited English Proficient person is someone who self-identifies as a person who is not fluent in speaking, reading, writing, or comprehending English with providers and staff. In addition, it can include staff who indicate limited fluency in speaking, reading, writing, or comprehending English so they can understand employment benefits, internal processes, and similar matters. Clients have the right to self-identify as a LEP person.

#### **III. Agency Description**

The Department ended FY2022 serving 24,593 families involving 86,453 children and adults: 41,263 children (0-17), 2,194 young adults (18 & older) and 42,996 adults. White, Hispanic/Latinx and Black children and adults account for the most consumers served by the Department. English is the primary language spoken amongst consumers, with Spanish being the next most prevalent language.

The Department of Children and Families strives to protect children from abuse and neglect and, in partnership with families and communities, helps ensure that children are able to grow and thrive in a safe and nurturing environment. We believe all children have the right to grow up in a home free from abuse and neglect, with access to food, shelter, clothing, health care, and education. As an organization, we work toward establishing the safety, permanency, and well-being of the Commonwealth's children by:

- providing support and services to stabilize and preserve families when it is safe to do so;

- providing quality temporary alternative care when necessary to keep children safe from harm;
- working to safely reunify families, when appropriate; and
- when necessary, creating new families through kinship, guardianship, or adoption.

#### Agency Core Practice Values

DCF's Core Values are anchors that ground our practice. DCF is committed to making these values more than words on paper. By strengthening the links among the Department, families, and communities, DCF will move closer to service delivery systems that reflect the core values listed below. With child and family safety at the heart of our work, we believe that:

- building parental capacity and family resilience, whenever possible, helps keep children safe and reduces trauma;
- collaborating with youth, families and community partners helps us achieve our mission;
- promoting cultural humility and culturally responsive case practices, and committing to diversity, equity and inclusion will help reduce disparities and lead to better child and family outcomes; and
- engaging in continuous learning and continuous quality improvement (CQI) is a core strategy to achieve our mission.

Services are currently delivered statewide from the Department's Central Office as well as the 5 Regional and 29 Area Offices across the Commonwealth, as described below:

1. Central Office, 600 Washington Street, 6<sup>th</sup> Floor, Boston, MA 02111 (617) 748-2000
2. 5 Regional Offices:
  - Western Regional Office, 200 Front Street, Holyoke, MA 01040
  - Central Regional Office, 5 Brussels Street, Worcester, MA 01609
  - Northern Regional Office, 280 Merrimack Street, Lawrence, MA 01843
  - Southern Regional Office, 110 Mulberry Street, Brockton MA 02302
  - Boston Regional Office, 1785 Columbus Ave, 5<sup>th</sup> Floor, Boston, MA 02119
3. 29 Area Offices strategically located within the 5 regions. These locations are the main business points of contact with the client population. Contact information for each office can be located here: [www.mass.gov/orgs/massachusetts-department-of-children-families/locations](http://www.mass.gov/orgs/massachusetts-department-of-children-families/locations)
4. Child-At-Risk Hotline 1-800-792-5200
5. Website address: <https://www.mass.gov/orgs/massachusetts-department-of-children-families>

In addition to the contact between consumers and DCF staff in the area offices, DCF direct service staff most often meet families in their homes, visit children in foster and pre-adoptive homes and in the Department's contracted congregate care facilities. Other points

of contact take place in the community, courts, schools, day care centers, medical facilities, service provider agencies and other locations in the community as appropriate.

#### **IV. Language Access Plan**

##### **1. Agency Language Access Coordinator**

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Executive Office of Health and Human  
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##### **2. Agency Language Access Needs Assessment**

DCF strives to ensure that LEP identified individuals or persons seeking services have equal access to programs and services regardless of preferred language spoken or English proficiency.

Effective communication by social workers and DCF staff at all levels is imperative, so that consumers may receive services that are accessible as well as culturally and linguistically responsive. To that end, DCF continues to use a combination of approaches throughout the service process from intake, information and referral, assessment, action planning, service delivery and coordination to case resolution. This includes assignment of bilingual staff, securing both telephonic and in-person interpretation services when bilingual staff are unavailable, providing information translated into the language requested by LEP individuals or persons, contracting with providers who commit to meaningful language access and collaborating with community stakeholders so that individuals can be referred to bilingual services in the community.

