



# Language Access Plan

**Publication: September 2022** 

**Cybersecurity and Infrastructure Security Agency** 

# **Table of Contents**

Purpose	3
Introduction	
Scope	
Key Terms	
Policy	
Roles and Responsibilities	
LAP Task Force	
Language Services Needs	
LEP Communities Served or Encountered	
Procedures and Prioritization	6
Internal Communications	7
Training	7
External Outreach and Notice	7
Monitoring, Tracking, and Quality Control	8
Accomplishments	8

# **PURPOSE**

The purpose of this language access plan (LAP) is to establish policy and provide guidance for developing and implementing reasonable efforts to eliminate or reduce barriers to persons with limited English proficiency (LEP) to accessing Cybersecurity and Infrastructure Security Agency resources, services, activities, or events as required by Executive Order (EO) 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000). Executive Order 13166 requires, among other things, that each Federal agency "examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency." Executive Order 13166 has two fundamental goals: nondiscrimination and effective government for everyone.

# INTRODUCTION

CISA works with partners to defend against today's threats and collaborates to build a more secure and resilient infrastructure for the future. CISA's mission is to lead the National effort to understand, manage, and reduce risk to our cyber and physical infrastructure. CISA connects our stakeholders in industry and government to each other and to resources, analyses, and tools to help them build their own cyber, communications, and physical security and resilience, in turn helping to ensure a secure and resilient infrastructure for the American people. Additionally, CISA is committed to providing meaningful communication to all persons, including LEP persons who seek to access or participate in agency programs and activities.

#### **SCOPE**

CISA's commitment to language access extends to programs and activities directly conducted by CISA and those conducted by its contractors and grant recipients.

#### **KEY TERMS**

The following are terms associated with the goals of CISA LAP and its implementation:

- Interpretation and Translation: Interpretation involves oral communication. Translation involves written 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. Interpreting is a complex task that combines several abilities beyond language competence to enable delivery of an effective professional interpretation in each 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, dialect, 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.
- **Limited English Proficient Persons**: Persons who do not speak English as their primary language and who have a limited ability to read, speak, write, and/or understand English.<sup>1</sup>
- Bilingual Persons: 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 mere 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 to be fluently bilingual and require additional

<sup>&</sup>lt;sup>1</sup> Please see Commonly Asked Questions | LEP.gov.

specific skills as previously described in 'Interpretation and Translation.'

# **POLICY**

CISA follows the policy in the DHS Language Access Plan and adopts the following CISA specific policy. Its intent is to provide meaningful access for LEP individuals to operations, services, activities, and programs by providing quality language assistance services in a timely manner. CISA divisions, offices, and program units 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 as required by the EO 13166 and in accordance with guidance provided by the Department of Homeland Security (DHS) Language Access Plan. In this regard, the primary goal of this policy is to provide meaningful access to CISA resources and services and maintain compliance with civil rights laws by communicating effectively with LEP individuals in languages other than English.

# **ROLES AND RESPONSIBILITIES**

The CISA Chief Privacy Officer (CPO) is responsible for the strategic direction of the CISA language access program. Within the Office of the Chief Privacy Officer (OCPO), the Associate Chief for External Civil Rights and Civil Liberties (ECRCL), is responsible for the management of the language access program and designating a Language Access Project Manager/Coordinator.

The Language Access

Project Manager/Coordinator will be responsible for assessing CISA's language access and support needs, leveraging agency-wide best practices to enhance and update the LAP, coordinating across CISA to implement the plan, monitoring implementation, and ensuring compliance with law and policy. The Language Access Project Manager/Coordinator will also participate in the DHS Language Access Working Group and lead the CISA LAP Task Force (TF).

#### LAP TASK FORCE

CISA has established a LAP TF to develop a CISA-wide LAP. The LAP will set forth the standards, principles, and guidelines that CISA will use to continue to provide and improve meaningful access for LEP persons in the Agency's operations, services, activities, and programs.

# LANGUAGE SERVICES NEEDS

Historically, CISA has leveraged partial language services specific to individual programs or has leveraged the services established by other DHS entities to translate particular documents. These services have supported the translation of educational and outreach materials regarding cybersecurity and infrastructure materials on a limited basis, for only the most critical materials. CISA has identified a need to unify translation services across CISA, to ensure all CISA resources and materials are available in languages other than English and establish policy and procedure to ensure compliance with language access requirements. Further, CISA has identified a critical need for interpreter services across various divisions and offices, which is a complex function that may require a combination of contract services and in-house CISA workforce language ability.

CISA interacts and communicates with the public in a variety of ways. These include awareness programs, educational resources, and regional services for physical security, cyber security, and emergency communications. CISA also offers tailored resources for school safety and security and places of worship safety and security.

