ICE Language Access Plan

Supplemental Update Covering Fiscal Years 2019 and 2020

July 21, 2020

U.S. Immigration and Customs Enforcement

Message from the Director

July 21, 2020

I am pleased to share the U.S. Immigration and Customs Enforcement (ICE) Language Access Plan (LAP) Supplemental Update, covering fiscal years 2019 and 2020. This update will provide ICE employees with continued guidance on ensuring compliance with our critical responsibility to provide language access services to external stakeholders.

ICE protects America from the cross-border crime and illegal immigration that threaten national security and public safety. Under this mission and Executive Order (EO) 13166, *Improving Access to Services for Persons with Limited English Proficiency*, this supplemental plan has identified innovative ways to enhance accessibility for external stakeholders with limited English proficiency (LEP).

The LAP Supplemental Update sets forth the standards our agency's programs and activities follow in providing services to external stakeholders, including members of the public with LEP, such as visitors to detention centers, victims, witnesses, suspects of crimes, and detainees.

I am proud to acknowledge the excellent work of ICE employees in providing meaningful access for external stakeholders with LEP. By consistently evaluating and updating our agency's language access plans and policies, we continue to progress in providing individuals with meaningful access to programs and activities in a language they can understand.

Inquiries related to this Plan may be directed to the ICE Lead Disability Access Coordinator, Civil Liberties Division, Office of Diversity and Civil Rights at ICECivilLiberties@ice.dhs.gov.

No Private Right

These guidelines, which may be modified, superseded, or rescinded at any time, are not intended to, do not, and may not, be relied upon to create any right or benefit, substantive or procedural, enforceable at law by any party in any administrative, civil, or criminal matter.

Sincerely,

Matthew T. Albence
Deputy Director and Senior Official Performing the Duties of the Director
U. S. Immigration and Customs Enforcement

Table of Contents

I. BACKGROUND 1

II. PURPOSE 1

III. LANGUAGE ACCESS PLAN (LAP): EVALUATION AND UPDATES 2

A. ICE LANGUAGE ACCESS WORKING GROUP 2

B. EVALUATION TOOLS AND MECHANISMS: ICE SELF-ASSESSMENT SURVEY 2

1. Management and Administration and the Office of Diverstiy and Civil Rights 2
2. Homeland Security Investigations 3
3. Enforcement and Removal Operations 4
4. Office of Public Affairs 5
5. Office of Professional Responsibility 5

C. UPDATES ON ESTABLISHED PRIORITIES 5

1. Compliance with the DHS Prison Rape Elimination Act (PREA) Standards 5
2. Training, Technical Assistance, and Resources for Personnel 5
3. Language Access/Detention 6
4. Tracking 6
5. Quality Assurance 7
6. Notice to the Public 7

D. DEMOGRAPHIC ASSESSMENTS 7

E. NEW TECHNOLOGIES 9

F. LANGUAGE ACCESS PRIORITIES FOR FISCAL YEAR (FY) 2019 AND FY 2020 9

Appendix A: FY 2019 Top 10 Language by Volume of Requests 10

Appendix B: FY 2019 Tier 1 Language: Requests & Fulfillment Rate 11

Appendix C: FY 2019 Indigenous Languages Fulfillment Rates 12

I. BACKGROUND

On June 14, 2015, U.S. Immigration and Customs Enforcement (ICE) issued its Language Access Plan (LAP) to improve language access services for external stakeholders with limited English proficiency (LEP). The ICE LAP presents its strategy to provide timely and effective communication, which includes identifying and translating vital documents into the most frequently encountered languages, providing interpretive services where appropriate, and educating personnel about language access responsibilities and how to use language access resources. Each ICE Directorate and Program Office plays a vital role in carrying out the ICE LAP and providing language access services to external LEP stakeholders. This Supplemental Plan also provides updates to the work ICE has done to provide language access to date since the issuance of the ICE LAP.

On August 15, 2018, the Department of Homeland Security (DHS) Office for Civil Rights and Civil Liberties (CRCL) issued direction to the components to prepare supplemental updates to their LAPs, to include considering their Language Access Working Group, evaluation tools and mechanisms, demographic assessments, and new technologies.