The uniquely personal and sensitive nature of our mission requires DCF to create working relationships wherein children and families feel safe and supported regardless of their cultural background or linguistic capabilities.

#### **Language Makeup of Client Population: Data**

The Department's Annual Report contains statistical tables and graphs which provide a demographic description of DCF consumers and foster care providers as well as information regarding child maltreatment and performance and outcome metrics.

At the end of FY2022, the vast majority of consumers open in a DCF case were primary English speakers. The next most commonly identified primary language was Spanish.

Primary Language FY2022	Children (0-17)		Young Adults (18 & Older)		Adults	
American Sign Language	14	*	-	*	38	*
Arabic	34	*	1	*	61	*
Cape Verdean Creole	94	*	6	*	240	1%
Chinese	21	*	4	*	75	*
English/Unspecified^	38,333	93%	1,870	85%	36,407	85%
French	-	*	1	*	30	*
Haitian Creole	121	*	24	1%	308	1%
Khmer (Cambodian)	17	*	-	-	68	*
Polish	3	*	-	-	8	*
Portuguese	331	1%	19	1%	718	2%
Russian	26	*	1	*	40	*
Spanish	2,079	5%	214	10%	4,286	10%
Vietnamese	12	*	3	*	58	*
Other	164	*	51	2%	659	2%
<b>Total Consumers Fiscal Year End</b>	<b>41,263</b>	<b>100%</b>	<b>2,194</b>	<b>100%</b>	<b>42,996</b>	<b>100%</b>

\*Less than 1% after rounding.  
English).

^English may be overcounted (i.e., i-FamilyNet Primary Language selection defaults to

The preferred language of consumers is not a mandatory field currently. During this LAP cycle, the Department will convert this field from optional to mandatory so that more comprehensive data can be collected for LEP DCF consumers.

### 3. Language Resources Assessment

The Department ensures meaningful language access to its consumers through a combination of bilingual staff, contracted interpretation and translation services, ensuring vendors with whom DCF contracts provide language access services, and, in collaboration with community stakeholders, identifying bilingual services in which to refer consumers.

#### Bilingual Staff

It is a priority for the Department to recruit and hire bilingual, bicultural staff to work more effectively with families served by DCF. This includes a focus on increasing DCF staff diversity and inclusion at all levels, through recruitment, improved retention, and promotional opportunities.

One of the strategies that the Department employs to recruit and retain staff who reflect the diversity of the areas that they serve and to meet families' cultural and linguistic needs is the use of a differential pay scale. Bilingual social workers and social work technicians receive differential pay for carrying a caseload/workload with a significant number of LEP consumers that speak the

language in which the staff person has proficiency. Approximately 30% of the total Department staff is bilingual.

The Department has some direct service employees who are proficient in ASL. In order to augment access to ASL speakers, the Department has executed a Memorandum of Understanding ("MOU") with the MA Commission for the Deaf and Hard of Hearing (MCDHH) for referral services during business hours to provide ASL interpreters for these families.

### **Interpreter and Translation Services**

#### **(a) Interpreter Services**

When bilingual staff are not available, DCF staff have 24/7 access to interpreter service to provide culturally and linguistically accessible and responsive direct services to families. In early 2019, the Department introduced telephonic interpretation services, available 24/7 via a toll-free number that provides access to 200 languages typically within 30 seconds, procured through the Commonwealth's statewide contract. In addition, in April 2020, DCF added video interpretation services available in 22 languages. Social work staff have been trained on how and when to access interpreter services.

For deaf and hard of hearing consumers, DCF utilizes the interpreter services through the MCDHH. Funding for MCDHH interpreter services is managed centrally.

#### **(b) Translation Services**

The Department's review of vital documents to determine which need translation is ongoing.

DCF has translated key documents into the six most requested languages (Spanish, Portuguese, Haitian Creole, Cape Verdean Creole, Chinese, and Vietnamese), including:

- Family Guide to Protective Services for Children<sup>1</sup>
- General and HIPPA Releases
- Family Assessment template<sup>2</sup>
- Notice Response Family Letter<sup>3</sup>
- Notice to Kin Entering Placement<sup>4</sup>
- Support Open Letter

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<sup>1</sup> Also available in Arabic, Khmer and Russian.

