Equitably Engaging with Customers in Their Preferred Language: How Inclusive Customer Engagement is Better Customer Engagement

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ABSTRACT

With an increased focus on equitable service delivery, energy service providers are looking for ways to better engage historically underserved customers. Previous studies have found that Limited English Proficiency (LEP) customers, or those who speak languages other than English (LOTE) are less likely to engage in energy efficiency programs. Further, there is little research on the experiences and needs of these individuals. Because of this, our client, a statewide program administrator, wanted to better understand the unique experiences and participation barriers of those with language access needs – and to identify opportunities to serve them more equitably.

This paper will share the results of an expansive study focused on language-focused barriers and a journey analysis to better understand the experiences of LOTE and LEP customers. The study integrated community organizations to support direct outreach to participating and nonparticipating customers through interviews, focus groups, and surveys in the five most common non-English languages spoken in the state: Spanish, Portuguese, Mandarin, Cantonese, and Haitian Creole. The study also included a comprehensive review of program webpages and collateral to assess the efficacy of those communications and potential implications on customers' experiences.

This paper will highlight the findings and opportunities unique to these customer groups, including language accessibility and customer engagement (among others). The authors will share how the client is using the study results to 1) guide marketing and outreach, program design, and implementation strategies, and 2) inform a language access plan to better engage LEP and LOTE customers.

Introduction

This paper centers around research completed as part of the Guidehouse evaluation contract in support of the Mass Save® Sponsors (Massachusetts (MA) Program Administrators (PAs)). The PAs, the Energy Efficiency Advisory Council (EEAC), members of the EEAC Equity Working Group (EWG), and other stakeholders, advocates, and public commenters identified language access as a key concern for both the 2019 – 2021 and the 2022 – 2024 Three-Year Plans.[1] To meet the 2022 – 2024 Three-Year Plan's strategic objective to develop just and equitable solutions among historically underserved communities, the PAs and EEAC prioritized understanding of and service to Limited English Proficient (LEP) customers and English-isolated households, groups they believe are historically underserved given their language access barriers.

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[1] 2019-2021 Plan Term Sheet, https://ma-eeac.org/wp-content/uploads/Term-Sheet-10-19-18-Final.pdf, 2018; Massachusetts Energy Efficiency Advisory Council, Workshop-5-Equity-Working-Group-Process-and-Recommendations-1.08.21-MM-Final-002.pdf, January 2021.

The PAs and EWG planned for several activities to address this concern including, 1) a residential language-focused journey mapping and barriers study, and 2) ongoing development of Mass Save® initiatives to better engage customers such as those who experience LEP and English-Isolation. This paper focuses on the research study completed as part of activity 1) identified above.

Recognizing that many people prefer or need to speak languages other than English, other industries, such as healthcare and education have for decades addressed language access. Indeed, in August 2000, then-President Clinton signed Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency." The order required Federal agencies to assess the services they provide and identify a need for services for LEP persons and develop plans to meet those needs.[2] As a result of this Executive Order, many Federal Agencies developed and implemented Language Access Plans (LAP).

Within the energy efficiency and efficient building industries, despite running programs that aim to serve all customers, a focus on language access has largely been missing and, despite paying into programs, the benefits of these programs have not accrued equitably across populations or service territories (Frank and Nowak 2016). As these authors have previously noted, the consequences of not having materials accessible in the languages people speak limits participation, and in fact, can create distrust and feel disingenuous if not done well (Kelley and Dunn 2020); (Kelley and Milla 2022). The study we focus on in this paper is one of the first to comprehensively map the journey through the program for customers who access—or would prefer to access—program services and materials in other languages. As such, we highlight it here to share the findings as they may be relevant to the broader industry, including how the PAs have incorporated into the study findings in their program implementation. Moreover, we believe that further research on this topic is sorely needed, and the authors aim to share our process for conducting the research in hopes that it may be valuable for other researchers considering similar research efforts.[3] Finally, we aim to show that strategies that improve the program experience for LOTE and LEP customers are likely to improve the experience for customers accessing the program in English as well. As practitioners of inclusive design point out, inclusive design often improves the experience for all customers, not only the specific community or population being designed for.