ICE protects the United States from the cross-border crime and illegal immigration that threaten national security and public safety. Under this mission, ICE's programs and activities include identifying and apprehending removable aliens, detaining and removing aliens as necessary, investigating domestic and international activities involving the illegal movement of people and goods into and within the United States, and representing DHS in exclusion, deportation, and removal proceedings against aliens in immigration court and before the Board of Immigration Appeals. Additionally, many ICE personnel support the ICE mission through management, mission support, and conducting internal investigations and inspections. ICE is comprised of program offices within the Office of the Director (OD) and its four main Directorates:

- Homeland Security Investigations (HSI)
- Enforcement and Removal Operations (ERO)
- Management and Administration (M&A)
- Office of the Principal Legal Advisor (OPLA)

The OD is responsible for overseeing the Agency's operations and leadership and includes leadership offices such as the Office of Professional Responsibility (OPR), the Office of Public Affairs (OPA), and the Office of Diversity and Civil Rights (ODCR). ICE OPR is responsible for promoting public trust and confidence in ICE by ensuring organizational integrity. ICE OPA is responsible for building public understanding and support for the Agency's mission by engaging with news media, federal, state and local agencies, and non-governmental organizations. ICE ODCR, among other responsibilities, leads the Agency's efforts to enhance the language access services provided to ICE's external stakeholders and to assess programmatic compliance with ICE's established milestones and guidelines for augmenting language access.

II. PURPOSE

This Plan is a supplementary update to the 2015 ICE LAP and details ICE's ongoing language access programs and initiatives in accordance with Executive Order No. 13166, *Improving Access to Services for Persons with Limited English Proficiency*, (Aug. 11, 2000) (EO 13166). This supplementary plan provides an overview of how ICE is currently providing, or intends to provide, language access services to its external stakeholders who are LEP. Periodically evaluating and updating language

access plans, policies, and procedures will help ensure that ICE's language access initiatives are effective and in compliance with EO 13166. This supplement identifies possible gaps or barriers in language access services and areas in which enhancements to language services could be made.

III. ICE LAP: EVALUATION AND UPDATES

A. ICE LANGUAGE ACCESS WORKING GROUP

The ICE Language Access Working Group (LAWG) was formally established in fiscal year (FY) 2015 to assess language access at ICE and to assist with the development of the ICE LAP. The ICE LAWG has been used as a forum to facilitate each Directorate's self-assessment of its language services programs. The ICE LAWG consists of representatives from ICE's four Directorates—ERO, HSI, M&A, and OPLA—and from Program Offices such as ICE ODCR, ICE OPR, and ICE OPA, each of which has designated its own Language Access Coordinator (LAC). ICE ODCR has chaired the ICE LAWG and has served as its subject matter expert. Since 2015, the ICE LAWG has held, and will hold, periodic meetings to review and assess language access needs at ICE and services provided across the Agency.

B. EVALUATION TOOLS AND MECHANISMS: THE ICE SELF-ASSESSMENT SURVEY

In compliance with DHS CRCL direction, in FY 2018, ICE ODCR, in conjunction with the ICE LAWG designed unique self-assessment survey tools and asked that each Directorate LAC provide information regarding the Directorate's mission and language access program through a series of yes/no questions, check-box status queries, and a narrative portion. The self-assessment focused on addressing the following nine questions:

- What advancements have been made?
- What has ICE done compared to its stated objectives in the LAP?
- What goals have been met?
- What goals need to be re-assessed?
- What steps need to be taken to either meet those goals or to drop those goals?
- What does the data reveal with respect to the effectiveness of current language services being provided?
- What does the data show that needs improvement?
- What barriers and gaps remain?
- What opportunities for improving services remain?

Through the surveys, each Directorate was asked to review and analyze what it had accomplished since 2015; indicate progress on its priorities; and then reassess its future priorities. From June 6 to August 13, 2018, ODCR worked with the LACs for each Directorate and Program Office to complete these self-assessment surveys. The responses from the self-assessment survey tools were analyzed over a period of months and a summary is provided below.

1. <u>Management and Administration and the Office of Diversity and Civil Rights</u>

ICE M&A and ICE ODCR made strides in providing language access services from 2015 to the assessment in 2018. On August 13, 2015, ICE ODCR launched a Language Access Program Resource Page on ICE's intranet site. Since then, the ICE LAP Resource Page is periodically updated to provide resources to assist ICE personnel with interpretation, translation, transcription, and web localization services, as well as training and other

language access resources. Copies of the ICE and Directorate LAPs can also be found on this site. In September 2016, ICE ODCR, in partnership with the ICE LAWG, procured an ICE-wide language services contract for interpretation, translation, transcription services, and web localization. Through this contract, language services are available 24 hours a day, 7 days a week, and 365 days a year for ICE personnel and contractors.

ICE ODCR developed the ICE Language Access 101 training in the Agency's online learning system in FY 2017. This training was launched and required to be completed by all law enforcement officers (1801s and 1811s), managers, and supervisors by April 30, 2017. A total of 13,861 individuals completed it by the established deadline, resulting in a completion rate of 93 percent. The ICE Language Access 101 training is being revised (ICE Language Access 201) to provide additional training information and updates to the ICE workforce. Once completed, the ICE Language Access 201 training will be launched in the Agency's online learning system as a biennial requirement for all law enforcement officers (1801s and 1811s), managers, and supervisors. The ICE Language Access 201 training is currently projected to be developed for launch in late FY 2020.

