

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



RYAN I. YAMANE
DIRECTOR
KA LUNA HO'OKELE

JOSEPH CAMPOS II
DEPUTY DIRECTOR
KA HOPE LUNA HO'OKELE


STATE OF HAWAII
KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF HUMAN SERVICES
KA 'OIHANA MĀLAMA LAWELAWE KANAKA
Office of the Director
P. O. Box 339
Honolulu, Hawaii 96809-0339

TRISTA SPEER
DEPUTY DIRECTOR
KA HOPE LUNA HO'OKELE

DIR 24.74

October 10, 2024

TO: APHIRAK BAMRUNGRUAN, EXECUTIVE DIRECTOR
OFFICE OF LANGUAGE ACCESS

FROM: RYAN YAMANE, DIRECTOR 

SUBJECT: VERIFICATION OF LANGUAGE ACCESS PLAN

I, Cari Uesugi, LEP Project Manager/Coordinator of the Department of Human Services (DHS), hereby attest that the Language Access Plan dated October 10, 2024 for DHS has been reviewed and is determined to be current and applicable as of this date.

This verification confirms the validity of the Language Access Plan and that no further revisions are required at this time. The next review of the Language Access Plan will occur no later than two years from the effective date of this verification, or sooner if deemed necessary.

Effective Date: October 10, 2024



STATE OF HAWAII

Department of Human Services

LANGUAGE ACCESS PLAN

July 1, 2024 – June 30, 2026



LANGUAGE ACCESS PLAN

Department of Human Services

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1. INTRODUCTION

Hawai'i is one of the most culturally diverse states and has one of the highest proportions of non-English speakers in the nation. According to the U.S. Census Bureau, 2017 American Community Survey (ACS) 1-year estimate, the total population in the State of Hawai'i was 1,427,583.¹ An estimate of 25% or 344,880 of Hawai'i residents, 5 years and older, speak a language other than English at home.² Of those, 152,618 or 11.4% indicated that they speak English "less than very well".³

The Hawai'i Department of Human Services (DHS) recognizes that language can be an obstacle for Limited English Proficient (LEP) individuals to access DHS programs and services. Creating and maintaining client access to services is a department priority.

For the purposes of this Language Access Plan, Limited English Proficient (LEP) individuals, LEP applicants, or LEP clients are individuals who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English. Such individuals may be eligible to receive language assistance with respect to particular services, benefits, or encounters.

DHS is committed to ensuring that language is not a barrier to accessing its programs and services. The purpose of this Language Access Plan (Plan) is to take reasonable steps to ensure persons with limited English proficiency gain meaningful access to DHS services, programs, and activities. This plan reflects the department's continuing commitment to provide essential, meaningful access to LEP individuals.

2. AGENCY OVERVIEW

The Department of Human Services (DHS) nurtures and partners with Hawai'i's residents to reach their full potential through our myriad programs.

¹ U.S. Census Bureau, 2017 American Community Survey (ACS) 1-Year Estimate, DEMOGRAPHIC AND HOUSING ESTIMATES IN HAWAII, available at https://data.census.gov/cedsci/all?q=2017%20census%20hawaii%20population&g=0400000US15&hidePreview=false&table=DP05&tid=ACSDP1Y2017.DP05&y=2017&vintage=2017&cid=DP05_0001E&lastDisplayedRow=17

² U.S. Census Bureau, 2017 American Community Survey (ACS) 1-Year Estimate, LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS OR OLDER IN HAWAII, available at <https://data.census.gov/cedsci/table?q=2017%20census%20hawaii%20population%20language&g=0400000US15&lastDisplayedRow=37&table=C16001&tid=ACSDT1Y2017.C16001&y=2017>

³ Ibid.

DHS believes that when each of us individually reaches his or her potential, our community and, in turn, the State of Hawai'i thrives. DHS has worked for more than 50 years toward nurturing and partnering with Hawai'i residents. The Territorial Department of Public Welfare was reorganized (by the State Legislature) as the State Department of Social Services and Housing (DSSH) in 1959 after statehood. In 1988, the Department was again reorganized and renamed the Department of Human Services (DHS).

DHS staff provides programs and services that create a grid of resources to support Hawai'i's residents and communities. These programs and services aim to increase each resident's well-being by connecting them to resources in the community. DHS understands that well-being is not developed overnight and requires a solid foundation and supports.

DHS provides support for individuals to lay a foundation of basic needs, like helping residents find housing, food for their families, and access to medical insurance. DHS also understands that well-being requires support and assists residents with services to strengthen families, programs to build independent living abilities for residents with disabilities, and initiatives for our kupuna continue to thrive.

