Massachusetts Health Connector
Language Access Plan

December 2016
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Section 1: Introduction and Purpose

The Massachusetts Health Connector is Massachusetts’ health insurance Marketplace, where qualified residents without access to health insurance through an employer or a public program can shop and enroll in health and dental insurance plans. Massachusetts residents who qualify for subsidized health coverage programs, such as federal Premium Tax Credits, and the state- and federally-funded ConnectorCare health plans, may only access these programs by applying and enrolling through the Health Connector.

The Health Connector is dedicated to ensuring access to the agency’s services for all people across the Commonwealth of Massachusetts, including those with Limited English Proficiency (“LEP”). The Health Connector considers an LEP person to be someone who may not be able to speak, read, write or understand the English language at a level allowing them to interact effectively with agency staff. It may also include people with impaired physical capabilities who need visual and audial assistance in communication.

This Language Access Plan (referred to as the Plan or the LAP) is meant to document the resources and tools for accessing Health Connector services, in light of the various needs of LEP populations. The Agency applied a four factor analysis in the assessment of current access and protocols for LEP populations, and areas of improvement for the agency. The four factors include:

- The number or proportion of LEP person eligible to be served or encountered by the program
- The frequency with which LEP individuals come in contact with the program
- The nature and importance of the program or service to people’s lives
- Resources available to the recipient and costs

The Language Access Plan and the self-assessment, processes, and new features for expanding access documented within the plan are a reflection of the Health Connector’s commitment to providing information about and access to health and dental insurance programs, for all individuals and families across the Commonwealth. However, any new features are contingent on availability of fiscal resources to implement the language access plan and related resources.

Legal Basis

This document serves as the plan for the Massachusetts Health Connector to provide comprehensive services for LEP individuals in compliance with Massachusetts and federal law prohibiting discrimination based on national origin, which includes language. It is designed to implement the requirements of Title VI of the Civil Rights Act of 1964, section 1557 of the Affordable Care Act and implementing regulations and compliance with state law including Massachusetts General Laws Chapter 151B.
**Section 2: Self-Assessment**

**Interactions with LEP individuals**

The Health Connector interacts with the general public in a number of different ways:

- **Electronically.** The Health Connector communicates electronically with members and the general public through its website, at MAhealthconnector.org, where individuals can to apply for, select, and enroll in health insurance plans. Additionally, the Health Connector provides outreach and educational messaging, which is disseminated by email and social media updates, and also made available online through website content at our consumer information site at MAhealthconnector.org.

- **By telephone.** Members of the public can contact the Health Connector by phone if they call the Customer Service call center, the Ombudsman, Appeals Unit, Human Resources department, or the agency’s Public Information Unit (PIU).

- **Written (paper) correspondence.** The Health Connector sends written notices by U.S. Postal Service regarding eligibility and enrollment information, and also periodically sends informational or outreach materials by paper mail.

- **In person.** The Health Connector interacts with many members of the public through the agency’s walk-in center sites, Appeals unit, and at regulatory hearings. The public also interacts with Navigator organizations and other enrollment assister partners, who act as community outreach liaisons for the Health Connector. A list of walk in center locations and 2017 Navigator grantees are available in the Appendix section of this document.

- **Advertisements and earned media.** The Health Connector maintains a strong media presence as a means for educating the general public about the availability of health and dental coverage through the Health Connector. Advertising vehicles include web and social media, radio, television, signs and posters in public areas, and sponsorships.

**Identifying LEP individuals**

The Health Connector uses the following tools to identify LEP individuals who require language access supports to interact with the agency:

- **Verbal self-identification.** Individuals verbally identify their language needs when they seek assistance at walk-in centers, Navigator organizations, and over the phone when making calls to Health Connector Customer Service, Appeals unit, Ombudsman, or PIU line.
- **Visual self-identification through “Language Identification Guide” posters.** Walk-in centers display “Language Identification Guide” posters, which contain the phrase “Point to your language. An interpreter will be called at no charge to you” in 99 languages other than English. These posters are used for individuals to self-identify language needs and communicate with walk-in center staff.

- **Written self-identification (write-in and/or pre-populated lists).** All Health Connector applicants are given a chance to provide both written and spoken language preferences when they apply for health or dental insurance through the online or paper application. In the paper application for health and dental coverage, an applicant may write in language preferences. When applying online, an applicant has the opportunity to select from a pre-populated list of languages. This application data is used as often as possible when the agency sends subsequent communications to applicants. Additionally, individuals who are filing an appeal with the Health Connector appeals unit are asked on the appeal request form if they prefer to conduct the appeal in a language other than English.

## Providing access for LEP audiences

The Health Connector provides various tools and means of support for interacting with individuals with LEP needs. The Health Connector recognizes the importance of the service that it provides for the residents of Massachusetts, as a major source for federal and state subsidies for health care. Given the impact of health coverage on the overall health, wellness, and financial security of individuals, it is of the utmost importance the Health Connector consider accessibility to the application and enrollment processes that enable qualified individuals to obtain health insurance and subsidies.

The Health Connector has made it a priority to implement policies and procedures that allow for greater access and increased ease in accessing services among LEP individuals who may encounter difficulties with the application and enrollment processes. The following section documents the Health Connector’s assessment of its interactions with LEP audiences, the protocols currently in place for meeting the needs of LEP audiences, and plans for future improvements to progressively increase ease of access to health coverage among LEP audiences.

