**Language Access Plan**

Massachusetts Commission for the Blind

## Introduction

The Massachusetts Commission for the Blind (“MCB”) within the Executive Office of Health and Human Services (“EOHHS”) has developed and prepared this Language Access Plan (“LAP”) outlining the ongoing efforts taken to provide language services to Limited English Proficient (“LEP”) consumers.

This LAP also defines the actions MCB is taking to ensure meaningful access to programs, services, activities, and materials for LEP consumers.

MCB will review and update this LAP every two years to ensure continued responsiveness to community needs and compliance with Executive Orders [614](https://www.mass.gov/executive-orders/no-614-establishing-the-digital-accessibility-and-equity-governance-board) and [615](https://www.mass.gov/executive-orders/no-615-promoting-access-to-government-services-and-information-by-identifying-and-minimizing-language-access-barriers), Executive Office for Administration and Finance (A&F) [Administrative Bulletin 16](https://www.mass.gov/administrative-bulletin/language-access-policy-and-guidelines-af-16), Section 1557 of the Affordable Care Act, and federal regulations at 45 CFR 92.201: *Meaningful access for individuals with limited English proficiency*.

MCB serves a diverse population of various ages and linguistic origins. A LEP consumer is a person registered with MCB who does not speak, read, write, of understand the English language at a level that allows them to interact effectively with MCB staff. A consumer maintains the right to self-identify as LEP.

## Purpose

The purpose of this LAP is to ensure meaningful access to services, programs, activities, and materials for all LEP consumers.

MCB is committed to making services, programs, activities, and materials available to LEP consumers. Based on this commitment, MCB makes every attempt to assist LEP consumers in accessing our services, programs, activities, and materials.

This LAP does not create new services, programs, activities, and materials. Rather, this LAP strives to eliminate barriers for LEP consumers accessing existing services, programs, activities, and materials and ensure all staff can assist LEP consumers in accessing these resources. MCB will provide quality language assistance to LEP consumers in a fair and timely manner, ensuring meaningful access to the agency’s services, programs, activities, and materials.

This LAP centralizes language access materials for staff and outlines the training for new hires to ensure all staff can access the services, programs, activities, and materials listed in the sections below.

The objectives of these Language Access Guidelines are to:

1. Improve access to and quality of state services, programs, activities, and materials for non-English speakers and LEP consumers.
2. Reduce any disparities and delays in the provision of services, programs, activities, and materials to eligible LEP consumers.
3. Streamline ongoing training and resources for staff to increase effectiveness and ensure public satisfaction.

## Policy

MCB Director of Policy and Compliance Nathan Skrocki is developing an MCB policy to provide meaningful access to programs and services to consumers who are limited in English proficiency. The policy will be implemented by March 31, 2024.

## Applicability

This policy will apply to all services, programs, activities, and materials within MCB.

## Role

MCB serves legally blind residents of the Commonwealth by providing access to employment opportunities and social rehabilitation with the goal of increasing independence and full community participation.

## Language Access Plan

This LAP shall be fully implemented, subject to the availability of requisite fiscal resources. This LAP represents MCB’s commitment to ensure all residents of Massachusetts and those registered with the agency can readily access services, programs, activities, and materials.

For staff, this LAP centralizes resources, training, and the agency’s multilingual content and publications, while outlining the minimum standard of access to the agency for LEP consumers.

### Language Access Coordinator

MCB’s Language Access Coordinator will be responsible for the implementation and compliance with MCB’s Language Access Plan. Contact information for MCB’s Language Access Coordinator is below:

Michael Saccone

Massachusetts Commission for the Blind

600 Washington Street, 3rd Floor

Boston, MA 02111

Phone: 857-248-0137

Email: michael.g.saccone@mass.gov

1. **Language Access Needs Assessment**

MCB strives to ensure LEP consumers have equal access to programs and services regardless of preferred language spoken or English proficiency.

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

* 1. **Predominant Language**

According to MCB’s case management system, the five most spoken languages of our consumers are English, Spanish, Haitian Creole, Portuguese, and Russian.