DHS has four divisions:

A) Benefit, Employment, and Support Services Division (BESSD)

The Benefit, Employment, and Support Services Division (BESSD) is a cornerstone in the department's work to increase Hawai'i residents' well-being by providing assistance for the most basic of resources. The division's programs provide financial assistance and program support to help Hawai'i's families access food, housing, job-readiness training, educational and vocation trainings, job placement and retention services, child care, transportation, and other work-related needs.

B) Med-QUEST Division (MQD)

The Med-QUEST Division (MQD) administers Hawai'i's Medicaid program. This program helps low-income adults and children obtain needed health care through the federal Medicaid health insurance program and state-funded programs that assist those who are Medicaid ineligible.

C) Social Services Division (SSD)

The Social Services Division's (SSD) number one concern is the safety and protection of children and dependent adults. SSD programs don't just provide safe living arrangements, they also help to strengthen families' connections internally and within

their communities. The division is made up of two branches: The Adult Protective and Community Services Branch and the Child Welfare Services Branch.

The Adult Protective & Community Services Branch (APCSB) administers an array of programs and services to protect vulnerable adults from abuse, neglect, and exploitation and to ensure their health, welfare, and safety in the community.

The Child Welfare Services Branch (CWSB) investigates allegations of child abuse and neglect and ensures safety and supportive services to children and their families. CWSB is mandated by law to ensure the safety, permanency (stability), and well-being of children. CWSB works with community partners to strengthen families.

D) Division of Vocational Rehabilitation (DVR)

The Division of Vocational Rehabilitation (DVR) is a state and federally funded program for individuals with disabilities who require assistance to prepare for, secure, retain, or regain employment. DVR administers three programs:

1. Vocational Rehabilitation Program
2. Services for the Blind (Ho'opono)
3. Disability Determination Program

Each program has separate but related functions to provide for the rehabilitation needs of persons with disabilities to secure employment and to lead full and productive lives.

DVR is primarily an employment agency for eligible persons with disabilities seeking employment. The division offers a broad range of services to support the goals previously stated.

E) Administratively Attached Agencies and Agencies

DHS also supports two administratively attached agencies – the Office of Youth Services (OYS) and Hawai'i Public Housing Authority (HPHA) – and two commissions – the Commission on the Status of Women and the Commission on Fatherhood.

The Office of Youth Services (OYS) provides programs and services for Hawai'i's youth, including the provision of balanced and comprehensive services for at-risk youth, to prevent delinquency, reduce recidivism, and maximize opportunities for youth to become productive, responsible citizens through community-based and family-focused treatment interventions.

The Hawai'i Public Housing Authority (HPHA) is the sole public housing agency for the State of Hawaii. HPHA is dedicated to providing safe, decent, and sanitary housing for

low-income residents of Hawai'i. HPHA administers the federal and state Low Income Public Housing programs, Section 8 program, Veterans program, and Rent Supplement and project-based housing.

The Hawai'i State Commission on the Status of Women (HSCSW) works toward equality for women and girls in the state by acting as a catalyst for positive change through advocacy, education, collaboration, and program development.

The Hawai'i State Commission on Fatherhood (COF) promotes healthy family relationships by emphasizing the important role fathers play in the lives of their children.

Each year, DHS strives to provide effective and efficient programs, services, and benefits to improve Hawai'i residents' well-being. DHS continues to incorporate a multigenerational approach, 'Ohana Nui, which aims to concurrently address the whole family's needs when providing services and supports. DHS will do so with other state departments and community stakeholders, and this will also allow DHS to more efficiently administer programs and funding to make a bigger impact on those whom we serve.

3. LEGAL BASES FOR LANGUAGE ACCESS

Language access is based on both federal and state laws. Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on ground of race, color or national origin, be excluded from participation in, be denied the benefit of or be subjected to discrimination under any program or activity receiving federal financial assistance."

On August 11, 2000, President William J. Clinton signed Executive Order 13166, *Access to Services for Persons with Limited English Proficiency* ("EO 13166"). EO 13166 requires all agencies receiving federal funds to address the needs of persons who, due to their status as having limited English proficiency (LEP), cannot fully and equally participate in the agency's programs and activities. Specifically, EO 13166 requires each federal agency prepare a plan to improve access by eligible LEP persons to its federally conducted programs and activities that is consistent with the compliance standards set forth by the LEP guidance issued by the U.S. Department of Justice.