### Interactions with LEP audiences

- **Multi-lingual staff.** The Health Connector employs some staff members and Customer Services representatives who are fluent in languages other than English, most frequently Spanish; fluency is based on these individuals having spoken the non-English language as their original language. These multi-lingual staff members converse with and assist LEP individuals who need
assistance in their language whenever they are present and available. Multi-lingual staff do not provide interpretation of documents for members or serve as interpreters at formal proceedings like an appeals hearing. The Health Connector also awards grants to Navigator organizations in various high-need communities throughout the Commonwealth. Many Navigator organizations have multi-lingual staff available to assist individuals in their native or preferred language. A list of Navigator organizations and the languages spoken by staff at each organization can be found in Appendix A of this document.

- **Telephonic interpreting.** The Health Connector utilizes Language Line, a third-party service that provides oral telephonic interpretation services in any language for LEP individuals. It is relied upon to interpret for LEP individuals at formal proceedings such as appeals hearings. Additionally, it is used for interactions with LEP individuals that can’t be met by staff, to interpret documents over the phone to an LEP individual, or when there is no multi-lingual staff available to help answer questions and converse with an LEP individual. The Language Line is utilized for inbound phone calls to the Health Connector’s Customer Service line, PIU, Ombudsman, and Appeals unit. It is also used at walk-in center sites for communicating with individuals who arrive in person and self-identify as speaking a language other than English.

- **Translated print educational and marketing materials, forms, and applications.** The Health Connector contracts with an outside vendor to provide culturally competent and linguistically appropriate written translations of educational and marketing collateral materials, such as flyers, emails, postcards, and brochures. This outside vendor also provides translation for paper applications and forms, which are available by print upon request from the Customer Service center, or by download at MAhealthconnector.org. Almost all of the Health Connector’s collateral material has been translated into Spanish, and many of the most-frequently requested materials have been translated into the ten non-English languages that are most commonly spoken throughout the Commonwealth. Print versions of many materials are available at the Health Connector’s walk-in center locations, as well as various community organizations. Almost all are available for download on the Health Connector website. A list of translated educational and outreach print materials can be found in Appendix B of this document.

- **Translated and accessible written notices.** The Health Connector has made all notices available in large print or Braille upon request. The Health Connector now can send written eligibility notices in Spanish to members who have indicated a Spanish written language preference. All notices sent to members regarding eligibility have been translated into Spanish. Primary recipients of communications who have indicated that they prefer Spanish as a written language receive eligibility notices in Spanish. The Health Connector is continuing to add Spanish versions of other notices, such as those that
pertain to enrollment and payment delinquency, and appeals-related notices, but has not implemented full translation of all notices as of the date of this plan. However, all written notices sent to members include a Babel sheet, which provides translation of the following phrase into numerous languages: “Important! This has important information about your health insurance. If you want the information translated into your own language, call 1-877-623-6765.” Until recently, the Babel phrase was translated into 11 different languages. The Health Connector has created a newly updated version of the Babel sheet that now contains 18 languages and is phasing in the new Babel sheet for notices starting in October 2016. A full list of languages and sample Babel page can be found in Appendix C of this document.

- **Translation tool for website.** The Health Connector’s content website at MAhealthconnector.org offers a drop-down menu for users to select a preferred language, and then utilizes a machine translation of content. This feature is available in 19 languages other than English. Content contained in PDFs and other documents for download are not all provided in other languages, though many are provided in Spanish and some have been translated into the 11 languages that previously comprised the Health Connector Babel sheet. At this time, the website portal/application is not available in any language other than English. However, applicants may fill out a paper application for health or dental insurance that has been translated into Spanish.

- **American Sign Language (ASL) interpreters.** The Health Connector provides in-person ASL interpreters for any individual who makes a request for such assistance in advance. These interpreters are provided at the Health Connector’s walk in center locations or with the Appeals unit, after an appointment or hearing date is requested. Appointments are requested through the walk in centers, correspondence with Health Connector Appeals staff, or by phone with a Customer Service representative. A list of walk in center locations where individuals may conduct an appointment with an ASL interpreter are listed in Appendix D of this document.

Protocols for access to resources for LEP audiences

- **Phone calls to Customer Service, Appeals unit, PIU, and Ombudsman.** When an LEP individual places a phone call to the Health Connector, they will self-identify their language needs and be connected to the telephonic interpreter service, for interpretation support in their language. Based on feedback from stakeholders who reviewed this Language Access Plan, the Health Connector will update the existing Babel sheet to provide more explicit instructions for how to bypass the interactive voice response (IVR) system to reach a Customer Service Representative more quickly. The revised Babel sheet will also let individuals know that interpretation services are available at no charge, and are confidential. Upon reaching a Customer Service
Representative, an LEP individual will need to communicate the language that they need an interpreter for. Before connecting the individual to the telephonic interpreter service, Customer Service Representatives will also communicate with the individual that the call is free and confidential.

- **Appointments for ASL interpretation services.** The Health Connector provides ASL interpreters for any individual who makes a request for such assistance. These requests are made either over the phone through a Customer Service Representative, or in person at any of the Health Connector’s walk in center locations. Appointments are scheduled approximately two weeks in advance, to allow for coordination with individuals, qualified ASL interpreters, and walk in center staff. The Health Connector Appeals unit also coordinates ASL interpreters for hearings upon request.

- **Spanish language preference indication on application.** If a member indicates through their initial eligibility application that they prefer written communications in Spanish, they will receive all eligibility notices sent by mail in Spanish. This data is also used to inform the supplemental communications sent by the Health Connector, such as emails and postcards. At this time, Customer Service Representatives do not have immediate access to language preference information for current members. As a future improvement for meeting the needs of members with LEP needs, the Health Connector will pursue the implementation of better dashboard tools for Customer Service representatives, which could include language preference of individual members as they call Customer Service. This future improvement would allow Customer Service Representatives to offer language interpretation services at the start of an interaction and may help to serve more LEP individuals.

- **Alternate written language preferences indicated on application.** If a member indicates another language other than English or Spanish is their preferred written communication language, they will continue to receive notices and supplemental communications in English, but will have a Babel sheet included with this mailing. If they need the content translated into their language, they will call Health Connector Customer Service and be connected to the Language Line for assistance.

- **Language preference indicated on Appeals form.** The Appeals unit uses the Language Line to connect appellants with interpreters when conducting Appeals hearings over the phone, or as needed for informal dispute resolution. When an appellant has indicated a Spanish language preference in their initial appeal, the Appeals unit will send notices and other communications, such as email, in Spanish to those appellants.

*Under development*

✔️ Translate the full website application into Spanish.
Translate remaining notices into Spanish as identified in self-assessment process.

Evaluate feasibility of adding additional capabilities for delivering notices in languages other than Spanish, such as Portuguese.

Continue to translate marketing and educational materials into additional languages as data collection reveals changes in language needs of the Health Connector’s membership and among the uninsured population in Massachusetts.

Include member language preference in any dashboard tools developed for Customer Service Representatives

Amend current Babel sheet to include messaging regarding the confidentiality and free service of the language line. Also include further instructions for LEP individuals to be connected with a Customer Service Representative, bypassing the full IVR messaging.

Assessing LEP Needs

The Health Connector relies on several data sources to monitor the proportion of LEP individuals and the variety of language access needs among its member population. The Health Connector also reviews data on the general population in the Commonwealth of Massachusetts which includes individuals who may currently be uninsured or at risk of becoming uninsured and requiring the services of the agency at some point in the future.

LEP needs of current members

To determine the LEP needs of the Health Connector’s current member population, the agency relies on self-identified language needs data submitted in the application process. As part of the self-assessment process, the Health Connector retrieved data on language preferences submitted by applicants seeking health or dental insurance for the current 2016 year of coverage. From this data, the Health Connector has determined the following top ten written and spoken languages preferred by applicants. Determining the preferred languages among applicants will aid the agency in identifying trends in the population of Massachusetts residents seeking health or dental insurance coverage through the Health Connector.

<table>
<thead>
<tr>
<th>Health Connector Applicants – Self-reported Preferred Written Languages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reported on July 21, 2016. Data source: hCentive DDE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Language</th>
<th>Individuals</th>
<th>Proportion</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>745,517</td>
<td>88.14%</td>
</tr>
<tr>
<td>Spanish</td>
<td>59,577</td>
<td>7.04%</td>
</tr>
<tr>
<td>Portuguese</td>
<td>13,472</td>
<td>1.59%</td>
</tr>
</tbody>
</table>
### Health Connector Applicants – Self-reported Preferred Spoken Languages

*Reported on July 21, 2016. Data source: hCentive DDE*

<table>
<thead>
<tr>
<th>Language</th>
<th>Count</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arabic</td>
<td>1,815</td>
<td>0.21%</td>
</tr>
<tr>
<td>Cambodian/Khmer</td>
<td>924</td>
<td>0.11%</td>
</tr>
<tr>
<td>Cape Verdean Creole</td>
<td>2,601</td>
<td>0.31%</td>
</tr>
<tr>
<td>Chinese - Cantonese</td>
<td>5,343</td>
<td>0.63%</td>
</tr>
<tr>
<td>Chinese - Mandarin</td>
<td>4,330</td>
<td>0.51%</td>
</tr>
<tr>
<td>English</td>
<td>739,308</td>
<td>87.41%</td>
</tr>
<tr>
<td>French</td>
<td>711</td>
<td>0.08%</td>
</tr>
<tr>
<td>Greek</td>
<td>227</td>
<td>0.03%</td>
</tr>
<tr>
<td>Haitian Creole</td>
<td>3,690</td>
<td>0.44%</td>
</tr>
<tr>
<td>Hindi</td>
<td>500</td>
<td>0.06%</td>
</tr>
<tr>
<td>Italian</td>
<td>111</td>
<td>0.01%</td>
</tr>
<tr>
<td>Korean</td>
<td>619</td>
<td>0.07%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>845,809</strong></td>
<td><strong>100.00%</strong></td>
</tr>
</tbody>
</table>

Note: .35% of the total population of applicants indicated “Other” as their written language preference.
Laotian 87 0.01%
Nepalese 442 0.05%
Other 3,142 0.37%
Portuguese 13,899 1.64%
Russian 1,602 0.19%
Somali 262 0.03%
Spanish 62,076 7.34%
Vietnamese 4,120 0.49%
Grand Total 845,809 100.00%

Note: .37% of the total population of applicants indicated “Other” as their written
language preference.

