

LANGUAGE ACCESS PLAN

MA Office for Refugees and Immigrants (ORI)



I. Introduction

The Massachusetts Office for Refugees & Immigrants (ORI) has developed and prepared this Language Access Plan (LAP) outlining ongoing efforts taken to provide services to Limited English Proficiency (LEP) constituents.

This plan also defines the actions our office is taking to ensure meaningful and equitable access to programs, services, activities, and materials for all LEP constituents. ORI will review and update this LAP at least every two years, or more often if needed, to ensure continued responsiveness to community needs.

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

II. Purpose

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

ORI is committed to making services available to this constituency as part of its mission and it will make every attempt possible to assist LEP constituents in accessing our services.

This Plan 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" (<u>A&F Administrative Bulletin 16</u>) and in consideration of:

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

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

This LAP centralizes language access policies and procedures for staff which will be used to develop and conduct regular training for new hires to ensure that all staff know how to access the materials and services listed in the sections below.

The objectives of these Language Access Guidelines are to:



- Improve access to and quality of state services, programs, and activities for non-English speakers and LEPs;
- Reduce any disparities and delays in the provision of services/programs to non-English speakers and LEPs; and
- Provide the foundation to create comprehensive training and resources for staff to increase effectiveness and ensure public satisfaction.

III. Policy

It is ORI's policy to provide meaningful and equitable access to programs and services to persons who are limited in English proficiency.

IV. Applicability

The policy in this LAP applies to all ORI programs and services.

V. Role

Agency Description

The Mission of ORI is to promote the full participation of refugees and immigrants as self- sufficient individuals and families in the economic, social, and civic life of the Commonwealth. ORI's responsibility is to administer the federally funded refugee resettlement program, which includes refugee cash and medical assistance, case management, employment services, English language for employment training, foster care for unaccompanied minors, services for elder refugees, and social adjustment services. In addition, ORI provides state funded programs such as citizenship, financial literacy, and other programs for all immigrants such as access to immigration legal services, ESOL, HomeBASE and other emergency assistance programs.

This includes the following activities:

- Fostering a public environment that recognizes and supports the ethnic and cultural diversity of the state.
- Working with other state agencies in developing, clarifying, or improving policies or programs that affect or serve immigrants, refugees, asylees or other new and emerging populations.

ORI programs and services description:

Refugee Cash Assistance:

Transitional cash assistance for refugees who are not eligible for TANF/TAFDC or SSI, for up to 12 months from their Date of Entry in U.S.

Refugee Medical Assistance:

Transitional medical coverage for refugees (equivalent to MassHealth Standard coverage)



who are not eligible for TANF/TAFDC or SSI for up to 12 months from their Date of Entry in U.S.

Refugee Health Assessment Program:

Initial health assessment of newly arrived refugees within 90 days of arrival.

Refugee Case Management:

Assists refugees in accessing a range of benefits and services to remove barriers to employment and self-sufficiency.

English Language Training for Integration (ELT-I):

Provides English classes at the beginner and intermediate levels, as well as literacy classes. Additionally, life skills topics such as financial literacy and banking, civics, and familiarity with community resources and institutions provide a topic structure for English language training and conversation building. The Massachusetts ELT-I program primarily addresses the English language training needs of non-employable refugees who require improved English proficiency.

Comprehensive Refugee Employment Services (CRES):

Assists refugees with finding their first job and provides post-employment assistance for job retention and job upgrades.

Wilson Fish/Family Independence Program (FIP):

Also known as Family Independence Program (FIP). The FIP program supports refugee families with employment services.

Employment Support Services Program (ESSP):

Employment services for refugees and non-Spanish-speaking immigrants who are eligible for TANF/TAFDC.

Social Adjustment Services:

Refugee Community Services – provides an array of community outreach, education and direct support services; Youth Adjustment Services – assists refugee youth succeed, both in school and in social adjustment through after-school tutoring, enrichment and parent-school liaison services.

Refugee School Impact Program (RSI):

The RSI program provides services for children aged 0-18 that entail cultural awareness, enrichment, and ensures school readiness through an array of programs provided in partnership with community-based organizations and schools.

Refugee School Impact Program-Early Education and Care (RSI-EEC):

The EEC program provides services to refugee children aged 0-5; families are given opportunities to have their children engage in early education activities, literacy, enrichment, and assistance with daycare enrollment.

Refugee Mentoring Program:



The RYM program recruits, trains, and maintains a volunteer corps to provide mentoring for refugee youth to support youth physical and mental well-being, employability, integration/acculturation, and financial literacy.

Refugee Health Promotion Program (RHAP):

Provides on-going individual healthcare information and access assistance to the newest refugee arrivals. RHAP offers linguistically and culturally appropriate health assessment services to newly arrived refugees and eligible immigrants.

Afghan Massachusetts Refugee Health Promotion Program:

Provides health promotion services to Afghan citizens and nationals.

Ukraine Massachusetts Refugee Health Promotion Program:

Provides health promotion services to Ukrainian citizens & nationals.