Inclusive design is a term that describes methodologies and approaches to create products that enable people of all backgrounds and abilities (Joyce 2022). Design practitioners have noted that in many cases, design choices made to enable access for a specific group of people benefit a much broader group. For instance, the "curb cut effect" refers to the ramp from a sidewalk to a street that was often first added for people using wheelchairs or other mobility devices. However, those curb cuts are now frequently used by people pushing strollers, wheeling a cart, pulling a suitcase, or even 'unencumbered' pedestrians. While the curb cut was implemented to create additional access for one group (people using wheelchairs or similar mobility devices), a much broader group of people has benefited (Glover Blackwell 2017). We begin the paper with a study overview, to provide a framework for understanding the goals and approach of the MA study.

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[2] Civil Rights Division | Executive Order 13166 (justice.gov); see also www.lep.gov
[3] We note that while a report based on the study is available publicly, where this paper differs is in the emphasis and discussion of the approach to integrating community organizations into the research process; in providing an update on how the PAs have incorporated the findings from that study, and in our reflections about inclusive design.

Next, we illustrate the method we took, particularly as it related to working with community organizations and how it used a process of iterative and adaptive research design to incorporate feedback from community groups and community stakeholders. Doing this benefited the research in several ways, First, it literally enabled the data collection since our initial plan may not have been viable. Second, the community organizations served as partners in the research, thereby taking an active role in verifying study findings and ensuring recommendations were viable.

After discussing the approach and how we adapted our originally planned approach, we shift to sharing the findings from the study. Although the findings focused on one specific program model (home energy audit program) we find that they are relevant for many program models. We next discuss how the study findings and recommendations are being adopted by the utility and the next steps for the program in enabling greater program access. The paper concludes with a discussion of inclusive design and how creating more accessible programs for LOTE customers can improve the experience for all customers.

Study Overview

During the 2019 – 2021 term, the PAs worked collaboratively with EEAC Councilors and other stakeholders to form the EEAC's EWG to make recommendations regarding improving the equity of outcomes achieved within the programs, expand their understanding of the barriers customers encounter when engaging in energy efficiency, and establish a set of metrics by which the PAs will benchmark and measure success over time toward achieving the intended equity related outcomes from improved program design. To address this objective, the PAs initiated several statewide activities including enlisting a language-focused barriers and journey mapping study. The exploratory study aimed to provide a better understanding of the specific program journey and barriers to Mass Save participation for LEP residential customers based on feedback from customers representing different languages and levels of program participation. The study meets the 2022 – 2024 Three-Year Plan strategic objectives to assess language access barriers and will inform the implementation of the Language Access Plan.

The study included extensive efforts to integrate community partnerships and to speak with participating and nonparticipating LEP customers through interviews, focus groups, and surveys in the five non-English languages identified as target populations by the MA PAs: Spanish, Portuguese, Mandarin, Cantonese, and Haitian Creole. The study results are being used to guide marketing and outreach, program design and implementation strategies, and inform the language access plan (under development) to better engage LOTE.

Study Population

For the MA study, we focused on the five non-English languages identified as target populations by the MA PAs: Spanish, Portuguese, Mandarin, Cantonese, and Haitian Creole (MA EEAC Equity Working Group 2021). Our study focused on speakers of those five languages who had varying experiences in participating in the Residential Coordinated Delivery and Retail programs. The evaluation team conducted research with residential customers, community organizations, and home performance contractors/energy assessors across MA to understand LEP customer experiences at various points in the participation journey. Overall, the

study team engaged 207 customers in this research, 91 of whom were LEP customers.[4] Of those 91, 60 were nonparticipants who did not participate in Mass Save programs during the study timeframe based on self-reports of no participation, 29 had participated in at least one Mass Save residential program during the study timeframe (participants), and two partial participant customers who had signed up for a Residential Coordinated Delivery program HEA but ultimately did not complete one during the study frame.[5] Participating and nonparticipating customers lived in or near 16 cities throughout MA, including the Boston area (Dorchester, Mattapan, Revere, Chelsea), Quincy and Waltham in the Metro West, Lawrence in the Northeast, Brockton and New Bedford in the Southeast, and Springfield in Western MA.[6] We also gathered feedback from 12 community organizations that provided services in languages other than English, and three bi- and multi-lingual home performance contractors (Guidehouse 2023). The table and figure below are taken from the study to demonstrate participant engagement by language.