2. Homeland Security Investigations

ICE HSI made significant advancements in providing language access services from 2015 to the assessment in 2018. ICE HSI's outreach to the public in non-English languages is a major accomplishment. ICE HSI Victim Assistant Specialists (VASs) use an ICE contract language provider for interpretation/translation during their interactions with persons who are LEP. They also facilitate connections between victims and non-governmental organizations (NGO) and community-based service providers to ensure that services are provided to victims who are LEP. Those NGOs or community-based service providers who interact with victims who are LEP provide their own language services.

ICE HSI continues to maintain Blue Campaign's informational brochures to combat human trafficking and outreach materials in multiple languages, including the following:

- Human Trafficking Tip Cards are available in Arabic, Bengali, Burmese, Chinese, English, French, Indonesian, Khmer, Korean, Laotian, Malay, Portuguese, Russian, Spanish, Taiwanese, Thai, and Vietnamese.
- The "Information for Trafficking Victims" brochure is available in English and Spanish.

HSI also continues to maintain information brochures and outreach materials in multiple languages on its Human Rights Violators and War Crimes Unit (HRVWCU) investigative program, such as:

- The "Human Rights Violators & War Crimes Unit Rwanda" brochure is available in English and French.
- The "Human Rights Violators & War Crimes Center" brochure is available in English, Arabic, Serbian/Bosnian/Croatian, and Spanish.
- The "Female Genital Mutilation is Child Abuse" informational flyer is available in English, French, Somali, and Arabic.

This HRVWCU literature provides the public with information on ICE HSI resources and programs, including information on how the public can report human rights violators and their crimes.

3. Enforcement and Removal Operations

ICE ERO has made great strides in providing language access services from 2015 to the assessment in 2018. ICE ERO created and disseminated, via broadcast to field office and facility staff, the *ERO Language Services Resource Flyer*, a user-friendly tool cataloguing available interpretation and translation resources and a one-page document of best practices for language assistance.

ICE ERO personnel can use language identification tools to determine a person's language, including the *I Speak Language Identification Guide* posters or booklets, the *I Speak Indigenous Language Identification* poster developed by DHS CRCL, and the Juvenile and Family Residential Management Unit's (JFRMU) *Intake Office Tool to Determine Indigenous Languages*, a Power Point presentation that asks listeners to raise their hand when their primary language is spoken. The presentation cycles through 12 indigenous languages that are spoken aloud. Family Residential Center (FRC) staff also use several procedures during the intake process to determine a resident's primary language and assess their understanding of the English language. These procedures include a standard script in Spanish and the above-referenced JFRMU intake PowerPoint covering twelve indigenous languages. When an indigenous speaker is identified, intake staff seek language assistance services. The individual's primary language is subsequently listed on their identification card to aid communication while they are at the FRC.

ICE ERO also updated its data systems to help identify LEP persons and their primary language(s) by coordinating with the Law Enforcement Systems and Analysis Division to include questions in the Enforcement Integrated Database Arrest Graphic User Interface for Law Enforcement interview screen that assists in identifying an individual's LEP status and capturing their primary language. During the interview process, if the LEP person responds "No" to questions regarding his/her ability to speak, read, write, or understand English, the officer is prompted to document the person's primary language.

ICE ERO translates its pertinent forms and vital materials into Spanish and other languages, including Albanian, Arabic, Chinese, French, Haitian Creole, Portuguese, Russian, Romanian, and Somali. Most of the ICE ERO-requested translations are for text from English to Spanish, but ICE ERO's two language services providers can also translate materials into more than 200 languages. The following is a selection of flyers and posters that ICE ERO has had translated into languages other than Spanish, including Punjabi and Haitian Creole: *Detention Reporting and Information Line* (DRIL) flyer; *ICE Release and Reporting Summary* flyer; *Medical Services Overview* flyer; and *Sexual Assault Reporting* flyer.

ICE ERO has also translated the *National Detainee Handbook* into ten languages, including Spanish, Hindi, Chinese, Portuguese, Haitian Creole, French, Arabic, Vietnamese, Punjabi, and Russian. These translations can be accessed on Detention Management Division's (DMD) internal ICE webpage. ICE ERO is coordinating further with DMD to re-advertise the availability of the multiple translations to Field Offices, as well as to determine the best way to make the handbook versions directly available to facility partners, who at this time cannot access

internal ICE webpages. ICE ERO will also continue to examine translating the handbook into other frequently encountered languages, as needed.

4. Office of Public Affairs

ICE OPA made strides in providing language assistance services from 2015 to the assessment in 2018. In 2016, ICE OPA hired a full-time Spanish language writer-editor to review all materials and to translate them into Spanish, as appropriate. To date, ICE OPA's most significant advancement is the launch of the official ICE Spanish website [1] and ICE Spanish Twitter account[2], which are updated several times a week by a Spanish proficient writer-editor.

5. Office of Professional Responsibility

ICE OPR made strides in providing languages access services from 2015 to the assessment in 2018. ICE OPR has designated Language Access Coordinators LACs as points of contact for employees to address questions, concerns, and challenges encountered with language services, as well as language access monitoring for their respective divisions. Furthermore, ICE OPR utilizes interpretation services during criminal and administrative interviews with detainees, Prison Rape Elimination Act (PREA) audits, detainee death reviews, and detention facility compliance inspections.

C. UPDATES ON ESTABLISHED PRIORITIES LISTED IN THE ICE LAP

1. Compliance with the DHS Prison Rape Elimination Act Standards

DHS PREA Standard 6 CFR § 115.16 and Section 2.11 of the ICE 2011 Performance - Based National Detention Standards (revised 2016) require accommodating detainees who are limited English proficient. ICE ERO annual inspections and other on-site and ongoing monitoring initiatives ensure continuous assessment of detention facilities' fulfillment of the language access obligations specified in ICE detention standards and the DHS PREA standards. In addition, the ICE OPR Prevention of Sexual Assault Coordinator conducts continuous reviews of ICE OPR PREA investigations to ensure that all relevant protocols are met. As of September 2019, ICE OPR also provides notification of its PREA audits in 12 languages, which facilities are required to post in every housing unit in advance of PREA audits.

2. Training, Technical Assistance, and Resources for Personnel

ICE provides training materials, technical assistance, and resources for ICE personnel on their language access responsibilities, identifying LEP persons (including persons with disabilities who communicate through sign language), accessing available language services, and working with interpreters.

- ICE ODCR provides language access materials pertaining to ICE, DHS, and other federal language access requirements on the ICE Language Access Resource internal web page.

[1] See https://www.ice.gov/es.
[2] See https://twitter.com/ICEespanol

- As appropriate, ICE ODCR provides supplemental information to the ICE workforce through various means of internal distribution, including *ICE Breaker*, a weekly messaging for ICE employees.
- ICE ERO provides translations, tools, and other language access materials on the ICE ERO Language Access Resource internal web page.

The ICE and ICE ERO Language Access Resource Pages contain the DHS *I Speak…Language Identification Guide* materials discussed above, as well as the resource flyer, *Working with Interpreters: Job Aid for DHS Employees* to assist ICE personnel in identifying the languages spoken by LEP persons encountered and interacting with interpreters.

3. Language Access/Detention

ICE ERO Custody Management takes the following steps to improve language access to its programs and services:

- All detention facilities, including Intergovernmental Government Service Agreement (IGSA) facilities, have access to all ICE ERO language services providers for interpretation services. In addition to providing the information on a case-by-case basis, ICE ERO confirmed the availability of ICE ERO interpretation resources to facility partners via a broadcast to field offices and instructed field offices to forward the Language Services Resource Flyer to facilities. ICE ERO also trained various ICE and ICE ERO office staff and designated Contracting Officer's Representatives on language access responsibilities under standards and the available resources.
- When necessary, additional language line service providers or interpretation methodologies are identified and utilized to meet ICE ERO's language access needs.
- DHS *I Speak Language Identification Guide* materials are visibly displayed to detainees and staff at all detention facilities.
- ICE ERO has created and disseminated various language access tools to ICE ERO staff. All tools are uploaded onto the ICE ERO Language Access Resources page, including the DHS *I Speak* booklet. ICE ERO staff also disseminates the booklets during site visits.[3]
- ICE ERO works continuously with ICE program offices, such as ICE ODCR, to explore other tools that may be helpful to staff.

4. Tracking

ODCR tracks and maintains data from the contract language services provider and US Citizenship and Immigration Services (USCIS) Language Services Section to monitor language usage throughout ICE. The data contains frequently encountered languages throughout ICE, including indigenous languages, and individual Directorate usage data. The data is analyzed to identify trends showing where and how language services are being used and to suggest where the availability of additional language services may be necessary. In FY 2020, ODCR is conducting data analyses to evaluate usage and to identify whether there is any need to augment the language services available, and if so, to identify alternative approaches to meeting those needs

[3] ICE ERO has not created quick reference language ID cards due to feedback from various Field Offices questioning the usefulness of ID cards and the need to optimize available resources.

5. Quality Assurance

- In FY 2020, ICE ODCR is creating a plan to assess complaints about language services.
- ICE HSI and ICE OPR test the foreign language proficiency of its staff participating in the Foreign Language Proficiency Award Program for non-bargaining ICE law enforcement officers.
- ICE OPR's Personnel Security Unit (PSU) continues to process clearances for the contract linguists to provide language services.
- In FY 2020, ICE OPA implemented a new quality assurance process. Designated points of contact from ICE HSI, ICE OPLA, and ICE attachés review translations and Spanish-language content produced by ICE OPA's writer-editor, a native speaker, about their respective offices before they are shared publicly. ICE OPA is currently working with ICE ERO to designate an internal reviewer of their domestic content.
- In FY 2020, ICE ODCR is exploring the possibility of creating a group to perform internal vetting of contractor produced translated documents.
- ICE ERO monitors the provision of language access services via several mechanisms, including internal and external stakeholder inquiries and field office requests, to ensure that meaningful access is provided to LEP persons.

6. Notice to the Public

ICE's commitment to providing meaningful language access to LEP external stakeholders is posted to ICE ODCR's public-facing website.[4] This notice is also available in Spanish on ODCR's public-facing Spanish website.[5]

D. DEMOGRAPHIC ASSESSMENTS

ICE ODCR tracks and analyzes data provided by ICE's two main language assistance providers; the contract language services provider, and U.S. Citizenship and Immigration Services (USCIS). ICE ODCR receives language usage data from the contract language services provider on a monthly basis and from USCIS annually and upon request. In FY 2020, ICE ODCR will work with USCIS to obtain language usage data on a monthly basis. The data is consolidated and analyzed to determine the top requested languages and to inform ICE of the Agency's strengths and areas for improvement. The appendices listed below provide key demographic data regarding language services provided by ICE in FY19.

Appendix A provides the top 10 languages requested through the primary language services provider in FY 2019. Similar data was not available from USCIS. As USCIS does not provide interpretation for indigenous languages, ICE relies solely on the contract language services provider for indigenous language interpretation and translation. The contract language service provider has maintained fulfillment rates greater than 90 percent for nine of the top 10 languages. The fulfillment rate is the percentage of calls completed with an interpreter in the requested language.

Appendix B provides the Tier 1 Language requests and fulfillment rate for the languages most requested in FY 2019. Tier 1 Languages are the most requested languages. Spanish, the most

[4] www.ice.gov/leadership/dcr
[5] https://www.ice.gov/es/direccion/diversidad-derechos-civiles

requested language, had a 97 percent fulfillment rate. There was a fulfillment rate above 77 percent for 15 of 18 languages in Tier 1.

Appendix C presents the indigenous languages that were requested in FY 2019 and the fulfillment rate. Of the languages presented, only two indigenous languages (Quiche and Mam) exceeded a fulfillment rate of 50 percent. With 329 requests, Mam was the most requested language. Qu'iche ranked second with 328 requests, and Konjobal ranks third with 145 requests.

To assist in meeting the demands of the two most requested indigenous languages, Qu'iche and M'am, ICE ERO worked with the contract language services provider to establish dedicated shifts to ensure the availability of linguists during the specified timeframes:

- M'am: 10:00am - 2:00pm EST (Mondays - Fridays)
- Qu'iche: 9:00am - 4:00pm EST (Mondays - Saturdays)

Indigenous Languages

Ensuring meaningful access for LEP persons who speak indigenous languages remains a priority for ICE. All linguists under the contract are required to receive clearance by ICE's OPR PSU. Since FY 2017, ICE has continually worked with the contract language services provider and the OPR PSU to identify, recruit, clear, and employ linguists with fluency in indigenous languages. While efforts to recruit indigenous speakers have increased, the challenge remains in locating individuals who are English proficient and who comply with the ICE clearance requirements, including citizenship requirements. Despite their recruitment efforts, ICE and the contract language services provider have been unable to identify enough indigenous linguists to meet the current need who comply with the ICE clearance requirements. As a result, ICE's ability to fulfill the requests for indigenous language services remains limited. In FY 2019, the top 10 most requested indigenous languages for interpretation services were:

1. M'am
2. Qu'iche
3. Konjobal
4. Quichua, Chimborazo Highland
5. Kekchi
6. Ixil
7. Quichua, Canar Highland
8. Chuj, San Sebastian Coatán
9. Acateco
10. Quichua, Salasaca Highland

Additionally, ICE ERO has created and/or disseminated tools to assist in identifying individuals who are limited English proficient, including those who speak indigenous languages, and to provide them with meaningful access to ICE's programs and services. These tools include the PowerPoint resource titled *Intake Office Tool to Determine Indigenous Languages* and the DHS *I Speak Indigenous Language Identification* poster.

E. NEW TECHNOLOGIES

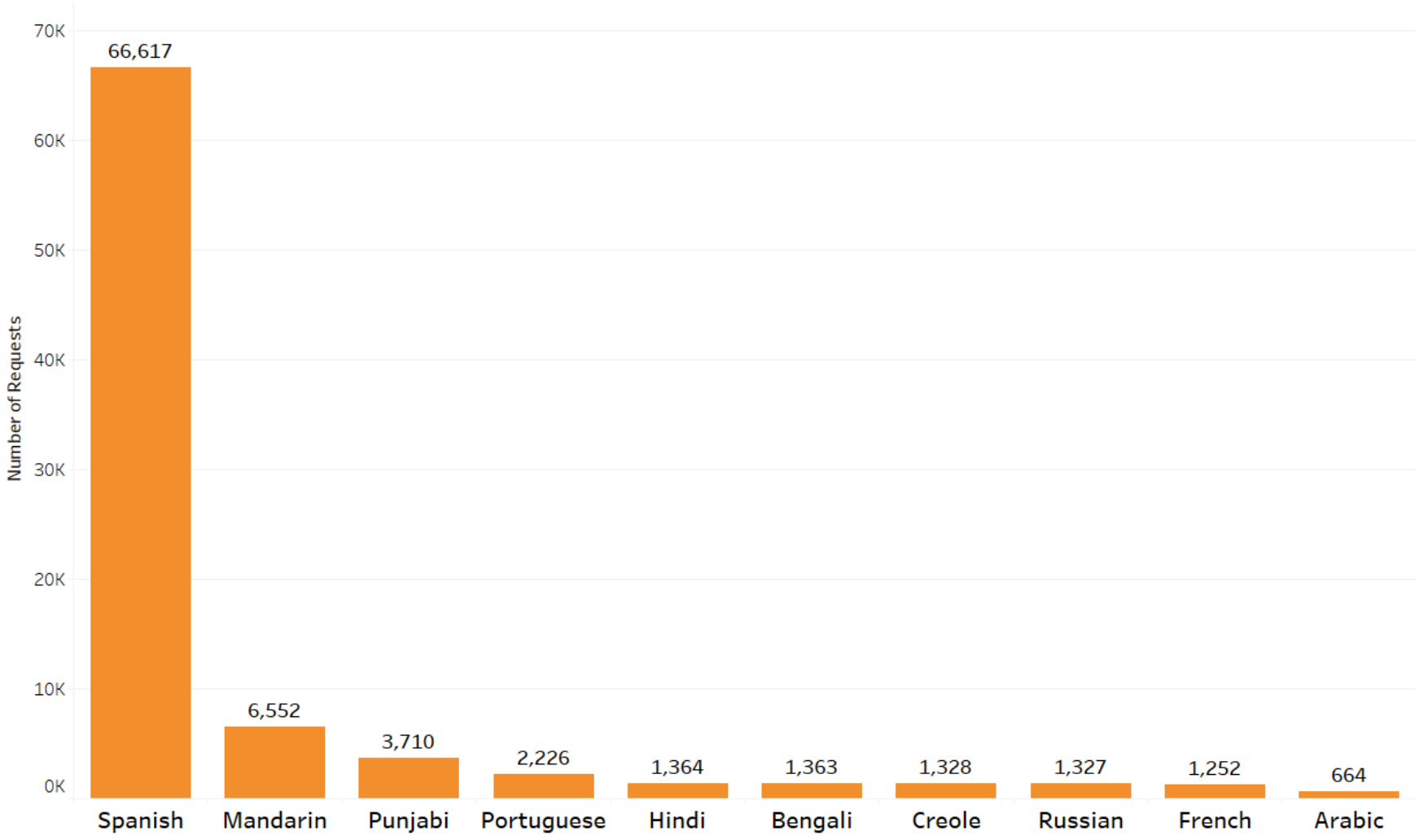
ICE ODCR will consider the feasibility of implementation and use of neural network machine language applications for interpretation and translation services. Neural machine translation is an approach to machine translation that uses an artificial neural network to predict the likelihood of a sequence of words, typically modeling entire sentences in a single integrated model. New technological development has significantly improved the efficiency and accuracy of the translated information. ICE ODCR will begin assessing this new technology in FY 2020 to determine whether it may provide a viable supplement to meeting ICE's language service needs.

