

**Department of Children and Families**  
**Language Access Plan**  
**2019 - 2021**

**I. Introduction**

The Massachusetts Department of Children and Families has prepared this Language Access Plan (“LAP” or “Plan”), which defines the actions to be taken by DCF to ensure meaningful access to agency services, programs, and activities on the part of persons who have Limited English Proficiency (“LEP”). The Department will review and update, on a bi-annual basis, this LAP in order to ensure continued responsiveness to community needs and compliance with the Executive Office of Administration and Finance (“ANF”) Administrative Bulletin #16.

**II. Purpose**

The purpose of this plan is to ensure that DCF clients, who are limited in their English language proficiency, have access to meaningful services, programs, and activities.

The Department views this Language Access Plan as an important response to ensure we meet our LEP clients’ service needs. The Plan is consistent with the requirements of Administrative Bulletin #16, as promulgated by the Executive Office of Administration and Finance.

Consistent with the guidance of ANF Administrative Bulletin #16, a Limited English Proficient person is someone who is not able to speak, read, write, or understand the English language at a level that allows him/her to interact effectively with DCF staff and/or service providers. The client maintains the right to self-identify as a LEP person.

**III. Agency Description and Language Access Plan Vision**

**A. Mission, Vision, and Values**

**Mission and Vision Statement:**

The Department of Children and Families is charged with protecting children from abuse and neglect and strengthening families in which child abuse and neglect have occurred. With the understanding that every child is entitled to a home that is free from abuse and neglect, DCF’s vision is to ensure the safety of children in a manner that holds the best hope for nurturing a sustained, resilient network of relationships to support the child’s growth and development into adulthood.

**Agency Core Practice Values:**

The Department’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 between the Department, families, and communities, DCF has moved closer to service delivery systems that reflect the core values listed below:

- Child-driven
- Family-centered
- Community- focused
- Strength-based
- Committed to diversity and cultural competence
- Committed to continuous learning/ continuous quality improvement (“CQI”)

## B. DCF Diversity Vision and Goals

### Agency Diversity Vision:

DCF recognizes that issues of identity and diversity are central to children’s welfare and that, to succeed, any comprehensive plan on identity and diversity must be grounded deeply in our work to protect children and support families. As a result, the agency’s diversity vision goes beyond workforce demographics to encompass our connections with families, communities, and providers. 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.

### Agency Diversity Goals:

DCF seeks to heighten awareness of diversity issues in order to create a learning environment that respects and embraces cultural, racial, ethnic, language, religious, sexual orientation, gender, physical and other differences represented in both our workforce and the families we serve.

### Priority Objectives:

Safely stabilizing and preserving families; safely reunifying families; and safely creating new families through kinship, guardianship and adoption.

### Programs and Services

The Department provides a wide array of services through the following core programs:

- Adolescent Services
- Adoption/Guardianship
- Domestic Violence Services
- Housing Stabilization
- In-Home Supports
- Out of Home Placements

### Activities to Support the Mission of the Department include:

- Case Management
- Investigations of Child Abuse Reports
- Initial Family Assessments
- Comprehensive Family Assessments
- Service Planning
- Service Referral

- Foster and Adoptive Parent Recruitment and License Studies
- Placement Support
- Continuous Monitoring and Evaluating of Access to Service and Service Delivery

There are currently more than 10,700 children in foster care across Massachusetts and more than 47,000 children in all served by the Department. As of December 31, 2018, a total of 96,360 individuals (adults and children) were being served by DCF. The Department is committed to safely maintaining children in their homes and has worked diligently over the past several years to reduce the number of children requiring placement.

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

The DCF Language Access Plan shall be fully implemented subject to the availability of fiscal resources to implement said language access plan. This Language Access Plan has been developed to adhere to the Language Access Guidelines of ANF Administrative Bulletin #16. This Language Access Plan represents the DCF administrative blueprint to provide meaningful access to DCF services, programs, and activities on the part of LEP individuals. This Language Access Plan outlines the tasks DCF will undertake to meet this objective.