Fundamental to CISA's mission are awareness and education programs. For example, a few of the awareness programs that may further benefit from expanded language access services include but are not limited to:

- Power of Hello: This awareness program promotes employee vigilance through the "Power of Hello."
   Simply saying "Hello" can prompt a casual conversation with unknown individuals and help determine
   why they are there. This program uses the OHNO approach Observe, Initiate a Hello, Navigate the
   Risk, and Obtain Help to help employees across various industries observe and evaluate suspicious
   behaviors, mitigate potential risk, and obtain help when necessary.
- The War on Pineapple: This infographic, a tongue-in-cheek approach to putting pineapple on pizza, examines how foreign adversaries conduct malign information operations to inflame hot button issues in the United States.
- National Cybersecurity Awareness Month: Cybersecurity Awareness Month—previously known as
   National Cybersecurity Awareness Month continues to raise awareness about the importance of
   cybersecurity across our Nation, ensuring that all Americans have the resources they need to be safer
   and more secure online. Resources provided during this annual awareness campaign are invaluable
   tools for reducing cybersecurity risks and protecting individuals online. The resources can be used by
   stakeholders in their communities and shared with partners throughout the year to encourage strong,
   nationwide cybersecurity.
- National Critical Infrastructure Security and Resilience Month: National Critical Infrastructure Security
  and Resilience Month reinforces the importance of critical infrastructure to America's homeland
  security and economic prosperity and reiterates the Department's commitment to keep our critical
  infrastructure, and the communities that depend on them, safe and secure. Resources provided in
  this campaign are invaluable resources for reducing critical infrastructure risks and increasing security
  and resilience.

Some of the services CISA provides for federal, state, local, tribal and territorial governments, as well as public and private sector critical infrastructure organizations, include but are not limited to:

- Cyber hygiene services.
- Cyber and physical vulnerability assessments.
- Architecture review and design subject matter expertise.
- Incident response support.
- Exercise planning and support.
- National Special Security Event planning and support.
- Chemical facility inspections and site security planning to implement Chemical Facility Anti-Terrorism Standards.

For additional information about CISA services, please visit the CISA Services Catalog at <a href="https://www.cisa.gov/publication/cisa-services-catalog">https://www.cisa.gov/publication/cisa-services-catalog</a>. The CISA Services Catalog provides centralized information on services across all of CISA's mission areas that are available to Federal Government; State, Local, Tribal and Territorial Government; Private Industry; Academia; and NGO and Non-Profit stakeholders.

CISA engages with stakeholders directly to provide these services through regional offices across the country. Local and regional Protective Security Advisors (PSAs), Cybersecurity Advisors (CSAs), Emergency Communications Division Coordinators, and other CISA personnel advise and assist in training and exercising best practices to support our partners in achieving more robust resilience. This type of collaboration with public

and private sector partners would greatly benefit from interpretation services. CISA also plans to assess language access services that may continue to bolster engagement with Indigenous and Tribal communities in furtherance of CISA's many diversity, equity, inclusion, and accessibility (DEIA) initiatives for underserved communities.

CISA also facilitates information sharing between public and private sector critical infrastructure partners to improve situational awareness of cybersecurity risks, incidents, and mitigation options.

# LEP COMMUNITIES SERVED OR ENCOUNTERED

In order to identify language of critical importance to the CISA mission, CISA referenced internal feedback as well as the Pew Research Center tabulations of the 2017 American Community Survey. CISA has initially identified Spanish and Chinese (Simplified and Traditional), as two languages of critical importance to the mission because they are the most common languages used in the United States other than English.<sup>2</sup>

CISA has also initially identified several other languages that may broaden the reach of CISA services and resources. These include but are not limited to Hindi and related languages (includes Urdu and Bengali), Filipino/Tagalog, French, Vietnamese, and the Dravidian family of languages (includes Telugu, Tamil, Malayalam, and Kannada).<sup>3</sup> Please note, this is not an exhaustive list. CISA acknowledges that in the context of language access, especially regarding interpretation services, a variety of languages and dialects may be essential. CISA also plans to examine considerations regarding language needs of indigenous and rare language speakers.

As CISA continues to develop prioritization procedures, CISA will leverage four factors of analysis to assess meaningful access needs. These include:

- Number or proportion of LEP individuals encountered or likely to be encountered.
- Frequency of contact with LEP individuals.
- Nature and importance of the program, activity or service provided.
- Resources available and costs to provide the meaningful access.

While many individuals who communicate using American Sign Language are not LEP, CISA is also committed to making its programs and services accessible to persons who are deaf and hard of hearing through ASL and other aids and services.<sup>4</sup>

#### PROCEDURES AND PRIORITIZATION

CISA continues to assess which additional vital documents should be translated and what interpretation services are needed based on input from internal and external stakeholders. CISA acknowledges that language access priorities may be subject to change and language access surges may occur. CISA plans to examine mechanisms to efficiently augment language capacity in a surge or sudden change in demographics.

The LAP TF will establish internal language access policies and procedures in alignment with DHS language access policy and Executive Order 13166. The LAP policy and procedures will provide a framework for CISA's access initiatives and activities to build trust and working relationships with diverse populations and promote

<sup>&</sup>lt;sup>2</sup> Please see <a href="https://www.pewresearch.org/hispanic/chart/immigrant-statistical-portrait-languages-spoken-among-u-s-immigrants/">https://www.pewresearch.org/hispanic/chart/immigrant-statistical-portrait-languages-spoken-among-u-s-immigrants/</a> for additional information.

