

U.S. Department of Homeland Security Office of the Citizenship and Immigration Services Ombudsman



Draft Language Access Plan

September 3, 2014

Table of Contents

Language Access Policy Statement.....	2
Interactions with the Public	2
Language Access Considerations in CISOMB Business Strategies and Objectives	2
Responsible Personnel/Offices and Oversight.....	3
Languages Frequently Encountered	3
Tracking of Frequently Encountered Languages	4
Projects: Implemented, Current, and Future	4
Employee Duties and Development.....	5
Training	5
Resources	5
Notice to LEP Persons	5
Procedures for Quality Control.....	6
Outreach to LEP Communities	6
Monitoring and Performance Measures	6
Acronyms	7

Language Access Policy Statement

The Office (CISOMB) confirms its commitment to following the DHS Policy on Language Access:

It is the policy of DHS to provide meaningful access for individuals with limited English proficiency to operations, services, activities, and programs that support each Homeland Security mission area by providing quality language assistance services in a timely manner. DHS Components, therefore, should 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.¹

All employees of CISOMB are covered by this Plan.

Public: The Language Access Policy Statement and the Language Access Plan will be posted to CISOMB's external website (www.dhs.gov/cisombudsman), linked to relevant translated materials, and disseminated to CISOMB's stakeholders electronically, in an accessible format that is Section 508 compliant.

Internal: The Language Access Policy Statement and the Language Access Plan will be posted to CISOMB's internal website and disseminated to all employees. The Department of Homeland Security Language Access Plan (February, 2012) was distributed to the workforce through the then Acting Chief of Mission Support, and is included in all new employee training materials.

Interactions with the Public

CISOMB regularly interacts with the public. CISOMB serves nearly 6,000 customers per year through individual case assistance, and provides information about relevant immigration issues to over 68,000 stakeholders through an annual conference, stakeholder meetings, webinars, teleconferences, and outreach materials such as brochures and posters.

Language Access Considerations in CISOMB Business Strategies and Objectives

CISOMB assists individuals and employers in resolving problems with U.S. Citizenship and Immigration Services (USCIS). USCIS is the component within DHS responsible for adjudicating immigration and citizenship benefits, ensuring the integrity of the nation's immigration system, as well as providing accurate and useful immigration information to its customers.

USCIS has 18,000 employees in 250 offices across the globe and adjudicates over a million petitions and applications each year. USCIS produces educational and outreach materials in

¹ <http://www.dhs.gov/xlibrary/assets/crcl/crcl-dhs-language-access-plan.pdf>

multiple languages and makes these translated materials publicly available on its website. USCIS also hosts public engagement sessions, and after first launching their national Spanish engagements, launched a series of engagement sessions in Chinese. Because USCIS regularly interacts with customers in languages other than English through interpreters and translated materials, some customers who may experience problems with their application or petition with USCIS may not know about how CISOMB can help. Accordingly, a comprehensive Language Access Plan is necessary to ensure meaningful access for CISOMB stakeholders and customers. CISOMB is committed to providing Limited English Proficiency (LEP) individuals its services.

Incorporation of language access considerations into CISOMB strategies and business objectives will be reviewed periodically in accordance with the CISOMB Language Access Plan.

The Ombudsman's Office shares information with stakeholders, employees, industry stakeholders, other federal agencies and the general public on a daily basis via the web, translated info-graphic materials (signage, flyers, etc.), video, and social media (including the DHS Blog, and if acquired, Twitter and Facebook). The office also interacts with several media outlets that represent a variety of languages.

Responsible Personnel/Offices and Oversight

The Chief of Special Programs, Director of Operations, Chief of Case Work, and the Public Affairs lead all serve on the Language Assistance Committee for CISOMB. The Public Affairs lead serves as the Language Access Coordinator for CISOMB, while the Director of Operations serves as the CISOMB Coordinator to the DHS Efficiency Review working group on Language Services Acquisition. The Language Access Committee is responsible for coordinating Language Access services.

The activities presented in the Language Access Plan will be implemented across CISOMB with the appropriate points of contact who can provide subject matter expertise, and the Language Access Committee will coordinate between these individuals.

CISOMB's Language Access Committee is responsible for developing and updating the CISOMB Language Access Plan on an annual basis.

Languages Frequently Encountered

CISOMB is working to identify the top ten most frequently encountered languages for CISOMB based on stakeholder feedback, U.S. Census statistics, CISOMB internal case statistics, and USCIS language priorities. CISOMB has identified the top three languages, which are Spanish, Chinese (Mandarin), and Vietnamese, respectively. When the top ten languages are identified, they will continue to be updated periodically.

Language Access is also being considered for those with disabilities who may also be limited English proficient.

Tracking of Frequently Encountered Languages

The following are the methods CISOMB uses to obtain and track information about currently available language services and encounters with persons who are limited English proficient.

CISOMB will begin tracking interactions with LEP persons by language, including the number of callers requesting phone assistance in any language other than English, website visits and downloads of CISOMB translated materials, and the number of times emails are received in another language. Due to the low volume of such calls at CISOMB, reports will be created manually on a quarterly basis, and will regularly evaluate options to automatically track this data.

CISOMB is also developing an initiative to collect data, including frequently encountered languages, through external surveys to our stakeholder network focusing on improvements to CISOMB case assistance.

Currently, CISOMB does not track the provision of language assistance services as an office. However, as CISOMB moves toward providing or supporting regular language services, CISOMB will create an appropriate tracking mechanism.

Projects: Implemented, Current, and Future

Language Access projects that have been implemented are as follows:

- In 2011, CISOMB first translated materials into Spanish.
- CISOMB currently provides an informational brochure and poster in Spanish, Chinese and Vietnamese.
- CISOMB's 2011 and 2012 Annual Report are both available in Spanish in print and in PDF. CISOMB's 2013 Annual report is available in Spanish and Chinese (Mandarin) in print and in PDF.
- On a case-by-case basis, CISOMB employees provide language services to those seeking case assistance.
- CISOMB provides a Spanish translation of FAQs regarding the case assistance process.

Language Access Projects that are currently in process:

- CISOMB is expanding the translation of outreach materials, case assistance information, the Annual Report and formal recommendations into Spanish, Chinese, Vietnamese and additional languages based on stakeholder feedback.
- CISOMB is coordinating an internal training to educate the workforce about Language Access.
- CISOMB will review outreach materials, case assistance information and other CISOMB policy materials for quality improvement and review purposes- ongoing.
- CISOMB will continue to track trends in data related to LEP stakeholders who contact the office, seek case assistance, and attend stakeholder events. Where there is an increase in frequency of calls, emails or case submissions in a specific language regarding a

certain topic, CISOMB will develop a plan to translate that item into the specific language.

- CISOMB will continue to assist customers in overcoming potential language barriers as needed.

Language Access Projects for Fiscal Year 2014 – 2016:

- CISOMB will post both the Language Access Statement and policy to the Department website (dhs.gov/cisombudsman) and intranet portals.
- CISOMB will disseminate the link to the agency's Language Access statement to stakeholder network.
- CISOMB will be developing protocols on how to identify persons needing language access and how to obtain the language services reasonably available.
- CISOMB will develop a plan to translate case assistance form into CISOMB/USCIS top 10 languages and post them to CISOMB's website.
- CISOMB will explore the provision of interpretation and translation services as a regular part of conducting programs and operations

Employee Duties and Development

Currently, there is no language requirement in any of CISOMB's job descriptions. CISOMB may begin assessing job descriptions after determining where the need for language requirements would be most beneficial, and to develop a strategic plan to address the need, as applicable.

Training

CISOMB will ensure that all of its employees receive training on language access responsibilities. An internal training will be the first step in providing the workforce information on the services available, how to identify a need for the services, and how to provide them to the public. New employees will also receive training on language access responsibilities.

Resources

CISOMB is participating in the DHS Efficiency Review Initiative on Language Services Acquisition, in which a cross-Component Integrated Project Team is developing a portfolio of vehicles to acquire language services, including a DHS-wide Blanket Purchase Agreement. The CISOMB Language Assistance Committee will be kept advised of any developments as the Language Access Working Group Coordinator also serves on the DHS Efficiency Review working group.

Notice to LEP Persons

CISOMB provides notice in the introductory message in the general email box that assistance is generally only available in English, but directs customers to translated CISOMB materials available online. This notice will be modified as CISOMB expands its use of language services.

Procedures for Quality Control

CISOMB measures quality control in translation contracting by requesting that the contractor conduct a quality assurance review of translations. The DHS Efficiency Review Initiative will also review quality control in contracting.

CISOMB's bilingual employees provide assistance on an ad-hoc basis, but internal procedures will be developed to establish a formal process in FY 2015.

Outreach to LEP Communities

CISOMB conducts extensive outreach throughout the year to a large stakeholder network through participation in site visits, roundtable discussions, trainings, conferences, webinars, and teleconferences. CISOMB will seek feedback from its stakeholder network for the purpose of assessing CISOMB's language services in all outreach activities.

CISOMB regularly hears issues and gathers important information and feedback from stakeholders about needed improvements to CISOMB's language services as well as those provided by USCIS. Information related to language access will be provided to CISOMB stakeholders to inform them of CISOMB's ongoing efforts to improve language services.

Monitoring and Performance Measures

There will be occasional internal surveys to monitor and evaluate the need for additional translation services for CISOMB. CISOMB will also be seeking public feedback, both positive and negative, as part of efforts to monitor language access.

Acronyms

ABA	American Bar Association
COR	Contracting Officer's Representative
CRCL	Office for Civil Rights and Civil Liberties
DHS	U.S. Department of Homeland Security
DOD	U.S. Department of Defense
FEMA	Federal Emergency Management Agency
ICE	U.S. Immigration and Customs Enforcement
IPT	Integrated Planning Team
IWG	Interagency Working Group
LEP	Limited English Proficiency
NSLI	National Security Language Initiative
NTAS	National Terrorism Advisory System
NVTC	National Virtual Translation Center
OPA	Office of Public Affairs
OPS	Office of Operations, Coordination, and Planning