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

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 Diversity Officer/ADA Coordinator  
 Department of Children and Families  
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##### **2. Agency Language Access Needs Assessment**

- A. The Department is committed to ensuring equal access for all DCF consumers to programs and services regardless of preferred language spoken or English proficiency. The Department will make every effort to provide application forms, notices, letters, service plans, and other documents intended for consumers and family resources, in the individual's preferred language, if possible.

The Department uses numerous forms, notices, and letters to communicate with consumers, providers, and mandated reporters. The Department's Family Guide to Protective Services for Children, General and HIPPA Releases, Support/Unsupport letters, and many other documents have been translated into the six (6) most requested languages: Spanish, Portuguese, Haitian Creole, Cape Verdean Creole, Chinese, and Vietnamese. All versions are available on the DCF Intranet Diversity Page.

The Department is in the process of reviewing all forms and letters to consumers to bring them in line with current DCF policies.

## **B. Language Makeup of Client Population**

The Department uses a child welfare information system called iFamilyNet. iFamilyNet is a statewide automated child welfare information system that was implemented in February 1998, and continuously upgraded. This management information system is used for virtually all DCF activities including intake, investigation, assessment, clinical/case management, foster care, adoption, financial, legal, and provider services. DCF staff enters case information directly into the central iFamilyNet database from their desktop computers and/or mobile devices. The aggregate and consumer-specific data available from this database via reports, extracts, and direct (on-line) access enables DCF to efficiently manage its resources to meet the needs of its clients.

The DCF Quarterly Reports contain statistical tables and graphs which provide a demographic description of DCF consumers and foster care providers as well as placement dynamics, case openings, adoption/guardianship subsidies, child maltreatment reporting, and District Attorney referrals.

For the FY 2019 second quarter, the Department reports the following findings regarding the preferred language of consumers:

### **Preferred Language of Consumers (DCF quarterly reports FY 2019, 2nd quarter)**

- The Western, Northern, and Boston regions had the highest proportions (and numbers) of Spanish speaking consumers, 5% (1617 consumers), 6% (1799 consumers), and 8% (1376 consumers) respectively. Spanish was the preferred language of most LEP DCF consumers. Other languages and their regions of highest prevalence were Portuguese (Northern, Southern, and Central), Haitian Creole (Northern, Southern, Central, and Boston), Cape Verdean Creole (Southern and Boston), Vietnamese (Southern, Northern, Central, and Boston), Chinese (Southern, Northern, Western, and Boston).
- From 1987 to 1997, there were substantial increases in consumers whose preferred languages were Khmer, Lao, Haitian Creole, Vietnamese, and Spanish. In the following decade (1997 to 2007), there were declines in consumers from all of these language groups. From 2007 to 2014, there were substantial increases in consumers whose preferred languages were Spanish, Portuguese, Haitian Creole, Cape Verdean Creole, and Chinese. Although there are increases and decreases in consumers with these preferred languages, there was not a decline in DCF consumers from these ethnic groups. These trends are attributable to the fact that as clients from the new refugee/immigrant communities continue to increase the proficiency and fluency in English, those who are fluent only in their native language make up a smaller proportion of these communities. These shifts impact

the recruitment of bilingual staff and the procurement of language appropriate programs and services for clients.

The two tables below document the shift in languages spoken by DCF clients over time.

Primary Language	Consumers Jul. 1987 No.	Consumers Jul. 1997 No.	Consumers Jun. 2007 No.	Consumers Dec. 2014 No.	Consumer Dec. 2017 No.	Consumers Jun. 2019 No.	1987-1997 Change %	1997-2007 Change %	2007-2014 Change %	2014-2017 Change %	2017-2019 Change %
English/Unspecified*	60,784	66,404	71,398	84,635	88895	83586	9%	8%	19%	5%	-6%
Spanish	3,664	6,334	4,516	5,830	6919	6785	73%	-29%	29%	19%	-2%
Portuguese	530	380	303	415	503	657	-28%	-20%	37%	21%	31%
Haitian Creole	175	360	260	384	473	493	106%	-28%	48%	23%	4%
Cape Verdean Creole	174	247	146	306	327	313	42%	-41%	110%	7%	-4%
Chinese	71	61	54	89	101	136	-14%	-11%	65%	13%	35%
Vietnamese	146	273	167	112	126	127	87%	-39%	-33%	13%	1%
Khmer Cambodian	253	851	356	129	122	84	236%	-58%	-64%	-5%	-31%
American Sign Language	47	23	41	75	68	62	-51%	78%	83%	-9%	-9%
Russian			37	53	62	56			43%	17%	-10%
Lao	30	74	20				147%	-73%			
Other	213	310	1,459	1,279	1245	1064	46%	371%	-12%	-3%	-15%
<b>Total</b>	66,087	75,317	78,757	93,307	98841	93363	14%	5%	18%	6%	-6%

