

U.S. Department of Homeland Security

Office of the Citizenship and Immigration Services Ombudsman



Language Access Plan

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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 planning in order to 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 Plan will be posted to CISOMB's internal website and disseminated to all employees. It will be included in all new employee training materials.

Interactions with the Public

CISOMB regularly interacts with the public. CISOMB provided case assistance to over 7,555 individuals and employers in the 2015 reporting year and 9,448 in the 2016 reporting period (April 1 to March 31). Furthermore, CISOMB provides information about relevant immigration issues to over 88,000 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 Special Advisor for Public Engagement, Acting Assistance Chief of Casework, and two Immigration Law Analysts serve on the Language Assistance Committee for CISOMB. The Special Advisor for Public Engagement serves as the Language Access Coordinator and DHS Plain Writing Coordinator for CISOMB. Additional representatives may be designated to serve on the Language Access Committee. The Language Access Committee will meet quarterly and 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 that can provide subject matter expertise, and the Language Access Committee will coordinate between these individuals.

CISOMB's Language Access Committee is responsible for developing, evaluating, and updating the CISOMB Language Access Plan as necessary 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, but the office is exploring mechanisms to track the needs of LEP customers through its online case management system and will continue to identify opportunities to improve in this area. As CISOMB moves toward providing or supporting regular language services, CISOMB will create an appropriate tracking mechanism by FY 2017.

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, Mandarin, and Vietnamese.
- CISOMB's 2011 and 2012 Annual Report are both available in Spanish in print and in PDF. CISOMB's 2013 and 2014 Annual report is available in Spanish and 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.
- In 2015, CISOMB 2015 Executive Summary is available in Spanish, Mandarin, and Arabic.
- In 2016, CISOMB participated in its first Spanish engagement.

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 a mandatory yearly internal training to educate personnel about Language Access. CISOMB is also requiring mandatory introductory LEP training for all new employees.
- CISOMB will review outreach materials, case assistance information, and other CISOMB policy materials for quality improvement and review purposes.
- CISOMB will continue to track trends in data related to LEP stakeholders who contact

the office, seek case assistance, and attend stakeholder events. In 2016, CISOMB will develop a plan to translate remaining resources into the top three languages identified by the Office.

- CISOMB will continue to assist customers in overcoming potential language barriers as needed and will share information about free or *pro bono* translation resources in response to LEP inquiries when CISOMB translation services are unavailable.

Language Access Projects for Fiscal Year 2014 – 2017:

- 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 develop a plan to encourage participation from LEP communities through stakeholder engagements and social media.
- CISOMB will be developing protocols on how to identify persons needing language access and how to obtain the language services reasonably available.
- CISOMB will translate case assistance instructions into CISOMB/USCIS top three languages and post them to CISOMB's website by FY 2017.
- CISOMB will explore the provision of interpretation and translation services as a regular part of conducting programs and operations.
- CISOMB will expand public engagement focused on LEP communities and will conduct at least one yearly outreach engagement in another language.

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 annual internal training will be a required 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.

We encourage stakeholders to contact CISOMB about language access at cisombudsman.publicaffairs@hq.dhs.gov.

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