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COMPTROLLER

Commonwealth of Massachusetts

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OFFICE OF THE COMPTROLLER Language Access Plan

I. Introduction

The Office of the Comptroller has prepared this Language Access Plan (“LAP” or “Plan”) which defines the actions to be taken by the Agency to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency, in the event the number of clients requiring 5% threshold of CTR customers. The Agency will review and update this LAP on a biennial basis in order to ensure continued responsiveness to community needs and compliance with the Executive Office for Administration and Finance (“ANF”) Administrative Bulletin #16.

II. Purpose

The purpose of this plan is to ensure clients of the Agency meaningful access to services, programs and activities although they may be limited in their English language proficiency.

The Agency is committed to this Language Access Plan as the appropriate response to meeting our clients’ needs. The Plan is consistent with the requirements of Administrative Bulletin #16 as promulgated by the Executive Office of Administration and Finance.

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

III. Agency Description

The mission of the Office of the Comptroller is to increase the efficiency of back office operations across state government, thereby enhancing its delivery of services while ensuring a high level of accountability throughout the Commonwealth's financial operations and providing taxpayers assurance that tax dollars are spent for their intended purposes.

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The Office of the Comptroller is an independent agency within the Executive Branch. The Comptroller's role is to work with [Commonwealth fiscal officers](#) in over 150 Departments to ensure the integrity, accountability and efficiency of the Commonwealth's fiscal operations, communicate accurate and timely financial information to decision makers within the Executive, Legislative and Judicial Branches, the financial community as well as the general public, and provide leadership and professional guidance in areas of fiscal policy within the Commonwealth and nationally. The Office is committed to accomplishing this mission in partnership with all Commonwealth fiscal officers.

The Office of the Comptroller's day-to-day activities, as well as long term initiatives, are closely coordinated with other Central Service Agencies, cabinet secretariats and constitutional offices. These activities include: payables management (vendor registration, contract management, payments and tax reporting); receivable management (automated billing and settlement, debt collection, intercept, revenue maximization and optimization); payroll management for Commonwealth employees (including payroll deductions and tax withholding and reporting); accounting and report management for all Commonwealth assets, liabilities, revenues and expenditures; and communication and training for Commonwealth fiscal officers and users of the state accounting system.

The Comptroller is assisted by four Deputy Comptrollers who oversee the day-to-day activities, as well as, the long-term initiatives of the Department. There are over [120 full-time equivalent employees](#) in the office, organized into ten bureaus. [The Executive Bureau](#) and Resource Management Bureau report directly to the Comptroller, and the other eight bureaus report to the Comptroller through the four Deputy Comptrollers.

- The [Federal Grant & Cost Allocation Bureau](#) oversees the federal grant and cost accounting activities of Commonwealth agencies. The bureau has two units (Federal Grant Unit & Cost Accounting Unit) and is responsible for a wide variety of financial operational activities.
- [The Resource Management Bureau](#) The Resource Management Bureau's responsibilities are to provide fiscal management, personnel, payroll and administrative support services for the Comptroller's Office. The bureau records the documents and reports sent to the state library.
- [The Quality Assurance Bureau \(QAB\)](#) The Quality Assurance Bureau (QAB) assists in the mission of the Office of the Comptroller by allowing the Comptroller to delegate to departments the approval of low risk transactions. As a result of this delegation, departments are responsible for adherence to regulations, policies and procedures for all of their fiscal business. The QAB's four areas of responsibility are: Quality

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Assurance Reviews, Internal Controls, statewide Single Audit, and Comptroller Internal Audit.