Languages and percentages of languages of consumers in FamilyNet as of 12/31/19

Preferred Language	Actual Consumer Count 12/31/17	Percentage of Total Population	Actual Consumer Count 12/31/19	Percentage of Total Population
American Sign Language	68	0.07%	62	0.07%
Cape Verdean Creole	327	0.33%	313	0.34%
Chinese	101	0.10%	136	0.15%
English	78173	###	72199	###
French	61	0.06%	38	0.04%
Greek	4	0.00%	4	0.00%
Haitian Creole	473	0.48%	493	0.53%
Italian	7	0.01%	7	0.01%
Khmer (Cambodian)	122	0.12%	84	0.09%
Lao	12	0.01%	6	0.01%
Polish	13	0.01%	11	0.01%
Portuguese	503	0.51%	657	0.70%
Russian	62	0.06%	56	0.06%
Spanish	6919	7.00%	6785	7.27%
Thai	8	0.01%	4	0.00%
Vietnamese	126	0.13%	127	0.14%
Other	1078	1.09%	994	1.06%
Unknown	10722	###	11387	###
<b>Total</b>	98779	###	93363	###

The “unknown” category is the default when no language value is selected by the person entering the consumer data. Due to the fact that language is a required field in FamilyNet, if no language is selected, the language defaults to “unknown.” It is of concern that such a large percentage of consumers do not have their preferred language recorded in their profiles in FamilyNet. This is an area that has been identified as needing improvement.

The DCF Diversity Officer, who is currently also the Language Access Coordinator, will work with the Diversity Leadership Team to develop guidance for staff to reduce the number of “unknowns” in the consumer demographics on language. Offices that have a particularly high “unknown” rate will be targeted to address this issue and gather better demographic data for their consumers. DCF is already engaged in a similar effort to improve data collection on race, ethnicity and other protected categories.

### C. Points of Contact between DCF and Clients

DCF direct service staff most often meet families in their homes, visit children in foster and adoptive homes and in residential and group home 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.

In addition, there are business points of contact between DCF and our client population. These points of contact are listed 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, 140 High Street, 5<sup>th</sup> floor, Springfield, MA 01105
  - Central Regional Office, 13 Sudbury 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, 600 Washington Street, Boston, MA 02111
3. 29 Area Offices strategically located within the 5 regions. These locations are the main business points of contact with the client population.
4. Child-at-Risk Hotline 1-800-792-5200
5. Website address: [www.mass.gov/DCF](http://www.mass.gov/DCF)

### 3. Language Resources Assessment

#### a) Commitment to Diversified Staff and Management Team

It is a priority for the Department to recruit and hire bilingual, bicultural staff to work more effectively with families served by DCF. The DCF Diversity Plan includes a

goal to focus on all ethnic groups that often are not at the forefront of diversity discussions.

b) Aligning Resources to Meet Families' Cultural and Linguistic Needs

Another goal in the Diversity Plan is to increase DCF staff diversity at all levels through recruitment, improved retention, and promotional opportunities. To more effectively meet the needs of an area office, DCF management has successfully recruited bilingual social workers and supervisors based on the linguistic needs of the consumers in their local areas. DCF has recently acquired a "Language Line" vendor for telephonic interpreter services.

DCF cases are assigned and managed at the local area office. Local area management is constantly reviewing case assignments and is faced with many challenges in assigning bilingual cases to bilingual staff, while balancing case assignment to bilingual and non-bilingual workers. In order to ensure maximum alignment of resources to meet families' cultural and linguistic needs, DCF employees receive bilingual pay differential and represent preferred languages of consumers in their respective regions.

