GENERAL SERVICES ADMINISTRATION Washington, DC 20405

OCR 2335.1A May 3, 2024

GSA ORDER

SUBJECT: Language Access Plan

- 1. <u>Purpose</u>. The purpose of this order is to update the General Services Administration's ("GSA" or "Agency") 2012 Language Access Plan (LAP). The LAP sets forth guidance to ensure that meaningful access to GSA programs, services and activities is provided for individuals with Limited English Proficiency (LEP), including those who are Deaf or Hard of Hearing (D/HOH).
- 2. <u>Background</u>. GSA is committed to ensuring that individuals with LEP and/or who are D/HOH have equal opportunity to participate in the Agency's programs, services, and activities. GSA shall provide timely and quality language assistance services to its LEP and/or D/HOH customers to ensure their meaningful access to the Agency's programs, services and activities.
- 3. <u>Applicability</u>. This order and accompanying LAP applies to all GSA Service and Staff offices (SSOs), as well as organizations receiving Federal financial assistance through GSA. It is the responsibility of GSA SSOs and organizations receiving Federal financial assistance through GSA to take reasonable steps to ensure individuals with LEP, including those who are D/HOH, have meaningful access to GSA's programs, services, and activities.
- 4. Cancellation. 2012 GSA Language Access Plan is canceled.

5. Summary of Changes.

- a. The updated LAP outlines guidelines for enhancing language access services for individuals with LEP and/or who are D/HOH to ensure meaningful access for these individuals.
- b. The updated LAP includes guidance for providing language access services for individuals with LEP and/or who are D/HOH, further enhancing GSA's commitment to advancing equity and meaningful access for all.
- c. The updated LAP establishes agency-wide process and policy.
- 6. <u>Policy</u>. It is the policy of GSA to provide LEP and/or D/HOH individuals with meaningful access to its conducted and assisted programs, services, and activities. It is the responsibility of GSA, and not individuals with LEP and/or who are D/HOH, to take reasonable steps to ensure that communications between GSA and individuals with

LEP and/or who are D/HOH are not impaired. GSA shall take reasonable steps to effectively inform the public of the availability of language assistance services to promote equitable access to its programs, services, and activities.

- 7. Responsibilities. The Associate Administrator for the Office of Civil Rights (OCR) is responsible for leading all OCR program areas, including the Agency's language access program. The External Programs Branch Chief in OCR serves as the Agency's Language Access Coordinator (LAC) and leads the Agency's efforts to provide language access services for external customers with LEP and/or who are D/HOH. All GSA employees are responsible for abiding by this order. Organizations receiving Federal financial assistance through GSA are responsible for abiding by the accompanying LAP.
- 8. Signature.

<u>/S/</u>	
ALUANDA R. DRAIN	
Associate Administrator for Civil Rights	

GSA LANGUAGE ACCESS PLAN

April 2024

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A. GENERAL LANGUAGE ACCESS POLICY

1. Policy Statement

- a. Timely¹ and accurate communication with the public is essential to the mission of the U.S. General Services Administration ("GSA" or "Agency") to deliver the best customer experience and value in real estate, acquisition, and technology services to the government and the American people. GSA is committed to ensuring that individuals with limited English proficiency (LEP) and/or who are Deaf and/or Hard of Hearing (D/HOH) receive meaningful access to GSA's federally conducted and federally assisted² programs and activities in accordance with Executive Orders 13166, 13985, 14031 and 14091.
- b. GSA must comply with Section 504 of the Rehabilitation Act of 1973, which requires GSA to take appropriate steps to ensure that its communications with individuals who are D/HOH, blind, or have speech disabilities are as effective as its communications with others. This Language Access Plan ("LAP" or "Plan") includes discussion of language access for individuals who are D/HOH because many individuals who are D/HOH use American Sign Language (ASL)³, a language separate and distinct from the English language, and other individuals use other types of sign language.
- c. Therefore, it is GSA policy that Service and Staff Offices (SSOs) must take reasonable steps to plan for and provide individuals with LEP and/or who are D/HOH with timely, accurate, and effective communications within all programs or activities conducted by GSA and must work to ensure that recipients of federal financial assistance from GSA are complying with their corresponding obligations. These policies are based on the principle that it is GSA's responsibility, and not that of an individual seeking services, to take reasonable steps to ensure meaningful access to all GSA programs, services and activities and to foster equity for individuals who interact, or may interact, with GSA over the phone, in writing, in person, or via electronic methods.⁴

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¹ LEP Guidance to GSA recipients of Federal financial assistance provides that "[w]hile there is no single definition for 'timely' applicable to all types of interactions at all times by all types of recipients, one clear guide is that the language assistance should be provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the LEP person." 68 Fed. Reg. 43519 (July 23, 2003).

² U.S. Department of Justice, Civil Rights Division, *Title VI Legal Manual, "What is Federal Financial Assistance?"* 4-5 (2021).

³ National Association of the Deaf, <u>Community and Culture – Frequently Asked Questions -What is the</u> difference between a person who is "deaf," "Deaf," or "hard of hearing"?.

⁴ GSA recognizes that ensuring equity for individuals with LEP and who are D/HOH is not limited to the provision of language assistance services and aims to create comprehensive mechanisms that facilitate equity in planning, outreach, stakeholder engagement, allocation of funds, delivery of services, staff training, procurement, as well as performance and evaluation as established by this LAP. Other agencies use this term as well, see e.g., Department of Health and Human Services, Assistant Secretary for

d. Recipients of GSA federal financial assistance must likewise take reasonable steps to provide individuals with LEP and/or who are D/HOH timely, accurate, and effective communications.

- e. Ensuring the quality and accuracy of language assistance services is critical to providing individuals with LEP and/or who are D/HOH appropriate access to GSA's programs, services, and activities.
- f. Where applicable, Agency staff shall take reasonable steps to effectively inform the public, in a language they understand, of the availability of language assistance services, and to provide qualified language assistance at no cost to individuals with LEP and/or who are D/HOH.

2. Purpose

The purpose of this LAP is to ensure that individuals with LEP and/or who are D/HOH have equal opportunity to participate in the agency's programs, services and activities. This LAP also further clarifies the responsibilities of recipients of federal financial assistance from GSA and assists them in fulfilling their responsibilities to individuals with LEP and/or who are D/HOH, pursuant to Title VI of the Civil Rights Act of 1964 (Title VI), Section 504 of the Rehabilitation Act of 1973 (Section 504), and GSA implementing regulations.

3. Coverage

This Plan guides GSA staff as they conduct and provide GSA programs, services and activities. This Plan also guides recipients of GSA federal financial assistance as they deliver GSA's federally conducted and federally assisted programs, services and activities.

4. Authority

Executive Order 13166 requires each Federal agency to "examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency." Federal agencies shall also "prepare a plan to improve access to its federally conducted programs and activities ... includ[ing] the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's program and activities."

For agencies that provide federal financial assistance, Executive Order 13166 requires that they ensure that recipients of that federal financial assistance deliver meaningful access to applicants and beneficiaries with LEP. The latter provision is in accordance with the requirements of Title VI, which prohibits recipients of federal financial assistance from discriminating on the basis of national origin.

Planning and Evaluation, Office of Human Services Policy, <u>Tips on Equitable Communication Practices in a Policy Context</u>.

This LAP not only ensures the implementation of these language access legal requirements with respect to GSA's programs, services, and activities, but also provides general language access guidance for the SSOs and sets forth GSA internal policies on the provision of language access.

This Plan establishes guidelines and standards in accordance with:

Generally Applicable Statutes:

- a. Section 601 of the Civil Rights Act of 1964 (42 U.S.C. § 2000d) (Title VI): Prohibits discrimination in GSA's federal financial assistance programs, such as the Federal Surplus Personal Individual Property Donation Program, based on race, color, or national origin.⁵
- b. The Rehabilitation Act of 1973 (The Rehabilitation Act), as amended Section 504 and Section 508:

Section 504 prohibits discrimination based on disability in programs and activities that receive federal financial assistance and applies to entities that receive federal funds. Section 504 also prohibits discrimination against individuals with disabilities and requires reasonable accommodations to ensure equal access to programs and activities. Section 508 requires federal agencies to ensure that their electronic and information technology, including websites, electronic documents, and software applications, are accessible to individuals with disabilities.

Executive Orders:

- Executive Order 13166, <u>Improving Access to Services for Persons with</u> <u>Limited English Proficiency</u>, 65 Fed. Reg. 159, 50121 (Aug. 16, 2000).⁶
- b. Executive Order 13985, <u>Advancing Racial Equity and Support for Underserved Communities Through the Federal Government</u>, 86 Fed. Reg. 14, 7009 (Jan. 20, 2021).
- c. Executive Order 14031, <u>Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders</u>, 86 Fed. Reg. 105, 29675 (June 3, 2021).
- d. Executive Order 14058: <u>Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government</u>, 86 Fed. Reg. 71357

⁵ Denial of meaningful access to an individual with LEP is considered discrimination based on national origin. *See Lau v. Nichols*, 414 U.S. 563, 568-69 (1974) (holding that a federal funding recipient's denial of an education to a group of non-English speakers violated Title VI and its implementing regulations). ⁶ The Department of Justice has determined that EO 13166 applies only to persons who are located within the United States and its territories and does not apply extraterritorially. For more information on this EO, including what constitutes federally conducted and federally assisted programs and activities, see Commonly *Asked Questions & Answers Regarding Executive Order 13166*, (2019), https://www.justice.gov/crt/eo-13166.

- (December 2021).
- e. Executive Order 14091, <u>Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government</u>, 88 Fed. Reg. 10825 (Feb. 16, 2023).

DOJ Attorney General Directives and Policies:

- a. United States Attorney General's Memorandum to Heads of Department Components Regarding Language Access Obligations Under Executive Order 13166 (June 28, 2010).
- b. United States Attorney General's Memorandum to Heads of Federal
 Agencies, General Counsels, and Civil Rights Heads Regarding Federal
 Government's Renewed Commitment to Language Access Obligations
 Under Executive Order 13166 (Feb. 17, 2011).
- c. United States Attorney General's <u>Memorandum for Heads of Federal</u>
 <u>Agencies, Heads of Civil Rights Offices and General Counsels Regarding</u>
 <u>Strengthening the Federal Government's Commitment to Language</u>
 <u>Access</u> (Nov. 21, 2022).
- d. <u>DOJ Enforcement of Title VI of the Civil Rights Act of 1964 National Origin Discrimination Against Persons with Limited English Proficiency</u> (65 Fed. Reg. 50123, 50123-50125 (August 11, 2000).
- e. <u>DOJ Guidance to Federal Financial Recipients Regarding Title VI</u>

 <u>Prohibition Against National Origin Discrimination Affecting Limited</u>

 <u>English Proficient Persons</u> (67 Fed. Reg. 41455, 41455-41472 (June 12, 2002).

GSA Regulations:

- a. <u>Title 41 C.F.R. Subpart 101-6.2</u>: Effectuates the provisions of Title VI. Implements GSA's policy prohibiting discrimination based on race, color or national origin in its programs that receive federal financial assistance through GSA.
- b. <u>Title 41 C.F.R. Subpart 101-8.3</u>: Effectuates the provisions of Section 504. Implements GSA's policy prohibiting discrimination based on disability in its programs that receive federal financial assistance through GSA.

GSA Guidance for recipients of federal financial assistance:

a. Guidance to Federal Financial Assistance Recipients Regarding Title VI
Prohibition Against National Origin Discrimination Affecting Limited
English Proficient Persons (2003): On July 23, 2003, GSA issued
guidance to clarify the responsibilities of recipients of federal financial
assistance from GSA and assist them in fulfilling their responsibilities to
LEP persons pursuant to recipients regarding Title VI and GSA

implementing regulations prohibitions against national origin discrimination affecting individuals with LEP was issued on July 23, 2003.⁷

b. <u>GSA's Equity Action Plan (2022):</u> Commits GSA to reassessing and updating its language access plan to afford meaningful access for individuals with LEP. See: <u>GSA Equity Action Plan</u>

5. Scope of Policy

This LAP serves as the language access policy for the Agency. The guidance included in this Plan is intended to improve the internal management of the Agency's language access program, and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person. Because this document is intended for the internal management of GSA's language access program, it is not intended to be cited in any judicial or administrative proceeding.

6. Definitions

The terms used in this Plan are defined in Appendix A.

7. Roles and Responsibilities

a. Associate Administrator for Office of Civil Rights (OCR)

OCR is responsible for planning, developing, coordinating and administering GSA's nationwide civil rights program to ensure compliance with various federal civil rights laws, regulations, executive orders, and GSA policy statements. The Associate Administrator (AA) for OCR is responsible for leading all OCR program areas, including the Agency's language access program. Accordingly, AA will:

- Provide overall leadership, coordination, and direction in the development and implementation of GSA's language access program;
- ii. Proactively promote meaningful access to GSA's programs and activities for persons with LEP and/or who are D/HOH, and provide guidance to SSOs and recipients of federal financial assistance from GSA:
- iii. Provide leadership in the issuance of policies, directives, procedures, rules and/or regulations as necessary to ensure that GSA fully achieves its language access compliance and monitoring obligations.

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⁷ See https://www.gsa.gov/cdnstatic/gsalepquidance R2Z-i1M 0Z5RDZ-i34K-pR.pdf.

b. Agency Language Access Coordinator

OCR's External Programs Branch (EPB) is responsible for implementing and monitoring compliance with Federal civil rights laws, regulations, executive orders, policies and guidance related to GSA's conducted and assisted programs, services, and activities. Ensuring that underserved communities, including the LEP and/or D/HOH communities, have equal opportunity to participate in GSA programs, services and activities is of key importance. The Branch Chief of EPB serves as the Agency Language Access Coordinator (LAC) and is responsible for:

- i. Developing and implementing a GSA-wide initiative on language access:
- ii. Developing, leading, and promoting uniformity of policies, procedures, and best practices relating to language access within GSA:
- iii. Ensuring consistent compliance with EO 13166, and mandates on language access in GSA's Equity Action Plan, EO 13985, EO 14091, and any other relevant directives;
- iv. Leading the implementation and regular review of the LAP;
- v. Streamlining access to, and overseeing the expansion and centralization of, language assistance services within GSA;8
- vi. Developing and promoting internal guidance, resources, and materials to expand language access across GSA;
- vii. Providing guidance and/or procedures for SSOs to use in requesting and using qualified interpretation and translation services through the existing contracting process;
- viii. Overseeing the implementation and quality of the language services provided by the vendor(s);
- ix. Developing and providing language access training to SSOs;
- x. Providing ongoing guidance and technical assistance for SSOs, as appropriate, on their language access needs;
- xi. Providing ongoing training and technical assistance necessary to make entities funded by GSA aware that language assistance services provided in order to comply with Title VI must be provided at no cost to those in need of language assistance services:
- xii. Ensuring that SSOs actively support and adhere to requirements of federal statute and authorities that prohibit discrimination, including national origin, under any program or activity

⁸ This includes creating and maintaining a one-stop-shop containing relevant internal resources, such as a repository of commonly translated documents; a GSA translation glossary of common technical terms in the top languages spoken by individuals with LEP; standard language assistance notices, flyers, and posters for GSA SSOs and recipients of federal financial assistance from GSA to use; template web pages or web standards to help SSOs and recipients of federal financial assistance from GSA post translated content; and guidance on identifying documents for translation and targeting languages for translation.

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- conducted by GSA;
- xiii. Leading GSA with respect to conducting outreach and engagement with communities with LEP and/or who are D/HOH, and entities that represent their interests to strengthen access to GSA and other government services by individuals with LEP and/or who are D/HOH;
- xiv. Collecting and reporting language access data;
- xv. Researching and incorporating innovative approaches for engaging;
- xvi. Collaborating with, and serving individuals with LEP and/or who are D/HOH from a people-centered approach; and
- xvii. Collaborating with the DOJ Civil Rights Division and other Federal agencies regarding issues related to language access.

c. The Language Access Working Group

The Language Access Working Group (LAWG) will be chaired by OCR's AA and led by the Agency LAC, and each SSO shall designate a representative to serve on the LAWG. The LAWG will:

- i. Convene on at least a routine basis and not less than quarterly basis:
- ii. Increase awareness of language access legal requirements and best practices;
- iii. Identify and share language access best practices and resources addressing translation, interpreting, training, use of technology, and other critical language access issues to assist staff in communicating with individuals with LEP and/or who are D/HOH;
- iv. Coordinate the collection of data on GSA-wide current customers with LEP and/or who are D/HOH as needed; and
- v. Address customer concerns or complaints regarding the availability and quality of language access services provided by GSA.

d. SSOs

Consistent with the requirements and obligations above, and where appropriate considering each SSOs' unique mission and operations, SSOs shall take reasonable steps to ensure meaningful access by individuals with LEP and/or who are D/HOH to both federally conducted and federally assisted programs, services and activities by:

- i. Designating an office representative to serve as the point of contact for the individual SSOs to:
 - a. Assist the implementation of the LAP in their respective SSOs:
 - b. Assist the SSO with respect to the collection and reporting of language access data to OCR on a quarterly basis;

- ii. Ensure staff attend language access training provided by OCR to ensure all employees with public contact can provide interpretation language assistance services as needed and in a timely manner.
- iii. Identifying the top languages used by the communities they serve or may serve and determine the most common means through which communities with LEP and/or who are D/HOH interact with their offices.
- iv. Identifying and tracking the primary language of individuals with LEP who seek access to their programs, services and/or activities. SSO staff should, at the point of first contact with individuals with LEP and/or who are D/HOH, make reasonable efforts to conduct or arrange for an initial assessment of the need for language assistance services.
- v. Ensuring that individuals with LEP and/or who are D/HOH who contact their offices to access programs, services, and/or activities are informed that language assistance is available to them and at no cost.
- vi. Using individuals and entities qualified to provide interpretation and translation services to their respective customers.

B. AGENCY-WIDE PROCESS AND POLICY

1. Agency-wide and Inter-Agency Cooperation

GSA is committed to sharing promising practices and exploring Agency-wide and interagency initiatives that could potentially streamline and improve our ability to provide meaningful access to individuals with LEP and/or who are D/HOH. To that end, the Agency's LAC, with the participation of the LAWG, shall identify, develop, and distribute useful resources and materials, and shall, as needed, create subcommittees to focus on cross-cutting areas of concern regarding implementation. In addition, SSOs are encouraged to collaborate with each other and other Federal agencies to share resources, implement best practices, improve efficiency, and standardize Federal terminology. SSOs may engage in reimbursable agreements for services and utilize interagency agreements to obtain services from other government agencies.

2. Technology Considerations

GSA will continually evaluate technologies that support language translation and interpretation. Our priority remains ensuring that persons with LEP and/or who are D/HOH have meaningful access to GSA programs, services and activities through timely and accurate language assistance services, including both translation or interpretation, while seeking to improve language access by increasing productivity of multilingual staff, reducing costs by sharing existing knowledge and work across the Agency, and increasing access to language services through remote interpretation.

The focus of GSA's consideration of technologies for language access will encompass

three principal applications:

- i. Machine translation, by which staff utilize computers and automation to provide a computer-generated translation;
- ii. Computer-aided translation, by which translators utilize digital tools to assist in providing and capturing human-certified translations, including facilitating corrections to machine-generated translations; and
- iii. Virtual (video) and remote (audio/text) interpretation, by which qualified interpreters provide services from remote locations.

Any SSOs using technologies for the above applications through third-party services, direct government procurement, or modifying existing services must consult with the Agency LAC, and must consider the following:

- i. Accuracy of translation and interpretation;
- ii. Accuracy of domain-specific translation and interpretation:
- iii. Speed to incorporate corrections to production systems;
- iv. Ability to share and learn from previous translation/interpretation work:
- v. Cost per supported end-user;
- vi. Required training and enabling technologies;
- vii. Ability to capture feedback from customers on the level of quality of translation/interpretation;
- viii. Security and privacy;
- ix. Records retention and records management; and
- x. Origins of source data utilized for machine-generated and computer-assisted applications.

3. Monitoring Accessibility and Quality of Services

OCR will develop procedures for reviewing GSA interactions with individuals with LEP and/or who are D/HOH to determine the nature, scope, and quality of language assistance services requested and provided. OCR will develop uniform intake and data collection procedures to document contact with customers with LEP and/or who are D/HOH, including standard forms for recording data. OCR will also develop and implement a complaint tracking system to address complaints received from external stakeholders and customers regarding access issues.

Monitoring Accessibility

OCR will conduct a review every fiscal year to assess the accessibility of language access services provided by SSOs to individuals with LEP and/or who are D/HOH. This assessment shall include:

i. Determining whether new documents, web content, programs, services, and/or activities need to be made accessible to individuals with LEP

- and/or who are D/HOH;
- ii. Conducting an inventory of languages most frequently encountered;
- iii. Identifying the primary channels of contact with community members with LEP (whether telephonic, in person, correspondence, web-based, etc.);
- iv. Reviewing SSO programs, services and activities for language accessibility;
- v. Reviewing an inventory of who attended language access training (including topics discussed);
- vi. Reviewing the annual cost of translation and interpreter services; and
- vii. Consulting with outside stakeholders.

Monitoring Quality of Services

OCR will develop a plan to monitor the quality and effectiveness of GSA's language access services. The plan will include, but not be limited to, an assessment of the efficacy of the translation and interpretation services provided to individuals who are LEP and/or D/HOH; an assessment of the technical assistance and training tools provided to GSA employees and contractors to enhance their understanding of their obligations to provide language access services; and an assessment of the public-facing information provided in foreign languages to stakeholders with LEP.

OCR will implement this plan by providing oversight of all language access services and activities including; providing technical assistance to the SSOs, as requested; overseeing and coordinating outreach activities to individuals with LEP, which will include notification and instruction on how to obtain language assistance services from GSA and information on the programs and services available; and monitoring programmatic compliance including investigating complaints related to individuals with LEP and/or who are D/HOH accessing GSA's programs, services, and activities.

Biennial Review of LAP

OCR will be responsible for coordinating biennial reviews with SSOs of the Agency's LAP to determine if updates and revisions are required, and if so, to facilitate making the appropriate revisions to the LAP. The biennial review will include, but will not be limited to, the following:

- Assessing the number or proportion of individuals with LEP and/or who are D/HOH impacted by GSA's programs, services, or activities;
- ii. Conducting data analysis of the language access services sought by individuals with LEP from GSA. This includes examining the frequency of services requested and identifying the languages encountered in translation and interpretation needs;
- iii. Monitoring the usage of interpretation services by tracking the languages translated from, the number of minutes utilized and the number of pages translated in each language;

iv. Analyzing the costs and trends in providing the needed translations and interpretations;

- v. Assessing vital documents requiring translation and their frequency of use. Additionally, evaluating whether these documents are housed within a management system to ensure their availability;
- vi. Measuring the impact of training and technical assistance materials provided during the compliance review timeframe and while conducting outreach;
- vii. Assessing the impact of community engagement and outreach to underserved communities, including communities with LEP, and their rate of participation in GSA programs, services, or activities; and
- viii. Tracking technology and digital services developments related to language access services, including assessments of machine translations.

OCR will review contracts for language assistance services, translation of vital documents, staff training, and collaboration with communities with LEP and stakeholders to ensure accountability in implementation of the LAP for each consecutive fiscal year.

OCR will develop and produce an annual report for the Administrator that outlines GSA's promising practices, lessons learned, and opportunities for further development of the language access services provided to individuals with LEP and/or who are D/HOH individuals. The report will be prepared and submitted by the end of the first quarter for the previous fiscal year, beginning with FY 2024.

C. GUIDELINES FOR PLANNING AND PROVIDING MEANINGFUL ACCESS

Every day, contact between GSA and the public may involve individuals with LEP and/or who are D/HOH. Keeping in mind their missions, operations, and levels of interaction with the public, SSOs shall consider the needs of individuals with LEP early in the process of designing programs, services, and activities. There is no "one size fits all" solution for language access.

The obligation to provide meaningful language access is fact-dependent and is generally evaluated using a four-factor analysis: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by a program; (2) the frequency with which individuals with LEP come into contact with the program; (3) the nature and importance of the program, activity or service provided by the recipient to its beneficiaries; and (4) the resources available and the costs of language access services.

As a general matter, SSOs should use the four-factor analysis and should proactively provide language access services (for example, in-advance translation of vital documents) for any language spoken by more than 5 percent of the eligible population;

what languages this includes will depend on the region of the office in question.

SSOs should follow the ten principles and policies in planning for language access for individuals with LEP and/or who are D/HOH.

- Identification of Communities with Individuals with LEP and/or who are D/HOH and their Interactions with GSA
- 2. Identification of Individuals with LEP and/or who are D/HOH and their Primary Language or Method of Communication
- 3. Outreach and Engagement with Communities who Serve Individuals with LEP and/or who are D/HOH
- 4. Quality Assurance and Control
- 5. Allocation of Resources
- 6. Notification of the Availability of Language Assistance Services
- 7. Provision of Language Assistance Services
- 8. Staff Training
- 9. Access to Multilingual Staff
- 10. Self-Assessment and Monitoring

1. Identification of Communities with LEP and/or D/HOH Individuals and their Interactions with GSA

The Agency LAC, in consultation with the LAWG, shall identify the top languages for GSA as a whole. In addition, to plan for and effectively provide meaningful access to individuals with LEP, each SSO shall, at least every three years, identify the top languages spoken by the communities they serve or may serve based on their program objectives, constituency, and/or geographic region, using any or all the following tools and resources:

Language maps and data on communities with LEP

- <u>LEP.gov/Maps</u> is a DOJ-maintained website with national, state, and judicial district maps of the U.S. population with LEP by number and concentration. However, Census language categories used in those maps are limited and do not include disaggregated data or information on individuals who speak languages that are rare in the U.S., or some Indigenous, Native American, and Native Hawaiian languages, and/or language variants.
- Data from other Federal, state, and local government agencies, or from community organizations can also be helpful to supplement Census data or obtain more granular details on the languages used by a specific community or region, including intersectional or disaggregated data.
- Consultation with community members and organizations that serve individuals with LEP and/or who are D/HOH.
- DOJ Language Access Self-Assessment Tool⁹ can assist agencies and

⁹ Department of Justice, <u>Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs</u>, (2011).

offices in identifying the different points of interaction with individuals with LEP, historic usage of programs and activities by individuals with LEP, and effective service-delivery strategies.

According to the American Community Survey, the top five languages spoken in the United States by individuals with LEP are Spanish, Chinese (including the spoken languages of Mandarin and Cantonese and the written languages of Simplified and Traditional Chinese), Vietnamese, Korean, and Tagalog (including Filipino). Based on a self-assessment conducted by SSOs in March 2023, the following foreign languages were most frequently encountered in the delivery of GSA's programs, services, and activities: Spanish (predominant non-English language); Arabic (Modern Standard); Chinese (Simplified and Traditional, Mandarin and Cantonese); Portuguese; French; Russian; Somali; Sinhala; Tamil; Farsi; Urdu; and Hindi.

2. Identification of Individuals with LEP and/or Who Are D/HOH and Their Primary Language or Method of Communication

SSO staff shall, at the point of first contact with an individual with LEP and/or who is D/HOH, make reasonable efforts to conduct or arrange for an initial assessment of the need for language assistance services. SSO staff should not make assumptions about an individual's primary language based on race, color or national origin, or because they appear to be or are D/HOH.

SSO staff can determine whether an individual needs language assistance in several ways:

- Voluntary self-identification by the individual with LEP or their companion;
- Affirmative inquiry regarding the primary language of the individual if they have self-identified as needing language assistance services;
- Engagement by a qualified multilingual staff or qualified interpreter to verify an individual's primary language; or
- Use of an "I Speak" language identification card or poster. OCR makes the "I Speak" cards available to GSA employees and contractors on OCR's web page under <u>Library</u>.

Additional considerations when identifying language include asking the individual about their region, municipality, village, or specific community, to ensure the correct identification of language. The Agency LAC shall identify resources and develop templates for SSO staff to use in determining whether language assistance is needed.

3. Outreach and Engagement with Communities with LEP

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¹⁰ This broad listing of top languages spoken by individuals with LEP is a guide for SSOs and does not replace SSO responsibility to ensure that individuals with LEP, regardless of languages spoken, are afforded meaningful access, particularly with respect to individual specific communications, including correspondence. See also U.S. Census Bureau, <u>American Community Survey 5-Year Estimate</u>.

Effective outreach and engagement with communities with LEP, and entities that represent their interests, is critical to language access planning efforts to increase access to GSA programs, services, and activities for these communities and to receive regular feedback on the implementation of GSA language access plan or language assistance services.¹¹

SSOs, in consultation with the Agency LAC, shall consider the following:

- Establishing and maintaining relationships with a variety of entities representing
 the interests of individuals with LEP and/or who are D/HOH, and of those
 communities who have traditionally been marginalized because of their limited
 ability to speak English and/or who are D/HOH.
- Conducting appropriate outreach efforts designed to inform communities and individuals with LEP and/or who are D/HOH about GSA programs, services, and activities.
- Communicating clearly through written, video and/or audio means about the nature, scope, and availability of language assistance services and how to request them.¹²
- Increasing efforts to encourage participation from local communities in, for example, GSA consultations, focus groups, and/or listening sessions, with the goal of learning about their concerns, needs, and perspectives.
- Taking reasonable steps to ensure that community outreach events involving individuals with LEP and/or who are D/HOH are designed to provide meaningful access, where individuals with LEP and/or who are D/HOH can participate, receive information, and provide input in their primary language(s) at such events.
- Creating and maintaining lists of non-English press to disseminate information about GSA programs, services, and activities.
- Disseminating information about GSA programs, services, and activities in non-English languages.
- Reaching out and partnering with stakeholders to amplify Agency communications to specific communities that may include individuals with LEP and/or who are D/HOH.
- Establishing formal and easily accessible mechanisms to receive feedback about the quality of the Agency's language assistance services.

For SSOs that have a significant presence in Puerto Rico, their language access point of contact and LAWG representative shall include someone with expertise in needs and activities there.

4. Quality Assurance and Control

SSOs shall take reasonable steps to ensure that qualified multilingual staff or

¹¹ U.S Department of Justice, Civil Rights Division, <u>Ten Tips for Conducting Effective Community</u> Outreach (2015).

¹² This may include visible signage in SSOs public spaces and recipients of GSA federal financial assistance public spaces announcing the availability of language assistance services, translated promotional material (flyers, registration forms, etc.) with information about the availability of interpreting services during the event by request. For additional information about notice of language assistance services, see *Notification about Available Language Assistance Services* section below.

contracted personnel who serve as translators, interpreters, or who communicate "in language" with individuals with LEP and/or who are D/HOH are competent to do so and have the resources necessary to meet GSA's requirements.

Use of individuals who are not competent could result in a breach of confidentiality, a conflict of interest, or inaccurate, impartial, or incorrect interpretation, and is discouraged.

Absent exigent circumstances, ¹³ SSO staff shall avoid using the following individuals to provide language assistance services:

- Staff who are not qualified
- Family members (especially minor children)¹⁴
- Neighbors
- Friends
- Acquaintances or bystanders

Considerations of competency for qualified multilingual staff or contracted personnel may include:

- Demonstrated proficiency in and ability to communicate information accurately in both English and other languages.
- Using the appropriate mode of interpreting (e.g., consecutive, simultaneous, or sight translation).
- Accurately interpreting or translating materials and rendering meaning using appropriate terminology particular to an agency/office's program or activity into the language used by the individual with LEP.
- Understanding and following Agency and other applicable confidentiality, impartiality, and ethical rules in compliance with the Agency's expectations.
- Ability to understand and maintain the role and observing professional standards for interpreters, translators, or multilingual staff.
- Understanding the appropriate use of current technologies for providing language assistance, including the proper review and use of machine translation.

SSOs providing interpretive services should be aware of potential interpreter fatigue and the possibility that such fatigue can result in errors. SSOs shall consider strategies to address interpreter fatigue for longer proceedings, where possible, including frequent breaks for the interpreter or the use of multiple interpreters.

Staff shall also be mindful of asking community-based organizations or other volunteers to provide free language assistance services. Such individuals may not have the necessary skills, qualifications, or knowledge of rules of professional responsibility to provide accurate, impartial, and confidential interpreting. This may also unduly burden an organization's staff and resources, and it may constitute a gift under

¹³ OCR shall provide SSO staff with guidance regarding circumstances that would rise to the level of "exigent" and procedures for providing language assistance services under those circumstances.

¹⁴ Use of minor children as interpreters shall be avoided in all but the most exigent situations. Absent exigent circumstances, use of adult family members as interpreters shall be allowed only if the individual with LEP is offered a qualified interpreter and declines that interpreter, in writing.

government ethics rules and/or a violation of the Anti-Deficiency Act, 31 U.S.C. §1342.

5. Allocation of Resources

Informed by the four-factor analysis, SSOs shall consider the appropriate resources needed for language access planning, outreach, and assistance services. As permitted by resource availability, SSOs should aim to allocate resources in proportion to the level of current and projected interaction that they have, or may have, with individuals with LEP and/or who are D/HOH, including any projected expansion of language assistance services.

6. Notification of Availability of Language Assistance Services

When language assistance services are not readily available, or when an individual does not know that language assistance services are free and available, individuals with LEP and/or who are D/HOH are less likely to participate in or benefit from the Agency's programs and activities. As a result, many individuals with LEP and/or who are D/HOH may not seek out the Agency's benefits, programs, information, and services; and may encounter difficulties in filing complaints.

OCR will establish and maintain a separate section under the Civil Rights Program web page titled, "Language Access.". This section shall contain relevant information and documentation, including this LAP, applicable authorities and resources, and contact information of individuals responsible for coordinating and/or overseeing language access services for members of the public seeking information or wishing to request language access services.

The SSOs will ensure that individuals with LEP and/or who are D/HOH who contact their office to access programs, services, and/or activities are informed that language assistance is available to them and at no cost.

For use in public-facing materials, SSOs are encouraged to use multilingual taglines to be developed by the Agency LAC informing individuals with LEP and/or who are D/HOH of the availability of language assistance services and how to request those services. The taglines should be incorporated into outgoing emails to the public and added to GSA's vital documents and webpages. OCR will assist the SSOs in including the multilingual taglines in their emails.

7. Provision of Language Assistance Services

Interpretation

OCR administers a translation and interpretation services contract which is available for use by SSOs. SSOs should contact OCR (civilrights@gsa.gov) to coordinate a

¹⁵ SSOs should consult with the Agency LAC for tips and tools on projecting and planning for language assistance services.

request for either interpretative or translation services when they encounter an individual with LEP and/or who are D/HOH seeking to access a GSA program, service or activity.

Translation of Vital Documents

GSA prioritizes the translation of vital documents and also recognizes the importance of making available routine program material in regularly encountered languages other than English.

Classification of a document as "vital" depends upon the importance of the program, information, encounter, or service involved, and the consequence to the individual with LEP if the information in question is not provided accurately or in a timely manner. SSOs have discretion to determine what documents are considered "vital" for language translation services.

There are two types of vital documents: (1) those that are meant for the general public or a broad audience, and (2) those that are specific communications regarding a case or matter between an individual and GSA.

Vital documents intended for the general public, or a broad audience may appear on webpages, social media, apps, or texts; they include, but are not limited to:

- Claim or application forms including their instructions;
- Forms or written material related to individual rights:
- Notices of outreach or community meetings or trainings:
- Press releases announcing activities or matters that affect communities with LEP and/or individuals who are D/HOH; and
- Notices regarding the availability of language assistance services.

SSOs are encouraged to translate vital documents for the general public into their top languages, as needed, and to consider translating into other languages as appropriate based on the application of the four-factor test, given program objectives, constituencies, and/or geographic regions.

Each SSO shall, in consultation with Agency LAC, develop its own criteria for identifying vital documents and prioritizing languages for their translation. For vital documents aimed at a national audience, SSOs should begin by translating vital information in the top languages spoken by individuals with LEP. Even where public outreach or educational materials are not deemed "vital," they should be considered for translation.

Non-vital information includes documents that are not critical to access programs, services, and/or activities. Although meaningful access to a program requires an awareness of the program's existence, it would be impossible, from a practical and cost-based perspective, to translate every piece of outreach material into every language. This is not required.

SSOs shall also ensure that all translations are completed by qualified translators.

SSOs shall avoid using machine translation alone without appropriate human review and quality control. In particular, machine translation is discouraged when information communicated is vital to a person's rights or benefits, when accuracy is essential, or when the source materials use non-literal language (like slang or metaphors), have unclear grammar or structure, contain abbreviations or acronyms, or are complicated, technical, or wordy.

Individuals with LEP wanting to access services from GSA may not be literate in the prevalent written language of their country of origin, or their language may lack a written form, rendering translated material ineffective for communication. For such individuals with LEP, SSOs may want to consider sight translation, interpretation, or audio/video communication.

Recognizing that translating vital documents can be costly and time intensive, SSOs are encouraged to seek stakeholder input in determining which documents should be prioritized for translation. Additionally, recognizing the importance of accurate and accessible translation, SSOs should include on translated documents a method by which customers can provide feedback or make complaints about the quality of the translation and should promptly respond to such contacts.

8. Staff Training

SSO staff (including contractors who perform customer-facing roles) need to know how to provide language assistance services. For policies and procedures to be effective, SSOs shall ensure that appropriate new and existing staff members periodically receive language access and effective communication training relevant to their job duties. SSOs shall remember language access training needs when assessing professional development requirements for all staff.

Where applicable, considering the SSO's mission and operations, staff shall be trained on:

- Identification of individuals with LEP and/or who are D/HOH and specific language needs.
- Legal requirements relating to language access for individuals with LEP.
- GSA language access policies and plans, including how and when to access language assistance services.
- Accessing and providing language assistance services through qualified multilingual staff, in-house interpreters, and translators, or contracted qualified personnel.
- Use of plain language.¹⁶
- Best practices for working with interpreters in person, over the telephone, or via video remote platforms.
- Best practices for working with a translator.
- Interpreter ethic.

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¹⁶ The Plain Language Act of 2010, 5 U.S.C. § 105, requires government agencies to provide any information to the general public in clear, easy to understand language. The US government provides resources on plain language at https://www.plainlanguage.gov.

- Cultural competency.
- Best practices for recording and tracking the use of language assistance services.
- Best practices for providing meaningful language assistance to individuals with LEP and/or who are D/HOH.

In addition, to ensure the quality and accuracy of language assistance services provided, OCR shall ensure that all staff or contracted individuals who serve as translators, interpreters, or who communicate directly in-language with individuals with LEP:

- demonstrate proficiency in and ability to communicate information accurately in both English and in the other language;
- identify and employ the appropriate mode of interpreting (e.g. consecutive, simultaneous, or sight translation), or can communicate fluently in the target language;
- have knowledge in both languages of any specialized terms or concepts particular to the program or activity and of any particularized vocabulary used by the LEP individual;
- understand and follow confidentiality, impartiality, and ethical rules; and
- understand and adhere to their role as interpreters, translators, bilingual or multilingual staff.

SSOs are encouraged to offer technical training (e.g., interpreter ethics, interactive online language access courses, etc.) to qualified multilingual staff to maintain and improve their language assistance skills.

The Agency LAC shall develop a GSA language access training utilizing existing models¹⁷ and provide training to SSO staff who have the potential to interact or communicate with such individuals, as appropriate. Training for customer-facing staff should be no less than every three years.

Many SSO tasks and functions are conducted by contracted staff and, consequently, contracted staff may interact with individuals with LEP and/or who are D/HOH. SSOs shall notify contracted staff of the obligation to ensure nondiscrimination, including compliance with Executive Order 13166. SSOs shall consider contractors and interns having contact with individuals with LEP and/or who are D/HOH when determining who needs to be briefed and trained on their responsibilities under GSA's language access policy or guidance.

9. Bilingual/Multilingual Staff

GSA values the multilingual abilities of its employees. Qualified multilingual staff can assist GSA in meeting Title VI and Executive Order 13166 requirements for federally conducted and federally assisted programs and activities. They can also aid GSA's

¹⁷ A video training series, *Providing Meaningful Access for Limited English Proficient Individuals*, and other training videos are available at https://www.lep.gov/videos.

recipients of federal financial assistance in meeting Title VI requirements to ensure meaningful access for individuals with LEP and/or those who are D/HOH. The qualified multilingual employees include staff whose job responsibilities involve direct inlanguage communication and language assistance, and personnel who volunteer to use their assessed language skills on behalf of GSA.

SSOs shall track the composition of existing and newly qualified multilingual staff by non-English languages spoken and level of oral and written proficiency. Maintaining an inventory of qualified multilingual staff can be useful for resource-sharing initiatives within and among agencies and offices. Managers shall consider the amount of time an employee has spent providing language assistance services when assessing workload and productivity.

10. Self-Assessment and Monitoring

An effective language access plan incorporates a system for collecting, tracking, reporting, and monitoring the number of persons with LEP served, language preferences, translated materials, and other data points. To this end, SSOs shall collect, track and monitor language access data. Quality language access data is the cornerstone of an effective language access plan. Knowing the languages spoken by individuals with LEP within a service area, the frequency of encounters with them, and the resources available to serve them will better prepare GSA and its SSOs to provide qualified and competent language assistance services that avoids delay or denial of access to any GSA program or activity. This data will help GSA review and improve its language access efforts.

Language access data allows GSA to assess whether SSOs are using qualified multilingual personnel or telephonic interpreter services; whether webpages, digital services, and customer service voicemail menus intended for public use are accessible to individuals with LEP and/or who are D/HOH; whether vital documents and information are translated into frequently encountered languages, and whether SSOs are notifying the public about the availability of free language assistance services in a language that they can understand.

To assess language access needs and services, each SSO office shall record and track the language spoken and the language assistance service provided at the point of contact with individuals with LEP and/or who are D/HOH. Any personal identifiable information (PII) collected during any stage of this data collection, tracking, and reporting, must be kept confidential and accessible only to authorized personnel.

Each SSO shall report language access data to the Agency LAC on a semi-annual basis. This data shall be provided electronically to the Agency LAC. The semi-annual data requests may be revised by the Agency LAC, but until such revision, they shall include the items listed in Appendix B. The Office of the Chief Information Officer (OCIO) shall collaborate with the Agency LAC to develop a common repository to store the data, and tools to visualize and analyze it.

D. CONTACT INFORMATION AND ASSISTANCE

OCR can be contacted by email at civilrights@gsa.gov, or phone at 202.501.0767 for more information about GSA's language access services.

Complaints and feedback about language access services in GSA's programs, services, and activities may be filed in any language with OCR. For more information about filing such complaints with GSA, email civilrights@gsa.gov.

APPENDIX A: DEFINITIONS

The Agency uses the following terms as defined below for the purposes of this LAP:

<u>Bilingual/Multilingual Staff</u> - Bilingual/Multilingual Staff means an employee who has demonstrated proficiency in English and at least one other foreign language, and who can interpret accurately, impartially, and effectively between that foreign languages and English, using any specialized terminology necessary for effective communication, but whose main job responsibilities are not providing interpretation services.

<u>Deaf/Hard of Hearing (D/HOH)</u> - A deaf individual has profound hearing loss, which implies very little or no hearing and often uses sign language for communication. An individual who is hard of hearing is an individual with hearing loss ranging from mild to severe. People who are hard of hearing usually communicate through spoken language and can benefit from hearing aids, cochlear implants, and other assistive devices as well as captioning. An individual who is deaf or hard of hearing (D/HOH) may also have limited proficiency in spoken or written English and may not be proficient in ASL or any other recognized sign language.

<u>Direct "In-Language" Communication</u> - Monolingual communication in a language other than English between a multilingual staff and an individual with LEP (e.g., Koren to Korean).

<u>External Stakeholder</u> – A member of the public or the representative of a public-facing organization or community organization that is seeking access to and participation in GSA's programs, services, and/or activities.

<u>Interpreter</u> - An individual who has demonstrated proficiency in both spoken English and at least one other language, and who can interpret accurately, impartially, and effectively to and from such language(s) and English using any specialized terminology necessary for effective communication, and who understands interpreter ethics and client confidentiality needs.

<u>Interpretation</u> - The immediate oral communication of meaning from one language (the source language) into another (the target language).

<u>Language Assistance</u> - Language Assistance means all oral and written language services needed to assist individuals with LEP and/or who are D/HOH to communicate effectively with GSA staff to provide them with meaningful access to, and an equal opportunity to participate fully in programs, services and activities administered by the Agency.

<u>Individuals with Limited English Proficiency (LEP)</u> - Describes an individual who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English in a manner that permits them to communicate effectively.

<u>Meaningful Access</u> – Language assistance that results in accurate, timely, and effective communication and that is available at no cost to the individual with LEP and/or who is D/HOH.

<u>Primary Language</u> - The language in which an individual most effectively communicates when interacting with GSA. An individual's primary language may be a language variant.

Qualified Interpreter - A bilingual/multilingual person who has the appropriate training and experience or demonstrated ability to fully understand, analyze, and process and then faithfully render a spoken, written, or signed message in one language into a second language and who abides by a code of professional practice and ethics. In the context of disabilities, a qualified interpreter is one who is able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary. A child shall not be considered a qualified interpreter, nor shall a family member or employee who does not meet the minimum qualifications specified above.

<u>Sight Translation</u> - Oral or signed rendering of written text into spoken or signed language by an interpreter without change in meaning based on visual review of the original text or document.

<u>Taglines</u> - Taglines are brief messages in non-English languages, which may be included in or attached to a document that is written in English, that describe how individuals with LEP can obtain translations of the document or an interpreter to read or explain the document.

<u>Translation</u> - Involves conveying meaning from written text in one language to written text in another language.

APPENDIX B: REPORTING

Semi-Annual Data Reporting:

The semi-annual request may be revised by the Agency LAC, but until such revision, it shall include:

- Number of written translation requests, by language.
- Description of all new documents or websites and all updated documents translated, by language.
- Number of oral interpretation requests, by language.
- For oral interpretation: number of each type of language assistance service provided, by language, by:
 - Qualified Bilingual Personnel
 - Qualified In-house Interpreters
 - Qualified Contracted Interpreters
 - Qualified Telephonic Interpretation Services
 - Video interpretation services
 - Language bank or dedicated pool of qualified interpreters
 - Other
- Description of all public service announcements (PSAs) issued in non-English languages, including the languages.
- Description of all program discrimination complaints involving language access, including the languages.
- The effectiveness of both services and technologies used for language assistance services.
- Additional resources needed to ensure meaningful access.
- Best practices or effective, model strategies newly implemented.

Additional Annual Data Reporting:

- The name and contact information for the SSOs' LAWG Representative.
- The language assistance services (interpretation and translation) available to the organization's personnel for communicating with individuals with LEP, and how these services are accessed.
- In particular, which of the following are accessible, and how:
 - Qualified bilingual staff
 - Qualified interpreters (oral)
 - In-house
 - Contracted, in-person

- Contracted, telephonic
- Contracted, video
- Language bank or dedicated pool
- Borrowed from another agency
- Other
- Qualified translators (written)
 - In-house
 - Contracted, in-person
 - Language bank or dedicated pool
 - Borrowed from another agency
 - Other
- Description of each language access training provided to personnel, including whether it is required, who is the intended audience, how many federal employees, contractors, and others are required to complete each training, and how many have done so.
- The number of bilingual/multilingual staff employed by the SSO and the languages they speak fluently.
- With respect to oral interpretation:
 - Fiscal year expenditures, distinguishing between on-demand language lines and other interpretive services.
 - Most common challenges
 - Solutions to challenges
 - Lessons learned
- With respect to written translation and transcreation:
 - Fiscal year expenditures, distinguishing between generally available information and communications, and individual communications, and between translation and transcreation.
 - Most common challenges
 - Solutions to challenges
 - Lessons learned
- The SSOs' plan for language access expenditures for the next fiscal year, including plans for obtaining new multilingual personnel, contracts, or other services.
- Whether the SSO is using machine translation software, and if so, how it is ensuring the adequacy of the translation for vital communications.
- How the SSOs' website displays multilingual notices informing individuals with LEP about the availability of free language assistance services and how to request these services.

APPENDIX C:RESOURCES

- OCR's Library of LEP Resources: https://www.gsa.gov/reference/civil-rights-programs/office-of-civil-rights-library
- U.S. Census Bureau, <u>American Community Survey 5-Year</u> Estimate.
- U.S. Census Bureau, *Language Identification Flashcard* (2004).
- Department of Justice, <u>Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs</u> (2011).
- Department of Health and Human Services, Assistant Secretary for Planning and Evaluation, Offices of Human Services Policy, <u>Tips on Equitable Communication</u> <u>Practices in a Policy Context</u>.
- LEP.gov tools and tips:
 - Providing Meaningful Access for Limited English Proficient Individuals, and other training videos, available at https://www.lep.gov/videos.
 - <u>Before You Hire Ask Yourself: "What are my Project's Language</u> Needs?
 - o TIPS on Building an Effective Staff Language Service Program.
 - LEP.gov, Translation, Federal Agency Translated Taglines
 - TIPS for Working with Telephone Interpreters.