

LANGUAGE ACCESS PLAN FOR LEP INDIVIDUALS

State Agency: Office of People With Developmental Disabilities

Effective Date of Plan: October 5, 2012

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PART 1 – INTRODUCTION

Pursuant to Executive Order No. 26 (“Statewide Language Access Policy”), we have prepared this Language Access Plan (“Plan”) that sets forth the actions we will take to ensure that persons with Limited English Proficiency (“LEP”) have meaningful access to agency services, programs, and activities.

Statement of Agency Services to the Public:

The Office for People With Developmental Disabilities (OPWDD) provides high quality, person-centered services, support and advocacy to approximately 125,000 individuals with developmental disabilities and their families. OPWDD works with a network of nearly 800 not-for-profit providers to help people with developmental disabilities lead richer lives that include meaningful relationships, good health, personal growth and productivity and homes in their communities. OPWDD also provides leadership and excellence in research and in developing public policy in the field of developmental disabilities services. In keeping with its commitment to “Putting People First,” OPWDD invests heavily in enhancing its partnership with other state and local agencies. OPWDD is focused on seamlessly meshing its system of service provision, with a broad network of state agencies whose work interconnects with the lives of people with developmental disabilities. This provides better access to the generalized and specialized supports and services they need to live their lives. Our goal is to help people with developmental disabilities achieve their personal best and attain the highest level of independence through individualized service programs.

In developing this plan, we have understood LEP individuals to be persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. We will reassess language needs periodically as needed, but at least every two years starting from the effective date of this plan.

PART 2 – ASSESSING LEP POPULATION LANGUAGE NEEDS

The estimated total number of individuals in our service area is: OPWDD serves approximately 125,000 individuals with developmental disabilities. It is estimated that 2% of New Yorkers have developmental disabilities.

The top eight languages spoken by LEP individuals that our agency serves or could potentially serve are as follows:

Language	Estimated Number of LEP Individuals Who Speak this Language
Spanish	2,577,033
Korean	106,949
Haitian Creole	135,430
Chinese	454,479
Italian	235,045
Russian	230,989
Yiddish	126,293
Urdu	62,840

We use the following resources to determine the top eight languages spoken by LEP individuals:

- U.S. Census data (including American Community Survey data)
- Agency data on client contacts
- School system data
- Information from community organizations that serve LEP individuals

Names of organizations: See attached List of Community Organizations/Multicultural Providers.

- Information from other government agencies

Names of agencies: The Governor's office has predetermined the top 6 languages spoken by LEP individuals utilizing 2010 census data.

- Other (describe) We have a need for Yiddish and Urdu in the NYC area (Brooklyn) and will add these additional languages to the 6 languages designated by the Governor's office.

We have determined the frequency of our contacts with LEP individuals as follows:

To determine the frequency of our contacts with LEP individuals, OPWDD has surveyed all Development Disabilities Services Offices (DDSOs) and collected the available data utilizing the Tracking and Billing Services program (TABS), intake/transmittal forms, and Individualized Service Plans. We will be implementing a monitoring system to record LEP data throughout the agency.

PART 3 – PUBLIC OUTREACH AND NOTICE OF AVAILABILITY OF LANGUAGE ASSISTANCE SERVICES

We inform LEP individuals, in the languages indicated in the chart in Part 2 of this plan, about their right to free language assistance services by using the following measures:

- LEP individuals are informed directly by our staff

In what ways? Staff will be provided NYS Language Identification Tool signs, “I-Speak” cards and literature that informs LEP individuals about their right to free language assistance. Staff will be trained to route telephone calls to a telephonic interpretation service that will provide interpretation services in all languages. This service will enable individuals with LEP to access information about OPWDD’s supports and services in the language of their choice.

- Brochures or flyers about language assistance services

- In public areas of the agency

- Elsewhere in the agency's service areas

- Signs posted about language assistance services

- In public areas of the agency

- Elsewhere in the agency's service areas

- Outreach and presentations at schools, faith-based groups, and other community organizations

What are the LEP populations targeted? Spanish, Korean, Chinese, Italian, Russian, Haitian/Creole, Yiddish, Urdu.

- Local, non-English language media directed at LEP individuals in their languages

- Telephonic voice menu providing information in non-English languages

In which languages: The service will be linked directly to our information line which will then provide informational assistance. The info-line provides language assistance in the 8 identified languages and most other languages.