On July 10, 2006, the state of Hawai'i enacted Hawai'i's Language Access Law, now codified in the Hawai'i Revised Statutes, Chapter 321C ("HRS Ch. 321C"). The purpose of the Hawai'i Language Access Law is to affirmatively address, on account of national origin, the language access needs of LEP persons to ensure meaningful access to state services, programs and activities. The Hawai'i Language Access Law requires, among

other mandates, all state agencies and covered entities (entities that receive state funds) to establish a language access plan (“LAP”) to be reviewed every two years and revised if necessary.

Accordingly, DHS continues to take reasonable steps to provide meaningful access to LEP individuals in compliance with Title VI of the Civil Rights Act of 1964, EO 13166, HRS Ch. 321C, Policy and Procedures Manual 4.10.3, and Policy and Procedures Manual 4.10.4. See Appendixes A and B.

4. LANGUAGE ACCESS IMPLEMENTATION PLAN: COMPONENTS

Component 1:	Assessment of LEP Population Requirements
Component 2:	Providing Notice of Language Assistance Services
Component 3:	Providing Oral Interpretation Services
Component 4:	Providing Written Translation Services
Component 5:	Maintaining Agency Language Access Services
Component 6:	Ensuring Quality of Language Access Services
Component 7:	DHS Discrimination and Complaint Process
Component 8:	Maintaining Reporting Systems
Component 9:	Staff Training
Component 10:	Stakeholder Consultation
Component 11:	Monitoring and Updating the Language Access Plan
Component 12:	Designating DHS Language Access Coordinator

Component 1: Assessment of LEP Population Requirements

The purpose of this assessment is to ensure that LEP persons receive meaningful access to critical services provided by DHS.

To determine how to provide effective and meaningful access to LEP applicants and clients, DHS will look at the totality of circumstances, including the following four factors established by the U.S. Department of Health and Human Services (“DHHS Guidance”).⁴

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. The frequency LEP individuals come in contact with the program;

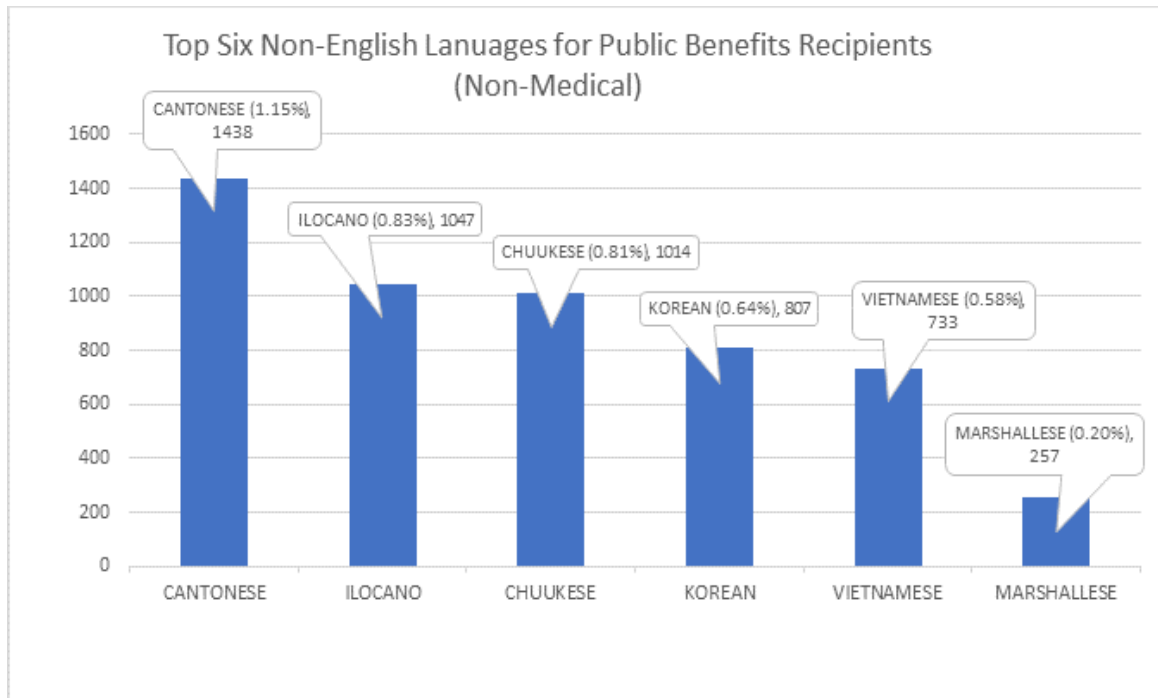
⁴ U.S. Department of Health and Human Services, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons,” U.S. Department of Health and Human Services, 68 FR 47317 (August 8, 2003).

3. The nature and importance of the program, activity, or service provided to people’s lives; and
4. The resources available to the grantee/recipients and costs.

DHS currently uses two approaches to identify its target population’s linguistic needs. First, DHS uses a combination of the federal census data and Federal Poverty Guidelines (adjusted to Hawai’i) to identify LEP individuals who are at or below 200% of the Federal Poverty Guidelines. Second, DHS captures linguistic data as clients apply for public benefits. Staff enter an individual’s primary language into the Hawaii’ Automated Welfare Information System (HAWI) for non-medical public assistances and the Kauhale Online Eligibility Assistance System (KOLEA) for medical assistance.

According to data collected by HAWI, as of December 2021, 5.10% or 7,608 of the 149,213 unique clients who were eligible for public benefits (non-medical) identified their English proficiency as “minimum command or below”. The top 6 non-English languages reported by HAWI are: Cantonese, Ilocano, Korean, Vietnamese, Chuukese, and Marshallese [see Table 1].

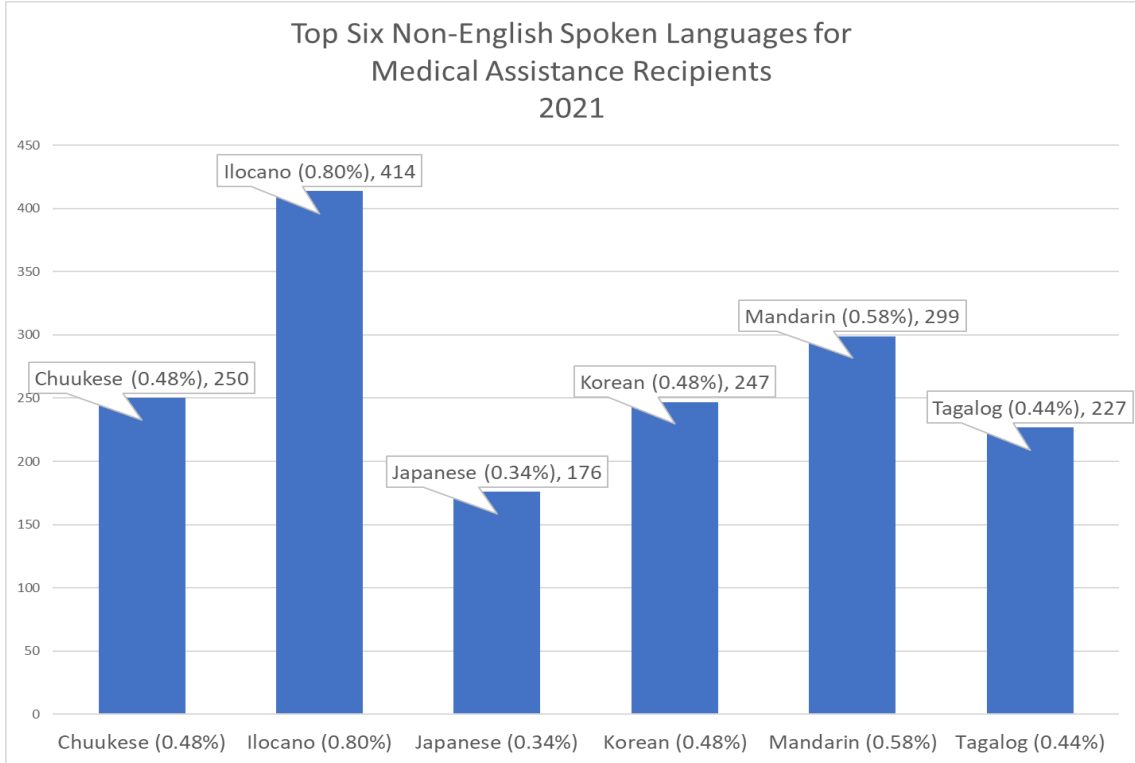
Table 1



According to data from KOLEA, as of December 2021, 1.3% or 5,880 of the 436,773 unique clients who were eligible for medical assistance in December 2021 indicated other non-English languages as their preferred spoken language. The top six non-English

spoken languages reported by KOLEA are: Ilocano, Mandarin, Korean, Chuukese, Tagalog and Japanese [see Table 2]

Table 2



Using the figures and data provided by HAWI and KOLEA, along with Census Data Information, DHS concluded that the most common languages spoken by LEP persons who were eligible for DHS benefits are: Chinese (Cantonese), Chuukese, Ilocano, Korean, Mandarin, Marshallese, and Vietnamese. The department’s assessment of language needs is in line with the top four state-wide languages (Korean, Vietnamese, Chinese, and Ilocano) as reported by the Hawai’i Department of Business, Economic Development and Tourism.⁵

Component 2: Providing Notice of Language Assistance Services

An important component of implementing language access, is making sure LEP individuals are aware of the interpreter services available to them. DHS does this by notifying LEP individuals of the available interpreter services and making sure that each division of DHS is in compliance with language access requirements.