<sup>2</sup> According to DCF data, in 97.8% of the applicable foster care reviews that took place during FY2021, the family action plan was written in the family's primary language.

<sup>3</sup> Also available in Arabic, Khmer and Russian.

<sup>4</sup> Not yet available in Chinese or Cape Verdean Creole.

- Unsupport Notification Letter
- Adoption Case Closing Letter<sup>5</sup>
- Case Closing Letter with Fair Hearing Rights<sup>6</sup>
- Fair Hearing Scheduling letter/Information about the Hearing
- Fair Hearing Guidelines – Virtual Hearing

Many of DCF's translated documents are available on its intranet page. In addition, social workers can request translation of case-specific documents, such as the Family Assessment and Action Plan, from the Department's contracted translation providers. The DCF intranet also serves as a forum for social workers to ask their colleagues directly for additional translated forms (or how to obtain translation for a particular document). This dialog allows workers to share helpful resources and allows the agency to learn what documents and forms are the priority for future translation.

During this LAP cycle the Senior Diversity, Equity and Inclusion Manager will continue to review which vital documents need translation as well as identify more general information about Departmental practice, services and activities that should be translated to assist both consumers and foster parents in communicating with the Department.

### **Vendor Services**

#### **(a) Lead Agency Model**

When a social worker requests services for a family with LEP, they request services in the family's preferred/primary language. The Department utilizes a Lead Agency model to match provider services with client needs which allows for services to be more accessible and appropriate for client needs. For consumers with Limited English Proficiency, the social worker requests the service through the Lead Agency to be provided in the preferred language of the client. The Lead Agency then checks provider resources within the geographic area to find and match a clinician or treatment provider that is bilingual in the language of the consumer.

DCF has contracts with providers who have the capacity to provide counseling and other client services in the preferred language of the client, including community based and congregate care providers that serve linguistic communities. This is particularly true for community-based providers who serve specific cultural and linguistic communities.

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<sup>5</sup> Not yet available in Vietnamese.

<sup>6</sup> Not yet available in Vietnamese.

#### **(b) Family Resource Centers**

Family Resource Centers (FRCs) have been serving local communities since their inception in 2015. Currently, there are 32 FRCs with at least one located in each of the 14 Massachusetts Counties. FRCs are community support programs procured through DCF and staffed by people from the communities in which they live, who provide parenting education programs, support groups, recreational activities and help parents and children connect to needed services in their community. Two thirds of the FRCs have bilingual staff embedded in their programs and one quarter of the programs offer bilingual groups at the FRC based upon the linguistic needs of the communities they serve, which DCF consumers can access.

#### **(c) Child-At Risk Hotline: After Hours Services**

The Child-At-Risk Hotline provides after-hours access for the community to report suspected child abuse and neglect. The Hotline service is provided by a vendor whose employees take reports regarding allegations of child abuse or neglect by phone and make determinations on whether an emergency investigation is warranted. The Hotline vendor has some bilingual capacity among the staff (screeners and supervisors) to communicate with reporters in Spanish and Haitian Creole. The Hotline is staffed in shifts to cover nights, weekends, and holidays and has access to a Telephonic Language Line vendor, as required by its contract.

Deaf and hard of hearing consumers and reporters that call the Hotline use MA Relay Services or a TTY line. The call comes into the Hotline as a regular phone call. There is an operator that facilitates these calls.

The Department utilizes on-call DCF social work staff to conduct emergency child abuse investigations during hotline hours which includes a list of bilingual DCF employees who are willing to be contacted after hours for interpretation and translation, including staff with ASL ability. These employees are also available to the Hotline investigators just for interpretation. Any DCF employee who responds during hotline hours, whether to investigate or interpret, is paid a hotline rate for reimbursement.

#### **(d) Leveraging the Procurement Process**

The Department is committed to ensuring our providers provide culturally competent and accessible services to families and children and will leverage our purchasing power to do so.

In two recent procurements, the Child-At-Risk-Hotline procured in 2019 and the Department's Congregate Care Provider Network procured during 2021, the Department stated with specificity a requirement of its contractors to serve LEP individuals.

The Child-At-Risk-Hotline is required to have the capacity to receive calls and provide responses professionally and timely from non-English speaking reporters or from those with limited English proficiency.