* 1. **Language Makeup of Consumer Population**

|  |  |
| --- | --- |
| **Primary Language** | **Consumer Count** |
| English | 22753 |
| American Sign Language | 67 |
| Asian | 25 |
| Bulgarian | 3 |
| Cambodian | 13 |
| Cantonese | 10 |
| Chinese | 60 |
| French | 28 |
| Haitian Creole | 120 |
| Indian | 14 |
| Japanese | 1 |
| Korean | 3 |
| Mandarin | 12 |
| Minimal Language Skills | 7 |
| Other | 150 |
| Polish | 6 |
| Portuguese | 98 |
| Russian | 83 |
| Spanish | 525 |
| Tactile American Sign Language | 4 |
| Vietnamese | 48 |
| Not Identified \* | 6522 |
| Total | 30552 |

\* A goal of MCB’s FY 2024-2025 Diversity Plan is to collect consumer demographic data, including primary language, to enhance services, programs, and outreach efforts to better meet the diverse needs of our valued consumers by June 2025.

* 1. **Points of Contact between MCB and Consumer Population**

Main Office:

600 Washington Street, 3rd Floor

Boston, MA 02111

800-392-6450

Western Massachusetts Office:

436 Dwight Street

Springfield, MA 01103

413-781-1290

Email: mcbinfo@mass.gov

Website: [www.mass.gov/mcb](http://www.mass.gov/mcb)

1. **Language Resources**
	1. **Plain Language**

MCB is committed to producing materials using plain language, in accordance with [Federal Plain Language Guidelines](https://www.plainlanguage.gov/media/FederalPLGuidelines.pdf).

Plain language (also called Plain English) is communication users can understand the first time they read it. Language that is plain to one set of readers may not be plain to others. Written material is in plain language if our audience can:

* Find what they need;
* Understand what they find; and
* Use what they find to meet their needs

Plain language means our users can understand your documents more quickly. Users won't call us so much for explanations. They'll make fewer errors filling out our forms. They'll comply more accurately and quickly with requirements. If our customers don't understand our documents, we may have to:

* Answer phone calls
* Write explanatory letters
* Write an explanatory document
* Litigate

Reading level algorithms measure how readable documents are. Use [MS Word's "Readability Statistics"](https://www.doe.mass.edu/nmg/passive.html?section=readability) to assess and adjust readability.

The [Juicy Studio Readability Test](http://juicystudio.com/services/readability.php) analyzes existing webpages.

* 1. **Translating Publications**

MCB is committed to maintaining all the agency’s widely application publications in the five most spoken languages in the Commonwealth: Spanish, Portuguese, Haitian Creole, and Chinese (Simplified or Traditional). When reaching out to specific communities in the Commonwealth, MCB staff should ensure these publications will be accessible in the languages prevalent in each community. Longer and more specific publications should be translated when there are accessibility concerns for the intended audience.

MCB maintains an annual translation budget. Once a translation or interpretation request is received, MCB ensures compliance with state procurement laws to obtain such services. This may include a request for quotes from [language service vendors on statewide contract](https://www.mass.gov/doc/prf75/download) and then reviewing responses in accordance with procurement to select a vendor to ensure timely and quality service.

* 1. **Written Translation Guidelines**

When translating a document, follow these steps:

* + 1. Choose what language(s) are needed for translation. Keep in mind that broadly applicable brochures and flyers should be translated into Spanish, Portuguese, Haitian Creole, and Chinese (Simplified or Traditional).
		2. Request a quote from [Language Bridge](https://lbridge.com/Quote)
		3. Once you receive the quote, work with your director and/or their designee to submit an Agency Purchase Order (APO) for the document to be translated.
		4. Once the APO receives all the required approvals, it will be sent to Language Bridge authorizing the translation service.
	1. **In-Person Interpreting**

When requesting an interpreter for an in-person event, follow these steps:

* + 1. Call Language Bridge at 413-216-4975.
		2. Say or enter your pin followed by # (staff can obtain a pin by contacting Commissioner Oliveria).
		3. Listen to the automated prompts and select the desired language.
		4. You will then be connected to the next available interpreter.