⁵ Hawaii Department of Business, Economic Development and Tourism, NON-ENGLISH SPEAKING POPULATION IN HAWAII (2015-2019).

In any area open to the public (e.g. Waiting rooms and reception areas), DHS displays an interpreter assistance notice created by the Office of Language Access (OLA) which states, in multiple languages, “Please point here if you need an interpreter in this language (at no cost to you)”. See Appendix E. The current Application for Financial and SNAP Assistance and Application for Health Coverage & Help Paying Cost also include notices of the availability of free interpreter services translated into 16 languages.

DHS also provides a translated “Access Hawai‘i” brochure, which provides notice to LEP individuals of their right to language assistance. This brochure also includes the discrimination complaint notice and contact information for filing grievances with DHS and federal agencies. This brochure is translated into 11 languages (Chinese, Chuukese, Ilocano, Hawaiian, Japanese, Korean, Marshallese, Samoan, Spanish, Tagalog, and Vietnamese) and is available in the department’s program offices and at the Civil Rights Corner on the DHS website. See Appendix I. DHS’ website also includes a notice in 16 languages of the right to free interpretation services and a telephone number within the department to request for interpreter services. (<https://humanservices.hawaii.gov>)

DHS continues our good faith efforts to notify individuals, community-based organizations, and the general public of available language assistance for LEP individuals at no cost. This includes media and various public forums such as community meetings, stakeholder meetings, and public gatherings.

In addition, each division, administratively attached agency, commission, and programs at DHS will inform and monitor its contractors and sub-recipients (covered entities) of their responsibility to provide notice to LEP applicants and clients of the availability of free language assistance services.

Component 3: Providing Oral Interpretation Services

The immediate availability of oral interpreter services is critical for LEP individuals, in order to communicate with DHS staff and apply for and receive services from DHS. DHS is able to provide oral interpretation services to LEP individuals both telephonically and onsite.

Use of Family of Friends as Interpreters

Although an agency has flexibility in determining the appropriate mix of language assistance services provided, DHS highly discourages the use of family and friends as interpreters.

Nevertheless, after offering free language assistance, an LEP individual chooses to use a family member or friend, DHS shall take reasonable steps to determine if the

individual providing the interpretation is competent to provide this service.

Determine whether conflict of interest, confidentiality or other concerns make the use of the family member or friend inappropriate.

Use caution if the LEP individual asks to have a minor provide interpretation.

If not appropriate or competent, DHS shall provide interpreter services in place of or, if appropriate, in addition to the person selected by the LEP individual.

Telephonic Interpretation Services

Telephone interpretation is useful in brief-encounters or urgent situations where immediate assistance is needed. It is more economical and provides quick access for LEP persons.

To ensure immediate language access to all LEP individuals, each DHS office or unit has immediate access to telephone interpreter services in more than 100 languages, 24 hours per day, 7 days per week. *See Appendix P.*

DHS signed a participating addendum along with another 14 States for telephonic interpreter services as a member of WSCA-NASPO, through the Hawai'i State Procurement Office (SPO). The current authorized vendors are Corporate Translation Services, Inc. dba Language Link and VOIANCE. DHS has determined that having accounts with the two vendors is in the best interest of both the department and LEP applicants and clients in order to accommodate any unexpected circumstances that may arise.

On-Site Interpretation Services

On-site interpreting generally requires advanced booking. This type of interpretation is normally used for complex or formal settings that require lengthy discussion. Each DHS office or unit can utilize a DHS volunteer staff interpreter, contact an interpreter directly⁶, or use an interpreter referral service. *See Appendixes C and D.*

Action Steps:

1. Determine the need for an interpreter. *See Appendix H.*
 - Ask the applicant/client directly which language they speak.

⁶ Hawai'i Court Interpreter Registry available at <https://www.courts.state.hi.us/wp-content/uploads/2017/01/interpreters.pdf>; Office of Language Access Online Roster of Spoken Language Interpretation and Translation available at <http://45.40.134.199/SurveyApp/Home/LanguageList>. The Language registers and roster can be searched to show the names, languages, contact information, geographic area, and relevant credentials of the spoken language interpreters.

