

Language Access During the COVID-19 Pandemic & Other Health Emergencies

Training for Recipients of Federal Financial Assistance

Agenda

- I. Welcome and Introductions
- II. Legal Background & Framework
- III. Overview of Effective Practices & Things to Avoid
 - 1) Identifying LEP Populations
 - 2) Engaging with Community-Based Organizations
 - 3) <u>Translation of Written Material</u>
 - 4) Quality Assurance in Translation
 - 5) <u>Interpretation</u>
 - 6) Subrecipient Monitoring & Compliance
 - 7) <u>Identification Requirements</u>
- IV. Additional Resources
- V. Questions & Contact Info

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Legal Background and Framework

Title VI of the Civil Rights Act of 1964 is a federal law that prohibits discrimination on the basis of race, color and national origin (including limited English proficiency) in programs and activities that receive federal financial assistance.

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

42 U.S.C. § 2000d

Legal Background and Framework (continued)

National origin discrimination includes discrimination on the basis of limited English proficiency (LEP).

A person who is limited English proficient (LEP) is someone who does not speak English as their primary language and has a limited ability to read, speak, write, or understand English.

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Legal Background and Framework (continued, 2)

Overarching requirement: Recipients must take reasonable steps to ensure that LEP persons have meaningful access to their programs and activities.

Meaningful Access is language assistance that results in accurate, timely, and effective communication and is available at no cost to the LEP individual.

5

Legal Background and Framework (continued, 3)

"If there appears to be a failure or threatened failure to comply with this part, and if the noncompliance or threatened noncompliance cannot be corrected by informal means, compliance with this part may be effected by the suspension or termination of or refusal to grant or to continued Federal financial assistance or by any other means authorized by law."

6 C.F.R § 21.13 (DHS); 44 C.F.R § 7.12 (FEMA); 45 C.F.R. § 80.8 (HHS)

- 6
- This slide contains the enforcement mechanism for noncompliance with Title VI of the Civil Rights Act of 1964.
- This includes violations based on national origin discrimination and limited English proficiency.

Links from slide:

https://www.ecfr.gov/current/title-6/chapter-I/part-21

https://www.ecfr.gov/current/title-44/chapter-I/subchapter-A/part-7/subpart-A

https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-80/section-80.8

Conducting a Language Self-Assessment (The Four-Factor Analysis)

- The number or proportion of LEP persons eligible to be served or likely to be encountered;
- 2. The **frequency with which LEP individuals** are encountered (and **what languages** they speak);
- 3. The **nature and importance** of the program, activity or service provided by the recipient to its beneficiaries; and
- 4. The **resources** available to the grantee/recipient and the costs of interpretation/translation services

7

Effective Practice:

- Conduct a language self-assessment of your conducted programs and activities.
 - The self-assessment should examine programs and activities that have contact with the public.
 - The self-assessment could contain the elements indicated on the slide.

Key Interactions to Consider

- Webpages
- Call centers or hotlines
- Social media
- Letters and texts
- Consent forms
- In-person communication (e.g., vaccine and testing sites)

• Your organization may want to examine these interactions with members of the public as part of a language self-assessment.

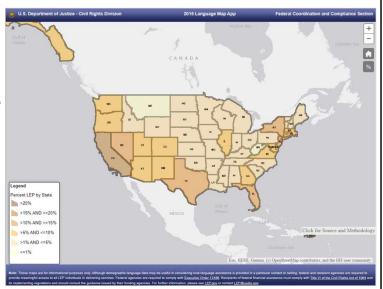
• Note that this list is tailored to programs and activities that are particularly relevant during public health emergencies and is not exhaustive.



1. Identifying LEP Populations

Effective Practices – Identifying LEP Populations

- Data from the U.S. Census Bureau
 - Language Use in the US: 2019
 - DOJ Language Access Map App
- Data from state/local governments
 - Pennsylvania Languages Map
 - City of Portland LEP Map
 - City of San Francisco Language
 Diversity Data
- Surveys of community-based organizations to identify LEP populations



10

 The DOJ Map App is not the most recent census data, more recent data may be available through the Census' American Community Survey.