Refugee Mental Health Initiative (ReMHI):

Through partnership with DPH, ReMHI assists in building capacity to address mental health needs of refugee populations including overcoming the stigma associated with mental health care and creating opportunities for social engagement to reduce isolation.

Afghan and Ukraine Legal Assistance:

Provides direct assistance and immigration legal services to the Afghan evacuees and Humanitarian Parolees from Ukraine resettling in MA.

Program to Enhance Elder Refugee Services:

Builds partnerships between the elder service system and refugee service providers to facilitate participation of elder refugees, asylees, humanitarian parolees, and others in mainstream elder services.

Unaccompanied Refugee Minor Program:

Residential and foster care for refugee, asylee, and trafficking victims who are minors and arrive in the U.S. without parents or guardians, and alien minors granted the immigration status of "Special Immigrant Juvenile."

Financial Literacy for Newcomers (FLN):

Provides basic concepts behind the American financial system to refugee, immigrant & U.S. citizens (evacuees). The FLN program model enhances the financial education topics addressed in multi-session workshops via a network of providers across the Commonwealth.

Citizenship for New Americans Program (CNAP):

Provides citizenship application services to lawful permanent residents, also known as "green card holders," and assists them with the naturalization process.

Emergency Assistance Services:

Provides food, shelter, case management, legal assistance and wrap around basic services for immigrants in the state shelter system, and at welcome centers.



Legal Assistance Services:

Assists eligible individuals in securing work authorization and immigration legal services.

VI. 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 ORI.

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

Language Access Coordinator

Carol Q. Leon Ombudsperson Massachusetts Office for Refugees and Immigrants 600 Washington Street Boston, MA 02111 617-685-9354 carol.q.leon@mass.gov

Language Service Protocols

For the purposes of this Language Access Plan, services and factors accounted for include:

- Bilingual and Bicultural ORI Staff
- Bilingual and Bicultural Providers Staff
- Translation and Interpretation Protocols
 - Note: ORI has translation equipment available for internal use among EOHHS sister agencies
- Additional Policies Regarding Access to Services.

Language Resources

Bilingual and Bicultural ORI Staff

While ORI provides no direct client services, ORI employs a diverse staff, whose countries of origin include El Salvador, Mexico, United States, Hong Kong, Spain, Colombia, Portugal, Haiti, Vietnam, Venezuela, Ethiopia, Nepal, and Brazil.

Additionally, the ORI staff can provide interpretation (from English to the language listed and vice versa) in the following languages: Arabic, Amharic, Tigrinya, Portuguese, Haitian Kreyol, Hindi, Chinese (Cantonese and Shanghainese), French, Spanish, Nepali, Urdu and Vietnamese and assist with translations (from English to the language listed and vice versa) in the following languages: Spanish, Urdu, Hindi, Arabic, Chinese (traditional characters), Catalan, English, Italian, Haitian



Creole, Portuguese, Vietnamese, Tigrinya, Amharic, Nepali, and Hindi.¹

• ORI's number of employees is currently twenty-five as of 1/4/2023.

Bilingual and Bicultural Providers Staff

ORI Service providers hired diverse staff who speak Arabic, Armenian, Chinese (Cantonese,) Chichewa Dari, Dinka, English, Ewe, Farsi, French, Haitian Kreyol, Hebrew, Hindi, Khmer, Kinyarwanda, Mandarin, Moldovan, Mongolian, Nepali, Nubian, Pashto, Portuguese, Punjabi, Russian, Sinhala, Somali, Spanish, Tajik, Tibetan, Tigrinya, Ukrainian, Urdu, Uzbek, and Vietnamese.

Refugee Service Providers

Refugee Service Providers (RSPs) serve to foster civic engagement and skills, citizenship and educational services, and other vital services to refugees across the lifespan, families, children with supplemental educational services, and elders. All refugee service providers and/or provider agencies operate with frontline and executive staff who are from refugee and immigrant backgrounds and speak the languages of newest arrivals to the United States.

Refugee Resettlement Agencies (RAs)

Refugee Resettlement agencies or RAs are one of the key partners in the refugee resettlement process. RAs maintain cooperative and consultative relationships with the other main entities in the refugee resettlement process: federal, state and local governments, Mutual Assistance Associations (MAAs), and other service providers. RAs are non-profit organizations that provide sponsorship and initial resettlement services for refugees entering the United States. Massachusetts has 8 RAs of which have frontline and executive staff who are from refugee and immigrant backgrounds and speak the languages of newest arrivals to the United States.

Language Makeup of Client Population

According to the Census Bureau's American Community Survey² more than 20% of the Commonwealth's residents 5 years of age and older speak a language other than English at home.