- Use visual aids that list languages, such as Office of Language Access posters and I-Speak cards, so the applicant/client may point to the language they speak. *See* Appendixes E and F.
 - Check for information about spoken language in referral documentation, such as application form, client’s file, or database.
 - Seek assistance from others, such as friends, family, or multilingual staff if the applicant/client is unable to say which language they speak.
 - If staff is still unable to identify the language needed, staff can call a telephone interpreting service to help determine the specific language spoken by the individual with LEP.
2. Offer interpreter services at no cost to the individual. Staff must request the individual to complete and sign the “Offer and Acceptance or Waiver of Free Interpreter Services” form (DHS 5000, 06/14). This form is valid until a change is requested by the individual. *See* Appendix J.
 3. When an oral interpreter is needed, DHS staff must explore all effective and timely options.
 - Utilize technology to effectively promote communication and understanding about programs, process, and LEP rights.
 - Consider the feasibility of having the interpretation by phone or face-to-face, as appropriate.
 - Have processes for utilizing such services based on needs, contracts, and resources.
 4. Telephone interpreter services are available to all DHS staff. However, if on-site interpretation services are more appropriate, the requesting employee may first utilize volunteer staff interpreters located at the worksite or general geographic area depending on the complexity of the interpreting services needed. Volunteer staff interpreters who are willing, on an as-needed basis, to assist DHS staff, are self-identified through a voluntary survey. Volunteer staff interpreters must obtain supervisor’s approval before agreeing to provide language services when requested by DHS staff.
 5. Volunteer staff interpreters should be familiar with the program for which interpretation is needed. They should sign the DHS Form 5050 concerning their interpreter abilities and be given a copy of the Interpreter Code of Ethics prior to interpreting. *See* Appendix K.
 6. If volunteer staff interpreters are not available or are not appropriate, the requesting employee must contact an interpreter using all other available methods.

Component 4: Providing Written Translation Services

Written translation of vital documents is provided for each eligible LEP language group that meets the threshold. The threshold is defined as five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be

affected or encountered.⁷ All translation services are centralized and coordinated by the LEP Project Manager/Coordinator under the Office of the Director.

DHS has determined that there are four prevalent languages that meet the threshold for written translation purposes: Chinese, Ilocano, Korean, and Vietnamese. The assessment is in line with the top four state-wide languages.⁸

Under the Safe Harbor Provision, for an LEP person who is seeking translation services, but speaks a language that does not meet the threshold, DHS provides written notice in the LEP person's primary language of the right to receive oral interpretation of written materials, free of cost.⁹

Action steps:

1. Identify vital documents.
 - A document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits or is required by law. Vital documents include, for example, applications, consent forms, complaint forms, and notices of rights.
2. Categorize and prioritize documents for translation.
 - Consider the frequency document may come in contact with an LEP individual, i.e., forms, information brochures, and periodic or seasonal communications.
3. Make documents language access ready.
 - Documents should be user-friendly and translatable. Documents should be written and designed in plain language so that documents are clear, logical, concise, and easy to read.
 - Plain language means the author needs to analyze and decide what information is needed by the client to make informed decisions, before words, sentences, or paragraphs are considered.
 - Plain language documents use words economically and at a level that the client can understand. The sentence structure should be tight; the tone welcoming and direct, and the design is visually appealing.
4. Identify the targeted languages using language data collection.
 - All vital documents must be translated for languages that meet the threshold.
5. Assess translation options.
 - Translation vendor vs. Bilingual volunteer staff.

⁷ Hawai'i Revised Statute (HRS) § 321C-3(c).

⁸ Hawaii Department of Business, Economic Development and Tourism, NON-ENGLISH SPEAKING POPULATION IN HAWAII (April 2016).

⁹ See "Component 3" for explanation of oral interpretation services.

- Currently DHS uses translation vendors due to the issue of liability and quality control.
- Consider pros and cons of all options.

Component 5: Maintaining Agency Language Access Services

All DHS staff have an important role in actively promoting and maintaining language access services. See Appendix G.

Action Steps:

1. Consult with the Office of Language Access for best practices and techniques on providing language assistance services.
2. Develop and implement policies and procedures related to language assistance.
3. Develop and maintain the multi-lingual listings on DHS employees and community members who volunteer to assist with interpretation and translation services.
4. Ensure all related signage and LEP materials are visible and accessible.
5. Increase the visibility of language access services to the general public.
6. Create a periodic survey of LEP applicants and clients to determine the effectiveness of language access service.
7. Assess and update the existing policies and procedures as necessary.

Component 6: Ensuring Quality of Language Access Services

To ensure the quality of telephone interpreter services, the current authorized vendors were selected through a Request for Proposal (RFP) evaluation process. As part of the evaluation, the committee took into consideration the interpreter quality assurance, such as screening process for interpreters, and the general minimum requirements for experience, education, language proficiency, and certification to ensure quality of interpreters.

