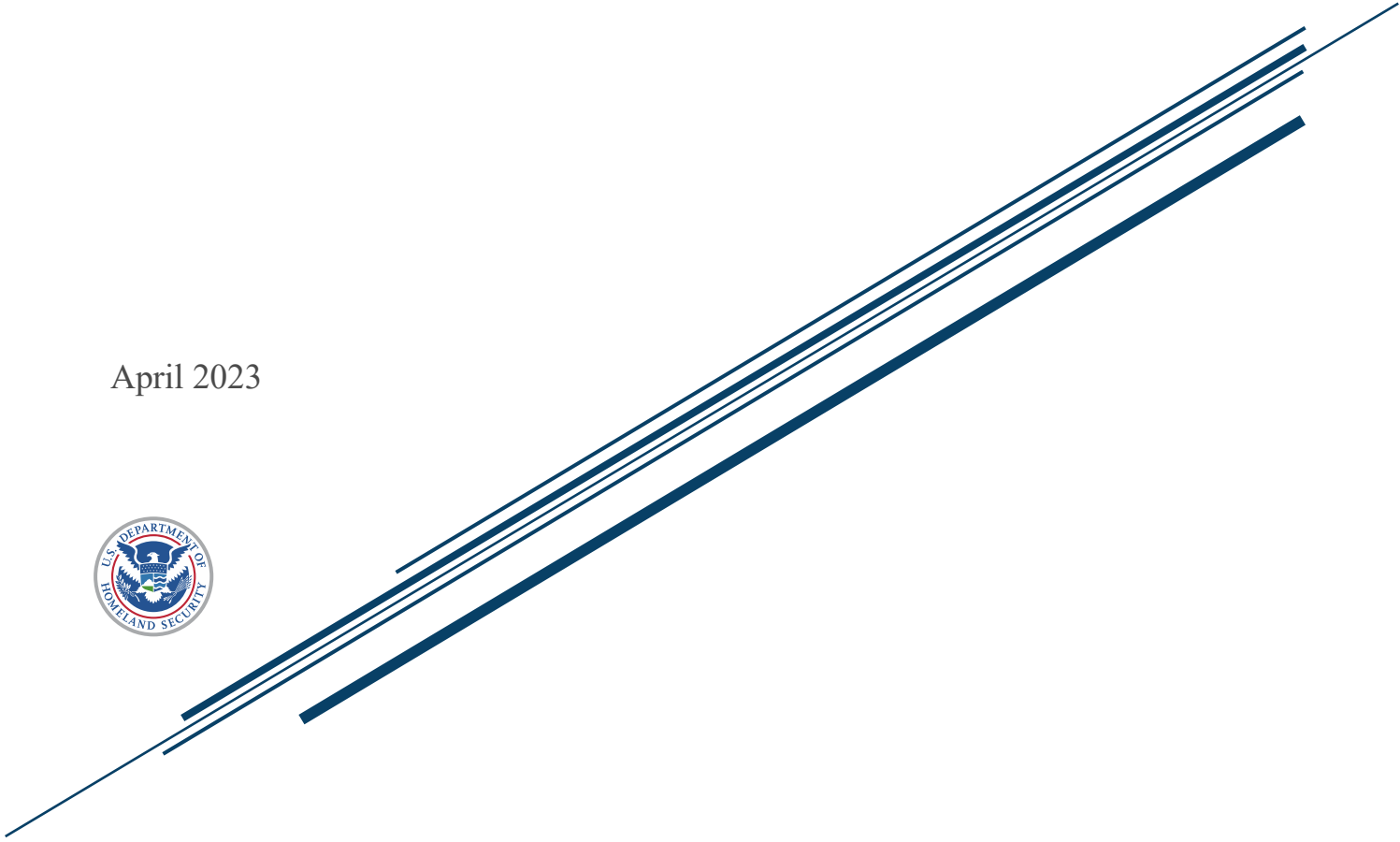


OIDO LANGUAGE ACCESS PLAN

April 2023



OIDO Language Access Plan

Introduction

Under 6 U.S.C. § 205, the U.S. Department of Homeland Security (DHS), Office of the Immigration Detention Ombudsman (OIDO), was established to administer an independent, neutral, and confidential process to receive, investigate, resolve, and provide redress for complaints relating to immigration detention facilities; conduct unannounced inspections; provide recommendations for immigration detention facilities and services; and to review and resolve problems, including assisting individuals with complaints about the potential violation of immigration detention standards or misconduct by DHS personnel.