The Congregate Care Network Procurement has a section devoted to linguistic competency, which requires that providers communicate with youth and families utilizing American Sign Language (ASL), Communication Access Realtime Translation (CART), as well as provide professional interpreting services whether in person, telephonic or video in the absence of a staff person who is fluent in the preferred language of the youth or family and coordinate with DCF in securing interpreter services for a low prevalence language or dialect, or for communication services that are difficult to secure.

In October 2021 the Department posted a Request for Information (RFI) regarding its Support and Stabilization Services. A section of the RFI is devoted to cultural and linguistic competency and solicits strategies which can be used to meet the diverse language needs of families to ensure that language access is provided to families in a timely manner, to determine what barriers exist, if any, for families with diverse language needs to receive services, and to identify suggestions for overcoming barriers so that the reprocurement of support and stabilization services, slated to occur in FY24, ensures timely and meaningful language access to the consumers that DCF serves.

In CY 22, the Department reprocured its telephonic and video interpretation services, in person interpretation services and translation services which has provided an additional opportunity to continue to provide quality language access, and increasing our total number of vendors on contract from 8 to 15. Updated instructions to access interpretation and translation services have been distributed and are available to staff via the DCF language interpretation and translation service page on the DCF intranet.

#### (e) Collaboration with Community Stakeholders

The PATCH Offices:

Four DCF social work units are strategically embedded in the communities of Dorchester, North Quabbin, New Bedford and Lawrence. These sites were selected based upon a Community Connection Coalition and a DCF Regional and Area Office having a strong relationship. The PATCH sites partner the neighborhood prevention work of the Community Connections with the child protective case practice of DCF social workers so that families can be connected to community resources more quickly, including resources that meet the linguistic needs of DCF consumers.



#### **4. Language Service Protocol**

##### **Administrative Procedures for Accessing In-Person Interpreter Services**

Social workers access the in-person language interpreter services with their supervisor's approval. Upon the social worker identifying the need for language interpreter services based on the family's preferred language, the worker contacts the vendor. The newly procured in-person interpreter services requires more stringent turnaround times. The vendor must respond to the request and confirm availability within 60 minutes of the call being placed by DCF staff and provide an interpreter within 24 hours after DCF places the request. Interpreters must be available, at a minimum, Monday-Friday, 9 am-5pm.

##### **Administrative Procedure for Telephonic Interpreter Services**

Each Area Office or selected Central Office Unit has been provided with a unique "Customer Code" assigned by Lionbridge, the Department's current vendor. The customer code identifies which location is utilizing these services for both billing and reporting purposes.

- In a non-emergency situation Area Office staff submits an Interpreter Request Form to the Area Administrative Manager (AAM) to access the Telephonic Interpretation.
- In an emergency (including but not limited to screening a 51A, conducting responses) staff can access the telephonic interpretation by dialing the 1-800 vendor number and follows up with the AAM after the service has been accessed to provide the information contained on the interpreter request form.

##### **Administrative Procedures for Translation of Vital Documents**

The Department has ensured the translation of vital documents into the six most commonly spoken languages, as noted above. Departmental staff access translation of vital documents via a request to the Department's Assistant Commissioner of Program Support who arranges for the document to be translated to the OSD approved contractor.

In addition, documents provided to consumers in conjunction with the Department's work with the family (such as action plans) are translated on an individual basis at the area office level, via a request to the contracted vendor for document translation.

## **Administrative Procedures for Accessing ASL Services**

When a need for interpreter services is identified by DCF social workers, a request for interpreter services is submitted to MCDHH through an online form. If emergency interpretation services are required, MCDHH has an emergency request telephone number. MCDHH contacts the social worker when an assignment has been confirmed or if there is a need to negotiate another date/time. MCDHH will determine if more than one interpreter is needed.

### **5. Stakeholder Consultation**

The Steering Committee of DCF's Racial Equity Workgroup, MCDHH, and the Office of Refugees and Immigrants were consulted during the development of this Plan. During this LAP cycle, the Department will identify additional stakeholders to provide feedback on the LAP.