- Other (describe) The OPWDD’s website utilizes the Google Translator that allows individuals to view content in multiple languages. We understand the limitations of this feature but will continue to offer it on our public website. We will identify and translate the vital public documents currently on our website. The website will direct the public to the OPWDD

Information Line, which provides language assistance in the 8 identified languages and most other languages.

PART 4 – PROVISION OF LANGUAGE ASSISTANCE SERVICES

We use the following resources to determine when an individual is LEP, and what the individual's primary language is, when the encounter is *in person*:

- "I Speak" posters or visual aids
- Reception staff make those determinations based on experience, with the assistance of bilingual staff members where available
- Other (describe) We will convert the language identification posters into smaller signs for reception areas and create "I Speak" reference guides for reception and intake staff.

We use the following resources to determine when an individual is LEP, and what the individual's primary language is, when the encounter is *by telephone*:

- Reception staff make those determinations based on experience, with the assistance of bilingual staff members where available
- Telephonic interpreting service
- Other (describe) Staff will be trained to ask if a person requires LEP assistance, and to transfer individuals with LEP to the information line. The OPWDD's Information Line provides language assistance in the 8 identified languages and most other languages.

We record and maintain documentation of each LEP individual's language assistance needs as follows:

OPWDD will update its documentation and intake procedures to record the preferred language of individuals receiving OPWDD's supports and services. An electronic data recording system will be developed to document the contacts with and record the language assistance needs of the Limited English Proficiency public. This system will be utilized to monitor compliance with the E.O.26 Language Access Policy and to facilitate the compiling of mandated annual reports to the Governor's office. The system will allow staff to record, at a minimum, the name of the individual making contact, their specific language assistance needs, date and time of the contacts, contact information (telephone numbers, address), name of the individual being served and the purpose of the contact. The system will also allow

staff to record and document the oral interpreting services provided to LEP individuals at each encounter with OPWDD. The system will be properly secured and made available for use by appropriate staff at both the DDSO offices and Central Office.

A. Oral Interpreting Services

Our protocol(s) for assessing whether an LEP individual needs oral interpreting services is as follows:

For in-person encounters: Language Identification Tool posters will be posted at the reception areas at all DDSOs and signs informing LEP individuals and families that OPWDD provides free interpreting and translation services will also be posted. "I Speak" cards will be provided to all reception and intake staff. Language Identification Tool signs will be posted in all reception areas.

By telephone: OPWDD's general phone lines will be updated with a greeting menu that will allow individuals to access information in multiple languages. The service will be linked directly to our information line which will then provide informational assistance. The info-line provides language assistance in the 8 identified languages and most other languages.

At initial contact in the field: Individuals will identify their preferred language using "I Speak" cards/posters. Personnel will facilitate oral interpreting service appointments. Alternatively, staff will help LEP individuals access the multi-language greeting menu.

For pre-planned appointments with LEP individuals: Staff will inquire if oral interpreting service is needed and arrange for interpretation services.

Other (describe): Services can be provided directly from our information line, which will then provide informational assistance. The info-line provides language assistance in the 8 identified languages and most other languages.

Our protocol(s) for informing LEP individuals that they do not need to provide their own interpreters and that free interpreting services will be provided is as follows:

For in-person encounters: Signs will be posted at all DDSOs informing LEP individuals that OPWDD provides free interpretation and translation services. The OPWDD's website will provide information regarding free interpretation and translation services.

By telephone: LEP individuals will be directed to the OPWDD's Information Line, which provides language assistance in the 8 identified languages and most other languages. The individuals with LEP will be provided information about translation and/or interpretation services through a qualified interpreter.

At initial contact in the field: OPWDD will contract for mobile language line interpretation services. Individuals will identify their preferred language using "I Speak" cards/posters. Personnel

will facilitate service appointments with an interpreter. Alternatively, staff will help LEP individuals access the multi-language greeting menu. Individuals with LEP will be provided information about translation and/or interpretation services through a qualified interpreter.

For pre-planned appointments with LEP individuals: Staff will inquire if oral interpreting service is needed, arrange and provide for interpretation services.

Other (describe): The OPWDD's LAP steering committee will continue to develop and adopt process and protocol related to LEP access.

If an LEP individual insists on using a family member, friend, or other person as an interpreter, our protocol(s) for determining whether to accept or decline such an arrangement is as follows:

LEP individuals that come into contact with our agency will be informed of the availability of free interpreting services. Generally, an LEP individual may not use a family member, friend, or a minor as an interpreter. However, **during emergencies** an LEP individual will be permitted to use a minor, a family member or friend as an interpreter. Upon request, an LEP individual may also be permitted to use a minor, a family member or friend as an interpreter for routine matters, such as asking the location of the office, hours of operation or rescheduling an appointment. Where the interaction with the LEP individual occurs at the agency's office and an individual is permitted to use an interpreter of his or her choosing, he or she must fill out a written consent/waiver form.

Where an LEP individual is engaged in official business with the agency, the agency will provide an independent interpreter at all times. An LEP individual will not be permitted to use an independent interpreter of his or her choosing when filling out applications or when involved in other legal matters.

Our protocol(s) for obtaining interpreter services in a timely manner is as follows:

Upon request or after a determination that a person is an LEP individual, our staff may immediately contact our language service provider for interpreting services. Interpreter services will be scheduled either utilizing community resources (voluntary agencies) or through the telephonic and/or interpretation services.

OPWDD has contracts with interpreter services. The business office maintains resources information and maintains interpretation contracts with multiple vendors.

We record and maintain documentation of oral interpreting services provided to LEP individuals at each encounter as follows:

As referenced above, OPWDD will develop an electronic system (data-base) to document the contacts with and record the language assistance needs of the individuals with LEP served. The system will allow staff to record and document the oral interpreting services provided to LEP individuals at each encounter with OPWDD.

Competency and confidentiality

The linguistic and cultural competence of interpreters is addressed as follows:

Parties serving as interpreters are sufficiently competent to ensure effective communication. Such interpreters may include, but are not limited to, facility staff, community volunteers or contractors. Contracted interpreters are trained, tested, certified, monitored and ensured.

The issue of confidentiality pertaining to the use of interpreters is addressed as follows:

The training provided to staff will address the importance of confidentiality. Furthermore, independent interpreters will enforce standards of confidentiality in accordance with NYS Law.

Additionally, the OPWDD Counsel's office will develop protocols in accordance with HIPAA. Individuals with LEP will be required to sign a consent form to release information to translating services. OPWDD staff members are bound by Mental Hygiene Law regarding confidentiality.

Maintaining a list of oral interpreting resources

We use, or have available for oral interpreting, the following resources:

- Bilingual staff members who work directly with LEP individuals

**Number of staff and languages
spoken:**

Bilingual staff members who are available to provide oral interpretation will be asked to register with the Director of Diversity and Inclusion Management. A language bank will be maintained as part of OPWDD's Language Access Plan (see above attached).

- The OPWDD's Information Line, which provides language assistance in the 8 identified languages and most other languages.
- Interpretation services from approved vendor pool.

Bilingual staff members who provide oral interpreting when necessary

Number of staff and languages spoken: OPWDD is currently compiling a list of "volunteer" interpreting staff. We have created a list of bilingual staff members who are available to provide oral interpretation, which will be updated periodically. They will be asked to register with the Director of Diversity and Inclusion Management. A contact list will be maintained as part of OPWDD's Language Access Plan. Additionally, the OPWDD's Information Line offers assistance in English, Spanish and most other languages.

Telephonic interpreting service

Names of vendors: The OPWDD's Information Line offers assistance in English, Spanish and most other languages through OGS group contracts. Additionally, there is a separate New York State Empire State Development Directory of Minority and Women-Owned Business (M/WBE) translation services providers (contractors). These organizations will be also utilized to provide translation services and assist in reaching the agency MWBE goals.

Contracts or other arrangements with community organizations or individuals for oral interpreting services

Names of individuals/organizations and languages: Staten Island DDSO currently uses All Language Translation (not on State Contract). Sinergia provides Spanish translation for OPWDD presentations in NYC.

Other (describe) We will continue to develop LEP community resources throughout the OPWDD system utilizing the attached Multicultural providers list.

The agency's Language Access Coordinator maintains the list of oral interpreting resources that are available to staff, which includes:

Names and contact information for all resources

Names and locations of staff members who are available to act as interpreters or provide services directly in the LEP individual's primary language

Languages in which each interpreter or service is qualified

Procedure for accessing each interpreter or service

We inform all staff members who have contact with the public how to obtain oral interpreting services as follows:

The mandatory training given to staff includes the process for obtaining interpretation services. Additionally, information regarding how to access services will be posted on the agency intranet and all reception staff will be provided with language identification desk reference cards.

B. Translations of Written Documents

The process to determine and reassess, at least every two years starting from the effective date of this plan, those vital documents (including website content) which must be translated is as follows:

The LAC and the Language Access Team, with input from staff and supervisors, will review existing documents, revisions and newly created documents to determine if the document is vital and needs to be translated. This review will occur at least once every two years, but may be more frequent depending on the need.

The process to timely translate documents that LEP individuals submit in their primary languages is as follows:

DDSO's Language Access Liaisons will send identified documents to the LAC Central Steering Committee for review. Documents will then be submitted to designated translation vendors in a timely manner.

The process for ensuring that documents are written in plain language before they are translated into other languages is as follows:

The OPWDD's Language Access Review Team has been established and will review documents prior to submission for translation. Documents will also be reviewed and rewritten wherever the potential for agency standardization exists. Documents will be reviewed and converted to Plain Language. An agency lexicon will be created.

OPWDD is currently undergoing an agency wide reorganization process. Many of the documents reviewed and deemed public and vital will require significant revision as a result.

The following documents are currently translated by the agency in the languages indicated:

Essential and Vital Forms to Be Translated

*** Documents with asterisks next to them are going to change due to agency reorganization. Those highlighted in yellow are suggested to be "most important" for translation. A determination of whether said "impact" documents are also "vital" will be made within a reasonable time after reorganization of the agency.*

LEGAL DOCUMENTS

1. PRIVACY NOTICES

- a. Privacy Notice (Receipt Acknowledgement)
- b. Privacy Notice (Short)
- c. Privacy Notice Letter
- d. Privacy Practices (Notice)
- e. Release Form (Internet and General Use)

2. NOTICE OF DECISION (NOD)

- a. NOD: Care at Home Program
- b. NOD: Developmental Disability Denial
- c. NOD: IUR Termination
- d. NOD: Developmental Disability –Termination
- e. NOD: HCBS Approval
- f. NOD: HCBS Denial
- g. NOD: HCBS Suspension
- h. NOD: HCBS Termination

LEGAL DOCUMENTS (continued)

3. LIABILITY FOR SERVICES

- a. Preexisting Services Liability Notice
- b. Limited Exception Notice for Persons Applying for Other Services
- c. Information About the Limited Exception for Individuals Receiving Supported Employment or Respite Services
- d. Limited Exception Notice for Individuals Meeting Exception
- e. Liability Notice for Persons Applying for Services
- f. Policy Clarifications on New Enrollments – Sunmount
- g. Liability Notice for Preexisting Services
- h. *Food Stamps – Liability for Services- revised*

4. FORENSICS

- a. Discharge Notice of Release
- b. Discharge Planning Acknowledgement
- c. DMH 44 (Notice of S&R involvement)
- d. Notice of Status and Rights – Involuntary Admission
- e. Notice of Application (330 Sub Retention Order)
- f. Notice of Status and Rights (Voluntary Admission)
- g. OPW 41 (Application Vol. or Minor Vol.)
- h. OPW 42A (Notice of S&R – Vol. or Minor Vol.)
- i. OPW 730-2 (Notice to Retain)
- j. OPW 45A (Notice of Application to Retain)
- k. SMCR 129 (Notice of S&R. CPL 333.20)

5. HIPAA and CONSENT

- a. Author Consent – Clinical Info
- b. Author Consent – Publication Purposes
- c. ICC Form Letter

BROCHURES/WEB-BASED COMMUNICATION

1. Aging Services brochure**
2. Autism Platform**
3. *Autism Research brochure*
4. Board of Visitors brochure**
5. Consolidated Supports and Services – A Seven Step Pathway to the Life You Want!**
6. Consolidated Supports and Services brochure**
7. *Developmental Disabilities Facts Brochure*
8. Direct Support Professional recruitment brochure**
9. Direct Support Professional recruitment poster, pull-off**
10. *Eligibility Transmittal Form*
11. Eligibility for OPWDD Services – Important Facts**
12. *Eligibility Advisory Guidelines*
13. *Employment Myth Busters Brochure*
14. *Employment SEMP Brochure*
15. FACTS about Developmental Disabilities**
16. FACTS about OPWDD**
17. Family Care Facts (brochure)**
18. Family Care Services **
19. *Family Support Services Brochure***
20. *Family Support Services – A Brief History*
21. Guide for Choosing a Residential Service Provider**
22. Guide to Understanding Supports and Services**

23. Housing Services**
24. How to Pay for Services**
25. Information Line**
26. IBR Brochure **
27. IBR George A. Jervis Clinic Fragile X Center**
28. Learning About Incidents Brochure**
29. Minority and Women Owned Businesses**
30. Multicultural Provider Brochure**
31. Myth Busters – Facts for People With Disabilities Who Want to Work**
32. People First Waiver: Information for Individuals and Families**
33. Preventative Health Care Screening Guidelines**
34. PROVIDER DIRECTORY (OPWDD website)
35. Safeguarding Alerts**
36. Self-Directed Services brochure**
37. Statewide Comprehensive Plan 2012-2014**
38. Values, Mission, Vision, Principles
39. What You Need to Know About Payment for Services**
40. What Families Need to Know About Payment for Services**

FISCAL

1. 273 Front
2. 273 Back
3. Annual Accounting Letter
4. BRO 504 Notice of Reimbursement Change
5. BRO 504 RP Cover Letter
6. Citation Bro 278
7. Request to Change Representative Payee
8. RFSO 263 Form
9. RFSO 557 Form
10. RFSO 557A Form Letter
11. RFSO VA Information Request

RIGHTS and ADVOCACY

- 1. Informed Consent**
 - a) Major Medical
 - b) Psychotropic Drugs (Non Willowbrook)
 - c) Routine Medical
- 2. Rights**
 - a) Understanding My Rights
 - b) Individual Rights (DDSO)
 - c) Residents Rights (Objection to Notification)

- d) Residents Rights (Receipt)
- e) Residents Rights (Sample Letter)
- f) Residents Rights (Statement)
- g) Rights and Responsibilities
- h) Rights and Responsibilities Grievance Document
- i) Relative/Guardian/Advocate Acknowledgement of Rights

SUPPORTS and SERVICES

1. Application-Intake

- a) Application for Services
- b) Universal Application Update (5.11)
- c) IBR Jervis Clinic Referral Form

2. Eligibility

- a) Eligibility Letters
- b) OPWDD DDP-1
- c) OPWDD DDP-2
- d) OPWDD DDP-4
- e) OPWDD DDP User Guides

3. Family Support Services

- a. Family Reimbursement Program
- b. Plan of Care Master
- c. Some Basic Facts about Family Support Services
- d. SPA Individual
- e. SPA Parent

4. Medicaid Service Coordination (MSC)

- a. Application for Participation in MSC
- b. MSC Activity Plan
- c. MSC Agreement Statement of Rights and Responsibilities
- d. MSC Agreement
- e. MSC Applications 1, 2, 3

5. HOME of YOUR OWN

- a. Application for Home of Your Own Program
- b. Cover letter AFI
- c. Monthly Household Spending Worksheet

6. HOME and COMMUNITY BASED SERVICES (HCBS) WAIVER

- a. Application for Participation in OPWDD HCBS Waiver Program
- b. Choice of Services
- c. Level of Care Eligibility Determination Form and Instructions
- d. General Policy Clarification – Sunmount
- e. HCBS Documentation of Choices
- f. New York State OPWDD Eligibility Important Facts
- g. Waiver Key Choices Form
- h. Waiver 507 Comprehensive Plan
- i. Transmittal for Determination of Developmental Disability
- j. 1115 Waiver Concept Paper

7. HCBS WAIVER: ENVIRONMENTAL MODIFICATIONS (EMOD)

- a. Application 3. Property Owner Consent Form
- b. Application 4. Bid Tally Sheet
- c. Application 6. E-mod Only Authorization for Third Party Reimbursement

8. HCBS WAIVER RESPITE SERVICES

- a. Annual Respite Services Agreement (CDDDSO)
- b. Emergency Authorization Form
- c. Respite Application
- d. Respite Information
- e. Respite Update Form

The process for ensuring that translations are accurate and incorporate commonly used words is as follows: (Note: The Office of the Deputy Secretary for Civil Rights will maintain a list of commonly used words.)

OPWDD through its vendor will ensure that proofing/editing for correctness and cultural sensitivity are a component of the translation services provided by any vendor under contract as part of the publication process. OPWDD will also ensure that plain language is used in materials produced before translation to ensure information is accessible to a range of literacy levels.