Examples of Effective State Practices:

- Use U.S. Census data combined with surveys of community-based organizations to identify LEP populations throughout the state, including geographic pockets where certain LEP communities may be concentrated.
- Use U.S. Census data, including data from the American Community Survey and State government data, to
 determine the top ten languages most commonly spoken by LEP individuals. Later, expanded LEP groups by
 utilizing data from the State Department of Education and State Court System to identify the top ten non-English
 languages.
- Use recent U.S. Census data maintained by the state's Office of Financial Management, an interactive online map displaying language access needs, and a COVID-19 Social Vulnerability Index mapping tool.
- Some community-based organizations assisted state officials in identifying Indigenous languages speakers that required video and/or telephonic interpretation due to lack of available in-person interpretation services.
- Received recommendations from the COVID-19 Health Equity Response Team taskforce -- made up of
 community, government, and academic stakeholders who have developed COVID-19 recommendations to help
 serve vulnerable populations, with each community represented by its own committee.

Links from slide:

https://www.census.gov/library/publications/2022/acs/acs-50.html

https://www.lep.gov/maps/lma2015/Final

https://padoh.maps.arcgis.com/apps/webappviewer/index.html?id=edea3b61247d4aa08a833cd52abbf573

 $\underline{\text{https://gis-pdx.opendata.arcgis.com/datasets/limited-english-proficiency/explore?location=45.580674\%2C-122.449875\%2C10.55}$

https://sf.gov/data/san-francisco-language-diversity-data



2. Engaging with Community-Based Organizations

Effective Practices – Engaging with Community-Based Organizations

- Convening periodic working groups or meetings with community-based organizations.
- Developing community engagement or outreach teams within your agency.
- Targeting community-based and faith-based organizations for partnerships or funding to implement community interventions unique to their communities.
- Partnering with community-based organizations to hold town hall or roundtable style discussions in locations where LEP persons may be geographically concentrated or isolated.

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Examples of Effective State Practices:

- State Department of Health COVID-19 Outreach and Public Health Education initiative has been convening a working group of community partner organizations that serve LEP community members. The organizations receive state and federal funding to identify needs and increase outreach to the LEP populations.
- Partner with trusted community leaders to conduct door-to-door canvassing, traditional and social media outreach, business walks, and visibility events to deliver culturally and linguistically-tailored messages and education materials.
- Locally-hired staff who speak over a dozen languages knocked on doors and had phone
 conversations to conduct vaccine outreach, delivering information in linguistically and
 culturally-appropriate ways, reducing vaccine hesitancy, and increasing vaccination rates.
- Award grant money to community-based and faith-based organizations to implement community interventions unique to their communities.
- One state's Community Engagement Team focused on supporting community partners to best engage LEP individuals across the state. Another Vaccine Operation Team collaborated with partners to co-create vaccine solutions with communities. The goal was to provide vaccine opportunities for communities disproportionally impacted by COVID and to create collaborative approaches to addressing health disparities.
- The Community Partner and Outreach Program team led efforts across the state to reach migrant and seasonal farmworkers through its bilingual/ bicultural staff and by providing funding to organizations that support migrant and seasonal farmworkers and implemented a Rapid Community Assessment survey of 500+ migrant and seasonal farmworkers.



3. Translation of Written Material

Effective Practices – Translation of Written Material

- Identify the top or most common languages spoken by LEP populations in your state.
- Ensure that LEP persons know how to request print materials in other languages.
- Use multilingual tagline notices informing LEP persons of the availability of language assistance services (interpreters and translated materials) and how to request them if needed to understand the information on the platforms.
 - Example: "ATTENTION: If you speak or read [insert language], language assistance services, free of charge, are available to you. Email [insert email] or call 1-xxx-xxx-xxxx."

14

Examples of Effective State Practices:

- Translate all COVID-19 media campaigns and critical testing and vaccine information in 12 languages and offers them through multiple channels to reach the widest audience. The State also regularly partners with Spanish language media outlets, e.g., Telemundo and Univision, on sending press releases and conducting interviews in Spanish.
- Provide a resource library of translated materials (structured by language, for easy access by LEP users) on the State Department of Health COVID-19 website.
- State webpages also have a link to Language Assistance Services that connects users to the taglines in the top 17 languages advising the user of their option to contact a state service to request language assistance.
- Taglines are short statements written in English and frequently encountered non-English languages that notify individuals with LEP about the availability of qualified, competent language assistance free of charge.

Translation of Vital Information & Documents

- What is a Vital Document?
 - Contains information that is critical for obtaining the services and/or benefits or is required by law.
 - Includes information displayed on webpages, digital platforms, or devices.
- Translate when a significant number or percentage of the population eligible to be served, or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively.
 - For many larger documents, translation of vital information contained within the document will suffice and the documents need not be translated in their entirety.
- Vital documents can include:
 - Applications
 - Consent and complaint forms
 - Notices of rights
 - Notices advising LEP persons of the availability of free language assistance
 - Letters or notices that require a response from the beneficiary or client

15

Vital information

- Whether or not a document or information is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information is not provided accurately or in a timely manner (for example, an application for disaster assistance).
- Remember that lack of awareness that a particular program, right, or service exists may effectively deny LEP individuals meaningful access.
- It is particularly important to ensure that vital documents are translated into the non-English language of each regularly encountered LEP group eligible to be served or likely to be affected by the program or activity.
- In general, information may be considered vital if it is "...necessary for an individual
 to understand how to obtain any aid, benefit, service, and/or training; necessary for
 an individual to obtain any aid, benefit, service, and/or training; or required by law."
 (29 CRR 38.4(ttt) Workforce Investment Opportunities Act's nondiscrimination
 provisions, which are based on Title VI).



4. Quality Assurance in Translation

Effective Practices – Quality Assurance in Translation

- Translated materials are <u>reviewed</u>, <u>proofread</u>, <u>and edited by qualified translators</u>.
- Usability testing
 - A process where LEP users test a website or digital service for ease of use.
 - During a typical usability test session, LEP participants will try to complete specific tasks while observers watch, listen, and take notes.
 - The goal of usability testing is to collect data, identify features or components that are useful to LEP audiences, and identify any usability problems that need to be addressed to improve access for LEP users.
- Guides that offer general frameworks and approaches for running a usability test include:
 - 18F Methods: <u>Usability Testing</u>, <u>Prototyping</u>
 - Usability.gov: <u>Usability Testing</u>, <u>Running a Usability Test</u>
 - Digital.gov: <u>Usability Testing</u> (Video), Government Usability Case Studies

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- Once you've taken some initial steps to translate your vital information and display it on your website, how do you know that an LEP user can effectively find and access the multilingual content? That where useability testing can be helpful.
- You might also consider reaching out to a local college, university, or community organization that services LEP individuals to ask about potential participants for your useability test or to review translated materials.

Example of State Effective Practice:

Trusted community partners review translated materials for accuracy.

Links from slide:

https://methods.18f.gov/validate/usability-testing/

https://methods.18f.gov/make/prototyping/

https://www.usability.gov/how-to-and-tools/methods/usability-testing.html

https://www.usability.gov/how-to-and-tools/methods/running-usability-tests.html

https://digital.gov/event/2018/06/14/usability-testing-with-steve-krug/?dg

https://digital.gov/resources/digitalgov-user-experience-resources/government-usability-case-studies/

Use of Automated or Machine Translation Tools

- Machine translation applications or software convert written text from one language to another without the involvement of a qualified human translator.
- Machine translation can reduce the accuracy or change the meaning of posted information when read in translated form.
- Machine translation may not "see" tables, images that contain text, menu items, and headers as content that requires translation.

18

- Let's talk about machine translation. We've seen this on many websites, and you may be using such a feature on your website to translate entire pages without a human translator.
- There are a number of concerns with using machine translation applications or software, and generally we discourage it's use. We have some of those concerns listed on this slide.

Use of Automated or Machine Translation Tools (continued)

- In addition, since the machine-translated content is not on the website, it cannot be found by placing non-English terms in a search engine.
- If your organization utilizes machine translation software, the organization should have a human translator proofread all content containing vital information before posting to ensure the accuracy of the translated information.
- Website content that is translated and checked by qualified human translators is more likely to be accurate and locatable by LEP users.

19

- We have received comments about the cost and feasibility of contracting with a qualified translator for the myriad languages provided through these machine translation apps.
- Remember, there is <u>no requirement</u> to translate <u>all</u> of your content into <u>every language</u>. What we're strongly encouraging you to do in order to meet <u>your requirement</u> to take <u>reasonable steps to provide meaningful access</u> is to translate vital information into the *most frequently encountered languages* of LEP persons who use information or are eligible to be served.
- Use of disclaimers regarding the accuracy of machine translations does not relieve the recipient of its responsibility to provide translated information that is accurate, reliable, and culturally appropriate.



5. Interpretation

Effective Practices – Interpretation

- A first step in providing effective interpretation is accurately identifying the language of the person with LEP.
 - Do not assume the primary language based on the country of origin; some persons may speak an indigenous language or another language altogether.
- Interpretation is a skill. A qualified interpreter has received training and has been assessed in the skills of interpretation and should have knowledge of the ethical issues of interpretation.
- A bilingual person may learn to become a translator or an interpreter but is not automatically qualified by virtue of their language abilities.
- Be sure to screen interpreters to eliminate a potential conflict of interest.
 - Absent emergency or extremely time-sensitive circumstances, family members <u>should generally not be used</u> to provide interpretation.



21

 We recommend that entities never rely on a minor child "to interpret or facilitate communication, except as a temporary measure while finding a qualified interpreter in an emergency involving an imminent threat to the safety or welfare of an individual or the public..."

Examples of Effective State Practices:

- Provide free in-person interpreters at various mobile vaccination sites when requested and identified by community-based organizations.
- Provide technical assistance to providers and hosts of vaccine events, leverage existing processes and contracts to directly schedule interpreters for events, provide access to video remote interpreting, and offer resources to enhance language access at events.
- Equip staff at original state-run mass vaccination sites with telephonic interpretation services information and launched community-based scheduling to increase access to appointments for LEP people.
- Utilize professional interpreters from local language services providers and bilingual volunteer staff who are familiar with the program and subject matter.
- Use appropriately trained foreign language interpreters when communicating with LEP patients.

Links from slide:

https://www.dhs.gov/sites/default/files/publications/crcl-i-speak-booklet-law-enforcement.pdf



6. Subrecipient Monitoring & Compliance

Subrecipient Monitoring: Definition and Obligations

- What is a Subrecipient?
 - A Subrecipient is a non-Federal entity that receives a subaward from a recipient to carry out part of a Federal award.
- What are the obligations of a Subrecipient?
 - Subrecipients have the same obligations as the primary recipient to comply with applicable civil rights requirements and should follow the recipient's' procedures regarding the submission of civil rights information.
- What are the obligations of the Primary Recipient?
 - The primary recipient is responsible for the subrecipient's compliance with applicable civil rights laws. The primary recipient should monitor the activities of the subrecipient to ensure compliance with these laws.
 - A subrecipient relationship exists when funding from Recipient is provided to perform a portion of the scope of work or objectives of the recipient's award agreement with the awarding agency
 - Any subrecipient of an award of federal financial assistance, must comply with civilrights-related requirements.
 - We strongly encourage recipients of federal financial assistance to describe in detail the steps the recipient will take to help ensure that subrecipients comply with nondiscrimination provisions.

Effective Practice – Developing a subrecipient monitoring plan

- 1. A description of the **types of data and information** the recipient will collect from subrecipients as part of the monitoring program.
- 2. A description of **training and technical assistance** materials provided to subrecipients on understanding and meeting their civil rights requirements.
- 3. A list of **criteria for selecting subrecipients** for a compliance review (e.g., size of entity, number or type of complaints, type of program, results of last review, etc.).
- 4. A description of the types of compliance reviews (e.g., desk audit or onsite review).
- 5. The procedures for scheduling compliance reviews.

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One effective practice that you may consider to aid subrecipient compliance is to develop a subrecipient monitoring plan. Many of your organizations may already have a plan to audit subrecipient's financial health – we encourage you to add monitoring subrecipients' civil rights compliance to any existing plan.

- 1. Description of the **types of data and information**, to collect from the subrecipient. The type of subrecipient, the intent of the funding and the program beneficiaries will drive this information
- 2. **Training and technical assistance** How will you, the primary recipient, provide technical assistance on how subrecipients are expected to meet their civil rights obligations?
- 3. What will be your **criteria for selecting subrecipients** for a compliance review? Can you make a business justification as to why one subrecipient was chosen for a review as opposed to another subrecipient?
- 4. A description of the **types of compliance reviews** They could include a desk audit where the subrecipient provides documents or data for review or an onsite review that includes the document review as well going onsite conducting interviews, verifying or conducting an inspection of program operations and reviewing a sample of applicable recipient records in the field.
- 5. The **procedures for scheduling and conducting compliance reviews** How will you notify a subrecipient of the planned review? In the notification, will you describe the schedule and type of review? As an organization you may determine at the beginning of the fiscal year, you will review a certain number of recipients via onsite and a certain number of recipients in a desk audit.

Elements of a subrecipient monitoring plan

- 6. A **compliance review instrument** (e.g., checklist) for agency staff to use in conducting a review or for monitoring subrecipient civil rights compliance.
- 7. A **description of records** that will be reviewed in a compliance review (e.g., policies and procedures, participation records, demographic data).
- 8. The **uniform standards for documenting compliance reviews** including written guides, templates, and forms (e.g., compliance review notification, documenting of selection criteria, report of findings and recommendations).
- 9. The plan for **training** to staff on planning and conducting compliance reviews.
- 10. The **procedures for handling instances of non-compliance** and how compliance is defined.
- 11. The designation of responsibilities and procedures for monitoring corrective actions.

2

- 6. **Compliance review instrument** what will your organization use to conduct the review? Will you use a checklist or some other type of data collection tool or form to conduct the review?
- 7. A **description of the subrecipient records** to be reviewed this will be determined by what the scope of the review is.
- 8. **Standards for documenting compliance reviews –** for example, once the review is underway who will document the work? Will you develop standard templates or forms outlining all the steps you have taken to monitor the recipient?
- 9. What is your plan for **training** your staff on how to conduct the review is there a designated or responsible staff person or persons to conduct the training?
- 10. How do you define **non-compliance**? How do handle instances of non-compliance? Is there a report? How is documented?
- 11. Then finally who will monitor corrective actions? How will this be documented? Will you schedule a follow-up? How will you inform the subrecipient of your findings and recommendations?

Example – one state provided not only its own language access plan, but also provided language access plans for some of its subrecipients, demonstrating in part how it monitors its subrecipients.



7. Identification Requirements

ID and Disparities:

- Requiring identification to obtain vaccination can lead to undue fears of immigration enforcement, and it can disparately impact racial and ethnic minorities.
- It is very important to the public health that any person is able to receive COVID vaccines and similar emergency-related health care and human services.

DHS Statement on Equal Access to COVID-19 Vaccines and Vaccine Distribution Sites:February 1, 2021, ...DHS and its Federal government partners fully support equal access to the COVID-19 vaccines and vaccine distribution sites for undocumented immigrants. It is a moral and public health imperative to ensure that all individuals residing in the United States have access to the vaccine... <u>DHS Statement on Equal Access to COVID-19 Vaccines</u> and Vaccine Distribution Sites | Homeland Security

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- It is very important to the public health that any person is able to receive COVID vaccines and similar emergency-related health care and human services.
- Strict ID or proof of residency requirements may also disparately impact communities of color in general.
- See, e.g., <u>DHS Announces Changes to Individual Assistance Policies to Advance Equity for Disaster Survivors</u> | <u>Homeland Security</u>
- <u>DHS Statement on Equal Access to COVID-19 Vaccines and Vaccine Distribution Sites | Homeland Security</u>
- The DHS memo of October 27, 2021 (<u>Guidelines for Enforcement Actions in or Near Protected Areas Memo | Homeland Security (dhs.gov)</u>, Section II, includes hospitals and clinics as "protected areas" in which "to the fullest extent possible, we [DHS] will not take any enforcement action in or near," in order to "not deny or limit individuals' access to needed medical care." Examples of protected areas include:
 - "A medical or mental health care facility, such as a hospital, doctor's office, health clinic, vaccination or testing site, urgent care center, site that serves pregnant individuals, or community health center."
 - This is based on longstanding policy, in consideration of public health & safety interests.

Links from slide:

https://www.dhs.gov/news/2021/02/01/dhs-statement-equal-access-covid-19-vaccines-and-vaccine-distribution-sites

Effective Practices – ID and Public Health Emergencies

- Guidance to Federal Financial Assistance Recipients Regarding Title VI and the Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons -Summary
 - Share information about eligibility requirements translated into the most prevalent languages spoken in the affected areas, including to what extent, if any, immigration restrictions may affect eligibility of some family members.
 - Provide training and publish and provide statements reminding recipients, including first responders and benefits providers, of the prohibition on discrimination and to not inquire about immigration status unless necessary for determining an individual's eligibility for a particular public benefit.
- Prohibition on requiring proof of health insurance information or government issued identification.