In recent years the Commonwealth has resettled new arrivals from 63 countries, speaking at least 64 languages, including: Acholi, Afar, Amharic, Arabic, Armenian, Bantu, Bhutanese, Burmese, Cantonese, Chichewa, Chin, Dari, Dinka, English, Ewe, Farsi, French, Haitian Kreyol; Hebrew; Hindi, Karen, Karenni, Kazakh, Khmer, Luganda, Kikongo, Kinyarwanda, Kirundi, Kiswahili, Kpelle, Krio, Kru, Kyrgyz, Lingala, Lithuanian, Maay, Maldivian Dhivehi, Mandarin, Mandinka, Mende, Mina, Moldovan, Mongolian, Nepali, Nubian, Pashto, Portuguese, Punjabi, Russian, Shona, Sindhi, Sinhala, Somali, Spanish, Ta Bedawi, Tajik, Tibetan, Tigrinya, Tshiluba, Ukrainian, Urdu, Uzbek, Vietnamese, and Wolof.

¹ This information on the ORI staff capacity to provide interpretation and translation services as well as their countries of origin was obtained through a Linguistical Capacity survey the ORI Staff completed by January 5, 2024.

² U.S. Census Bureau. "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over." American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B16001, 2022, https://data.census.gov/table/ACSDT1Y2022.B16001?t=Language Spoken at Home&g=040XX00US25



Definition of Translation vs Interpretation and Translator vs Interpreter

- <u>Interpretation</u>: Oral transmission of information from one national or ethnic language to another; where the original message is accurately conveyed, including maintaining the tone and register (level of language spoken), emotion, and style of the speaker.
 - <u>Simultaneous Interpretation</u>: mode of interpreting in which the constituent speaks, and the interpreter reformulates the speech into a language their audience or the person they are speaking to understands at the same time (or simultaneously).³
 - <u>Consecutive Interpretation</u>: mode of interpreting in which the constituent speaks (or says a few sentences) while the interpreter takes notes. The interpreter then reproduces what the speaker has said for their audience or the person they are speaking to.⁴
- <u>Interpreter</u>: An individual professionally trained and qualified to provide accurate language interpretation, relaying concepts and ideas from the source language to the target language, while possessing competency in both the source culture and target culture.
- <u>Translation</u>: Written transmission of information from one language into another.
- <u>Translator</u>: An individual professionally trained and qualified to provide accurate written language translation. The translator must ensure that the document reads as though it originated in the target language. Cultural references may need to be explained to the intended audience.

Additional Policies Regarding Access to Services

Improving Accessibility

While our primary populations are new arrivals who are speakers of languages other than English, ORI will ensure access for all individuals requesting information or services who indicate a preference for American Sign Language (ASL) by coordinating with the Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH) through its statewide Interpreter and Computer Assisted Realtime Translation (CART) Referral Service. This service provides referral services for sign language, spoken English, oral, tactile, and close vision interpreting for Deaf and Deaf – Blind/ visually impaired individuals. The service also provides referrals to freelance CART providers for CART provision on behalf of hearing and/or late deafened individuals. MCDHH referred interpreters undergo one of two certification entry points: via Registry of Interpreters for the Deaf, Inc. (RID) or have been screened and approved by MCDHH.⁵ Furthermore, when registering attendees for external presentations or events, ORI will provide an option for attendees to request

³ Simultaneous Interpreting | Knowledge Centre on Interpretation (europa.eu)

⁴ Consecutive Interpreting | Knowledge Centre on Interpretation (europa.eu)

⁵ You will find MCDHH's contact information on page 25 of this document.



American Sign Language (ASL) interpretation for the deaf and hard of hearing. Zoom, PowerPoint, and Teams presentations will also include a feature to enable captions.

ORI also commits to producing materials using plain language, where possible, in accordance with <u>Federal Plain Language Guidelines.</u> These materials include the information found on our website. By using the plain language approach (lower than 8th grade reading level), the goal is to allow anyone to understand the material the first time they read or hear it. Documents will be organized so that the most important information comes first. ORI aims to ensure that documents may be read by a screen reader for people with visual impairment by posting both a PDF and Word version of each document on its website. The PDF will serve as a printable version that often includes designed features, such as fillable fields for forms, as well as logos or photographs. The Word version is also compatible with screen readers and other assistive technology, and it may not include all the design elements of the PDF.

Refugee Case Management (RCM) Language Access Policies

All newly arrived eligible refugees receive interpretation and translation as needed through ORI's Refugee Case Management (RCM) services. RCM contracts require that providers have or are able to obtain through interpreters and translation services (either through internal bilingual capacity or through external resources), the language capacity to serve all clients. Each refugee client's language needs are identified at initial intake for RCM services. Interpreter services, as well as required translated forms and notices, are provided to the client as needed and applicable.

<u>Refugee Resettlement Program, Refugee Cash Assistance, General, Availability of Agency</u> <u>Policies, 45 CFR 400.55</u>

A State, or the agency(s) responsible for the provision of RCA, must make available to refugees the written policies of the RCA program, including agency policies regarding eligibility standards, the duration and amount of cash assistance payments, the requirements for participation in services, the penalties for non-cooperation, and client rights and responsibilities to ensure that refugees understand what they are eligible for, what is expected of them, and what protections are available to them. The State, or the agency(s) responsible for the provision of RCA, must ensure that agency policy materials and all notices required in §§ 400.54, 400.82, and 400.83, are made available in written form in English and in appropriate languages where a significant number or proportion of the recipient population needs information in a particular language. In regard to refugee language groups that constitute a small number or proportion of the recipient population, the State, or the agency(s) responsible for the provision of RCA, at a minimum, must use an alternative method, such as verbal translation in the refugee's native language, to ensure that the content of the agency's policies is effectively communicated to each refugee.

<u>Refugee Resettlement Program, Refugee Cash Assistance, Public/Private RCA Program, 45</u> <u>CFR 400.61(c) (1)</u>:

".....States and local resettlement agencies must.....ensure that the services provided.....are appropriate to the linguistic and cultural needs of the incoming populations..."



<u>Refugee Resettlement Program, Refugee Social Services, Scope, Services Requirements, 45</u> <u>CFR 400.156(e)</u>

Services funded under this part must be provided to the maximum extent feasible in a manner that is culturally and linguistically compatible with a refugee's language and cultural background.

<u>Massachusetts Refugee Resettlement Program, Right to Linguistically Appropriate Services,</u> <u>121 CMR 2.260</u>

"A refugee whose limited English proficiency prevents him or her from understanding his or her rights and responsibilities and from benefiting from the MRRP has the right to services from a case manager who can communicate in the refugee's primary language. If such bilingual staff is not available, an interpreter shall be provided at no cost to the refugee unless the refugee prefers his or her own interpreter. Program notices and forms shall be in languages commonly used by refugees. Any notices not in a refugee's language shall contain an advisory informing the refugee that if he or she needs assistance translating program notices or letters, the Case Management Agency shall provide a bilingual staff member or interpreter to assist."

Indicated below are the specific protocol employed to ensure quality and due process with regard to the aforementioned services.

Language access protocols for providing interpretation and translation services:

ORI has a vast database of professionally experienced translators and interpreters within the ORI network of service providers. The protocol for the provided services includes the following:

Interpretation Service Request Protocol

In-person interpretation for a person who is Limited English Proficient (LEP) typically occurs within the scope of MRRP service delivery in ORI's main location (i.e., Fair hearings) or at an ORI contracted agency (i.e., interviews with clients during monitoring visits). There are other events that require interpretation such as all providers' conferences or governmental-related visits by foreigner government officials. Most ORI's providers have multilingual language capacity. However, if a specific language is not available for interpretation on-site, the following protocol is employed:

- Identify the date/time of the event or instance that you need interpretation, the length you need interpretation for, and the languages that you need covered.
- Once the information above is finalized contact ORI's language access officer. They will assist or takeover the process of securing an interpreter. They will follow these steps:
 - Ensure there's a line item in the relevant contract related to the interpretation request.
 - Contact ORI's fiscal team to obtain the internal list of contractors that provide interpretation services.
 - Send a request to the relevant contractors that include the number of interpreters you are requesting, the languages you need them to interpret, the length of time you need



the interpreters for, and identify whether they will provide simultaneous or consecutive interpretation.

- Upon receipt of quote, email it to ORI's fiscal team along with the Service Purchase Fiscal form. Make sure to cc the relevant Program Manager and wait for them to approve the interpretation request.
- Once approved confirm with the contractor that they can fulfill the interpretation request and obtain the contact information of the interpreters or interpreter coordinator.
- ORI's staff must conduct a quality control assessment of the interpreters or interpreter to report back on the level of satisfaction of the interpreter to the contractor.
 - The interpretation requestor can do the assessment themselves if they speak the relevant language(s) or they can ask other ORI team members to assist with this.
 - If the language is not spoken within the ORI team, identify and reach out to ORI's service providers to inquire if they have a team member that can help with the assessment of the interpretation.
- When the interpretation services are fulfilled, ensure that:
 - You communicate any issues with quality or otherwise of the interpretation service providers.
 - Ask the interpretation contractor to send the final invoice and double check the invoice with the initial quote.
 - Please note that sometimes the invoice goes directly to the fiscal team. In that case, the fiscal team should check back in with you to double check and compare with the initial quote to ensure that the price in the invoice coincides with the original quote.
- Once the invoice is reviewed and approved, send the invoice to the fiscal team for processing.

ORI's Language Access Coordinator and Executive Director will explore budgetary avenues in FY24 to set up a language line to have immediate access to interpretation services for LEP constituencies that call our main line looking for assistance. The Language Access Coordinator will also conduct a quarterly inventory of the simultaneous interpretation technology we have available and conduct regular quality control on them to be able to use it and potentially loan it to our community partners starting 2024.

Translation Service Request Protocol

Translation of a document from English into a target language typically occurs in the following order:

- Identify the document that needs to be translated as well as the languages it needs to be translated into.
 - ORI staff member consults relevant service providers before finalizing the list of languages the document will be translated into.
- Once the languages are determined and the final document prepared, the ORI Language Access Coordinator will initiate the request process. These process follows the following steps:
 - Contact ORI's fiscal team to:



- ensure there are available funds in the relevant contract related to the document, and
- obtain the list of contractors approved by the state for translation services.
- Consult the PRF75 Statewide Contract regulations⁶ and use it as reference to request a quote(s) from the list of contractors approved by the state along with the list of languages the document needs to be translated into.
- Submit the most favorable quote and the Service Purchase Fiscal form to ORI's fiscal team and cc the relevant Program Manager (via email).
- ORI's fiscal team encumbrance the quoted amount and allow staff to proceed with the service requested (via email).