To ensure the quality of in-person interpretation, DHS requires interpreters to adhere to the interpreter code of ethics. DHS does this by requiring all in-person interpreters to sign form (DHS 5050) prior to interpreting.¹⁰

To ensure that the translated materials are accurate, consistent, reliable, readable, culturally appropriate, and free of errors, DHS requires that:

- All translators must be authorized or qualified by the American Translators Association (ATA) and/or other approved translator programs.
- Materials that are translated into other languages must go through a 2-step

¹⁰ Form DHS 5050 requires interpreters to acknowledge that they have read and agree to the Interpreter Code of Ethics.

process.

- Each step must be handled by a different translator in order to provide optimum accuracy and quality control.
 - Step 1: Translation
 - Step 2: Editing and proofreading
- Machine generated translations are not allowed.
- Translated materials must be at the same reading level as the source material.
- Translated materials must thoroughly and faithfully render the source language message (omitting or adding nothing), give consideration to linguistic variation in both source and target languages, and conserve tone and spirit of the source language message.

As an added measure of quality control, DHS also uses feedback and comments from users, community-based organizations, the Language Access Advisory and Advocacy Council, the Language Access Committee, and other stakeholders to assess quality of interpreters and translators.

Component 7: DHS Discrimination and Complaint Process

All services provided to the public by the DHS or DHS-sponsored programs and activities shall be on an equal and non-discriminatory basis. No person shall be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination, harassment, bullying or retaliation under any phase or level of program or activity.

Discrimination complaint procedures are available in DHS Policy and Procedure 4.10.1, and are applicable to all DHS offices and programs, administratively attached agencies, commissions and private entities receiving Federal or State funds from the DHS. In order for DHS to maintain consistency in the administration of discrimination complaints procedures and to comply with various requirements, recipients who operate Federally/State funded programs for the DHS in the State of Hawaii may use these procedures. See Appendix L.

Service Applicants/Recipients, or potential applicants, may file a formal written complaint with the Civil Rights Compliance Staff using the “Discrimination Complaint Form.” See Appendix M. Upon receipt of a written complaint, an assigned investigator shall conduct a factfinding investigation. Individuals may be asked to complete a Consent/Release form. See Appendix N.

Component 8: Maintaining reporting systems

Maintaining accurate and up-to-date reporting systems and data is vital to the effectiveness of Language Access Services provided by DHS.

DHS collects data regarding preferred spoken and written languages, DHS services used, and the frequency such services are utilized by LEP applicants or clients. Specifically, the primary language of each LEP applicant or client is entered into the HAWI or KOLEA systems based on type of benefits they receive. For other programs or services that do not have access to HAWI or KOLEA, DHS staff will enter the primary language data into a paper case record system in order to alert staff that language assistance is needed.

DHS also collects utilization data based on LEP encounters by language from divisions, agencies, commissions, and offices to review of language needs and ensure adequate resources are available. This data is reported to the Hawai'i Office of Language Access on a semi-annual basis. See Appendix O.

Each DHS division, agency, commission, and office will have mechanisms in their report systems to regularly access the LEP status and language assistance needs of DHS applicants and clients. DHS also requires sub-recipients (covered-entities) to collect the primary language spoken by each LEP client and to report back to DHS regularly.

Component 9: Staff Training

In order to successfully implement the Language Service Plan, DHS staff must develop awareness, knowledge, and skills of good practice to effectively communicate with LEP persons. DHS is committed to providing language access training opportunities for all program staff.

In 2010, DHS completed the initial language access training. The training was conducted in-person and on-site at all the neighbor island program offices. The training topics include information regarding DHS obligations to comply with Title VI and related language access laws, DHS policies and procedures for providing language services to LEP persons, the Language Access Plan, and all reporting requirements.

Starting 2018, DHS created an on-demand on-line training requiring all DHS staff to complete an annual mandatory training on Language Access. See Appendix Q. The DHS Language Access Coordinator, in collaboration with the DHS Training Office, is responsible for coordinating and implementing staff training.

The purpose of the training is to improve language access, create awareness, and prevent discriminatory practices.

Action steps:

1. Provide training on language access for all DHS employees who have regular contact with the public and newly hired staff.
2. Require annual on demand, on-line training on language access for all staff.

3. Develop, update, and provide training materials to DHS staff.
4. Coordinate and organize training for bilingual volunteer staff on language competency and on ethics.
5. Encourage DHS staff to attend workshops, webinars, and conferences that address language access issues.
6. Regularly monitor and assess the effectiveness of training provided.