Table 3. Study Participation: Customer Count by Program Participation and Language

Language	Nonparticipants	Participants	Partial Participants	Total
Spanish	15	14	1	30
Haitian Creole	17	1	-	18
Mandarin	8	6	1	15
Cantonese	8	5	-	13
Portuguese	12	3	-	15
Total	**60**	**29***	**2**	**91**

* Two of these 29 partially completed the program participant survey; one Spanish and one Cantonese speaker.

*Source: Nonparticipant Group Interviews, Participant Survey, Partial Participant Interviews (Appendix E).*

Source: (Guidehouse 2023).

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[4] Partnering community organizations engaged (scheduled) additional customers through nonparticipant focus group recruitment efforts. The exact number of customers who agreed to participate in a focus group but ultimately did not participate is unknown.

[5] The low number of study participants, notably among past program participants, was primarily driven by limited available information to identify individuals' language preferences and the level of accessibility of the program to non-English speakers. Refer to the full report for details on sampling and recruitment (Guidehouse 2023).

[6] To reduce barriers to participation related to sharing personal information, we did not ask nonparticipants who attended a nonparticipant group interview hosted by community organization to share their home address. We report these nonparticipants as "near" the city where the organization is located.

Figure 5. Community Organization Research by Language (N=12)
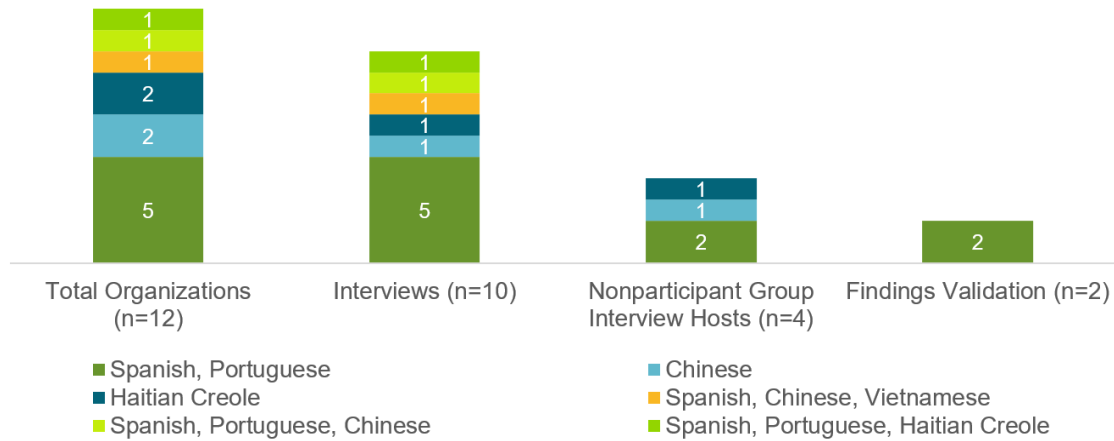
Source: Community Organization IDIs (B.3, Appendix E).

Research Methods

The study team used a combination of quantitative and qualitative research methods to support the exploratory and iterative nature of this study. These methods included program materials, website, and data review; in-depth interviews with community organizations, contractors, and customers; participant surveys; and nonparticipant small group interviews. The study team obtained verbal consent at the start of all interviews and surveys participation was opt-in only. All customers who participated in the study were compensated for their time ($50 per participant survey, $100 per participant, partial participant, and nonparticipant 1-hour interview), and community organizations received a $500 donation per interview and/or up to $2,000 per nonparticipant group interview for hosting as compensation for up to 10 hours of training and nonparticipant recruitment efforts. Nonparticipant group interviews were held at various times during weekdays, weeknights, and weekends based on the needs of the study participants and as deemed appropriate by the hosting community organization. Home performance contractors, as program actors, were not offered an incentive. All materials were translated into and interactions with customers were conducted in each of the targeted five non-English languages: Spanish, Portuguese, Mandarin, Cantonese, and Haitian Creole. All researchers who translated materials or directly interacted with customers were fluent in a target language and English; almost all were native speakers. Any information study participants shared was reported in aggregate to protect their identities and otherwise kept confidential according to data security protocols protecting any personally identifiable information.