In addition to reviewing the language preferences of applicants, the Health Connector
has assessed the language preferences reported by currently enrolled members. The
data below reflects both percentages and absolute numbers of members with varying
self-reported written and spoken language preferences.

**Health Connector Members – Self-reported Preferred Spoken Languages**
*Reported on October 27, 2016.*
*Data source: FMS All_Spans 10/27/16, hCentive DDE 10/27/16*

<table>
<thead>
<tr>
<th>Preferred Spoken Language</th>
<th>Members</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arabic</td>
<td>332</td>
<td>0.14%</td>
</tr>
<tr>
<td>Cambodian/Khmer</td>
<td>189</td>
<td>0.08%</td>
</tr>
<tr>
<td>Cape Verdean Creole</td>
<td>656</td>
<td>0.28%</td>
</tr>
<tr>
<td>Chinese - Cantonese</td>
<td>2,372</td>
<td>1.01%</td>
</tr>
<tr>
<td>Chinese - Mandarin</td>
<td>1,809</td>
<td>0.77%</td>
</tr>
<tr>
<td>English</td>
<td>151,623</td>
<td>64.27%</td>
</tr>
<tr>
<td>French</td>
<td>129</td>
<td>0.05%</td>
</tr>
<tr>
<td>Greek</td>
<td>65</td>
<td>0.03%</td>
</tr>
<tr>
<td>Haitian Creole</td>
<td>627</td>
<td>0.27%</td>
</tr>
<tr>
<td>Hindi</td>
<td>190</td>
<td>0.08%</td>
</tr>
<tr>
<td>Italian</td>
<td>34</td>
<td>0.01%</td>
</tr>
<tr>
<td>Korean</td>
<td>236</td>
<td>0.10%</td>
</tr>
<tr>
<td>Laotian</td>
<td>10</td>
<td>0.00%</td>
</tr>
<tr>
<td>Nepalese</td>
<td>122</td>
<td>0.05%</td>
</tr>
</tbody>
</table>
### Preferred Spoken Language

<table>
<thead>
<tr>
<th>Preferred Spoken Language</th>
<th>Members</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other</td>
<td>688</td>
<td>0.29%</td>
</tr>
<tr>
<td>Portuguese</td>
<td>2,292</td>
<td>0.97%</td>
</tr>
<tr>
<td>Russian</td>
<td>532</td>
<td>0.23%</td>
</tr>
<tr>
<td>Somali</td>
<td>21</td>
<td>0.01%</td>
</tr>
<tr>
<td>Spanish</td>
<td>10,797</td>
<td>4.58%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>978</td>
<td>0.41%</td>
</tr>
<tr>
<td>Not Specified</td>
<td>62,218</td>
<td>26.37%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>235,920</td>
<td></td>
</tr>
</tbody>
</table>

### Health Connector Members – Self-reported Preferred Written Languages

*Reported on October 27, 2016*

*Data source: FMS All_Spans 10/27/16, hCentive DDE 10/27/16*

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<tr>
<td>Haitian Creole</td>
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<tr>
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<tr>
<td>Italian</td>
<td>34</td>
<td>0.01%</td>
</tr>
<tr>
<td>Korean</td>
<td>236</td>
<td>0.10%</td>
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<tr>
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<td>10</td>
<td>0.00%</td>
</tr>
<tr>
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<tr>
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<td><strong>Total</strong></td>
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<td></td>
</tr>
</tbody>
</table>
Telephonic/Phone Interpreter Line and Navigator assistance requests
The Health Connector reviewed data available through external parties that provide assistance to LEP population, to assess the frequency with which LEP individuals are coming into contact with the Agency.

One of these sources of data is the Language Line, the aforementioned third-party service that provides oral interpretation services for incoming calls. The Language Line shares data on a monthly basis with the Health Connector, upon request. Below is a summary of the top requested language services over a four-month period in 2016.

Languages requested through Telephonic Interpreter Phone Line
(January 2016 through April 2016).
1. Spanish (74%)
2. Portuguese (14%)
3. Chinese (Mandarin) (5%)
4. Haitian Creole (3%)
5. & 6. Portuguese Creole (2%) & Vietnamese (2%)
7. Russian (1%)

The Health Connector’s Navigator organizations act as another data source available to help inform the understanding of the frequency with which LEP individuals are seeking assistance. The Health Connector awards grants to Navigator organizations that are located in various communities throughout the Commonwealth. These organizations assist the agency in the goal of enrolling new members and supporting current members with health insurance coverage questions and decisions. An organization’s language capacity is considered when scoring Navigator applicants and selecting Navigator grantees.

In the 2015-2016 grant period, staff at the fifteen Navigator organizations spoke eighteen distinct languages. These are languages spoken by the certified staff themselves and not translators. This allows consumers to speak directly to the person that is assisting them, and not through a third party. However, in addition to the eighteen spoken languages, many Navigator organizations have language lines and offer translation services for consumers when staff does not speak the consumer’s primary language. These Navigator organizations track the number of community members that they support in different languages throughout the year, and provide this data to the Health Connector on a monthly basis. Below is an aggregated list of the top languages spoken by individuals who were assisted by Navigator organizations in the 2015-2016 grant period.

Percentages by language of individuals assisted by Navigator organizations that employed languages other than English
(August 2015 through May 2016)
1. Spanish (49.6%)
2. Portuguese (34.96%)
3. Arabic (6.77%)
4. Vietnamese (3.27%)
5. Nepalese (2.49%)
6. Haitian Creole (.92%)
7. Somali (.80%)
8. Russian (.67%)
9. Simplified Chinese (Mandarin) (.24%)
10. Cape Verdean Creole (.18%)

**LEP needs of the uninsured population**

In addition to these sources for data, the Health Connector also looks to data published through other state and federal agencies to help inform outreach to uninsured populations, and other metrics that help guide the strategic direction of the agency. This includes data collected through the U.S. Census, Massachusetts Department of Public Health, the Massachusetts Office for Refugees and Immigrants, the Center for Health Information and Analysis and the Pew Research Foundation.

To examine the language needs of the overall population in Massachusetts for the purpose of this Plan, the Health Connector looked to data from the American Community Survey from 2010, accessed through the Modern Language Association (MLA). Below is a list of the languages most spoken in Massachusetts as a percentage of the total number of languages spoken.

**Top 15 most spoken languages in Massachusetts, 2010**

*Source: Modern Language Association, accessed on November 11, 2016 from MLA website*

<table>
<thead>
<tr>
<th>Language</th>
<th>Number of people reported speaking</th>
<th>Percentage of total number of languages spoken</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>4,823,127</td>
<td>78.93%</td>
</tr>
<tr>
<td>All languages other than English combined</td>
<td>1,287,419</td>
<td>21.07%</td>
</tr>
<tr>
<td>Spanish</td>
<td>458,256</td>
<td>7.50%</td>
</tr>
<tr>
<td>Portuguese</td>
<td>181,437</td>
<td>2.97%</td>
</tr>
<tr>
<td>French</td>
<td>67,788</td>
<td>1.11%</td>
</tr>
<tr>
<td>Chinese</td>
<td>67,525</td>
<td>1.11%</td>
</tr>
<tr>
<td>French Creole</td>
<td>54,456</td>
<td>0.89%</td>
</tr>
<tr>
<td>Italian</td>
<td>43,798</td>
<td>0.72%</td>
</tr>
<tr>
<td>Russian</td>
<td>37,865</td>
<td>0.62%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>35,283</td>
<td>0.58%</td>
</tr>
<tr>
<td>Greek</td>
<td>24,857</td>
<td>0.41%</td>
</tr>
<tr>
<td>Arabic</td>
<td>22,830</td>
<td>0.37%</td>
</tr>
<tr>
<td>Mon-Khmer, Cambodian</td>
<td>22,448</td>
<td>0.37%</td>
</tr>
</tbody>
</table>
### Language Access Plan

<table>
<thead>
<tr>
<th>Language</th>
<th>Number of people reported speaking</th>
<th>Percentage of total number of languages spoken</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>4,823,127</td>
<td>78.93%</td>
</tr>
<tr>
<td>Polish</td>
<td>22,295</td>
<td>0.36%</td>
</tr>
<tr>
<td>Cantonese</td>
<td>17,537</td>
<td>0.29%</td>
</tr>
</tbody>
</table>

The data gathered on languages needs among the Health Connector’s members, applicants, and the entire population in Massachusetts reveals a large audience of individuals with a diverse array of language access needs. A comparison between the variation and frequency of languages spoken in Massachusetts appears to be congruent with the Health Connector’s member population, and the members and applicants who are seeking LEP services through the Agency’s resources.

The Health Connector is committed to continually reviewing the language needs of the LEP audience within its membership, as well as the broader population of the Commonwealth of Massachusetts, and to meeting the needs of this audience through the LEP accessibility tools and procedures that are currently in place within the Agency. The Health Connector is also committed to broadening and strengthening this access with stronger tools and processes as their implementation becomes feasible.

**Under development:**
- ✓ Formalize data collection and review on LEP populations on biennial basis.
- ✓ Refresh Language Access Plan with fresh data on LEP population as it becomes available.
- ✓ Add additional options to language selection list in online application, to reflect full breadth of known populations in the Commonwealth of Massachusetts.
- ✓ Bifurcate Portuguese language selection in online application to include both European Portuguese and Brazilian Portuguese. This will allow for more accurate reporting of these potentially significant differences among the overall Portuguese-speaking population.

### Section 3: Staff Training

All Heath Connector staff will receive in-person Diversity Awareness training on a regular basis. Diversity Awareness training materials will also be retained as a resource available to all employees throughout the year.

In addition, Customer Service Representatives, who are not employed directly by the Health Connector, but rather by an outside vendor (currently NTT DATA Services, LLC), receive Diversity Awareness training that includes, among other things, training in how to interact with LEP individuals in a culturally competent, effective manner. This training will be conducted annually in January as part of the general training for Customer Service Representatives.
The goal of this training is to help staff and Customer Service Representatives identify cultural differences and determine how to manage communication issues and discuss disabilities. The Diversity Awareness training also provides guidance on navigating differences in communication between different generations, how to identify senior sensitivity needs, and recognize sensitivity towards LGBTQ populations.

**Under development:**
- Share current Diversity Awareness training with community stakeholder groups for feedback and potential improvements to help the Health Connector meet its training goals.

**Section 4: Stakeholder Consultation**

The Health Connector received extensive input on a draft version of this Plan from a group of consumer advocates and the Massachusetts Office of Refugees and Immigrants (MORI).

The Health Connector would like to thank those partners who provided thoughtful input into this Plan and helped shape better policies and procedures for LEP populations served by the Health Connector. Many of the comments and suggestions provided by stakeholders have been incorporated in the final version of this Plan. The Health Connector will continue to seek input from stakeholders in future iterations of this Plan and as additional improvements to access become possible.

**Section 5: Agency Contact**

The Health Connector can be contacted through the following phone numbers:

**Health Connector Customer Service:**
1-877-MA-ENROLL (1-877-623-6765), or TTY 1-877-623-7773 for people who are deaf, hard of hearing, or speech disabled.

**Health Connector Public Information Unit (PIU):**
617-933-3145

**Health Connector Appeals Unit:**
617-933-3096

Members of the public are also encouraged to visit the Health Connector’s walk in centers for help with answering questions and enrolling in health and dental coverage (also found in Appendix D).
These walk in center locations are open year-round, with the following hours during Open Enrollment, November 1, 2016 – January 31, 2017. Please note, locations and hours will change after the Open Enrollment period has ended. Please check our website at MAhealthconnector.org for the most up to date list of locations and schedule of operating hours.

**Boston**
133 Portland Street
*Monday - Thursday, 8 a.m. - 8 p.m.*
*Friday 8 a.m. - 6 p.m.*
*Saturday 9 a.m. - 5 p.m.*

**Springfield**
88 Industry Ave
*Monday - Friday: 9 a.m. - 5 p.m.*

**Worcester**
146 Main Street
*Monday - Thursday, 8 a.m. - 8 p.m.*
*Friday 8 a.m. - 6 p.m.*
*Saturday 9 a.m. - 5 p.m.*

Help from the Health Connector is available at the following locations during Open Enrollment

**Brockton**
Brockton Neighborhood Health Center
63 Main Street
*Monday - Friday: 9 a.m. - 5 p.m.*

**Lowell**
Lowell Community Health Center
161 Jackson Street
*Monday - Friday: 9 a.m. - 5 p.m.*

**Fall River**
HealthFirst Family Care Center
387 Quarry Street
*Monday - Friday: 9 a.m. - 5 p.m.*

**Section 6: Grievance Procedures**

Any person who believes that they have been discriminated against on the basis of language preference, including the denial of the provisions outlined in this Language Access Plan, may file a complaint with the Health Connector, using the contact listed below if you. You must file your complaint within 60 days of the alleged incident. To file a complaint, submit the written complaint to:

Attn: Compliance Manager
A complaint must be in writing. To help streamline such submissions, the Health Connector has developed a standard complaint form, which has been translated into Spanish. The English and Spanish versions of this form are available for download on our website at: www.mahealthconnector.org/site-policies/nondiscrimination-notice. A complaint may be filed electronically using the email address above, or on paper by mail to the address above. A sample of the complaint form can be found in Appendix E of this document.

The Compliance Manager will conduct an investigation of any complaint received. This investigation may be informal, but it will be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint. The Compliance Manager will main the files and records of the Health Connector relating to such complaints. To the extent possible, and in accordance with applicable law, the Compliance Manager will take appropriate steps to preserve the confidentiality of files and records relating to grievances and will share them only with those who have a need to know.

The Compliance Manager will issue a written decision on the grievance, based on the preponderance of the evidence, no later than 30 days after its submission, along with notice to that person of the right to pursue further administrative or legal remedies.

The Health Connector will make appropriate arrangements to ensure that individuals with disabilities and individuals with limited English proficiency are provided auxiliary aids and services or language assistance services, respectively, if needed to participate in this process. Such arrangements may include, but are not limited to, providing qualified interpreters, providing taped cassettes of materials for individuals with low vision, or assuring a barrier-free location for the proceedings. The Compliance Manager Coordinator will be responsible for such arrangements.
Appendix

Appendix A: 2016-2017 Navigator Organizations

Individuals can also get help at any of the following 2016-2017 grant year Navigator organizations. Navigators are trained to help people with applying, enrolling, and maintaining their coverage through the Health Connector.