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In the DHS Guidance, the agencies cited to public health emergencies in which they issued guidance against this type of national origin discrimination. Stakeholders have informed agencies about fear of speaking a language other than English or asking for language access at healthcare sites, due to fears of unfair immigration enforcement.

Insurance information may be requested but it cannot be required, and it must be made clear that providing the information is optional.

Links from slide:

https://www.hhs.gov/civil-rights/for-providers/laws-regulations-guidance/guidance-federal-financial-assistance-title-vi/index.html

Additional Resources: DHS CRCL & FEMA OER

- Civil Rights Resources for Recipients of DHS Financial Assistance | Homeland Security
- DHS Language Access Guidance for Recipients of Department Financial Assistance
- DHS: Language Access Resources including:
 - "I Speak" language identification materials
 - For DHS Recipients: Developing a Language Access Plan
 - Language Access Webinar materials
- FEMA: Civil Rights COVID-19 Vaccine Checklist

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Links from slide:

https://www.dhs.gov/civil-rights-resources-recipients-dhs-financial-assistance

https://www.dhs.gov/guidance-published-help-department-supported-organizations-provide-meaningful-access-people-limited

https://www.dhs.gov/publication/dhs-language-access-materials

https://www.fema.gov/disaster/coronavirus/vaccine-support#equity

Additional Resources: HHS

- HHS Bulletin: <u>Civil Rights Protections Prohibiting Race</u>, <u>Color and National Origin</u>
 <u>Discrimination During COVID-19</u>: <u>Application of Title VI of the Civil Rights Act of 1964</u>
- HHS Bulletin: Ensuring the Rights of Persons with Limited English Proficiency in Health Care During COVID-19
- Language Access Plan Worksheet
- Guidance to Federal Financial Assistance Recipients Regarding Title VI and the Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons -Summary

30

Links from slide:

https://www.hhs.gov/guidance/document/bulletin-civil-rights-protections-prohibiting-race-color-and-national-origin

https://www.hhs.gov/sites/default/files/lep-bulletin-5-15-2020-english.pdf

 $\frac{https://www.hrsa.gov/sites/default/files/hrsa/about/organization/bureaus/ocrdi/language-access-plan-worksheet.pdf$

https://www.hhs.gov/civil-rights/for-providers/laws-regulations-guidance/guidance-federal-financial-assistance-title-vi/index.html

Additional Resources: U.S. Department of Justice, Civil Rights Division

- DOJ, DHS, HHS, and other Agencies: Guidance to State and Local Governments and Other Federally Assisted Recipients Engaged in Emergency Preparedness, Response, Mitigation, and Recovery Activities on Compliance with Title VI of the Civil Rights Act of 1964
- Tips and Tools for Reaching Limited English Proficient Communities in Emergency Preparedness, Response, and Recovery
- <u>LEP.gov</u> maintained by the Federal Coordination and Compliance Section in the Civil Rights Division
 - Translation and Interpretation Procurement Series (TIPS)
- Improving Access to Public Websites and Digital Services for Limited English Proficient
 Persons, Limited English Proficient Committee of the Federal Title VI Interagency Working
 Group

31

Links from slide:

https://www.justice.gov/crt/fcs/EmergenciesGuidance

https://www.justice.gov/crt/file/885391/download

https://www.lep.gov/

https://www.lep.gov/language-access-planning#toc-translation-and-interpretation-procurement-series-tips-

https://www.lep.gov/sites/lep/files/media/document/2021-12/2021 12 07 Website Language Access Guide 508.pdf



Contact Us

DHS Office for Civil Rights and Civil Liberties <u>TitleVILanguageAccess@hq.dhs.gov</u>

FEMA Office of Equal Rights
FEMA-EqualRights@fema.dhs.gov

HHS Office of Civil Rights
OCRMail@hhs.gov

Links from slide:

mailto:TitleVILanguageAccess@hq.dhs.gov

mailto:FEMA-EqualRights@fema.dhs.gov

mailto:OCRMail@hhs.gov