The Language Access Officer confirms with contractor that they can fulfill with the translation request (via e-mail).

- Upon receipt of translation documents, ensure a quality control check of the documents translated:
 - If language(s) is spoken within ORI's staff: selected staff reviews document(s) for accuracy.
 - If the language is not spoken within ORI's staff, identify and reach out to ORI's service providers for assistance with quality control of documents translated.
- Once the quality of the translation is assured, the Language Access Officer confirms with contractor request final invoice. Final invoice will be compared to the initial quote for accuracy of prices quoted.
 - Often, the invoice is submitted directly to ORI's fiscal team. In that case, they check back in with Language Access Coordinator to ensure that the price in the invoice coincides with the original quote.
- Once the invoice is reviewed and approved, confirm with the fiscal team for final processing.
- Send **translated documents** to the ORI staff member that requested the initial translation.

Interpretation for the Deaf & Hard of Hearing at Agency Events

If ASL interpretation is requested, follow the steps below to request an ASL interpreter:

Per MCDHH all requests for ASL interpretation must made by submitting a request for services by submission of a request via Virtual Gateway; submitting an online request form during normal business operating hours telephonically or via TTY; or using the approved form via fax. For emergency interpretation needs, a phone request for services can be made to provide after- hours or short-turn-around interpretation. The contact information for MCDHH is listed on page 25 of this document.

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 canceled, you should provide notice to MCDHH at least three days before the scheduled date to avoid fees. General guidance for ORI staff is laid out below:

⁶ download (mass.gov)



- 1. Request ASL interpreter(s)/CART through MCDHH for the date and time in question. Most events will require two ASL interpreters.
 - a. It is possible to request interpreters from multiple organizations. You should make time prior to the event for the interpreters to connect.
- 2. After requesting ASL services/CART:
 - a. The requestor will receive contact information for the assigned interpreters by MCDHH.
 - b. The requestor needs to confirm date/time/location with ASL interpreters and get an email stating their rates as documentation of the cost estimate for submitting to ORI A&F.
- 3. After the meeting/event:
 - a. ASL interpreter will invoice the requestor directly.
 - b. Requestor works with ORI Office Manager and ORI A&F to process invoice.

ORI staff can also review the <u>First Time Use Instructions</u> from the Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH) to familiarize themselves with the different kinds of interpretation that could be requested or visit the Commission's website, linked <u>here</u>.

Access to ORI Website

All mass.gov websites feature a "Select Language" option in the menu at the top of the page. By choosing this widget, visitors to the site can translate the page into any one of 37 languages.

Access and utilization of resources identified above.

ORI's contracted service providers hire bilingual/bicultural case managers in anticipation of the arrival of new refugee communities designated for resettlement. Bilingual/bicultural staff are vital for the successful community orientation and adjustment of refugees and become part of a diverse interpreter pool for the geographic area in which the refugees are resettled. They assist schools, healthcare providers, housing representatives and other health and social service agencies to communicate with refugee families.

(1) Vital Document Translation:

For the purposes of this Language Access Plan, ORI has determined that any document is considered vital if it contains information that is critical for obtaining services, benefits, or is a document required by law. Vital documents include applications, consent and complaint forms; notices of rights; notices advising LEP persons of the availability of free language assistance; and letters or notices that require a response from the beneficiary or client. Further documents are detailed below:

- 1. The Massachusetts Refugee Resettlement Program (also referred to as the MRRP) funding application to the U.S. Office of Refugee Resettlement for refugee services, FFY24, includes the following assurances regarding bilingual capacity and translations:
 - a. MRRP will provide culturally and linguistically appropriate services to clients as required by Title VI (Prohibition Against National Origin Discrimination) and of Civil Rights Act & as required by 45 CFR Sections 400.55 and 400.156 of ORR



regulations. To ensure compliance in this area, refugee resettlement sites shall periodically review client needs and adjust staffing and translation of documents accordingly. Sites shall also maintain a list of individuals in the community who are available to supplement languages spoken by program staff.

- b. All written policies and forms will be available in a refugee's language as they relate to eligibility, duration and amount of cash assistance payments, and participation requirements including penalties for non-cooperation and client rights and responsibilities. The following types of documents will be translated into primary client languages and disseminated to all resettlement service sites: a) documents that need client signature; b) documents that explain program services; c) documents that explain client rights and responsibilities; d) documents that explain key elements of the resettlement program; and e) documents that provide notice in change of benefits or opportunity for hearings. These will include the following: Notice of Request for Verifications and Checklist; Client Rights and Responsibilities; Program Participation Requirements and Procedures; Notice of Approval of Application; Notice of Denial of Application; Family Self- Sufficiency Plan; Medical Report (release authorization only); Notice of Grant Reduction/Termination; Notice of Conciliation; Conciliation Agreement; Notice of Grant Reduction/Termination (Non-Compliance); Notice of Request for a Fair Hearing; Notice of Fair Hearing; What to Expect at Your Fair Hearing;
 - i. *Note:* Translations of these documents will be completed in the following languages: English; Amharic; Arabic; Dari; Farsi; French; Haitian Kreyol; Kinyarwanda; Spanish, Swahili, and Vietnamese. The refugee resettlement program forms and notices are currently being revised to incorporate new language needs.
- c. ORI will develop two-sided forms (with one side in English, and the other in the new arrival's primary language) for the languages available in translated form or an advisory on availability of interpreter services so that the refugee can have the same document that is in the case file. For non-primary new arrivals' languages comprising a small proportion of the caseload, for which translations are not available, to ensure that policies are effectively communicated to each refugee, alternative methods such as verbal translation of the forms will be used. Such translations will be documented on the English language version of the form by the signature of the client and case manager/interpreter.
- d. Pursuant to 45 CFR 400.55, ORI assures that all written policies and forms shall be made available to refugee clients in English and in languages commonly used by refugees, as the material relates to eligibility, duration and amount of cash assistance payments, and participation requirements including penalties for non-cooperation, and client rights and responsibilities. For refugee languages comprising a small portion of the caseload, alternative methods of communication, such as verbal translation, will be documented and signed by the client and case manager/interpreter to ensure that policies are effectively communicated to each refugee. Also see: 121 CMR 2.260, Right to Linguistically Appropriate Services.



e. Currently, the Massachusetts Refugee Resettlement Program forms are translated into 15 languages: Amharic, Arabic, Babel, Dari, Haitian Kreyol, Farsi, French, Russian, Somali, Spanish, Swahili, Nepali, Pashto, Tigrinya, and Ukrainian.

ORI Budget Department pays for the translation of materials and interpretation from the statewide contracts/vendors' quotes.

ORI is seeking for qualified vendor (s) to provide interpretation services either in-person, telephonic or video remote to facilitate communications with high numbers of newly arrived immigrants with limited English proficiency staying at emergency assistance shelters operated by the Executive Office of Housing and Livable Communities (EOHLC) and other Supplemental Shelter Sites.

ORI also has translation equipment available for internal use among EOHHS sister agencies. For details, please contact Asquale Gebremedhen, ORI's Administrative Assistant at 617-727-7888 or asquale.gebremedhen@mass.gov.

2. Stakeholder Consultations

ORI has on-going communication with community organizations and governmental agencies (i.e. nonprofits, community health centers, municipalities, etc.) that service new arrivals regardless of their immigration status (i.e. asylum seekers, refugees, humanitarian parolees, etc.). ORI facilitates Regional Consultations with refugee resettlement agencies and community stakeholders and has been hosting biweekly community conversations with agencies providing services to new arrivals. Additionally, ORI receives demographic information regarding planned refugee resettlement numbers from the Federal Office of Refugee Resettlement (ORR). This is how ORI staff members gather information on an ongoing basis on the language needs of newly arriving refugees and ensures that we are up to date with the translation and interpretation needs of the communities we serve.

The Language Access Coordinator will also consult the October 12, 2012, Administrative Bulletin from the Executive Office of Administration and Finance, "Language Access Policy and Implementation Guidelines" and prior ORI LAPs to ensure the office has a comprehensive and inclusive LAP.

In addition, ORI:

- Hosts and participate in quarterly providers' consultations where ORI staff and refugee service providers and local stakeholders meet to discuss the needs of refugees and immigrants in Massachusetts. Attends the Office of Refugee Resettlement (ORR) Convenings.
- Attends the federal agencies' Bi-weekly meetings which include Office of Health & Human Services, DHS, USCIS and other states to obtain info & dialogue on assisting refugees & immigrants.
- Attends the State Refugee Coordinators Annual Convening and monthly meetings to get updated info & resources from federal & state partners.



- Organizes provider trainings on diverse topics which are designed to ensure cultural sensitivity in the provision of refugee & immigrant services and to keep staff current on developments in the field of refugee & immigrant services.
- Utilizes Technical Assistance Consultants, who are contracted by ORR to provide assistance to States on client diversity issues.
- Provides ongoing training and technical assistance to service providers for the day-to- day implementation of program services, thereby ensuring adherence to program/contract requirements, including those related to language access.
- 3. Notice to Public

The ORI website links to ORI's regulations, which set forth the Right to Linguistically Appropriate Service. 121 CMR 2.260. Also, refugee clients receive a "Rights and Responsibilities" document, which outlines the right to linguistically appropriate services, at the time of their enrollment in the Massachusetts Refugee Resettlement Program (MRRP).

4. Agency Monitoring

Monitoring of vendor service contracts and subcontracts and the provision of technical assistance by ORI program staff is ongoing and includes annual telephone interviews, quarterly/trimester/annual report desk reviews and annual on-site provider visits. Telephone interviews are conducted by individual ORI Program Coordinators in the first quarter of the fiscal year.