- [The Financial Reporting and Analysis Bureau \(FRAB\)](#) is responsible for all financial reporting and analysis functions at the Office of the State Comptroller. Reports prepared by FRAB include: Statutory Basis Financial Report, and Comprehensive Annual Financial Report.
- [The Department Assistance Bureau](#), the "Customer-Service" bureau in the Comptroller's Office, provides a number of services, including: training and ongoing support for state employees on MMARS, LCM, the Information Warehouse, Payroll Procedures, and Internal Controls. DAB provides technical assistance to MMARS and LCM users via a central helpline network, web portal maintenance, and oversight of application security for MMARS and LCM.
- [The Accounts Payable Bureau](#) is responsible for the review, approval, management and maintenance of the Commonwealth Vendor/Customer table. It oversees all payments issued through the Massachusetts Management and Reporting System (MMARS), and manages all matters regarding tax reportable income reported to the Internal Revenue Service, Social Security Administration and/or Massachusetts Department of Revenue. It also carries out oversight of all contracts, encumbrances, grants, subsidies, and Intergovernmental Service Agreements (ISAs) processed through the Massachusetts Management and Reporting System (MMARS), and oversees the coordination and updating of the Expenditure Classification Handbook and the FY Closing/Opening Instructions.
- [The General Accounting Bureau](#) oversees the accounting activities of the Commonwealth and provides guidance to departments. The bureau is comprised of three units: Accounts Receivable/e-Commerce, Budgetary and Reconciliation. Together, these units manage the collection of non-tax revenue and debt-collection, and manage various Commonwealth funds, accounts, and reconciliations.
- [The Enterprise Systems Service](#) Bureau provides information technology services that support both the day-to-day business and the future direction of the Office of the Comptroller. These services include: maintenance of the Comptroller's Intranet/Internet sites, enterprise-wide applications operations, maintenance and enhancement support, and strategic project planning and coordination.
- [The Payroll Bureau](#) is responsible for ensuring that the Commonwealth payroll system, HR/CMS, pays all Employees/Contracted Employees on-time, accurately and efficiently. In addition, the Payroll Bureau (PRB) ensures the departments post payroll expenditures within available budgets and to accounts suitable for such charges.

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PRB implements Commonwealth payroll policies, coordinating consistent implementation with both the University payroll system, e*mpac, and the State Payroll system, HR/CMS. The PRB accomplishes these functions by ensuring Payroll systems are reliable and properly maintained, policy is clear and well distributed, reports are available and accurate, and departmental payroll professionals are continually updated and given the tools needed to do their jobs.

IV. Language Access Plan:

The Agency Language Access Plan shall be fully implemented subject to the availability of fiscal resources to implement said language access plan. At this point in time, CTR does not anticipate meeting or exceeding the 5% threshold. However, should the 5% threshold be met, CTR intends to implement the below-detailed plan subject to the availability of fiscal resources.

This Language Access Plan has been developed to adhere to the Language Access Guidelines of ANF Administrative Bulletin #16. This Language Access Plan represents the administrative blueprint to provide meaningful access to Agency services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks Agency will undertake to meet this objective.

In the event the CTR client population meets or exceeds the 5% threshold, CTR will implement the following plan:

(1) Agency Language Access Coordinator:

The Department Assistance Bureau Director will be named the Language Access Coordinator.

(2) Agency Language Access Needs Assessment: In the event the CTR client population meets or exceeds the 5% threshold, CTR will implement the following:

- a. Access to Services for LEP clients.**
 1. Oral Translation. For LEP clients who require CTR assistance or services within the Agency Description outlined above, CTR will provide oral interpretation or reading assistance that are free of cost within the threshold of the law.
 2. Written Translation. For LEP clients who require CTR assistance or services within the Agency Description outlined above, written translation of documents necessary to obtain CTR services or assistance will be provided when oral interpretation is not reasonable or meaningful within the threshold of the law.
 3. Personnel. CTR will continue its ongoing commitment of hiring employees who, in addition to skills for their position, also have bi-lingual skills and are willing to volunteer for translation

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services as needed. Hiring bi-lingual staff solely to serve as staff interpreters is not reasonable within CTR's current and foreseeable budgetary constraints.

b. Language Makeup of Client Population

Currently, the CTR client population does not meet the 5% threshold in any language. Until the CTR client population meets or exceeds the 5% threshold, CTR will periodically collect information about the LEP populations requiring CTR services based upon inquiries made through the CTR Helpdesk, email and phone calls. In the event the CTR client population meets or exceed the 5% threshold, CTR will maintain a reporting system designed to periodically obtain and a record key information about the LEP populations who use CTR services or have the potential for doing so.