Boston Public Health Commission
1010 Massachusetts Ave., Boston
800-847-0710
bphc.org
Languages spoken: Cape Verdean Creole, English, French, Haitian Creole, Portuguese, Spanish

Cambridge Economic Opportunity Council
11 Inman St., Cambridge
617-868-2900
ceoccambridge.org
Languages spoken: Amharic, English, Farsi, Haitian Creole, Spanish

Caring Health Center
1049 Main St., Springfield
413-739-1100
caringhealth.org
Languages spoken: Arabic, English, Spanish

Community Action Committee of Cape Cod & Islands
372 North St., Hyannis
800-845-1999
cacci.cc
Languages spoken: Arabic, English, Spanish

Community Health Center of Franklin County (Greenfield)
489 Bernardston Rd, Greenfield
413-325-8500
chcfc.org
Languages spoken: English, Spanish

Ecu-Health Care
99 Hospital Ave., North Adams
413-663-8711
ecuhealth.boxcarexpress.com
Languages spoken: English

Family Health Center of Worcester
26 Queen St., Worcester
508-860-7700
fhcw.org
Languages spoken: Albanian, Arabic, Berber, English, French, Italian, German, Greek, Portuguese, Spanish
Fishing Partnership Support Services
Chatham, Gloucester, New Bedford, Scituate
888-282-8816
fishingpartnership.org
Languages spoken: English, Italian, Portuguese, Spanish

Greater Lawrence Community Action Council
305 Essex St., Lawrence
978-681-4905
glcac.org
Languages spoken: English, Spanish

Health Care for All
1 Federal Street, Boston
(617) 350-7279
hcfama.org
Languages spoken: English, Spanish, Portuguese

Hilltown Community
Health Care Centers
58 Old North Rd., Worthington
413-238-5511
hchcweb.org
Languages spoken: English

Joint Committee for Children’s
Health Care in Everett
484 Broadway, Everett
617-394-2414
jccchce.org
Languages spoken: English, French, Haitian Creole, Italian, Portuguese, Spanish

Manet Community
Health Center
110 West Squantum St., North Quincy
617-376-3000
manetchc.org
Languages spoken: Arabic, Cambodian, Cantonese, English, Hindi, Italian, Mandarin, Portuguese, Spanish, Vietnamese

People Acting in Community
Endeavors (PACE)
166 William St., New Bedford
508-999-9920
paceinfo.org
Languages spoken: English, Portuguese, Spanish

Stanley Street Treatment and Resources
400 Stanley St., Fall River
508-675-1054
### Appendix B: Availability of Marketing and Educational Materials in LEP-accessible formats

<table>
<thead>
<tr>
<th>Document Name</th>
<th>English Version</th>
<th>Spanish Version</th>
<th>Other (Large Print, Braille, other languages)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guide to Subsidies</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes - Arabic, European Portuguese, Cambodian, Haitian Creole, Mandarin, Cantonese, Vietnamese, Brazilian Portuguese, Laotian, Russian</td>
</tr>
<tr>
<td>ConnectorCare Overview</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>ConnectorCare Shopping Guide</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes - Arabic, European Portuguese, Cambodian, Haitian Creole, Mandarin, Cantonese, Vietnamese, Brazilian Portuguese, Laotian, Russian</td>
</tr>
<tr>
<td>QHP Shopping Guide</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Important Account Information (Walk In Centers)</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Payment Tips</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Student Health Insurance FAQs</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Document Name</td>
<td>English Version</td>
<td>Spanish Version</td>
<td>Other (Large Print, Braille, other languages)</td>
</tr>
<tr>
<td>------------------------------------------------------------</td>
<td>-----------------</td>
<td>-----------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>How to Use Your Coverage (Welcome Letter insert)</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Uninsured rack cards</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes - Arabic, European Portuguese, Cambodian, Haitian Creole, Mandarin, Cantonese, Vietnamese, Brazilian Portuguese, Laotian, Russian</td>
</tr>
<tr>
<td>Open Enrollment flyers (2015-2016)</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes - Arabic, European Portuguese, Cambodian, Haitian Creole, Mandarin, Cantonese, Vietnamese, Brazilian Portuguese, Laotian, Russian</td>
</tr>
<tr>
<td>COBRA/Unemployment Overview</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>APTC Overview</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>“What to Expect” for annual renewals process</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes (available online) - Arabic, European Portuguese, Cambodian, Haitian Creole, Mandarin, Cantonese, Vietnamese, Brazilian Portuguese, Laotian, Russian</td>
</tr>
</tbody>
</table>

**Appendix C: Sample Babel Sheet content**
To get this information in English large print or Braille, call 1-877-623-6765. TTY: 1-877-623-7773.

¡Importante! Esto tiene información importante sobre su seguro de salud. Si usted quiere la información traducida a su propio idioma, llame al 1-877-623-6765.

Spanish

edByak! ឈឺលុេយនរីលេយន្តូសុំនៅក្នុងប្រការពារការំពើសិក្សាដ៏មួយ។ ប្រឈឺដ្ឋាន់ឈឺនិយមរីលេយន្តូសុំនៅក្នុងប្រការពារការំពើសិក្សាដ៏មួយ 1-877-623-6765។

Cambodian

重要提示：该文件载有关於您的醫療保險的重要資訊。如果您想要將相關資訊
翻譯為您的母語，請致電 1-877-623-6765。

Traditional Chinese

重要提示：该文件载有关于您的医疗保险的重要信息。如果您想要将相关信息
翻译为您的母语，请致电 1-877-623-6765。

Simplified Chinese

Important! This package contains important insurance information. If you want the information translated into your language, call 1-877-623-6765.

Haitian Creole

Enpòtan! Sa a gen enfòmasyon enpòtan ou asirans sante ou. Si w vle nou tradwi enfòmasyon an nan pwòp lang ou rele 1-877-623-6765.