### **6. Staff Training**

The ability to collaborate with families is dependent upon the Department's use of language to create understanding and agreement. The Department stresses this fact deeply during the new worker training series because it is vital for social workers to hold it as a value in their work. The Senior Diversity, Equity and Inclusion Manager includes information regarding available translation and interpretation services in training provided at all levels: new social workers, supervisors, and managers. All newly hired social workers are required to attend New Social Worker Pre-Service Training. This training includes a module on Equity Mindful Practice which in part discusses accessing supportive services in the family's preferred language. The curriculum for new supervisors and managers includes a presentation where the topics of cultural humility, disabilities, and accommodations as well as language access in the workplace is covered and the language access plan is distributed.

During this LAP cycle the Department will create an eLearning on the Language Access Plan and process by which interpretation and translation services are accessed. The Language Access Plan is posted on both the Diversity Page of the Intranet as well as the New Social Worker Preservice Training Page where all training curriculum is located. To reinforce learning and communication materials, the Language Access Protocols will be presented at staff meetings across all area and regional offices as well as Central Office.

Language access training priorities include:

- the development and use of an interactive training on the Language Access Plan for all staff.
- training in conjunction with the re-procurement of

- contracts with interpreter and translation services which occurred CY22.
- training on determining an individual's preferred language in conjunction with converting the language field in iFamilyNet from optional to mandatory.

## **7. Notice to Public**

A language access notice is posted on the DCF website which details how an individual can file a language access complaint. The DCF Language Access Plan is included as a link on the language access page. The Department also has posted signage notifying consumers that they have the right to interpretation services at no cost in each area office.

## **8. Agency Monitoring**

A key element to an effective Language Access Plan is to monitor the plan. To that end, the Departments' Continuous Quality Improvement Unit will include in its case review process a series of questions to assess whether staff is providing meaningful language access to LEP consumers.

The Department has created and hired a full-time civil rights compliance coordinator, separate and distinct from the Senior Diversity, Equity and Inclusion Manager assigned to DCF. This staff member will work closely with staff in the Office of the Ombudsman to help resolve complaints made by DCF consumers to address concerns raised by parents, caregivers and others involved in DCF matters as it pertains to complaints of discrimination, including language access.

In summary, during this LAP cycle, the Department will:

- Convert the "preferred language" field in iFamilyNet from optional to mandatory so that more comprehensive data can be collected for LEP DCF consumers.
- Conduct training on determining an individual's preferred language in conjunction with converting the language field in iFamilyNet from optional to mandatory.
- Continue to review which vital documents need translation as well as identify more general information about Departmental practice, services and activities that should be translated to assist both consumers and foster parents in communicating with the Department.
- Ensure ongoing training occurs regarding the newly procured interpreter and translation services which occurred in CY22.
- Identify additional stakeholders to provide feedback on the LAP.
- Present the Language Access Protocols at staff meetings across all area and regional offices as well as Central Office.
- Develop and use an interactive training on the Language Access Plan for

all staff.

- Ensure that signage notifying consumers that they have the right to interpretation services at no cost continues to be posted in each area office.
- Conduct a sampling of reviews of individual cases on a routine basis to assess whether staff is providing meaningful language access to LEP consumers by the Departments' Continuous Quality Improvement Unit.
- Utilize the newly hired full-time civil rights compliance coordinator, to help resolve complaints and address concerns raised by parents, caregivers and others involved in DCF matters as it pertains to complaints of discrimination, including language access.

## **9. Complaints**

### **Language Access Complaint Procedure:**

Individuals may file a complaint with the DCF Office of the Ombudsman or the Office of Access and Opportunity if they believe they have been denied the benefits of this plan. The complaint must be filed within 6 months of the alleged denial. The complaint must be in writing. To file a complaint with the Civil Rights Compliance Coordinator, individuals must submit the written complaint to:

Office of the Ombudsman  
Department of Children and Families  
600 Washington Street, 6<sup>th</sup> Floor  
Boston, MA 02111

Email address:

To file a complaint with the Office of Access and Opportunity, the written complaint must be submitted to the attention of:

Office of Access and Opportunity  
Executive Office of Administration and Finance State House, Room 373  
Boston, MA 02111

## 10. Approvals



Robert Arnáu  
Senior Diversity, Equity, and Inclusion Manager  
Executive Office of Health and Human Services

Date: 5/19/2023



Linda S. Spears  
Commissioner  
Department of Children & Families

Date: 5/19/2023



Secretary Kathleen E. Walsh  
Executive Office of Health and Human  
Services

Date:

