

**MASSACHUSETTS
COMMISSION FOR THE
DEAF AND HARD OF
HEARING (MCDHH)
LANGUAGE ACCESS PLAN**



I. Introduction

The Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH) has developed and prepared this Language Access Plan (LAP) outlining ongoing efforts taken to provide language services to Limited English Proficiency (LEP) constituents.

This plan also defines the actions our office is taking to ensure meaningful access to programs, services, activities, and materials for all LEP constituents.

MCDHH will review and update this Plan every two years to ensure that it is continuing to respond to community needs and comply with Executive Order [615](#).

MCDHH serves a diverse population of various ages and linguistic origins. An LEP person may be someone who cannot speak, read, write, or understand the English language at a level that allows them to interact effectively with MCDHH staff. A constituent maintains the right to self-identify as LEP.

I. Purpose

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

MCDHH is committed to making services available to LEP persons as part of its mission. Based on this commitment, MCDHH makes every attempt to assist LEP constituents in accessing our services.

This LAP has been developed to adhere to the October 12, 2012, Administrative Bulletin from the Executive Office of Administration and Finance, “Language Access Policy and Implementation Guidelines” ([A&F Administrative Bulletin 16](#)) and in consideration of:

- [Executive Order 614](#): Establishing the Digital Accessibility and Equity Governance Board;
- [Executive Order 615](#): Promoting Access to Government Services and Information by Identifying and Minimizing Language Access Barriers;
- [Federal Plain Language Guidelines](#);
- Federal Regulation [45 CFR 92.101](#): Meaningful access for individuals with limited English proficiency.

This LAP does not create new services; rather it strives to eliminate barriers for LEP constituents accessing existing services and ensure that all staff can assist LEP constituents in accessing those resources. MCDHH will provide quality language assistance to LEP constituents in a fair and timely manner, ensuring meaningful access to the agency’s services.

This LAP centralizes language access materials for staff and outlines the regular trainings for new hires to ensure that all staff can access the materials and services listed in the sections below.

The objectives of these Language Access Guidelines are to:

- a. Improve access to and quality of state services, programs and activities for non-English speakers and LEP persons;
- b. Reduce any disparities and delays in the provision of services/programs to eligible LEP speakers; and
- c. Streamline training and resources for staff to increase effectiveness and ensure public satisfaction.

II. Policy

It is MCDHH policy to provide meaningful access to programs and services to persons who are limited in English proficiency.

III. Applicability

This policy applies to all departments within MCDHH.

IV. Role

The Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH) is responsible for ensuring that Deaf or hard of hearing residents of Massachusetts receive quality and timely communication access. MCDHH was established by Chapter 716 of the Acts of 1985, which amended Massachusetts General Laws, Chapter 6 § 191-97, as a Commonwealth agency housed under the Executive Office of Health and Human Services. MCDHH provides American Sign Language (ASL)/English interpreter and Communication Access Real-time Transcription (CART) referral services – including 24/7 standby referral for press conferences, referral for court and legal proceedings, and referral for emergencies, as well as ASL/English interpreter training, mentorship and quality assurance, communication access training, and technical assistance. Additionally, MCDHH provides critical case management and independent living services for Deaf and hard-of-hearing adults and children in the community.

As leading experts in accessibility and services for the Deaf and hard of hearing, MCDHH partners with sister agencies and community entities to increase accessibility and improve the quality of existing and new services throughout the Commonwealth. This includes working directly with agencies such as DCF and DMH to ensure accessibility is integrated into their service models and supporting Deaf and hard-of-hearing employees working for the Commonwealth in these critical roles. MCDHH has been providing service for 35 years throughout the Commonwealth. Our staff provides the Commonwealth with the resources it needs to serve Deaf, hard of hearing, and late-deafened individuals in an extensive range of human services, healthcare, safety, legal, education, and economic settings, and to provide the accommodations that are required under the Americans with Disabilities Act and Section 504 of Rehabilitation Act of 1973.

Our dedicated and passionate staff provide the Commonwealth with the resources it needs to serve Deaf, hard of hearing, and late-deafened individuals in an extensive range of human

services, healthcare, safety, legal, education, and economic settings. With the support of the Healey-Driscoll Administration, MCDHH will continue to ensure that Deaf and hard of hearing individuals living and working in the Commonwealth enjoy equal access and opportunity to all of the public services, opportunities, and benefits Massachusetts has to offer.

Commissioner: Dr. Opeoluwa Sotonwa

Deputy Commissioner for Administration & Finance: Sehin Mekuria

Chief of Staff: Sharon Harrison

The Population We Serve

- Approximately 1,405,983 citizens in Massachusetts are Deaf, Hard of Hearing or late-Deafened.
- Approximately more than half a million people throughout the United States use American Sign Language (ASL) to communicate as their native language.
- ASL is the third most commonly used language in the United States, after English and Spanish.
- Johns Hopkins estimates nearly a fifth of all Americans 12 years or older have hearing loss so severe that it may make communication difficult.
- In Massachusetts, more than 60% of the people who make up the Deaf and Hard of Hearing population are aged 65 or older.
- The fact that someone is Deaf or Hard of Hearing is not immediately visible.
- Communication preferences and accommodations vary widely, depending on individual need. Of the 48 million people in the United States with hearing loss, about 1% use ASL. The majority of people with hearing loss use spoken language to communicate.
- The most commonly used languages of MCDHH's clients are English, ASL, Spanish, Portuguese, Arabic, and Russian.

Linguistic and cultural diversity:

- Deaf
- Oral Deaf
- Deaf-Blind
- Late-Deafened

Multi-cultural Diversity:

- Immigrant and refugee groups

MCDHH Programs & Services

Communication Access Services: The Interpreter/CART Referral Department provides interpreter and CART services to ensure full communication access for both Deaf and hearing individuals at state, public and private levels in accordance with all applicable federal and state laws.

- Statewide Interpreter/CART Referral Service
- MCDHH conducts various interpreter screenings for Deaf, ASL Interpreters and Legal screening for interpreters who have been trained to interpret in legal settings.

Communication Access, Training & Technology Services (CATTS):

- ADA Communication Access Compliance trainings to public health, public safety, human service, state agency and private enterprise personnel – approximately 70 trainings/events in FY23, both onsite and remote.
- Onsite/remote Technical Assistance for regulatory compliance with communication access and assistive technology issues to requesting public/private entities – approximately 25/year.
- Communication Accessible internally produced vlogs – approximately 30 per year; MCDHH also provides assistance to other entities wishing to create accessible vlogs.
- Targeted resource distribution to law enforcement and public safety officers: visor card visual communication tool, Covid card visual communication tool, public safety DFS/OEMS visual communication tool: from 12,000/year at rollout to 2,500 – 3,500 per year sustained.

Case Management and Social Services:

Deaf and Hard of Hearing infants, children, and adults and their families are eligible to receive case management services on a voluntary basis which include but are not limited to adult case management, family and children's services, care coordination and collaboration with other state agencies.

- In FY23, 2,104 clients on caseload of which 1,331 are on MassHealth.

Deaf and Hard of Hearing Independent Living Services (DHILS):

Integrated array of services developed and presented by individuals with disabilities to assist consumers with advocacy, communication access, health preservation, life skills, personal safety and economic well-being. There are eight programs statewide.

- During FY23 DHILS provided 35,350 hours of service.
- Direct one-to-one services were provided to 276 consumers in the areas of advocacy, skills training, peer mentoring, and community-based assistance.
- Community-focused education and outreach activities were provided multiple times each month across the Commonwealth by all DHILS programs.

Substance Use Disorder (SUD) Services:

- MCDHH SUD services include a counselor position, a lead recovery coach, and 14 certified addiction recovery coaches.
- The team provides seminars and conferences for community members and is working on creating training that is linguistically and culturally appropriate for Deaf Recovery Coaches to meet recertification requirements in advocacy, mentoring, education, and recovery wellness support.
- Communication access services at meetings and seminars include Alcoholics Anonymous, Narcotics Anonymous, Overeaters Anonymous, All Recovery, and Recovery Dharma.
- Recovery Support Zoom meetings are held daily, offering over 570 meetings annually with approximately 5,400 participants.
- Recovery coaches also provide support for a jail diversion program and a parent project.
- Vlogs are posted to MCDHH's social media for the community to empower, inform, and use prevention models.

Staffing

54.69 FTE; 40% of staff are Deaf or Hard of Hearing.

V. Language Access Plan

This LAP shall be fully implemented, subject to the availability of requisite fiscal resources. It represents the agency's commitment to ensuring that all residents of Massachusetts can readily access information and resources from MCDHH. In developing this LAP, MCDHH has consulted and will continue to consult the most recent data available from the United States Census Bureau as well as other sources of data related to the community MCDHH serves. MCDHH also consults with community-based organizations that provide services to the populations served by MCDHH.

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

- a. **Language Access Coordinator:** Margaret (Peggy) Lee, Director, Community Services Division. margaret.lee@mass.gov.
- b. **Language Resources:** Cat Dvar, Director, Communication Access Services (for Deaf and hard of hearing interpretation services) cat.b.dvar@mass.gov; Sehin Mekuria, Chief Financial Officer, for coordinating with state vendors for translation services sehin.mekuria@mass.gov.

i. Translating Publications

MCDHH is committed to maintaining all its widely applicable publications in the five most spoken languages in the Commonwealth: English, Spanish, Portuguese, Haitian Creole, and Chinese (Simplified or Traditional). When reaching out to specific communities in the Commonwealth, MCDHH staff should ensure that 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. MCDHH is encouraged to produce materials using plain language in accordance with [Federal Plain Language Guidelines](#).

MCDHH will review its vital documents and prioritize the top five for translation into the five most spoken languages in the Commonwealth, and will also ensure that ASL vlog versions are available on our website. It is a top priority for the Commission that our website and written materials are as accessible as possible to our community members who use ASL to communicate.