The bilingual employees 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. This enables the Department to assign those cases/families to these workers who are able to provide case management services in the preferred language of the client. The Department acknowledges that working with LEP clients may be more complex than with English speaking consumers and thus, the provision of the pay differential to the employee per the SEIU Local 509 contract. The complexity is related to connecting the client with bilingual service providers, finding interpreters, translating documents for the consumers, and ensuring culturally competent services above and beyond the language capacity. Not all bilingual staff receive the differential pay.

The Department has a handful of direct service employees who are proficient in ASL. As a result, the ability to meet the needs of the deaf and hard of hearing community is a challenge. 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.

c) Meeting the Linguistic Needs of Families After Business Hours

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. Most often

when a person, who has limited English proficiency, calls the Hotline, they have someone with them to translate to hotline staff. The Hotline is staffed in shifts to cover nights, weekends, and holidays which make it a challenge to always have someone on shift that is bilingual in any language. The Hotline now has access to a Telephonic Language Line vendor at this time.

The 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. We have 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 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) Meeting Language Access Needs via Service Request Protocols

1) Community –based Resources Available to Assist Agency in Meeting Language Access Needs

When a social worker requests services for a family with LEP, they request services in the family's language. The Department utilizes a Lead Agency model to match provider services with client needs. This model allows for services to be more accessible and appropriate for client needs. For consumers with Limited English Proficiency, the social worker would request the service through the Lead Agency to be provided in the preferred language of the client. The Lead Agency will then check provider resources within the geographic area to find and match a clinician or treatment provider that is bilingual in the language of the consumer. Providers do their best to have staffing capacity to meet the cultural and linguistic needs of the community they serve. Their capacity to provide linguistically appropriate services for clients is challenged by the difficulty to find highly trained and competent bilingual clinicians in the local community.

e) Meeting Language Access Needs via Interpreter and Translator Services

In the event that DCF, through its bilingual staff capacity and the matching to services through the Lead Agencies, is not able to meet the language needs of a client, our staff utilize the OSD approved Master Service Agreement vendors for interpreter and translation services.

For the deaf and hard of hearing consumers, DCF utilizes the interpreter services through the MCDHH. Countless requests were approved for ASL, CART (Communication Access Real-Time Translation) and/or CDI (Certified Deaf Interpreter) interpreter services for families statewide. Funding for MCDHH interpreter



services is managed centrally. One of the strategies to achieve this goal is to use the DCF-MCDHH Workgroup to ensure communication access for families involved with DCF and children in DCF custody who are deaf and/or hard of hearing.

f) Meeting Language Access Needs via Procurement and Contract Requirements

The Department plans to review RFR language for new procurements to address the need for provider linguistic capacity for certain language populations. 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.

1) Language Service Protocols

a) Which language services are required to implement the Language Access Plan

In-person interpretation, phone interpretation, and community based resources are needed to implement our Language Access Plan.

*In-person Interpretation*

When a bilingual social worker or service provider is not available in the language of the client, the Department uses the OSD approved vendors for language interpretation and translation services.

*Phone Interpretation*

DCF utilizes the bilingual employees for phone interpretation as needed and the new telephonic language line.

*Community-based Resources*

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 particular linguistic communities. This is particularly true for community based providers who serve specific cultural and linguistic communities.

b) Define and Describe the Agency's Language Access Protocols for Providing Interpretation Services

Administrative Procedures for Accessing In-Person Interpreter Services

Social workers access the in-person language interpreter services with their supervisor's approval. The process is as follows:

- The social worker or investigator identifies the need for language interpreter services based on the family's preferred language
- The social worker completes a request form provided by the approved vendor and has it approved by the supervisor
- The social worker faxes the form to the vendor
- The vendor identifies the appropriate interpreter
- The interpreter calls or emails the DCF social worker to set up an agreed upon meeting time with the family
- The meeting takes place
- The interpreter bills DCF for a minimum of 2 hours at the approved rate

The Department does not have much difficulty finding interpreter services for the most common non-English speaking languages such as Spanish or Portuguese. For less common languages, it becomes more difficult to obtain an interpreter in the catchment area or one who is willing to travel, but usually the vendor does its best to meet the needs of the requesting DCF staff. In most instances, the interpreter is available within one week or sooner depending on the situation.