The mission of OIDO is to independently examine immigration detention to promote and support safe and humane conditions. OIDO's vision is to be recognized as an objective, credible resource for those impacted by immigration detention, creating a more effective and humane system.

As part of seeking improvements to the nation's immigration detention system, OIDO routinely engages directly with persons in immigration detention, many of whom are primarily of limited English proficiency (LEP), to identify and address individual complaints and inquiries, facility-level standards compliance, and enterprise-level issues. OIDO believes focus on effective communication is critical to ensure that such persons can communicate needs and concerns. These communications are of particular importance given that they may pertain to legal rights and responsibilities, incidents of crime, mistreatment, medical and mental health, environmental health, or accommodation of disabilities and religious practices. Moreover, some LEP persons who migrate to the United States have suffered traumatic experiences that impair their trust in, or ability to verbalize to, OIDO personnel seeking to assist them.

Accordingly, it is the policy of OIDO to ensure that persons with whom we communicate are provided professional interpretation and/or translation services to the extent possible.

Under DHS Delegation 19003, the Office for Civil Rights and Civil Liberties (CRCL) has been delegated the authority for ensuring that all federally conducted programs of DHS comply with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000).

Consistent with the requirements of Executive Order 13166, this OIDO Language Access Plan builds upon the DHS Language Access Plan released in February 2012.¹ This plan establishes a system within OIDO for ensuring and improving access by LEP persons to the full range of OIDO's programs, services, information, and activities. OIDO's plan conforms to CRCL's

¹ On November 21, 2022, U.S. Attorney General Merrick Garland published a [Memorandum for Heads of Federal Agencies, Heads of Civil Rights Offices, and General Counsels, on Strengthening the Federal Government's Commitment to Language Access](#). The Department of Justice's [Commonly Asked Questions & Answers Regarding Executive Order 13166](#) contains additional context and resources. [Civil Rights Division. (2019, December 19). *Commonly Asked Questions & Answers to Executive Order 13166*. U.S. Department of Justice. Retrieved on November 30, 2022, from <https://www.justice.gov/crt/eo-13166>.] See, also, [DHS Language Access Plan](#).

priorities for improving access for LEP persons to programs and activities across the Department.

The principles and guidelines in this plan are designed to be consistent with the standards in the DHS guidance to recipients of financial assistance from the Department, Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons with Limited English Proficiency, 76 Fed. Reg. 21755-21768 (April 18, 2011) (DHS Recipient Guidance).

Contents

Introduction	1
Key Terms	4
Limited English Proficient (LEP)	4
Bilingual	4
Translation and Interpretation	4
Meaningful Access	4
Indigenous Languages	5
Policy	5
Scope	6
Current Language Access Resources Within OIDO	6
Language Assistance Services	6
Program Activities Involving Interactions with the Public and Persons in DHS Custody	7
Language Access Procedures	8
Quality Assurance Procedures	8
Training	9
Notice to the Public and Outreach	10
Notice to the Public about Language Services	10
Outreach	10
Monitoring and Evaluation	10
Priorities for Future Years	10
Improvements in Access to OIDO Programs and Activities	10
Contact Information and Assistance	15

Key Terms

Limited English Proficient (LEP)

Persons who are limited English proficient do not speak English as their primary language and have a limited ability to read, speak, write, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing). ([DHS Language Access Plan](#)).