Brazilian Portuguese

Importante! Neste pacote há informações importantes sobre o seu seguro-saúde. Se quiser que as informações sejam traduzidas para o seu idioma, ligue para 1-877-623-6765.

European Portuguese

Importante! Contém informações importantes sobre o seu seguro de saúde. Se desejar a tradução das informações para a sua língua, contacte-nos pelo telefone 1-877-623-6765.

Russian


French

Σημαντικό! Το παρόν περιέχει σημαντικές πληροφορίες σχετικά με την ασφάλεια ζωής σας. Εάν επιθυμείτε να μεταφραστούν οι πληροφορίες αυτές στη γλώσσα σας, καλέστε στο 1-877-623-6765.

Greek


Gujarati

中要! 健康保險相關的重要內容。如欲將此內容翻譯為您的語言，請撥打 1-877-623-6765。

Korean


Vietnamese

The Massachusetts Health Connector complies with applicable federal and state civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex.
Appendix D: Walk in Center Locations

These walk in center locations are open year-round, with the following hours during Open Enrollment, November 1, 2016 – January 31, 2017. Please note, locations and hours will change after the Open Enrollment period has ended. Please check our website at MAhealthconnector.org for the most up to date list of locations and schedule of operating hours.

**Boston**
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*Friday 8 a.m. - 6 p.m.*  
*Saturday 9 a.m. - 5 p.m.*

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**Worcester**
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*Monday - Thursday, 8 a.m. - 8 p.m.*  
*Friday 8 a.m. - 6 p.m.*  
*Saturday 9 a.m. - 5 p.m.*

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Brockton Neighborhood Health Center  
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*Monday - Friday: 9 a.m. - 5 p.m.*

**Lowell**
Lowell Community Health Center  
161 Jackson Street  
*Monday - Friday: 9 a.m. - 5 p.m.*

**Fall River**
HealthFirst Family Care Center  
387 Quarry Street  
*Monday - Friday: 9 a.m. - 5 p.m.*

Appendix E: Grievance form sample

**Health Connector Language Access Complaint Form**
**Your information**

Please fill in your name and contact information.

Name: ____________________________________________________________

Address: __________________________________________________________

City: ___________________________ State: _______ ZIP: ____________

Daytime phone number where you can be reached:

______________________________________________________________

**Who was allegedly discriminated against?**

Please fill in the contact information for the person who was allegedly discriminated against (if different from above):

Name: ____________________________________________________________

Address: __________________________________________________________

City: ___________________________ State: _______ ZIP: ____________

Daytime phone number where you can be reached:

______________________________________________________________

Relationship to this person: _______________________________________

**Discrimination Information**

Please tell us how you believe discrimination occurred. Select all that apply

☐ Lack of signs informing the public of translation services
☐ Lack of forms/materials in multiple languages
☐ Lack of bilingual personnel
☐ Other (Explain below)
People who may have discriminated against you

Please list any names, addresses and phone numbers of anyone who you allege may have discriminated against you.

<table>
<thead>
<tr>
<th>PERSON</th>
<th>NAME</th>
<th>ADDRESS</th>
<th>PHONE NUMBER</th>
<th>DATE OF OCCURRENCE (MM/DD/YYYY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Discrimination basis

Please specify the basis or bases on which you believe you were discriminated against.

Remediation or relief

Please identify what remediation (correction) or relief you seek.
Other complaints filed

Have you or the person allegedly discriminated against filed a complaint about this matter with any other agency or organization?

☐ Yes  ☐ No

If yes, please identify the name and location of the office(s) where the complaint was filed.

When was the complaint filed? (MM/DD/YYYY): __________________

Your signature

We cannot accept a complaint if it has not been signed. Please sign (electronically or by hand) and date this complaint form below:

Signature: ____________________________ Date: __________

Signature: ____________________________ Date: __________

Note: If you are filing the complaint for someone else, you must also get that person to sign and date it.
How to file this complaint
Send a completed, signed and dated copy of all pages of the Health Connector’s Language Access Complaint Form and any supporting documentation you want us to see, to:

Mailing Address: Attn: Compliance Manager
Massachusetts Health Connector Compliance Unit
P.O. Box 960189
Boston, MA 02196

Email Address: LanguageRights@state.ma.us

OPTIONAL SECTION
The remaining information on this form is optional. Not answering these does not affect the Health Connector’s investigation into your complaint.

Special accommodations
Do you need special accommodations for us to communicate with you about this complaint?
(Check all that apply):

☐ Braille     ☐ Large Print ☐ CD with Word file ☐ Audio CD ☐ Electronic Mail
☐ TDD

☐ Sign language interpreter (specific language):
____________________________________________

☐ Foreign language interpreter (specify language):
____________________________________________

☐ Other (specify): ____________________________________________________________

Ethnicity and language preference
To help us better serve the public; please provide the following information for the person you believe was discriminated against (you or the person on whose behalf you are filing).
Ethnicity (select one):
☐ Hispanic or Latino       ☐ Not Hispanic or Latino

Ethnicity (select all that apply):
☐ American Indian or Alaska Native  ☐ Asian  ☐ Native Hawaiian or Other Pacific Islander
☐ Black or African American  ☐ White

☐ Other (specify):
_______________________________________________________________

Preferred Language (if other than English):
_________________________________________