#### Administrative Procedures for Accessing ASL Services

When a need for interpreter services is identified by DCF social workers, the following steps must be taken.

The social worker must contact the Central Office designee to request funding. This should be done via email. The email should contain the following information:

- Date(s) interpreter needed
- Time
- Duration (2 hour minimum)
- Address/location of assignment
- Names of deaf and/or hard of hearing person(s)
- Communication preference, if known (ASL, CART, etc)
- Requested interpreter (if consumer has a preference, MCDHH will try to accommodate where possible)
- Description of need/situation (51A investigation, foster care review, monthly home visit etc)
- Total number of participants
- The DCF designee will notify MCDHH via email to approve the funding. A copy of the email will be sent to the social worker who made the request
- Upon receipt of the email confirmation, the social worker will then call MCDHH at (617) 740-1600. MCDHH will request additional information from the social worker to determine the level of expertise needed by the Interpreter. MCDHH will contact the social worker when an assignment has been confirmed or if there is a need to negotiate another date/time.

- Upon completion of the services, the vendor/interpreter bills DCF directly
- Each session equals a two-hour minimum charge. MCDHH will determine if more than one interpreter is needed. MCDHH requires a two-day (48 business hours) notification of cancellation. Otherwise, full charges will be assessed to the account.

### Vital Document Translation

Numerous forms and letters have already been translated into Spanish, Portuguese and Haitian Creole, Cape Verdean Creole, Chinese, and Vietnamese, but may need updating due to recent policy changes. Documents continue to be translated and several more documents are slated to be translated into the 6 most requested languages within the next few months. The plan is to have all forms and letters translated over the next 12-24 months, depending on Bargaining Unit negotiations and funding availability. Babel notices are also in use.

Agency website content: ANF and ITD are working toward streamlining website and communications for all agencies. The language for this section will be provided by ITD

### Stakeholder Consultation

The DCF Diversity Leadership Workgroup, MCDHH, EOHHS, and the Office of Refugees and Immigrants were consulted during the development of this Plan, Due to time constraints, the Department was unable to consult with additional stakeholders. The plan is to identify stakeholders and provide opportunities for input on the LAP.

### Staff Training

All newly hired employees are required to attend CORE, or New Worker Pre-Service, Training. The CORE Training includes a module involving cultural humility and a module in which a parent will speak to the class regarding their experience with DCF. The parent voice also provides first hand exposure to the diversity of our families' cultural and linguistic needs. The Department hopes to strengthen the CORE Training by adding a segment on the Language Access Protocols for new employees. In addition, we will post the Language Access Plan on the DCF Intranet for easy access for all staff. 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.

In addition, our language access training priorities include:

- Communicating the importance of accurate demographic data in iFamilyNet
- Developing systemic and culturally sensitive methods of gathering racial, ethnic, and linguistic demographic information from our families
- Reduce or eliminate the numbers of “unknowns” in the languages listed for consumers

## Notice to Public

New clients at DCF are informed of language assistance during the investigation or initial assessment process. Our staff is trained to access language preference during the first contact with the family. If the family's case is opened for services, the assigned social worker will provide language access to the family through resources available to DCF

## Agency Monitoring

A key element to an effective Language Access Plan is to monitor the plan. To that end, on a bi-annual basis, DCF shall at a statewide, regional and area office level:

- Evaluate progress in improving data collection on the preferred language of consumers
- Review the language needs of DCF consumers and whether existing services are meeting the needs
- Assess whether staff is knowledgeable about the Language Access Plan, protocols and procedures and how to access services
- Assess whether the language resources are still current and viable

## Complaints

Language Access Complaint Procedure:

Individuals may file a complaint with the Agency Language Access Coordinator 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 Language Access Coordinator, individuals must submit the written complaint to:

Diane K. Chang, Esq.  
Department of Children and Families  
600 Washington Street, 6<sup>th</sup> floor  
Boston, MA 02111  
(617) 748-2104  
[diane.chang@state.ma.us](mailto:diane.chang@state.ma.us)

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

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Diane K. Chang  
Diversity Officer/ADA Coordinator  
Language Access Coordinator

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Date

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Linda S. Spears  
Commissioner

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Date

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Secretary MaryLou Sudders  
Executive Office of Health and Human  
Services

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Date