F. LANGUAGE ACCESS PRIORITIES

- ODCR will continue to collaborate with the directorates and program offices to monitor progress and document completion of the LAP priorities.
- ODCR will continue to explore ways to increase the availability of indigenous language-speaking linguists and has informed USCIS of the need for indigenous language linguists. ODCR continually reviews language usage data to identify gaps in coverage and works with USCIS and the contract language assistance provider to ensure that appropriate coverage is available to meet ICE's needs. Should there be a need for additional linguists, ICE will work with the language assistance providers to recruit additional linguists and with ICE OPR's PSU to initiate the security clearance process and expedite clearances, if necessary, for exigent circumstances.
- ICE ERO will evaluate the possible benefits of testing the foreign language proficiency of ICE bilingual or multilingual staff and explore ways to identify and leverage the languages they speak.
- ICE ODCR will develop the next generation ICE Language Access 201 Training for ICE staff that interact with external stakeholders who are LEP.
- ICE ODCR will collaborate with the Office of Leadership and Career Development and ICE ERO to explore the incorporation of language access training into ICE courses at the Federal Law Enforcement Training Center (FLETC) at Glynco, Georgia, and other FLETC campuses.
- ICE HSI is reassessing the process by which the ICE HSI Victim Assistance Program can provide consistent technical assistance and training to ICE HSI Victim Specialists and Coordinators working with the DHS Blue Campaign to develop language accessible campaign materials, such as awareness trainings, and to look for ways to improve the efficiency and effectiveness of its human trafficking indicator cards.