A [Language Identification Flashcard](https://www.mass.gov/doc/language-identification-flashcard-1/download) is posted on our website homepage and brought to events for easy access. The card states “I speak” in 38 languages and can be used to identify the language spoken by LEP consumers accessing services, programs, activities, and materials provided by MCB.

For language access requests related to a disability, medical condition, or need for a reasonable accommodation to access services, programs, activities, and materials, please contact MCB’s ADA Coordinator:

Shauntay M King

EOHHS ADA Accommodations Coordinator

600 Washington Street, 7th Floor

Boston, MA 02111

617-894-4352

Shauntay.M.King@mass.gov

* 1. **Correspondence**

MCB will work to include the text below in initial correspondence to consumers and as necessary thereafter.

*This document contains important information about your registration status with the Massachusetts Commission for the Blind. Please have the document translated immediately.*

The statement is translated in the following languages:

Arabic, Armenian, Bengali, Cambodian, Chamorro, Simplified Chinese, Traditional Chinese, Croatian, Czech, Dutch, Farsi, French, German, Greek, Haitian Creole, Hind, Hmong, Hungarian, Ilocano, Italian, Japanese, Korean, Laotian, Polish, Portuguese, Romanian, Russian, Serbian, Slovak, Spanish, Tagalog, Thai, Tongan, Ukrainian, Urdu, Vietnamese, Yiddish

* 1. **Web Content**

All mass.gov webpages can be auto translated under “Select Language” at the top of the screen. MCB provides this text in a variety of languages for attachment to important forms or webpages.

*Please note: All mass.gov sites can be auto translated under “Select Language” at the top of the screen. To request a document be translated into another language, please fill out the form below.*

The statement is translated in the following languages: Spanish, Portuguese, Khmer, Cape Verdean, French, Vietnamese, Haitian Creole, Russian and Simplified Chinese.

Important PDFs attached to MCB’s webpages will be translate in Spanish, Portuguese, Haitian Creole, and Chinese (Simplified or Traditional). If consumers would like to request a document be translated into a language of their choosing, they may do so by submitting [this form](https://www.mass.gov/forms/request-a-translation-of-an-mcb-document).

* 1. **Multilingual Staff at MCB**

MCB is committed to hiring and retaining multilingual staff for all positions, especially for public facing staff and on the agency’s hotlines.

* 1. **Interpreter Services for Walk-in Consumers**

While the preference is to provide direct service to LEP consumers in their primary language, MCB staff also have access to an over-the-phone language service.

* 1. **Hotline & General Phone Lines**

MCB staff have access to an over-the-phone language service which is a three-way conference call with an interpreter.

* + 1. Call Language Bridge at 413-216-4975.
		2. Say or enter your pin followed by # (staff can obtain a pin by contacting Commissioner Oliveria).
		3. Listen to the automated prompts and select the desired language.
		4. You will then be connected to the next available interpreter.
	1. **Interpretation for the Deaf and Hard of Hearing at MCB Events**

MCB must provide interpretation for the deaf and hard of hearing when requested. When registering attendees for external presentations or events, MCB provides an option for attendees to request American Sign Language (ASL) interpretation for the deaf and hard of hearing.

Zoom, PowerPoint, and Teams presentations include a feature to enable captions. We encourage the use of this tool, as well as providing interpretation services.

The **Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH)** provides interpretation and language access for deaf and hard of hearing people throughout the Commonwealth. When registering attendees for our office presentation/event, you should provide an option for attendees to request American Sign Language (ASL) and/or other interpretation for the deaf and hard of hearing.

Review the [First Time Use Instructions](https://www.mass.gov/doc/communication-spectrum-tip-sheet-for-first-time-interpretercart-requests/download) from MCDHH to familiarize yourself with the different kinds of interpretation that could be requested, depending on the communication needs of the individual you are working with.