The first item in the telephone interview identifies the language capacity of program staff. The interview also includes ethnic breakdown of current clients and the specific question: "What do you use to meet the language needs (internal and/or external resources) of the refugee population(s) served?" This process provides ORI with information needed to determine if the language access needs of clients are adequately met.

Site visits, also conducted by the ORI Program Coordinators, take place in the second half of the fiscal year, and again include information regarding language capacity and bilingual/bicultural staff, site visit and quarterly program reports, document provider outreach activities, their use of ethnic media, "target language" ads and ISpeak cards.

Finally, in the "coordination of services" section of the site visit and quarterly reports, providers describe their collaboration with other refugee service providers, including the sharing of interpreter services.

(2) Language Access Complaint Procedure

A client may file a complaint with the ORI Language Access Coordinator if the client believes he/she has been denied the benefits of this Plan. The complaint must be written and filed within 6 months of the alleged denial. To file a complaint with the Language Access Coordinator, the written complaint must be submitted to:



Yarlennys Villaman Director of Community Affairs

Language Access Coordinator Office of the Governor Maura T. Healey Massachusetts State House, Room 280 Boston, MA 02133 617-947-9759 Yarlennys.k.villaman@mass.gov

Carol Q. Leon Ombudsperson Massachusetts Office for Refugees and Immigrants 600 Washington Street Boston, MA 02111 617-685-9354 carol.q.leon@mass.gov

Cristina Aguilera

allon & Wahl

Secretary Kate Walsh Executive Office of Health and Human Services January 8, 2024 Date

March 1, 2024

Date



Provider and Partner Listing for FY24

Action for Boston Community Development, Inc.

178 Tremont St. Boston, MA 02111-1093 617-348-6000 www.bostonabcd.org

African Community Education Center

51 Gage St Worcester, MA 01608 (508) 459-2284 www.acechildren.org

Agencia ALPHA (Congregation Lion of Judah)

62 Northampton St.# H 101 Boston, MA 02118 (617)-522-6382 www.agenciaalpha.org

Angels -Net Foundation, Inc.

360 W. Boylston Street #216 West Boylston, MA 01583 (774) 261-4232 www.angelsnetfoundation.org

Ascentria Care Alliance-West Springfield Site

425 Union Street, Floor D W. Springfield, MA 01089 (413) 787-0725 www.ascentria.org

Ascentria Care Alliance-Worcester Site

11 Shattuck St. Worcester, MA 01605 (774)-243-3100 www.ascentria.org

Association of Haitian Women, Inc.

330 Fuller St. Dorchester, MA 02124 (617)-287-0096 www.afab-kafanm.org



Brazilian Welcome Center

14 Harvard Ave, #2, Allston, MA 02134 (617) 783-8001

Catholic Charities of Boston

275 West Broadway Street South Boston, MA 02127 (617) 464-8100 www.ccab.org

Casa Dominicana

402 Haverhill Street Lawrence, MA (918) 794-5399 AMadena@glts.net

Catholic Charities Archdiocese of Boston

275 W. Broadway St. Boston, MA 02127 (617)-464-8100 <u>www.ccab.org</u>

Catholic Charities Agency of the Diocese of

Springfield

65 Elliott St. Springfield, MA 01105 (413)- 452-0572 www.diospringfield.org/Ministries/cca

Center for New Americans

42 Gothic Street Northampton, MA 01060 (413) 587-0084 www.cnam.org

Community Action Committee of Cape Cod

& Islands 372 North St. Hyannis, MA 02601 (508) 771-1727 www.cacci.cc

Community Economic Development Center

1285 Acushnet Ave.



New Bedford, MA 02746 (508) 979-4684 www.cedcnewbedford.org

Community Upliftment Program, Inc.

465 Belmont Ave.Springfield, MA 01108(413) 784-3301www.comunityupliftment.org

Congolese Development Center

330 Lynnway Street suite 302 Lynn, MA 01901 (781) 593-0100 Ext.11 www.cd-c.org

Dept. of Children and Families

600 Washington St. 6th floor Boston, MA 02111 (617) 748-2436 www.mass.gov/eohhs/gov/department/dcf

Dept. of Public Health

305 South St. Jamaica Plain, MA 02130 (617) 983-6590 www.mass.gov/refugee-health

East Boston Community Council

50 Meridian St E. Boston, Ma 0100 (781) 593-0100 www.ebecc.org

Eastern Nazarene College Welcome Center

23 East Elm Avenue Quincy, Massachusetts 02170 (617)-745-3000

Edward Kennedy Community Health Center

19 Tacoma Worcester, MA 01605 (800) 853-2288 www.kennedychc.org



Eritrean Community Center 590 Shawmut Avenue Roxbury, MA 02118 (617) 427-1210 www.eccboston.org

Friendly House

36 Wall Street Worcester, MA 01604 508-755-4362

Greater Lawrence Community Action Council, Inc.