<sup>&</sup>lt;sup>3</sup> Please see <a href="https://www.pewresearch.org/hispanic/chart/immigrant-statistical-portrait-languages-spoken-among-u-s-immigrants/for additional information">https://www.pewresearch.org/hispanic/chart/immigrant-statistical-portrait-languages-spoken-among-u-s-immigrants/for additional information</a>.

<sup>&</sup>lt;sup>4</sup> Please see <u>eCFR</u>:: 6 CFR Part 15 – Enforcement of Nondiscrimination on the Basis of Disability in Programs or Activities <u>Conducted by the Department of Homeland Security.</u>

community engagement.

The LAP TF will assess language service needs, share best practices, establish CISA-wide language services and technologies. The TF will also disseminate information on language services and technologies as well as the appropriate use of these services and technologies.

CISA will gather feedback through the LAP TF, internal data calls and assessments, and stakeholder engagement to identify language access needs across CISA. CISA will use this feedback to tailor the strategic priorities for language access services.

CISA is developing language access procedures for personnel likely to have contact with the public. These procedures will provide a framework to identify LEP contact situations, determine the primary language of LEP individuals, and effectively utilize available options to assist in interpersonal electronic, print, and other methods of communication between CISA and LEP individuals.

# INTERNAL COMMUNICATIONS

Once finalized, the language access procedures will be available to all CISA employees via the internal intranet page. CISA will also share the LAP and associated language access procedures through CISA Vision, a regularly circulated internal e-newsletter featuring resources for employees including updates on training, professional development and other CISA and DHS-related news.

# **TRAINING**

To ensure that CISA's LEP language assistance policy is followed, CISA will periodically train employees who interact with the public. Training will support the CISA workforce in understanding translation request procedures and the dynamics of interpretation. Further, the training will ensure that employees are knowledgeable and aware of all LEP policies, understand language access resources available, and are prepared to work effectively with the public as well as translation and interpretation providers.

# **EXTERNAL OUTREACH AND NOTICE**

CISA, in coordination with DHS Office for Civil Rights and Civil Liberties (CRCL) will continue to engage with various community and civil society organizations, including those representing LEP communities. CISA has also established a ECRCL program within OCPO. The ECRCL program, among other objectives, will aim to promote inclusion of diverse populations in CISA programs and activities as well as ensure that LEP communities have equal access to the services and resources provided by CISA.

CISA is considering a variety of options to make LEP individuals aware of translation and interpretation services, including but not limited to:

- Posting notices at regional offices, in languages other than English, of the availability of staff interpreters or contractor services with trained and competent interpreters.
- Use of language identification cards which allow LEP stakeholders to identify their language needs to CISA staff and for staff to identify the language needs of stakeholders.
- Inclusion of statements about the services available and free language assistance services, in non-English languages, in brochures, booklets, and outreach information and other materials that are routinely disseminated to the public.
- The development of a language access resource page on <a href="https://www.cisa.gov">https://www.cisa.gov</a> and links to translated content where appropriate.

# MONITORING, TRACKING, AND QUALITY CONTROL

CISA plans to conduct periodic reviews of language services to ensure they are compliant with all applicable laws and policies. Quality assurance metrics are being developed and will be implemented to ensure accuracy and effectiveness of language interpreters and translators.

CISA will assess ways to obtain direct feedback from LEP stakeholders. The use of direct feedback may enable CISA to improve translations and better meet the needs of stakeholders over time. This information may also assist CISA in updating its language access guidance plans and policies and in its compliance with Executive Order 13166.

In the future, CISA also plans to develop administrative procedures to formalize intake and record keeping processes for language services requests across CISA to facilitate an effective, efficient, and trackable process. CISA plans to review and update, as needed, the LAP every two years.

# **ACCOMPLISHMENTS**

In FY 2022, CISA developed its first written LAP. CISA also stood up a LAP TF to further develop internal policy and procedure regarding language access.

Additionally, CISA has made significant progress in the translation of public-facing resources for diverse stakeholders. For example:

- CISA has translated a series of materials to assist businesses, government offices, schools, and communities in preparing for and responding to an active shooter incident. These resources include a detailed booklet, a desk reference guide, a reference poster, a pocket-size reference card, and a Power of Hello Placemat that have been translated into 17 different languages: Arabic, Chinese (Simplified and Traditional), English, Hindi, Hmong, Japanese, Khmer, Korean, Punjabi, Russian, Somali, Spanish, Tagalog, Urdu, and Vietnamese.
- CISA has translated Cybersecurity Awareness Month publications. The publications have been translated into Spanish, French, Arabic, Portuguese, and Traditional Chinese.
- As of FY2022, CISA has also begun translating materials in the Mis-, Dis-, and Malinformation Resource Library into Spanish. This library provides voluntary resources that individuals; State, local, tribal and territorial (SLTT) governments; the private sector; academia; and others can use to understand the threat of malicious information activities and includes actions to mitigate associated risks from mis-, dis-, and malinformation (MDM) and foreign influence activities.