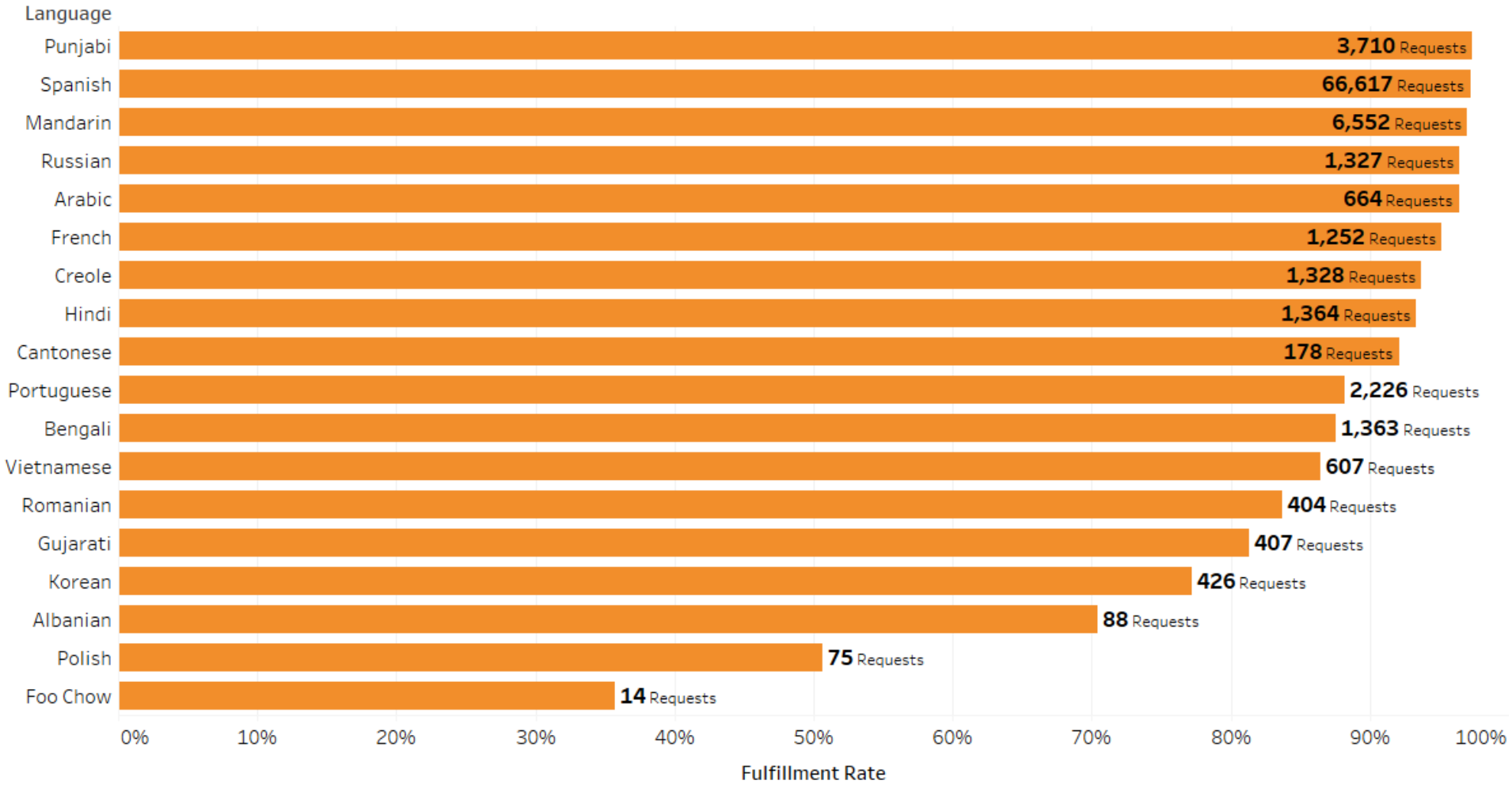
Appendix A

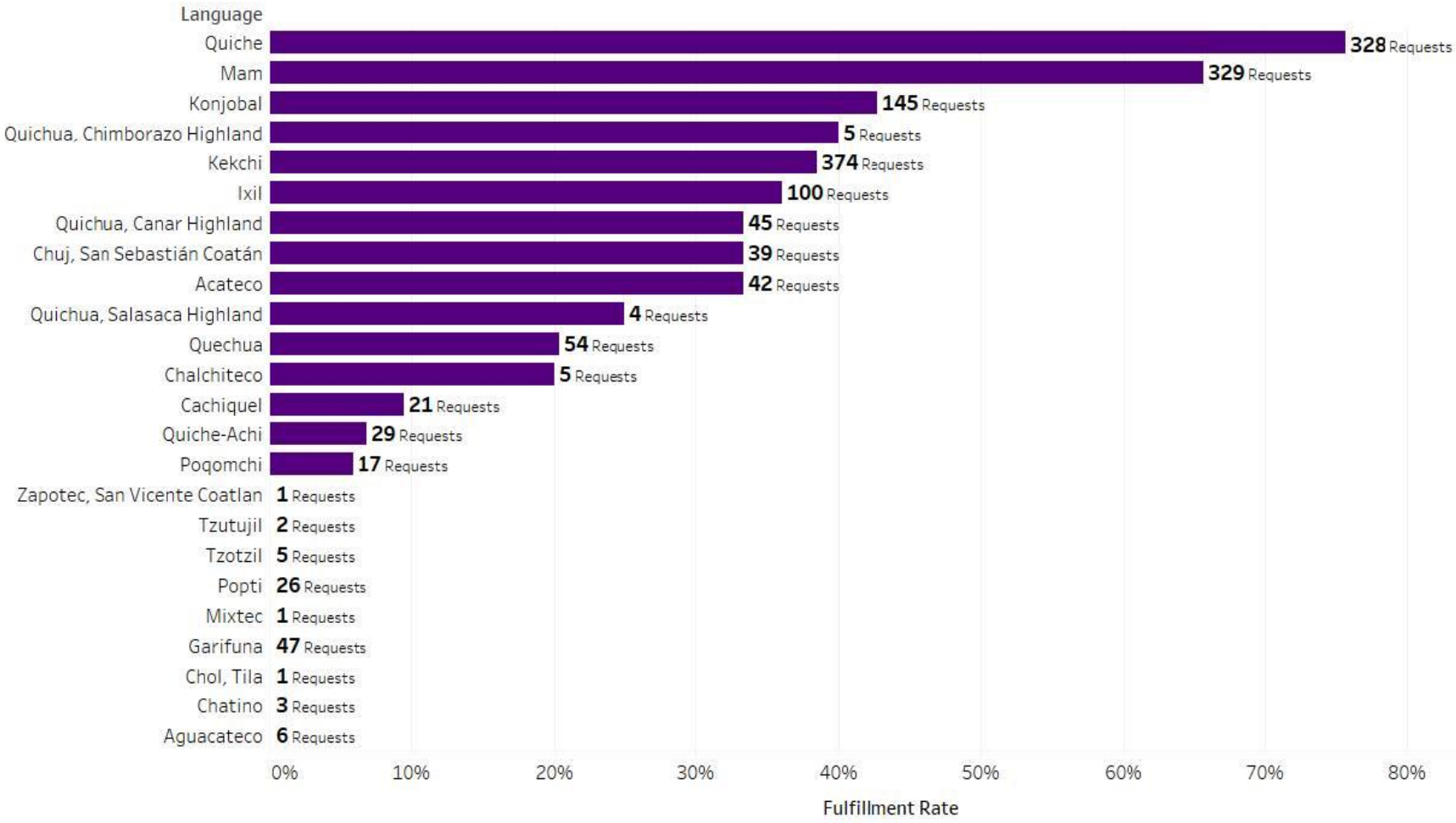
FY 2019 Top 10 Languages by Volume of Requests



Appendix B

FY 2019 Tier 1 Languages: Requests & Fulfillment Rate



Appendix C

FY 2019 Indigenous Languages Fulfillment Rates