c. Points of Contact between Agency and Client Population

Scott Olsen, Department Assistance Bureau Director (Language Access Coordinator)
One Ashburton Place, Room 901
Boston, MA 02108
617-973-2360
www.mass.gov/osc

(3) **Language Resources Assessment.** Currently, the CTR client population does not meet the 5% threshold in any language. However,

- a. CTR will periodically identify existing staff who are linguistically, culturally and technically able to deliver services in a language other than English and voluntarily serve as interpreters or translators if the need arises.
- b. CTR will implement a voluntary outreach for staff of CTR and other nearby agencies who may be available to voluntarily offer interpreter or translation services if the need arises.
- c. In the event the CTR client population meets or exceeds the 5% threshold, CTR will implement a plan to identify specific CTR staff who will be available as part of their job duties to serve as interpreters or translators. Hiring bi-lingual staff solely to serve as staff interpreters is not reasonable within CTR's current and foreseeable budgetary constraints.

(4) **Language Service Protocols.**

- a. **Language Services Resources:** In the event the CTR client population meets or exceeds the 5% threshold CTR will maintain a comprehensive listing of language assistances resources.

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1. Interpreter lists will be updated and distributed regularly to each division and administratively attached agency.
 2. CTR will provide or post notices of free language assistance services.
 3. **Orient Interpreters to Role Expectations and Code of Ethics Guidelines.** CTR staff or other regularly assigned interpreters will be required to review CTR's code of ethics for providing interpreter services, sign an interpreter form and be asked to participate in Office of Language Access (OLA) training on the role of interpreters and serving individuals with language needs.
 4. **Evaluate the effectiveness of Language Assistance Efforts.** Evaluations will be conducted periodically by CTR in consultation with staff of the Office of Language Access (OLA) to determine CTR's compliance with obligations to provide language access services. Recommendations will be addressed by the CTR LAP Coordinator and CTR Language Access Task Force, as indicated by the findings.
- b. **Language Access Protocols – Language Access Coordinator and Access Task Force.** In the event the CTR client population meets or exceeds the 5% threshold the Department Assistant Bureau Director will serve as the Language Access Coordinator for CTR. In addition, CTR will establish an Language Access Task Force consisting of representatives from Department Assistance, Human Resources and Legal Bureaus. The Language Access Task Force will develop protocols for providing interpretation and translation services based upon the LEP populations that have met the 5% threshold and based upon the specific CTR services that these individuals require.
- c. **Client Access to Resources.** Client populations who meet or exceed the 5% threshold will have access to the oral, translation and CTR personnel interpreters outlined in Section IV (2) (a) above under **Access to Services for LEP clients** based upon the protocols developed by the CTR Language Access Task Force. The **Language Services Resources** listed in Section (4)(a) above will be updated periodically to notify LEP clients of the availability of resources.

(5) Vital Document Translation:

- a. In the event the CTR client population meets or exceeds the 5% threshold, CTR will identify the vital documents that LEP clients who require CTR assistance or services will need when oral or other mediums of interpretation or translation are not reasonable or meaningful within the threshold of the law.

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CTR regards vital documents as “any document that is critical for ensuring meaningful access to the recipients’ major activities and programs by beneficiaries generally and LEP persons specifically.”

CTR does not provide clients with major activities or programs and does not generally have documents that are needed in multiple languages. In the event the CTR LEP population meets or exceeds the 5% threshold, CTR will engage in the process of identifying vital CTR documents necessary for LEP client access to CTR services and will translate and provide these documents (in writing or in oral or video recordings) as determined fiscally appropriate based upon the needs of the LEP client population as a whole, as opposed to the needs of any specific individual in the LEP population.

The CTR Language Access Task Force as part of the protocols development will identify the most critical vital documents based upon the most critical or majority need of the LEP population to determine the order in which vital documents will be translated and the medium used for the translation. CTR will develop and periodically review and update an inventory to reflect the vital documents that have been translated.

- b. **Agency website content.** Currently the CTR client population does not meet the 5% threshold in any language. Due to the significant costs involved with updating website content, in the event the CTR LEP population meets or exceeds the 5% threshold, the CTR Language Access Task Force as part of the protocols development will identify the most critical website content needed by the majority of the LEP population to determine the order in which website content will be translated and the medium used for the translation on the website.