Bilingual

Persons who are bilingual are *fluent* in two languages and can conduct the business of the workplace in either of those languages. This is to be distinguished from *proficiency* in more than one language. An individual who is proficient in a language may, for example, be able to greet an LEP individual in his or her language, but not conduct agency business in that language. Interpretation and translation require the interpreter or translator to be bilingual and require additional skills for interpretation and translation as described below. ([DHS Language Access Plan](#)).

Translation and Interpretation

Translation involves written communication. Translation requires precision because the translator will not engage directly with the person reading the translation or be able to clarify what was meant. *Interpretation* involves oral communication. Interpretation involves the immediate communication of meaning from one language into another. An interpreter conveys meaning orally; as a result, interpretation requires skills different from those needed for translation. Interpretation combines several abilities beyond language competence to enable delivery of an effective professional interpretation in a given setting. From the standpoint of the user, a successful interpretation is one that faithfully and accurately conveys the meaning of the source language orally, reflecting the style, register, and cultural context of the source message, without omissions, additions, or embellishments on the part of the interpreter. Professional interpreters are subject to specific codes of conduct and should be trained in interpretive skills, ethics, and subject-matter language. ([DHS Language Access Plan](#)).

Meaningful Access

DHS defines *meaningful access* as providing quality language assistance services in a timely manner, and calls on DHS Components to incorporate language access considerations into their routine strategic and business planning, identify and translate crucial documents into the most frequently encountered languages, provide interpretive services where appropriate, and educate personnel about language access responsibilities and how to utilize available language access resources. ([DHS Language Access Plan](#)).²

² See also [U.S. Department of Justice Language Access Plan](#), which states: “For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed or inferior as compared to programs or activities provided to English proficient individuals.” [Department of Justice. (2012). *Department of Justice Language Access Plan*.

Indigenous Languages

Indigenous languages are spoken by descendants of those who inhabited a country or a geographical region at the time when people of different cultures or ethnic origins arrived. There are an estimated 476 million indigenous people worldwide.³ Among the indigenous peoples are those of the Americas (e.g., the Lakota in the United States, the Mayas in Guatemala, or the Aymaras in Bolivia), the Inuit and Aleutians of the circumpolar region, the Saami of northern Europe, the Aborigines and Torres Strait Islanders of Australia, and the Maori of New Zealand. These and most other indigenous peoples have retained distinct characteristics that are clearly different from those of other segments of the national populations.⁴

Policy

Consistent with Executive Order 13166 and DHS policy, it is the policy of OIDO that all LEP persons be provided meaningful access to OIDO's programs, services, and activities with quality language interpretation and translation services in a timely manner regardless of subject. All OIDO divisions, therefore, shall incorporate language access considerations into their policies, procedures, plans, and activities to include case management, detention oversight, external relations, and policy and standards. These considerations should include, but not be limited to, assessing language access needs, accessing interpretation and translation services, identifying most frequently encountered languages, identifying documents and print media for translation, and educating personnel about language access roles and responsibilities and how to access language resources.

It is OIDO policy to take reasonable steps to effectively inform persons in immigration detention, as well as members of the public seeking to advocate on their behalf, of the availability of language assistance in communications with OIDO. Furthermore, it is the responsibility of all OIDO personnel to take reasonable steps to provide language services to LEP persons whom they engage with or encounter while carrying out their duties.

Timeliness and quality of language services are of paramount importance in carrying out the OIDO mission, particularly when communicating vital information or providing access to specific programs and activities, such as OIDO's complaint process and external engagement. Due to the need for confidentiality and accuracy regarding matters of health, safety, civil rights, and legal services, OIDO personnel shall avoid reliance upon other detainees, family members, colleagues, or other language-qualified persons to provide language interpretation and translation, unless in exigent circumstances.

U.S. Department of Justice. [Retrieved on November 30, 2022.]
<https://www.justice.gov/sites/default/files/open/legacy/2012/05/07/language-access-plan.pdf>

³ The World Bank. (2022, April 14). *Indigenous Peoples*. The World Bank. Retrieved November 30, 2022, from <https://www.worldbank.org/en/topic/indigenouspeoples>.

⁴ United Nations Permanent Forum on Indigenous Issues. *Indigenous Peoples, Indigenous Voices*. United Nations. Retrieved November 30, 2022, from http://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf

OIDO shall incorporate language access considerations into its business and strategic planning and in routine efforts that involve communication, outreach, and other activities designed for the public or persons in immigration detention.

Scope

All OIDO personnel are expected to comply with this plan. The requirement to provide meaningful access to LEP persons applies to all OIDO case management, detention oversight, external engagement, and policy programs and activities, and any medium of communication, verbal and written, in-person, telephonic, or electronic.

Current Language Access Resources Within OIDO

Language Assistance Services

Professional Interpretation and Translation Services

OIDO has a contract for third party provision of language interpretation and translation services. The contract supports translations of OIDO correspondence, print media, and other written communications. The contract also includes on-demand telephonic interpretation services and in-person interpretation.

The procedures for how OIDO personnel request these services are available through the Contracting Officer's Representative (COR) for this contract situated in OIDO's Operations and Resource Management Division (ORMD).⁵

Personnel with Foreign Language Skills

OIDO staff include bilingual persons fluent in a foreign language as well as persons who have acquired some level of foreign language proficiency through education and/or experience. These skills are valued, but OIDO does not currently offer training in interpretation or translation, nor does it have a program in place for testing language proficiency. Before relying on staff members for communications with LEP persons in their own language, OIDO personnel should consult with their supervisors on which situations are appropriate for them to provide needed language services using their own skills. When there is any doubt as to whether a communication involving health, safety, civil rights, or civil liberties is fully understood, OIDO staff will use the language line for professional interpretation.

DHS CRCL "I Speak" Language Identification Guide

All OIDO personnel and contractors who perform case management, detention oversight, external relations and policy activities shall be provided access to either a print or online version of the DHS CRCL "I Speak" Language Identification Guide ("I Speak" Guide) to assist with

⁵ Sign language interpretation and other services to assist in communication with persons with disabilities is to be provided through a separate OIDO contract on an ad-hoc basis.

prompt identification of languages to assist LEP persons.⁶ OIDO personnel should access the “I Speak” Guide at all locations where interactions with LEP persons are expected to occur and use the guide as appropriate.

Program Activities Involving Interactions with the Public and Persons in DHS Custody

OIDO’s four operational divisions engage with the public and persons in DHS custody as part of meeting the OIDO mission. The activities implemented by these four divisions are all supported by the above-referenced OIDO contract.

Case Management Activities

The OIDO Case Management Division (CMD) independently and objectively examines immigration detention concerns submitted by the public and works collaboratively with our stakeholders and partners to efficiently and effectively provide assistance or redress. CMD ensures meaningful access to LEP persons through the course of its work handling complaints, allegations, or inquiries relating to immigration detention conditions. Members of the public can submit complaints, allegations, and inquiries on OIDO’s Case Intake Form (DHS Form 405), which is available in multiple languages, as well as through any other means of communication. CMD case managers also make verbal presentations to groups of detained individuals that may include a substantial number of LEP persons. Case managers will obtain the services of an interpreter for such presentations unless the case manager is competent to make such presentations in the native language of the LEP audience. LEP interactions are managed by Regional Directors and Immigration Detention Case Managers, who are trained to identify and facilitate language services.

Detention Oversight Activities

OIDO’s Detention Oversight Division (DO) ensures safe and humane conditions exist in immigration detention through independent, objective, and credible inspection and analysis of ICE and CBP facilities throughout the United States, which result in reasonable and realistic recommendations. Its inspections also include review to determine whether a facility has taken corrective action to resolve violations or concerns identified during another oversight office’s prior inspection, audit, or investigation. DO reviews facility programs for meaningful access to LEP persons through the course of its work in assessing outcomes of care, safety, justice, and administration.

External Relations Activities

OIDO’s External Relations Division (EXTRA) engages directly with stakeholders to build trust with and provide information to the public with respect to OIDO’s mission and activities.

⁶ See *I Speak . . . Language Identification Guide*. Civil Rights and Civil Liberties. (2011). *I Speak . . . Language Identification Guide*. Department of Homeland Security, Office of Civil Rights and Civil Liberties. <https://www.dhs.gov/sites/default/files/publications/crcl-i-speak-booklet.pdf>.

Through communication and connection, EXTRA also gains awareness and solicits information about stakeholder concerns as they relate to the conditions of immigration detention, working with other OIDO divisions to determine the appropriate method of resolution. LEP interactions are managed by OIDO Public Engagement Specialists, who are especially trained to identify and facilitate language services.

Policy and Standards Activities

OIDO's Policy and Standards Division (POSTA) is responsible for addressing enterprise level issues in the nation's immigration detention system. POSTA accomplishes this mission through four vital functions: detention data analysis; proposal of solutions to systemic issues; detention-based education and technical assistance; and creation of the OIDO annual report to Congress. During review or research of possible systemic issues, the Policy and Standards Division may have a need to conduct one or more interviews with the detainee population concerning their immigration detention experiences to further understand the impacts of certain issues on those in custody. LEP interactions are managed by POSTA Policy Analysts, who are especially trained to identify and facilitate language services.

OIDO Website

OIDO's public-facing website contains information about the entire range of OIDO programs and activities. Currently, all content is displayed in both English and Spanish. A one-page document describing OIDO's work is available in multiple languages.⁷ The Office's Case Intake Form is also available in multiple languages, including English, Spanish, Portuguese, Haitian Creole, Russian, Turkish, Arabic, and Romanian. OIDO plans to expand the available languages for the Case Intake Form and other materials, as well as to develop multi-language access points for the information most likely to be of interest for persons seeking the services of OIDO. OIDO reviews website content on a routine basis with the goal of improving LEP accessibility. This includes identifying the most important information to be translated into other languages and the best means for disseminating translated content to LEP communities.

Language Access Procedures

OIDO personnel shall be given procedures for identifying and facilitating interpretation (verbal) and translation (of written documents, whether orally or in writing) services for communications with LEP persons.

Quality Assurance Procedures

Quality assurance is a critical part of OIDO's efforts to provide LEP persons with meaningful access to OIDO's programs and activities. Through the DHS Language Access Working Group, OIDO is collaborating with DHS CRCL and other DHS components to identify best practices for

⁷ At the time this language plan was finalized, the one-pager was available in 16 languages.

ensuring quality in language services as well as establish proposed standards for quality control across the Department.

OIDO personnel shall provide routine feedback to OIDO Operations and Resource Management about the quality of interpretation or translation services received.

OIDO's contract for language services includes specific requirements for providing high quality translation and interpretation services, for testing to establish level of proficiency of the interpreter or translator and for conducting quality assurance. For translations, the contractor conducts an internal quality review of each translation before delivering the translation to OIDO. For interpretation, the OIDO COR requests feedback from OIDO personnel about the interpretation session. OIDO's current efforts and practices are as follows:

Translations: In addition to internal quality control OIDO requires of its contractor, once the COR receives a translated document from the contractor, the COR may provide the translation to an OIDO staff member with foreign language skills to informally assess whether the translation appears to communicate the intended information. The COR sends the contractor any questions or comments and notifies the contractor of language preferences for future translation work. OIDO may also use a second vendor as a step in the quality assurance process.

Interpretation: In addition to internal quality control procedures that OIDO requires of its language services contractor, OIDO personnel using interpreters are asked to provide feedback to the COR regarding the quality of the interpreted session. As in the case with translations, the COR communicates any issues to the contractor.

Training

OIDO's Program Integration Division is responsible for ensuring OIDO personnel are trained on the contents of this plan, including the policy on language access, key terms, and language access procedures. Effective Fiscal Year 2023, OIDO shall provide training to all new personnel on Executive Order 13166 and language access principles, requirements, and best practices.

Through the Federal Interagency Working Group on LEP, CRCL, Immigration and Customs Enforcement (ICE), and the Federal Emergency Management Agency (FEMA) worked with the U.S. Department of Justice and other federal agencies on the development of a series of [training videos](#) covering various aspects of providing meaningful access to LEP persons to federal government programs and activities. OIDO is also working with other DHS components to share training resources. A good starting point is the video, [Providing Meaningful Access for Limited English Proficient Individuals](#). OIDO shall incorporate resources such as these into new employee orientation under OIDO's Program Integration Division.

Notice to the Public and Outreach

Notice to the Public about Language Services

The provision of meaningful access also involves providing notice of language assistance services. OIDO's Case Intake Form ([DHS Form 405](#)) is available in multiple languages.

Outreach

OIDO EXTRA will conduct outreach on the Language Access Plan through:

- presentations at community engagement roundtables throughout the U.S.;
- translations of a summary of language access resources into multiple languages, which will be posted online and distributed at community engagement roundtables; and
- posting of this plan and related resources on the OIDO website and LEP.gov.⁸

Monitoring and Evaluation

OIDO routinely and continuously monitors the quality and effectiveness of language services provided through its language services contract. OIDO intends to evaluate the effectiveness of the plan by, among other things:

- soliciting feedback from LEP persons it serves; and
- soliciting feedback from OIDO personnel on the availability, quality, sufficiency, and impact of language services.

Evaluation of the OIDO Language Access Plan will occur every two years by OIDO POSTA and the ORM COR. A report on the status of language access within OIDO, including any recommendations for improvements and modifications to the plan, will be provided to the Ombudsman following each evaluation period.

Priorities for Future Years

Improvements in Access to OIDO Programs and Activities

In developing this plan, OIDO assessed its priorities and language needs, as well as its current capacity to meet these needs. OIDO's assessment took into consideration the following:

- the number or proportion of LEP persons encountered or likely to be encountered;
- the frequency of contact with LEP individuals;
- the nature and importance of the program, activity or service provided; and
- the resources available and costs to provide meaningful access.

⁸ See [LEP.gov](http://www.lep.gov). <http://www.lep.gov>.

Going forward, OIDO shall continue to apply these factors and reassess language needs and priorities in response to changes in the language makeup of detainee populations.

In assessing the first two factors, OIDO is cognizant of the fact that the proportion of LEP individuals in the entire DHS detainee population (including the prevalence of particular languages) may not capture widely differing proportions from one facility to another, and may rapidly change over time, such as when world events affect the demographics of the detainee population. Accordingly, OIDO will regularly monitor the sufficiency of this Language Access Plan in each individual facility and determine whether interpretation services must be enhanced and whether vital documents should be translated into additional languages.

Finally, OIDO identifies vital documents and key interactions with the public based on the importance of the activity, information, or encounter, the frequency of the interaction, and the demographics in particular locations or programs. The following priorities are based on this assessment, but subject to change as new data is received.

Leveraging Foreign Language Skills of OIDO Personnel

OIDO is fortunate that a substantial portion of the staff are proficient in more than one language. Foreign language proficiency may range from the ability to engage in very basic communications to fully bilingual. The following initiatives will help OIDO make the most effective use of those skills:

- the identification of reputable services for assessing the level of foreign language proficiency of OIDO personnel;
- determining the level of proficiency necessary to ensure meaningful access to different types of OIDO programs and services;
- identifying resources that can be made available to OIDO personnel seeking to improve their foreign language proficiency;
- exploring the feasibility of providing incentives or assistance for staff with foreign language fluency to improve their level of proficiency or gain additional skill in interpretation.

Determining Priorities

In determining how to prioritize the use of language interpretation and translation services, OIDO gives special consideration to vital interactions and to vital documents and information.

Vital Interactions

OIDO has determined that the following functions are vital interactions with LEP persons:

- in-person interactions with persons in immigration detention facilities, including the ability of OIDO personnel to effectively apply OIDO's victim-centered and trauma-informed approach to such interactions and the detainee's ability to participate fully in interviews and other interactions intended to understand the complaint; and
- access to the complaint submission processes, including the Case Intake Form (DHS Form 405).

Vital Documents and Information

OIDO has determined that the following are vital documents and as such are a priority for obtaining translations:

- incoming correspondence and other information in languages other than English, particularly as they relate to allegations from detainees or the public regarding unsafe or inhumane treatment of persons in immigration detention facilities, or the failure of a detention facility to meet the required standard of care;
- information on how a complaint concerning detention conditions may be brought to the attention of OIDO.

Specific Activities

This OIDO Language Access Plan is not merely a static document, but also a guide for specific activities to undertake in the pursuit of improved language access. The following list of activities under this current Plan does not detract from the freedom to undertake additional activities.

Interpretation and Translation

- Maintain contractual services capable of providing an adequate number of interpreters and translators, including indigenous language interpreters and translators.
- Explore the appropriate use of machine translations as an alternative when live interpretation is unavailable.
- Translate select OIDO documents that are regularly distributed in DHS facilities or at OIDO roundtables, events, and other community engagement activities.
- Develop a plan and protocol for the use of in-person interpreters for on-site investigations to supplement the use of telephonic interpretation.
- Develop plans and protocols for use of in-person interpreters for specific community engagement events.
- Provide the OIDO Lexicon: Victim-Centered and Trauma-Informed Approach to Communications at Immigration Detention Facilities to the language services contractor for use in translations and awareness in interpretations.
- Review the OIDO webpage, identifying the most important information to be translated and the best means for informing LEP communities and organizations serving LEP communities about the availability of these translations.
- Develop a framework for new OIDO webpages with multilingual content similar to the Social Security Administration’s “multilingual gateway” and the USCIS Multilingual Resource Center.
- Identify and catalogue vital documents throughout DHS—and the status of translations— and collaborate with DHS components to establish a plan for translating documents most vital to persons in immigration detention into additional languages.

- Identify ways in which language access can be improved within immigration detention facilities, particularly where a component with detention responsibility is noncompliant with its applicable standards pertaining to language access.
- Collaborate with other DHS components on translating select “Know Your Rights” materials into additional languages. A “Know Your Rights” Video is currently available in English, Spanish, and French in immigration detention facilities.

Training

- Continuously provide training and technical assistance to staff on language access principles, policy, and procedures.
- Develop guidelines for offering bilingual staff language assessment testing.

Collaboration with Other Federal Agencies and Other Organizations

- Collaborate with the Federal Interagency Working Group on LEP on implementation of Executive Order 13166 across the federal government through participation in the federally conducted subgroup and other related activities.
- Participate in the DHS Language Access Working Group.

Outreach

- Continue to provide information on language access and obtain input from external stakeholders on improving language access in OIDO services and across DHS components responsible for the care and safety of persons in immigration detention.

Tracking, Evaluation, and Monitoring

- Identify effective methods for collecting and tracking the languages of LEP persons in communication with OIDO to inform OIDO in planning for future language services.
- Review the OIDO website with the goal of improving its accessibility to LEP persons.
- Solicit feedback from external stakeholders on OIDO’s provision of language access, for use in evaluating the sufficiency of OIDO’s Language Access Plan.

Monitor OIDO’s Progress

OIDO will monitor its progress in carrying out language access activities outlined in the OIDO Language Access Plan and provide ongoing technical assistance to personnel in providing language access to OIDO’s programs and activities.