If ASL interpretation or CART (captioning) are requested, follow the steps available here ([How to Request an ASL Interpreter or CART provider | Mass.gov](https://www.mass.gov/how-to/how-to-request-an-asl-interpreter-or-cart-provider)) to request communication access services. Requests should be made at least two weeks or more in advance of the event. If the services are no longer needed or the event is cancelled, you should provide notice to MCDHH at least two business days before the scheduled date to avoid fees.

For language access requests related to a disability, medical condition, or need for a reasonable accommodation to access programming or services, please contact MCB’s ADA Coordinator:

Shauntay M King

EOHHS ADA Accommodations Coordinator

600 Washington Street, 7th Floor

Boston, MA 02111

617-894-4352

Shauntay.M.King@mass.gov

* 1. **Necessary Consultations**

In developing this LAP, MCB has consulted and will continue to consult the most recent data available from the United States Census Bureau, as well as community-based organizations that provide services to the populations served by our agency.

* Modern Language Association, accessed on December 14, 2023, from [MLA website](https://apps.mla.org/map_data)
* United States Census Bureau Language Use Data, accessed on December 14, 2023, from [U.S. Census Bureau website](https://www.census.gov/topics/population/language-use/data.html)
* MIRA Coalition fact sheet last updated on February 1, 2023, accessed on December 14, 2023, from [MIRA Coalition website](https://miracoalition.org/wp-content/uploads/2023/02/Language-Access-Factsheet-MIRA-Coalition-2023.pdf)
* MCB Language Access Plan dated August 6, 2020
* During this LAP cycle, MCB will identify additional stakeholders and community-based organizations to provide feedback on the LAP.
	1. **Staff Training**

The LAP will be:

1. Posted internally for all employees.
2. Incorporated into the orientation for new employees.
3. Presented to management so they are fully aware of and understand the LAP, in order to reinforce the plan’s importance and ensure its implementation by staff.
4. Presented to MCB staff having contact with the public, so such staff is trained to work effectively with LEP consumers and telephone interpreters.
	1. **Notice to Public**

MCB will post this LAP on its website. Copies will be made available upon request via a link to the website or in hard copy form consistent with the state public records law.

* 1. **Monitoring**

MCB will review and update its LAP at least every two years or more frequently, as needed.

The review assesses:

1. Whether there have been any significant changes in the composition or language needs of thepopulation served;
2. Whether the staff knows and understands the LAP document, and is comfortable using the services described within;
3. Whether additional documents require translation;
4. Identification of any issues or problems related to serving LEP persons which may have emerged during the past year; and
5. Identification of any recommended actions to provide more responsive and effective language services (e.g., adding documents to be translated, creating, or expanding partnerships with community organizations, or changing staffing priorities).

Monitoring the effectiveness of a LAP may include:

1. Analyzing current and previous data on language assistance usage, including languages served;
2. Surveying staff on how often they use language assistance services, if they believe there should be changes to the services provided or the providers used, and if they believe that the language assistance services in place are meeting the needs of the LEP communities in their service area; and
3. Monitoring feedback from community-based organizations, legal services and other stakeholders about the agency’s effectiveness and performance in ensuring meaningful access for LEP individuals.
	1. **Complaints**

**Language Access Complaint Procedure**

Individuals may file a complaint with the MCB Ombudsperson or the Office of Access and Opportunity if they believe they have been denied benefits of this LAP. The complaint must be written within six months of the alleged denial. The complaint must be in writing. To file a complaint with the MCB Ombudsperson, individuals must submit a written complaint to:

Massachusetts Commission for the Blind

Attention: Ombudsperson

600 Washington Street, 3rd Floor

Boston, MA 02111

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

 Attention: Yarlennys Villaman– Office of the Governor

 State House, Room 280

 Boston, MA 02133

1. **Approvals**

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| --- | --- | --- |
| John Oliveira signature |  | 02/02/2024 |
| Commissioner John OliveiraMassachusetts Commission for the Blind |  | Date |
| Kathleen E. Walsh Signature |  | 03/01/2024 |
| Secretary Kathleen E. WalshExecutive Office of Health and Human Services |  | Date |