Community Engagement Approach

For this research, we heard from participants in the Mass Save program as well as nonparticipants. To reach participants, we used the contact information provided through the program vendor and implementer data. However, we spoke with more nonparticipants than participants, which we view as reflective of the success of our approach leveraging community organizations and community networks.

Our process of community collaboration began with outreach to community stakeholders and key organizations and then listening to understand their concerns and build from their knowledge. Through previous research, we knew that organizations serving communities are deeply aware of the concerns, challenges, and resources within communities. They often have existing relationships and are trusted resources in the community. Recognizing that community organizations have established relationships with their clients and communities, and that they serve as a trusted and safe resource for customers to share their experiences, we first connected with organizational representatives. Specifically, we interviewed community organizations serving LEP customers to better understand the communities they served and their perception of and experience with Mass Save. We then collaborated with organizations, adapting our study design based on their insights, including establishing formal partnerships with organizations to recruit for and host small group interviews on-location at their facilities or through a virtual meeting platform where nonparticipants joined with support from organization staff.

We began by reaching out to organizations serving the communities where the people speaking the five languages of interest—Spanish, Portuguese, Haitian creole, Mandarin, and Cantonese—lived. We excluded any organizations already working with the Mass Save program (i.e., community action agencies who were already delivering the program). The team developed an initial sample of organizations, starting with select organizations we interviewed and attempted to interview for the 2020 Nonparticipant Barriers study, including Centro Latino, Chinese Progressive Association, and the MA Alliance of Portuguese Speakers. The team then leveraged US Census and American Community Survey data through tools like the MLA Language Map and Data.census.gov to identify geographic locations within MA where higher concentrations of these groups reside. We used that information to conduct web searches to identify other organizations to consider in the sample. We later built upon this work to identify key geographic locations as part of the participant survey sample. The team provided an early list of 44 organizations to the PAs, EEAC, and EWG for review and to solicit key contacts with whom they may have existing relationships. While the PAs, EEAC, and EWG were unable to provide key contacts, they did provide feedback and suggestions for other organizations to consider.

About a week into recruitment, we introduced snowball sampling to leverage the existing relationships between interviewees and other organizations and bolster recruitment. In total, we engaged with 12 different organizations across MA achieving a 20% response rate. As compensation for time taken and value provided, the team provided a $500 donation to the organizations on behalf of the PAs and Mass Save. These interviews provide context for the team as we develop data collection documents and subsequently analyze and interpret the survey responses and follow-up interviews.

Through the interviews with organizations serving 21 cities and towns across the state and with operations in 6 languages we heard nuanced and actionable insights. The community organizations we spoke with shared the experiences and concerns of the clients and communities they worked with, including identifying outreach modes and specific examples of language and technology barriers. They also highlighted how the barriers we had previously identified in the 2020 Nonparticipant Barriers Study (Guidehouse 2020) were at play in their communities when it came to trusting outside organizations or participating in programs that seemed like government programs (such as the Mass Save program or the utilities that are many of the

sponsoring organizations of the Mass Save program). We heard from community organizations how barriers related to trust, prioritization, and knowledge impacted customer experiences.

We also shared our study goals and research approach with these organizations and invited their feedback on our planned approach. Our initial research approach included asking the community-based organizations we spoke with to circulate recruitment information so their clients could sign up to participate in an online interview or focus group. While several agreed to do so, they also noted that the approach we were planning to use (online interviews) might not work with their client communities due to limited access to Wi-Fi, and concerns about trust. We should note that conducting research online in these communities was never our optimal plan, but at the time the study was scoped (2021) and the research was happening (2022) we were not yet back in field after COVID.

Based on the feedback from the community organizations the team identified that the plan we had outlined for nonparticipant group interview was not in line with best practices for this type of research. For example, the original scope considered using data gathered through publicly available language data to inform nonparticipant sampling, which we have learned did not reliably provide language preference indicators (Guidehouse 2023); (Kelley and Milla 2022). Additionally, the original scope considered using a cold-call approach to identify and recruit nonparticipants into online group interviews, which we learned from community organization interviews would likely be unsuccessful given trust and technology access barriers.

Based on this feedback, we developed an adapted approach where we partnered with community organizations to lead recruitment and serve as hosts to provide a trusted and familiar location for the group interviews to be held. We developed a framework for the partnership, provided training to organization staff, and managed the partnership throughout the nonparticipant group interviews. Given the greater time commitment, the team developed subcontracts with the organizations to compensate community organization staff for their time and reimbursements for direct expenses like refreshments during a group interview.

We also incorporated the organizations into the reporting process, inviting them to review and comment on a draft of the report and presenting our initial findings to them so they could provide feedback and ensure that their perspectives were represented.[7] While it took time to build relationships and flexibility to adapt our study plan, we are confident that through doing so we were able to engage with individuals and communities that would have likely not been accessible using a more traditional evaluation or market research approach.

Findings and Recommendations

LEP customers must overcome participation barriers regardless of language such as concerns with trusting service providers, prioritization of activities to meet basic needs, not fully understanding programs or why providers offer them, underinformed perceptions of how program offerings can benefit them, and others (Guidehouse 2020). As research on choice infrastructure demonstrates, it is imperative the holistic system within which a choice, such as to participate in an energy efficiency program, is operating (Schmidt 2022). Where these broader infrastructures are not considered, interventions to support increased engagement may be ineffective. In this case, those infrastructural constraints related to prioritization and trust were

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[7] While only 2 organizations opted to provide feedback on the report, we invited all participating organizations to provide feedback. We incorporated the feedback we did receive into the report findings and recommendations.

exacerbated by gaps in language access resources. Residential program designs and funding strategies need to recognize and address these participation and language access barriers concurrently and comprehensively to better engage nonparticipant customers.

Trust: some customers did not want to provide information the program requires, especially where there was fine print text that they did not understand. This was more pronounced among income-eligible customers. Some customers worried that their information was not protected or kept confidential, that their information would be shared or misused, or that sharing their information would result in undesirable and unintended consequences, such as being flagged in a system for investigation. As one nonparticipant explained, "a lot of people don't want to damage their immigration status by getting some support. So, we want to be sure that it won't affect anyone's ongoing immigration case, just to receive these services." Other customers were worried about fine print on documents like enrollment applications and HEA reports. In some cases, individuals had previous poor experiences where they were locked into contracts with hidden stipulations or other scenarios where they felt taken advantage of by other service providers (i.e., cable, internet, phone) because of details in the fine print that they had not or could not, read.

We found that one way to address this barrier is through personal connections and interactions. Customers who previously experienced challenges when accessing resources or programs (e.g., Mass Save or others) required more than information about the offering to motivate them to participate. They sought referrals from family, friends, neighbors, and local community liaisons such as business owners, real estate agents, faith-based leaders, and public and nonprofit human services providers. In general, customers shared that they rely heavily on word-of-mouth referrals because these referrals are backed by sources' prior positive experiences or level of perceived expertise. Word-of-mouth referrals provide reassurance that 1) any real or perceived risks associated with participation are acceptable, 2) the value of the service is clearly understood, and 3) the process to achieve the value is worth it.

Prioritization: Barriers related to prioritization typically had to do with the time required to access services or programs. Navigating program processes in-language requires more effort and time than it does for English speakers who may overcome other shared participation barriers. The study found that customers accessing the Mass Save program in languages other than English found the process quite lengthy and laborious. For example, auto-answer phone trees were cumbersome and real-time translation services such as hotlines were not available in all dialects. One customer who subsequently dropped out and didn't participate in the program explained: "For me, it would've been best that, even if in English and through a translator, to have someone who'd help me, to at least deal with the same person instead of bouncing among so many people at the same time because I ended up feeling really confused."

Other customers explained that they were directed to different contacts or organizations and required to restate their needs with someone new multiple times: "Each time I called [to schedule as assessment] I had to explain [my needs] again...It takes several minutes of my time to repeat it and their time too. Not a good process." And those customers using translation services during in-home appointments (equipment installation or HEAs) experienced longer appointments because program representatives needed more time to complete the work when providing a translation service for customers. One home performance contractor noted that while the translation hotline could be time consuming, "it worked. I was able to explain everything to

the customer, and they ended up doing a lot of the recommendations." The study found that although translation hotlines can be a good step to providing language access to customers, the additional time it requires may create a barrier for some customers.

Language access barriers

The study found gaps in language access throughout the customer journey and in resources that could inform market characterization and strategic customer engagement strategies.

Data Access: Publicly available data sources with information about customers' language preferences or US Census or American Community Survey data lack individual-level or even block group-level indicators. Lacking this detail, they are unreliable sources. Our study developed and put into practice a complex, exploratory approach to sampling and recruitment of limited English speakers for study participation. We found, assessed, and documented limitations of several sources to inform language flags for customer data, as discussed in (Kelley and Milla, Translation is Not Enough: Meaningfully Serving Communities Speaking Languages Other Than English 2022). In partnership with PAs and their data vendor, DNV, the team reviewed other public data sets such as tax parcel data and geographic cultural centers defined by in-language names of places of worship, then layered the information over primary data sources to attribute best-educated-guess language flags. While the approach was useful for targeting community organizations to host nonparticipant group interviews, survey respondents' self-reports of languages they spoke at home indicated that the study's language flags for individual customers were largely unreliable. Additionally, we found that the PAs and their implementation vendors did not have information about individual customers' language preferences, but that customers we spoke with were supportive of sharing this information.

Marketing and Awareness: We also had several findings related to marketing and awareness. We found that although Mass Save marketing materials are available in limited languages other than English, those translated materials could be improved. For instance, although MassSave.com was translated into Spanish and Portuguese, not all functionality was available in both languages. For example, program lookup tools embedded in translated webpages included phone numbers and email addresses for customers to use to take the next step in participation, but these contact pathways did not indicate language capability to connect Spanish- or Portuguese-speakers to contractors who spoke those same languages. Providing quality content online can help programs meet customers where they are. For example, one partial participant said they prefer websites to phone conversations because they can read in English and then take their time figuring out what it says. As one nonparticipating customer said: "Our listening and speaking skills are not that good, but reading is easier. Also, there is no time limit online, so we can take longer to read stuff we didn't understand and work around it." We also found that customers may be likely to disregard any mailers they do not recognize, including Mass Save collateral other than bill inserts. Community organizations we interviewed said that mailed flyers are useful when they clearly describe who sent the flyer, why it was sent to that customer, what the program is, or why the program exists. This is information that customers need when deciding if the program is right for them.

Interactions with Program Representatives: Another category of findings related to interactions with program representatives. We found that program representatives could provide

customers with only limited access to bi-or multilingual staff. Some customers discontinued contact if the initial response to their outreach was in English for several reasons including worry of being judged for their level of English proficiency and beliefs that program representatives would treat them differently and poorly. Several customers noted that they struggled to find organizations that provided staff who spoke their preferred language, although that experience was on par with their everyday challenges: One participant noted, "I asked if they could have a Spanish speaking technician, but they said they don't control the technicians. That's why I think I haven't done it again, in case they come back, and the same thing happens. So, I think, why do it again if it'd be the same problem?" Similarly, customers struggled to schedule in-language appointments, even with organizations that provided staff who spoke their preferred language.

We also note that program representatives also experience challenges related to navigating between languages with customers. Enrollment processes were not clearly communicated to customers, which, at times, resulted in customers unknowingly (without consent) being signed up for programs or scheduled for in-home appointments.

Where program representatives did have staff who spoke non-English languages, these staff tended to do more tasks than required of their position to support LEP customer needs. For example, one assessor described spending 30-40 minutes on an in-language customer service call re-explaining the program purpose and reviewing the customers' recommendations with them after an English-only assessor had completed the assessment.

Recommendations

This section presents a discussion of five recommendations for how to engage with customers who speak languages other than English. The table below presents a summary of these recommendations.

Table 1. Summary of Recommendations

Recommendation
1.   Track language and dialect practices.
2.   Enhance customer service touchpoints to ensure that people who are accessing a system or service in a preferred language can do so consistently through the process.
3.   Translate with support from native speakers.
4.   Support a multilingual workforce across various roles, including office or administrative staff, customer service representatives, and field staff and technicians.
5.   Continue and develop new community partnerships to ensure that programs are accessible for all eligible customers.

First, track language and dialect practices. It is not possible to offer relevant and appropriate language services to customers if you don't know what languages your customers or constituents speak. The publicly accessible data on language is very limited, and in some cases too broad to be useful (e.g. census data that tracks "other Asian languages" does not provide useful insight in terms of offering services in specific languages). Some utility partners of ours shared customer concerns related to tracking language preferences, however, the people we

spoke for this study and others with were comfortable sharing their language preferences, especially if it enabled them to access services more easily.

Our second recommendation is to enhance customer service touchpoints to ensure that people who are accessing a system or service in a preferred language can do so consistently through the process. Marketing material in Spanish is not effective if, when a customer calls the number in English, the phone service doesn't have a Spanish-speaking operator. This ties into an overall finding and recommendation for the study, which is to ensure that language access is consistent across touchpoints. Offering inconsistent in-language support creates very poor customer experiences. When customers know that a service is only accessible in English, they have strategies to navigate that service, from recruiting a family member to serve as translator, to translating themselves using the internet or other translation services. However, when they are led to believe that a service is offered in their language – perhaps through marketing or an interaction with a customer service representative in their language – and then that is not consistently available at every touchpoint, it can create disappointment and even more negative sentiment.

Our third recommendation is around translation. While automated translation services are inexpensive and can be beneficial, we recommend translating with support from native speakers. We heard consistently that automated translations were limited and contained errors or words out of context. Ensuring that translations are reviewed by a native speaker can address these challenges. Ideally, human translation is preferable, but using automated translation with a fluent speaker reviewing is a good option.

Fourth, we heard the importance of having multilingual or bilingual staff throughout. Customers shared challenges around having a home audit conducted where the auditor couldn't speak the language of the person who lived there (despite setting it up in their language). The person described how the auditor tried to explain technical terms using body language, but in the end, they wrote them down and just did their own research online afterward to make sense of what the auditor had been trying to tell them. Ensuring that language access is consistent across touchpoints likely requires a multilingual workforce across various roles, including office or administrative staff, customer service representatives, and field staff and technicians.

Finally, we recommend that utilities and program administrators continue to develop new community partnerships to ensure that programs are accessible for all eligible customers. Given that trust can be a barrier to participating in the program, working with trusted organizations can provide reassurance to customers that the programs are legitimate and provide valuable services. These community connections should go beyond the Community Action Agencies already involved in implementing the Income Eligible program to include, for instance, health care organizations including public health nurses and social workers, local school parent liaisons, faith-based organizations, cultural groups and organizations. For example, one of the organizations that hosted focus groups was led by a pastor who was embedded in the community and served as a nexus for connecting his constituents with resources and advocating for them.

How the PAs are Using These Results

As we referenced earlier, this study was commissioned as part of the goals of the 2022 – 2024 three-year plan to meet the goals of increasing language access and, more broadly, ensuring the programs are accessible to all customers. The PAs have made equity one of the key strategic

priorities of the 2022 – 2024 Plan. In the plan, they define equity as "the process of establishing more equal access to and participation in energy efficiency, particularly among those groups who have historically participated at lower rates, including renters/landlords, moderate-income customers, English-isolated families, and microbusinesses." There are several specific targets the PAs outlined related to equity, including increasing the number of Home Energy Assessments (HEA) delivered in Spanish or Portuguese, and the number of participants who subsequently go on to receive weatherization. They also set a target to offer HEAs in five languages other than English and to develop a Mass Save Language Access Plan (LAP). The LAP will address how customers are to be served in their preferred language, and will coordinate PA language resources to allow PAs, lead vendors, contractors, and suppliers to access needed translation and interpretation services.

The LAP is underway and will be completed in 2024 and implemented in 2025. The findings from the LEP study discussed in this paper have fed into the LAP in several ways. These study findings highlighted key barriers and focus areas for the programs, including challenges related to trust, marketing and awareness, and interactions with program representatives. In addition, because the LAP looked more broadly at programs, including the Small Business Services program, the research efforts scoped as part of the LAP were able to focus on areas outside the residential programs that were the focus of this research. In addition, one of the early activities of this study was a website and marketing review. Updating those materials based on the findings of this study was one of the LAP team's recommendations and is currently underway. The PAs are currently working to determine which Portuguese dialect to use for MassSave.com. As the study recommended, Eversource uses a professional transcreation service and works with an agency that specializes in Portuguese and Spanish advertising for campaigns in those languages.

