



# **Cybersecurity & Infrastructure Security Agency (CISA) Language Access Plan**

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# 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 access Cybersecurity and Infrastructure Security Agency (CISA) 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). EO 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." EO 13166 has two fundamental goals: nondiscrimination and effective government for everyone. This plan supersedes CISA's Language Access Plan issued on December 7, 2022.

# **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 access to all persons, including LEP persons who seek to access or participate in agency programs and activities.

#### **SCOPE**

CISA's commitment to meaningful 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 the CISA LAP and its implementation:

- **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 a LEP individual in their language, but not conduct agency business in that language. Interpretation and translation require the interpreter to be fluently bilingual and require additional specific skills as described in Interpretation and Translation.
- **Direct In-Language Communication:** Monolingual communication in a language other than English between a bilingual or multilingual staff person and person who is LEP (e.g., Korean to Korean).
- Interpretation and Translation: Interpretation involves oral and/or signed communication. Translation involves written communication. Interpretation involves the immediate

communication of meaning from one language into another. An interpreter conveys meaning orally/manually; 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/manually, 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 subjectmatter language.

- **Meaningful Access**: Meaningful access is the provision of language assistance services that results in accurate, timely, and effective communication at no cost to the person who is LEP. For individuals who are LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.
- Persons who are Limited English Proficient: Persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. Individuals who are LEP may be competent in English for certain types of communication (e.g., speaking or understanding), but have limited proficiency in English in other areas (e.g., reading or writing). LEP designations are also context-specific; an individual may possess sufficient English language skills to function in one setting, but these skills may be insufficient in other settings.
- **Primary Language:** An individual's primary language is the language in which an individual most effectively communicates.
- Sight Translation: Sight translation is the oral/signed rendering of written text into spoken/signed language by an interpreter without change in meaning based on a visual review of the original text or document.
- **Tagline:** Taglines are short statements written in non-English languages that indicate the availability of language assistance services free of charge.
- Vital Document: Vital documents are documents that contain information that is critical for obtaining any aid, benefit, or services or is required by law. Vital documents can include, but are not limited to, applications; consent and other forms that require signatures; complaint forms; notices of rights; notices on the availability of free language assistance; and letters or notices that require a response from the beneficiary, customer, or noncitizen.

#### POLICY

CISA follows the policy in the Department of Homeland Security (DHS) LAP1 and adopts the following

<sup>&</sup>lt;sup>1</sup> Updated DHS Language Access Plan (2023).

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<sup>2</sup> in a timely manner. CISA divisions, mission enabling offices (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,<sup>3</sup> and educate personnel about language access responsibilities and how to utilize available language access resources as required by EO 13166 and in accordance with guidance provided by the DHS LAP. 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. CISA is in the process of developing a CISA Directive that covers this policy.

# **ROLES AND RESPONSIBILITIES**

The CISA Office of Privacy, Access, Civil Liberties, and Transparency (PACT) is responsible for the strategic direction of the CISA language access program. Within PACT, 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 Coordinator.

CISA's Language Access Coordinator on-boarded in December 2023. They are 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 Coordinator also participates in the DHS Language Access Working Group and leads 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 AND RESOURCES

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 is in the process of developing internal policy and procedure to ensure compliance with language access requirements, including quality control procedures to ensure competency levels of both

<sup>&</sup>lt;sup>2</sup> Quality language services are language services that provide accurate, timely, and effective communication to the persons who are LEP.

<sup>&</sup>lt;sup>3</sup> Minors may not be used for providing interpreter or other language services in CISA programs and activities except in rare circumstances (e.g., exigent circumstances involving life and safety and only until such time as a qualified language service provider can be secured).

contractors and in-house CISA workforce. CISA has also begun unifying translation services across CISA to ensure CISA resources and materials are available in languages other than English. 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 members who are qualified to use their language abilities for interpretation.

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 CISA leads 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.
- 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.

For additional information about CISA services, please visit the CISA Services Catalog at <u>https://www.cisa.gov/publication/cisa-services-catalog</u>. The CISA Services Catalog provides centralized information on services across all CISA's mission areas that are available to federal government; state, local, tribal and territorial government; private industry; academia; and non-governmental organizations 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, Cybersecurity Advisors, 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 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

To identify languages 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>4</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, Korean, Vietnamese, and the Dravidian family of languages (includes Telugu, Tamil, Malayalam, and Kannada).<sup>5</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 continue to assess language needs of indigenous and rare language speakers who may interact with CISA.

As CISA continues to develop prioritization procedures, CISA will leverage four factors of analysis,

<sup>&</sup>lt;sup>4</sup> Please see <u>https://www.pewresearch.org/hispanic/chart/immigrant-statistical-portrait-languages-spoken-among-u-s-immigrants/</u> for additional information.

<sup>&</sup>lt;sup>5</sup> Please see <u>https://www.pewresearch.org/hispanic/chart/immigrant-statistical-portrait-languages-spoken-among-u-s-immigrants/</u> for additional information.

outlined in the DHS Recipient Guidance<sup>6</sup> and other federal agency guidance, 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 (ASL) are not LEP, CISA is also committed to making its programs and services accessible to persons with disabilities, including those who are deaf and hard of hearing through ASL and other aids and services.<sup>7</sup> Additionally, CISA follows federal Section 508 accessibility and plain language guidelines when developing materials that are intended for the public. The use of plain language enhances accessibility and understanding for persons who speak English and helps to ensure that translated materials convey information in a clear and concise manner.