305 Essex Street, 4th Floor Lawrence, MA 01840 (978) -681-4900

Haitian American Public Health Initiative

1603 Blue Hill Ave. Mattapan, MA 02126 (617) 298-8076 www.haphi.org

Immigrants' Assistance Center Inc.

58 Crapo Street New Bedford, MA 02740 (508) 996-8113 www.immigrantsassistancecenter.com

International Institute of Boston

2 Boylston Street, 3rd floor Boston, MA 02116 (617) 695-9990 www.iine.org

International Institute of NE Lowell

101 Jackson Street, Suite 2 Lowell, MA 01852 (978) 459-9031 www.iiboston.org

Jewish Family Service of Metro West

475 Franklin Street, Suite 101 Framingham, MA 01702 (508) 875-3100 www.jfsmw.org



Jewish Family Service of Western Mass

15 Lenox Street Springfield, MA 01108-2666 (413) 737-2601 www.jfswm.org

Jewish Vocational Services

75 Federal Street, 3rd floor Boston, MA 02110 (617) 399-3200 www.jvs-boston.org

Lawrence Family Development's Maria

Quintana Family Center 404 Haverhill St. Lawrence, MA 01841 (978) 224-8808 www.quintanacenter.org

Lowell Public Schools

155 Merrimack Street Lowell, MA 01852 (978) 674-2109 www.Lowell.k12.ma.us

Massachusetts Alliance for Portuguese Speakers

1046 Cambridge Street Cambridge, MA 02139 (617) 864-7600 www.maps-inc.org

Massachusetts Immigrant & Refugee Advocacy Coalition (MIRA)

69 Canal St., 3rd floor Boston, MA 02114 (617) 350-5480

MassHealth

100 Hancock St., 8th floor Quincy, MA 01246 (617) 847-1246 www.mass.gov/eohhs/gov/department/masshealth

Merrimack Valley Immigrant & Education Center

439 S. Union St., BLD 2, Basement Lawrence, MA 01843



(978) 683-7316 www.mviec.org

Mount Olives Community Center, Inc.

1283 Hyde Park Ave. Hyde Park, MA 02136 (617) 721-8948 www.mountoliveschurch.org/mocc-info

Multicultural Resource Center of MA, Inc.

425 Union St. Level B West Springfield, MA 01089 (413-726-1352 www.mrcmass.org

New American Association of MA, Inc.

330 Lynnway # 302 Lynn, MA 01901 (781) 593-0100 Ext.18 www.naamass.org

Project Citizenship

11 Beacon St, #729 Boston, MA 02108 (617) 694-5949 www.projectcitizenship.org

Quincy College

1250 Hancock St. Quincy, MA 02169 (617) 948-1700 www.quincycollege.org

Refugee and Immigrant Assistance Center - Boston

253 Roxbury Street Boston, MA 02119 (617) 238-2430 www.riacboston.org

Refugee and Immigrant Assistance Center – Lynn site

30 Lynnway, Lynn, MA 01901 (617) 238-2430 www.riacboston.org

Refugee and Immigrant Assistance



Center Worcester

316 Main Street, Suite 602 Worcester, MA 01608 (508) 756-7557 www.riacboston.org

Somali Development Center

10 Malcolm X Blvd, 2nd floor Roxbury, MA 02119 (617) 522-0700

Southern Sudanese Solidarity Organization

330 Lynnway #302 Lynn, MA 01901 (781) 593-0100

Southeast Asian Coalition of Central MA, Inc

50 Portland Street, Suite 521, 5th Floor Worcester, MA 01608 (508) 791-4373

The Literacy Center

80 N. Main St Attleboro, MA 02703 (508) 226-3603 www.theliteracycenter.com

West Springfield Public Schools

26 Central Street West Springfield, MA 01089 (413) 495-1750



For access to deaf and/or hard of hearing individuals, the following resources will be contacted:

Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH)

Executive Office 600 Washington St. – 3rd Floor Boston, MA 02111 617-740-1600 Voice 617-740-1700 TTY 866-970-7177 Video Phone 617-740-1810 Fax Toll Free: 800-882-1155 Voice Toll Free: 800-530-7570 TTY

Southeastern Massachusetts Regional Office-61 Industrial Park Road Plymouth, MA 02360 508-732-3105 Voice 508-830-9433 Fax – Send Fax with Cover Sheet – Attn: MCDHH

Central Massachusetts Regional Office 2 Foster Street, Second Floor Worcester, MA 01608 413-788-6427 Voice/TTY 866-948-4360 Video Phone 508-860-4000 Fax – Send Fax with Cover Sheet – Attn: MCDHH

Western Massachusetts Regional Office Springfield State Office Building- 436 Dwight Street, Suite 204 Springfield, MA 01103 413-788-6427 Voice/TTY 866-948-9190 Video Phone 413-731-5177 Fax- Send fax with Cover Sheet-Attn: MCDHH

Berkshire Regional Office -160 North Street, Suite 201 Pittsfield, MA 01201 413-788-6427 Voice/TTY 413-448-2466 Fax – Send Fax with Cover Sheet – Attn: MCDHH