DHS and OIDO Language Access Working Groups

OIDO participates in the DHS Language Access Working Group comprised of various DHS components and offices, administered under the leadership of CRCL. This supports OIDO’s own efforts to strengthen language access in its own programs and services as well as to carry out its detention oversight, case management, and policy development responsibilities relating to the

DHS components responsible for the care of persons held in DHS immigration detention facilities with respect to their language access plans.

To help carry out and improve upon its own Language Access Plan, OIDO will establish an OIDO Language Access Working Group (LAWG) comprised of representatives from each OIDO division (i.e., Case Management, Detention Oversight, Policy and Standards, External Relations, Program Integration, and Operations and Resource Management). The OIDO LAWG will spearhead examination of ways to improve language access by, among other things, assessing the strength of OIDO's multilingual workforce, developing mechanisms for assessing foreign language proficiency for multilingual personnel, exploring how to make the most effective use of personnel with foreign language skills, and evaluating new technologies and services that might enhance OIDO's ability to provide meaningful access for all LEP persons to OIDO's programs and services.

New Technologies

DHS CRCL and several DHS components have researched or explored the capabilities of "machine translation" for possible use in DHS operations and programs. Machine translation refers to the use of software that can translate source content into target languages. One such technology used within DHS facilities are electronic tablets that allow detainees to communicate with facility staff, obtain legal information, and request an appointment with OIDO concerning immigration detention treatment or conditions. Some of these electronic tablets include language translation software such that persons in immigration detention may select their preferred language. Their communications are translated into English, and responses in English are translated back to their preferred language.

OIDO will continue to research and evaluate new technologies and assess their impact on detention conditions as part of its oversight role.

Technical Assistance and Training

OIDO will look primarily to CRCL for technical assistance and training on language access requirements and resources for providing meaningful access to LEP persons in their programs and activities.

Evaluation Tools and Mechanisms

OIDO evaluates the effectiveness of its Language Access Plan by regularly monitoring the quality and effectiveness of its language services contract and by gathering feedback on the effectiveness of the plan through the OIDO Language Access Working Group.

Monitoring of language services contract

OIDO's Contracting Officer meets regularly to exchange information about the quality of language services that the contractor is providing to OIDO, the timeliness of these services, and staff satisfaction or concerns. This feedback is used to monitor the contract (and request adjustments), as well as the state of language access in OIDO.

Staff survey

Within six months after implementation of the OIDO Language Access Plan, OIDO's Policy and Standards Division, in cooperation with the COR and other OIDO divisions, will conduct a survey of OIDO staff to assess the effectiveness of OIDO's language access program and solicit feedback and recommendations for improvements.

Demographic Assessment

OIDO will evaluate the top languages and LEP populations that it serves by reviewing the use of OIDO's foreign language contract and OIDO case complaint records. OIDO will then identify the top languages for which interpretation or translation is requested, both across the entire DHS immigration detention system and within each dedicated DHS detention facility.

Contact Information and Assistance

To inquire about language access in any OIDO program or activity, anyone may contact OIDO by email at OIDO_Outreach@hq.dhs.gov by writing to OIDO at the address listed below, or by filing a complaint (described below) concerning lack of language access. Senders may write in the language of their choice and, if necessary, OIDO will translate it as well as any OIDO response.

Complaints about immigration detention conditions may be filed using the optional Case Intake Form (DHS 405) (in multiple languages), or by providing OIDO with a detailed written description of the allegations using the language of the sender's choice. More information about filing a complaint with OIDO can be found online (DHS Form 405).

The complaint and any supporting documentation can be sent to OIDO by one of the following means:

E-Mail: detentionombudsman@hq.dhs.gov

U.S. Mail and/or Expedited Delivery Services:

U.S. Department of Homeland Security

Office of the Immigration Detention Ombudsman, Mail Stop #0134

Patriots Plaza II, 375 E St SW

Washington, DC 20024

Due to security measures with the U.S. Government mail system, cases mailed (even those sent by expedited delivery services) may be delayed.