# **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.

CISA PACT, in coordination with the CISA Office of Strategy, Policy and Plans and the LAP TF is developing language access policies and procedures in alignment with DHS language access policy and EO 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 community engagement.

The LAP TF will continue to assess language service needs, share best practices, and establish CISAwide language services and technologies. The LAP TF will also disseminate information on language services and technologies as well as the appropriate use of these services and technologies.<sup>8</sup>

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.

<sup>&</sup>lt;sup>6</sup> Please see <u>https://www.dhs.gov/publication/lep-guidance-recipients-dhs-financial-assistance</u> for additional information.

<sup>&</sup>lt;sup>7</sup> Please see <u>https://www.dhs.gov/disability-access-department-homeland-security</u>.

<sup>\*</sup> As of March 2024, CISA is not currently using or planning to use Artificial Intelligence (AI) or Machine Learning (ML) capabilities to enhance language access at CISA. In the event CISA opts to explore AI or ML driven language songless. CISA will provide information to DHS Office for Civil Pigts and Civil Liberties (CPCL) about

language services, CISA will provide information to DHS Office for Civil Rights and Civil Liberties (CRCL) about how the quality of language services will be ensured.

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. Please see Appendix B of the DHS Language Access Plan for additional information about CISA's planned topics for language access training.<sup>9</sup>

# **EXTERNAL OUTREACH AND NOTICE**

CISA, in coordination with the 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. One of CISA PACT's primary objectives is 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.

In Fiscal Year (FY) 2025, CISA will begin taking additional steps to make LEP individuals aware of translation and interpretation services, which may include but not be limited to:

- 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. Please see the notice and tagline information in Appendix C of the DHS Language Access Plan for example notice and tagline information that CISA is considering replicating.<sup>10</sup>
- 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

Please see <u>https://www.dhs.gov/publication/dhs-language-access-plans</u>.

<sup>&</sup>lt;sup>10</sup> Please see <u>https://www.dhs.gov/publication/dhs-language-access-plans</u>.

CISA is also considering additional options to make LEP individuals aware of translation and interpreter services, which may include but may not be 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.

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 EO 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. As appropriate, CISA also reports language access updates to DHS CRCL to include in the DHS Equity Action Plan.

# ACCOMPLISHMENTS

CISA has achieved the following accomplishments in developing and implementing language policy, governance, and resources:

- In FY 2022, CISA formalized its ECRCL program within PACT and established the CISA LAP TF to develop a LAP and associated internal policy and procedure regarding language access.
- In FY 2023, CISA published its first LAP and analyzed language access needs and requirements CISA-wide. CISA also modified its contract for ASL interpreter and Communication Access Real-time Transcription services to include external facing events and activities.
- In FY 2024, CISA hired its first dedicated Language Access Coordinator. CISA is in the process of developing a CISA-specific language access policy directive. CISA is also examining its existing language services contract to assess how it may be modified in the future to enhance language access across CISA.

CISA has also made significant progress in the translation of public-facing resources for diverse stakeholders.

• CISA has translated a series of materials to assist businesses, government offices, schools, and communities in preparing for and responding to active shooter incidents. These resources include videos, a detailed booklet, a desk reference guide, a reference poster, a

pocket-size reference card, and a Power of Hello Placemat that has been translated into 19 different languages: Arabic, Simplified Chinese, Traditional Chinese, Dari, French, Hebrew, Hindi, Hmong, Japanese, Khmer, Korean, Navajo, Pashto, Punjabi, Spanish, Tagalog, Thai, Urdu, and Vietnamese. CISA has also produced ASL versions of the videos.

- CISA has translated Cybersecurity Awareness Month publications. The publications have been translated into Arabic, Traditional Chinese, French, Portuguese, and Spanish. CISA has also begun translating ten additional cybersecurity documents into Simplified and Traditional Chinese.
- CISA has translated Secure Our World tip sheets, aimed at sharing resources and advice for users to stay safe online, into Arabic, Simplified Chinese, Traditional Chinese, French, Haitian Creole, Hindi, Korean, Punjabi, Spanish, and Vietnamese.
- CISA has translated election security materials into Spanish. CISA is exploring the development of additional translations of election security materials, including translations in Simplified Chinese, Traditional Chinese, and Korean.
- CISA has translated School Security and Resilience resources, developed for educators, school resource officers, and school administrators who serve in important roles in safeguarding schools, into Spanish, Simplified Chinese, and Traditional Chinese. The video resources are also available in ASL.
- CISA has produced Houses of Worship security guides and materials in ASL, Arabic, Simplified Chinese, Traditional Chinese, Hebrew, Hindi, Punjabi, and Spanish.

#### **CONTACT INFORMATION**

For more information, email us at <u>cisa.pact\_crcl@mail.cisa.dhs.gov</u>.

You can file complaints about language access in CISA programs and activities with DHS CRCL. For more information about filing complaints with DHS CRCL, go to dhs.gov/crcl. Complaints may be filed in any language.