(6) Stakeholder Consultations:

CTR has consulted with stakeholders in the development of this LAP Plan and will continue to identify stakeholders and potential LEP clients based upon inquiries made through the CTR Helpdesk, email and phone calls. In the event the LEP client population meets or exceeds the 5% threshold CTR will expand outreach to other agencies that have implemented LAP plans as well as stakeholders within the LEP populations as part of the CTR Language Access Task Force development of protocols.

- (7) Staff Training - Train Employees on Language Assistance Services.** In the event the LEP client population meets or exceeds the 5% threshold, CTR will develop a training process as part of the CTR Language Access Task Force protocols development. Training will include Helpdesk staff, Bureau staff,

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supervisors and managers, and will be targeted to create awareness, increase access to LEP clients and prevent discriminatory practices relative to national origin and LEP. The training will also include information about CTR LAP resources and a protocol for fielding requests for interpretation or translation from LEP clients.

- (8) **Notice to Public.** In the event the LEP client population meets or exceeds the 5% threshold, the following actions may be taken to ensure that LEP clients are aware of the CTR language services available:
- a. **Post “I Speak Cards”.** In order to help identify LEP individuals, we may make available “I Speak Cards” identifying the LEP languages available at CTR, similar to those of HUD (see HUD’s website for the cards and other translated documents at <http://www.hud.gov/offices/fheo/promotingfh/lep.cfm>).
 - b. **Notices of Oral Interpretation Services:**
 - 1. Interpreter lists will be updated and distributed regularly to each division and administratively attached agency.
 - 2. CTR will provide or post notice the availability of free language assistance services.
 - 3. CTR may post at its office notices of qualified third party interpreters (i.e. multicultural social service organizations), telephone and in-person interpretation services that may be available when services are necessary to communicate with LEP individuals.
 - 4. CTR may post relevant information relating to its LAP on its home page.

(9) Agency Monitoring

The CTR LAP plan will be reviewed and updated no less than biennially by the CTR Language Access Task Force in coordination with the CTR Employee Handbook as part of the internal controls reviews.

(10) Complaints - Language Access Complaint Procedure

An LAP Complaint notice will be posted on CTR Bulletin Boards outside the Office in a conspicuous location along with all similar types of public notice. A draft of the notice is attached. LEP clients may file a complaint with the CTR Language Access Coordinator or the Office of Access and Opportunity if an LEP client believes they have been denied the benefits of this Plan. The LEP complaint must be file in writing within 6 months of the alleged denial.

Complaints to the CTR Language Access Coordinator should be submitted to:

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Scott Olsen
Language Access Coordinator
Department Assistance Bureau Director
Office of the Comptroller
Room 901
One Ashburton Place
Boston, MA 02108
(617) 973-2360

Complaint with the Office of Access and Opportunity should be submitted to the attention of:

Office of Access and Opportunity
Executive Office of Administration and Finance
State House, Room 373
Boston, MA 02133
Email Address: Ronald.Marlow@state.ma.us

This LAP is enacted by the Office of the Comptroller as of the date of signature below in compliance with the Executive Office for Administration and Finance (“ANF”) Administrative Bulletin #16.

<i>/s/Martin J. Benison</i>		<i>5/16/14</i>
Martin Benison, Comptroller		Date

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LANGUAGE ACCESS COMPLAINT PROCEDURE

You may file a complaint with the Office of the Comptroller Language Access Coordinator or the Office of Access and Opportunity if you believe you have been denied the benefits of this Plan.

You must file your complaint within 6 months of the alleged denial. You must file a written complaint. To file a complaint with the Language Access Coordinator, submit the written complaint to:

Office of the Comptroller
Scott Olsen
Language Access Coordinator
Room 901
One Ashburton Place
Boston, MA 02108
(617) 727-5000

To file a complaint with the **Office of Access and Opportunity**, please submit the written complaint to the attention of:

Office of Access and Opportunity
Executive Office of Administration and Finance
State House, Room 373
Boston, MA 02133
Email Address: Ronald.Marlow@state.ma.us