To translate written materials, staff members should reach out to their supervisor, Peggy Lee, and/or Sehin Mekuria (see contact information on page 5) to coordinate translation with Bay State Interpreters or another Commonwealth-approved vendor.

ii. Written Translations Guidelines

When translating a document, follow these steps:

1. Choose which language(s) are needed for translation. Keep in mind that broadly applicable flyers should be translated into Spanish, Portuguese, Haitian Creole, and Chinese (Simplified or Traditional).

2. E-mail a Word document version of the publication to be translated to the translation company and request a quote.
3. There are several [state vendors](#), on the PRF75 Statewide Contract.
4. To translate written materials, staff members should reach out to their supervisor, Peggy Lee, and/or Sehin Mekuria to coordinate translation with Bay State Interpreters or another Commonwealth-approved vendor.

Questions? Contact Peggy Lee (Margaret.lee@mass.gov), Cat Dvar (cat.b.dvar@mass.gov), and/or Sehin Mekuria (sehin.mekuria@mass.gov).

iii. **In-Person Interpreting**

MCDHH staff may request in-person interpreters for events by following guidance specifically outlined in [PRF75 Statewide Contract](#) and adhere to State procurement laws and best practices.

To coordinate and schedule in person foreign language interpreting for client meetings or other community member needs, staff members should reach out to their supervisor, Peggy Lee, and/or Sehin Mekuria to coordinate translation with Bay State Interpreters or another Commonwealth-approved vendor.

iv. **Web Content**

To translate written materials, including for the web, staff members should reach out to their supervisor, Peggy Lee, and/or Sehin Mekuria to coordinate translation with Bay State Interpreters or another Commonwealth-approved vendor. Once the materials have been translated, staff can submit a Website Content Request Form to our CATTs Department, available here: [Website Content Request Form - Formstack](#).

v. **Multilingual Staff at MCDHH**

MCDHH is committed to hiring and retaining multilingual staff for all positions, but especially for public facing staff and on the agency's hotlines. 40% of our staff are Deaf or hard of hearing, reflecting the community we serve.

vi. **Interpreter Services for Walk-in Constituents**

While the preference is to provide direct service to LEP constituents in their primary language, MCDHH staff also have access to an over-the-phone language service that includes over-380+ languages. Step-by-step instructions on how to use the over-the-phone language services, including ASL, are included below in the section on hotlines and general phone lines.

A [Language Identification Flashcard](#) is posted on our homepage website for easy access. The card states "I speak" in 38 languages and can be used to identify the language spoken by LEP constituents accessing services provided by MCDHH.

vii. **Hotline & General Phone Lines**

MCDHH staff members may use Commonwealth-approved language lines/vendors to

communicate with LEP clients, as needed. To coordinate and schedule in person foreign language interpreting for client meetings or other community member needs, staff members should reach out to their supervisor, Peggy Lee, and/or Sehin Mekuria to coordinate translation with Bay State Interpreters or another Commonwealth-approved vendor.

Over-the-phone language services

There are several over-the-phone language services providers to assist in interpreting over the phone. All staff should have access to and be trained on the over-the-phone language service providers. There are other state vendors providing similar services – please visit [Baystate Interpreters](#).

Communication Access for the Deaf and Hard of Hearing

MCDHH provides interpretation for the deaf and hard of hearing. The organization hosting the event might request that our office provide interpretation when scheduling and confirming the event. When registering attendees for our office presentation/event, you should provide an option for attendees to request American Sign Language (ASL) interpretation for the deaf and hard of hearing.

Review the [First Time Use Instructions](#) from the Massachusetts Commission for the Deaf and Hard of Hearing (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](#)) 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.

c. Staff Training

The Language Access Plan (LAP) will be:

- a. Posted internally for all employees.
- b. Incorporated into the orientation for new employees.
- c. 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.
- d. Presented to MCDHH staff having contact with the public, so such staff is trained to work effectively with LEP constituents and telephone interpreters.

VI. Monitoring

MCDHH will review and update its Language Access Plan at least every two years or more frequently, as needed.

The review assesses:

- a. Whether there have been any significant changes in the composition or language needs of the population served;
- b. Whether the staff knows and understands the LAP document, and is comfortable using the services described within;
- c. Whether additional documents require translation;
- d. Identification of any issues or problems related to serving LEP persons which may have emerged during the past year; and
- e. 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).

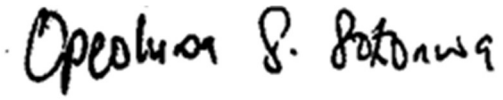
Monitoring the effectiveness of a Language Access Plan may include:

- a. Analyzing current and previous data on language assistance usage, including languages served;
- b. 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
- c. 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.

Language Access Complaint

Should an individual have a complaint regarding the implementation of this Plan or language access at MCDHH, they may contact MCDHH General Counsel Caitlin Parton (Caitlin.parton@mass.gov) and/or Director of Community Affairs Yarlennys Villaman (Yarlennys.K.Villaman@mass.gov).

Approvals



Dr. Opeoluwa S. Sotonwa
Commissioner of MCDHH

2/20/2024

Date



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

03/01/2024