We use, or have available for translating, the following resources:

- Contracts with language service vendors

Names of vendors: New York State Office of General Services (OGS) Group # 73005, Award # 20487: The "List of Contractors" is contained on pages 5 and 6 of the document. The contractors and contract number currently on the OGS contract are: **Geneva, Worldwide, Inc./SB/PS63092, Language Line Services, Inc. /PS63093, Language Services Associates, Inc./MWBE/PS63094, Languages R Us, Inc./SB/PS63095, Legal Interpreting**

Services/SB/PS63096, SOS International, LTD. /PS63098, and The TrustForte Corporation d/b/a as TrustForte Language Services, Inc./SB/PS63099. Note: Please note the following abbreviations relative to these centralized contracts -- M/WBE = Minority and Women-owned Business Enterprise, SB = New York State Small Business Initiative. OPWDD will also utilize additional agency-wide OGS contract for language interpreting services.

- Contracts or other arrangements with community organizations or individuals for oral interpreting services

Names of individuals/organizations and languages: Multicultural provider agencies (see attachment) will be invited to offer translation services.

- Oral translations of written documents by bilingual staff members

- Oral translations of written documents by other individuals or community organizations

- Other (describe)

The agency's Language Access Coordinator maintains the list of written translation resources that are available to staff, which includes:

- Names and contact information for all resources

- Names and locations of staff members who are available to provide oral translations of written documents

- Languages in which each translation service is qualified

- Procedure for accessing each translation service

PART 5 – STAFF TRAINING

The person(s) in the agency who is responsible for the provision of training to staff in language access issues is: Karen Galarneau, OPWDD Director of Talent Development & Training and Russell Ferguson, OPWDD's Director of Diversity Management

The staff training includes the following components:

- The legal obligations to provide meaningful access to benefits and services to LEP individuals

- ☑ How to access language assistance services
- ☑ How to work with interpreters
- ☑ Cultural competence and cultural sensitivity
- ☑ Documenting the language needs of LEP individuals and the language services provided to them by the agency
- ☑ How to obtain written translation services

The methods and frequency of training are as follows:

LEP training curriculum development has been completed by GOER and a multi-agency training consortium. OPWDD's staff have been identified and participated in a Train-the-Trainer sponsored by GOER. Initial training will be targeted to leadership, supervisors and identified reception staff. A supplementary curriculum for front line staff is currently under development by GOER. It is anticipated that this component of the LEP training will be delivered primarily as an online component. It is also anticipated that the LEP online module will be incorporated into new employee orientation training.

PART 6 – ADMINISTRATION

Monitoring

To ensure compliance with the Plan, the LAC will monitor its implementation as follows:

OPWDD Language Access Coordinators will report to the Agency LAC in regards to the OPWDD implementation plan. Progress reports will be entered in the agency LAP Database. Steering committee meetings will be held to assess work plans and resolve issues. A review of all DDSOs and agency progress will be compiled and reported to the OPWDD's Commissioner annually. In addition, DDSO Liaisons will be responsible for site monitoring and maintaining updated language access resources.

Complaints

We provide information to the public, including to LEP individuals in languages regularly encountered in this service area, advising them of the right to file a complaint if they feel that they

have been the subject of discrimination. The information we provide describes how and/or where to file a complaint. We do not retaliate or take other adverse action because an individual has filed a complaint alleging discrimination based on LEP status or needs.

We display information on the right to file a complaint, and the procedures to file a complaint, in the following manner:

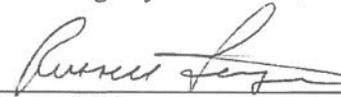
We will display information pertaining to rights and complaint procedures in the identified 8 languages on signs posted throughout the agency. Information will also be made available via the OPWDD web site. A complaint procedure policy will be created as part of the agency design of protocols regarding language access. We will make the standard complaint form available in all 8 languages on our website and at our office.

We handle complaints made to the agency regarding the provision of language assistance services in the following manner:

Complaints will be submitted to the LAC for review and in conjunction with OPWDD Counsel's Office will determine the appropriate action to follow.

PART 7 – SIGNATURES

 Commissioner 9/5/12
Head of Agency Title Date

 Director of Diversity Management 9/4/12
Agency LAC Title Date

 Deputy Secretary for Civil Rights 9/17/12
Date