Component 10: Stakeholder Consultation

Stakeholder outreach and consultation is an important component of meaningful access to LEP communities. Stakeholder communities can provide DHS with important information and insights. This information may be useful for conducting the assessment of need, capacity, accessibility, and overall quality of the language access plan.

Action steps:

1. Develop list of stakeholders.
2. Establish regular communications regarding language access services to community groups who work with or include immigrant and refugee communities.
3. Consult stakeholder communities to assess the accessibility and quality of DHS's language assistance services.
4. Respond to feedback from stakeholders concerning the language assistance services.

Component 11: Monitoring and Updating the Language Access Plan

The language access coordinator shall be responsible for the evaluation and revision of this language access plan.

Action steps:

1. Identify any significant changes in the composition or language needs using relevant data from various sources.
2. Monitor and determine whether the existing language assistance programs have been effective and sufficient to meet the need.
3. Conduct unannounced site visits to determine compliance with the Language Access Plan.
4. Periodically conduct telephone testing to request assistance in a language other than English to monitor compliance with the language access plan.
5. Inform and monitor sub-recipients (covered entities) of the Title VI and Language Access Law requirement and the agreement requirements through contract language. DHS incorporates language access as a condition to the contract. Require

- mandatory annual language access training. To fulfill language access obligation subrecipients need to submit certificate of completion to contractor.
6. Identify any recommended actions to provide more responsive and effective language services.

Component 12: Designating DHS Language Access Coordinator

To ensure proper coordination and implementation of the DHS Language Access Plan, the department's LEP Project Manager/Coordinator will be the agency's Language Access Coordinator and contact person. The DHS Language Access Coordinator is responsible for:

1. Coordinating the overall implementation of the Language Access Plan;
2. Overseeing and managing the development and implementation of department-wide systems, programs, policies, and procedures designed to address the language needs for the department's LEP applicants and clients;
3. Assessing the status and effectiveness of efforts to identify solutions to language access and identifying deficiencies and corresponding solutions;
4. Establishing priorities, methodologies, and means of measuring outcomes;
5. Developing and implementing systems, tools, and processes to implement, evaluate, and maintain adopted proficiency standards;
6. Developing a training program for employees on language access laws and regulations;
7. Coordinating training for interpretation and translation volunteers;
8. Providing technical assistance to departmental staff and serve as the lead representative at internal and external meetings and conferences that deal with LEP-related issues;
9. Providing liaison services to the Office of Language Access;
10. Acquiring, compiling, and reporting LEP data to the Office of Language Access;
11. Interfacing and collaborating with federal agencies and other state departments, service agencies, contractors, and private sector partners to establish and coordinate the implementation of a comprehensive department-wide plan to address LEP issues and concerns;
12. Advising the DHS Director about alternatives and means by which to improve access to services for LEP applicants and clients.

5. CONCLUSION

This Language Access Plan covers the period July 1, 2024 through June 30, 2026. This Plan addresses the Department's continuing commitment to enhancing access to DHS services and programs. This Plan supersedes the department's Language Access Plan covering the period July 1, 2022 through June 30, 2024.

All DHS divisions, administratively attached agencies, commissions, and offices shall comply with the provisions of this Plan.

This Plan shall take effect upon approval by the Director of the Hawai'i Department of Human Services. For further information on this Language Access Plan, contact the DHS Language Access Coordinator at 808-586-4898.

APPROVED:



Catherine Betts, Director

Mar 21, 2024

Date

APPENDIXES

APPENDIX A	Policy and Procedures Manual 4.10.3
APPENDIX B	Policy and Procedures Manual 4.10.4
APPENDIX C	DHS Volunteer Interpreter List (Updated June 27, 2022)
APPENDIX D	Court Interpreter Registry (Updated May 16, 2022)
APPENDIX E	Office of Language Access's Poster
APPENDIX F	I-Speak Cards (Sample)
APPENDIX G	LEP Action Steps Checklist for Supervisors
APPENDIX H	DHS Language Access Protocol
APPENDIX I	DHS Access Hawai'i Brochure (English and translated versions)
APPENDIX J	DHS 5000 – Offer and Acceptance or Waiver of Free Interpreter Services (English and translated versions)
APPENDIX K	DHS 5050 – Interpreter Form and Interpreter Code of Ethics (English and translated versions)
APPENDIX L	DHS Policy and Procedures 4.10.1 Discrimination Complaints Policy
APPENDIX M	DHS 6000 – Discrimination Complaint Form
APPENDIX N	DHX 6006 – Consent/Release Form
APPENDIX O	Language Access Reporting Tool
APPENDIX P	ICF Dated 06/27/19 – Language Assistance Services
APPENDIX Q	On-Line Annual Mandatory Training (Module 3)