Other key recommendations of the LAP include elements that align closely with the recommendations of this study, such as:

- Delivering language assistance services
- Plain language English communication
- Translated materials
- Transcreation of consumer facing materials
- Culturally and linguistically targeted outreach
- Inform LOTE constituents of their right to language access services
- Build Language Access Infrastructure
- Designate language access staff
- Allocate funding
- Collect and report on language data
- Language access compliance training to public contact staff
- Recruit and hire bilingual staff

These practices will make the program more accessible to LOTE customers. And, as we'll explore in the section below, may in fact improve the experience for customers more broadly.

Inclusive Design is Better Design

We believe that program designs to create access for LOTE speakers are likely to create benefits for a broader group. For instance, we found that outstanding customer service could be a powerful driver of participation. LEP and LOTE customers relied heavily on word-of-mouth referrals to accessible, beneficial, and trustworthy resources and services. They shared within their networks when they had interactions with services or programs that were accessible, that is, where enough information was readily available in-language to inform their decision-making; beneficial, that is, the value to them and their household was clear and the process to participate was simple and worth the effort; and trustworthy, the program is legitimate and any real or perceived associated with participation are acceptable.

When we spoke with customer about an instance of outstanding customer experience, they described experiences that shared several characteristics:

- End-to-end in-language support inclusive of all written and verbal information.
- Seamless and swift transfers to different staff, departments, or other program partners.
- Careful, comfortable, and kind communication with service paced to meet customers' needs or desires for information.

We describe each of these three in a bit more detail below.

First, end-to-end language support could look like a bi- and multi-lingual workforce from frontline customer service reps to certified specialists, such as home energy assessors and contractors to perform installations. It could include high quality and comprehensive in-language information that was not simply auto-generated, but at the very least informed by a fluent speaker to ensure cultural nuance and context relevance. It also could include the ability to reach contacts and resources in their language through phone, email, linked resources (pages, documents, videos, lookup tools, etc.) on websites, resources and reference materials for program representatives, and fine print. Ensuring that fine print was legible and understandable is particularly important. Finally, ensuring end to end in-language support would also include easy-to-access, accurate, and dialect-inclusive real-time translation services.

Seamless customer service could include swift transfers to different staff, departments, or other program partners. Ideally these transfers would maintain language continuity and would not require customers to repeat their information and reiterate the reason for their call. Seamless customer service would include information that was provided when customers needed it about what would happen without overwhelming them. This just-in-time information is particularly important for customers with limited bandwidth. Finally, this seamless customer service would include a single point of contact for their journey through the program, so that they would have a familiar and trusted resource to turn to with any questions they had.

The third component of this ideal customer service experience has to do with communication. We heard that ideal communication experiences were ones that were careful and respectful, where the customer service representatives had awareness of and skills to work with vulnerable populations. This enabled them to put customers at ease, which was especially important when there were challenges between languages because that was frequently not the experience for these customers. The customers we spoke with valued kind communication, that demonstrated empathy and patience; avoiding discriminatory pitfalls that were unfortunately common in their interactions with services, such as individuals demonstrating annoyance or

indifference to their language barriers. And finally, they valued service that was paced to meet their needs. This looked like making time for customers who required or preferred additional time to consider options; alleviating any pressure they felt if asked to sign something without time to read carefully and/or speak with people they trust before making decisions.

The LOTE customers we spoke with described these customer experience elements that could have made their experiences better and that they appreciated when they encountered them. But, as in the case of the curb cut, many of these would benefit customers who speak English as well. For instance, a model that provides a customer with a single point of contact is a best practice for customer service. For LOTE customers, this felt particularly important because it was sometimes challenging to reach someone they could speak with, but the value of that kind of model could be appreciated significantly more broadly, regardless of the customer's language.

Conclusion

In this paper, we have highlighted the research our team undertook to understand the journey through the residential Mass Save program for customers speaking languages other than English. We present the findings and recommendations from a study in Massachusetts, highlight the iterative approach to research design that enabled our team to conduct research with nonparticipating customers in languages other than English, and share how the PAs are integrating the findings of the study. We end with a set of recommendations for customer service delivery that could benefit LOTE customers as well as customers more broadly. We contend that inclusive design can improve the experience for all customers, and language is one facet of that experience.

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