

Language Access Plan 2024-2026

The Center for Prevention Program and Partnerships (CP3) *September 26, 2024*



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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 for persons with limited English proficiency (LEP) accessing the Center for Prevention Programs and Partnerships 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: to ensure that federally conducted programs and activities are accessible by eligible LEP persons and do not discriminate based on national origin in violation of title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations.

Agency Background

The Department of Homeland Security (DHS) Center for Prevention Programs and Partnerships (CP3) was established to expand the Department's ability to combat terrorism and targeted violence, consistent with privacy protections, civil rights and civil liberties, and other applicable laws.

CP3 strengthens our country's ability to prevent targeted violence and terrorism nationwide, through funding, training, increased public awareness, and partnerships across every level of government, the private sector, and in local communities.

CP3's approach to prevention is informed by key principles of public health, including a focus on the health and well-being of individuals and communities. This approach applies models that are used in other forms of violence prevention and are evidence-informed, based on research in areas like public health, psychology, and criminology. DHS's prevention strategy includes gathering lessons learned from across the United States and partnering with independent research organizations to collect data and evaluate programming using a multilayered approach to violence prevention.

Key Terms

- 1. **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.
- 2. **Bilingual Persons**: Persons who are bilingual are fluent in two languages and are able to conduct the business of the workplace in either of those languages. This is to be distinguished from proficiency in more than one language. An individual who is proficient in a language may, for example, be able to greet an individual who is LEP in their language, but not conduct agency business in that language. Interpretation and translation require the interpreter to be bilingual, and also require additional specific skills.

- **3. Persons who are Limited English Proficient (LEP)**: 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.
- 4. Vital Document: A vital document is a document that contains information that is critical for obtaining any aid, benefit, or services or is required by law. Vital documents can include 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.

Language Access Policy Statement

CP3 confirms its commitment to following the DHS Policy on Language Access¹:

DHS's policy is 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.

This language access plan will be posted to CP3's external website (https://www.dhs.gov/CP3) in an accessible format that is Section 508 compliant.

CP3 produces educational and outreach materials in multiple languages, making these translated materials publicly available on its website. Translated materials have a powerful potential to increase public awareness and reporting. The incorporation of languages and access considerations into CP3 provided objectives will be reviewed periodically in accordance with DHS guidelines.

Language Access Plan Task Force

CP3 has established a language access plan (LAP) task force (TF), which consists of at least one individual from each CP3 line of effort (LOE) to include: Strategic Communications Division, Research and Content Development, Strategic Engagement and Policy Implementation, Grants and Innovation, and Field Operations. The LAP TF's main objective is to develop a CP3-wide LAP and maintain it, ensuring its relevance and informing all LAP efforts. The LAP TF members have the responsibility to ensure the LAP is being executed across CP3 in each LOE. The LAP will set forth the standards, principles, and guidelines that CP3 will use to provide and improve meaningful access for persons who are LEP in the Center's operations, services, activities, and programs.

¹<u>Updated DHS Language Access Plan</u> (November 2023)

Responsible Personnel/Oversight

The activities outlined in CP3 LAP will be carried out through coordinated efforts between the CP3 Front Office, the Service Delivery Division, the Research and Strategy Division, and in collaboration with a third-party contractor for language interpretation and translation services. The Strategic Communication Division, identified in the preceding section of the LAP, will provide CP3 governance and leadership, while the LAP TF will oversee implementation across the CP3 divisions:

- The CP3 Director is responsible for all aspects of the CP3 LAP and shall ensure that it is implemented to provide quality language assistance services in support of the CP3 mission related to preventing targeted violence and terrorism.
- The Deputy Director for Research and Strategy has overall authority over the implementation of the CP3 LAP as part of DHS policy on providing meaningful access and CP3's compliance with EO 13166.
- The Deputy Director for Service Delivery shares support responsibilities and coauthority with the Deputy Director for Research and Strategy for the development and management of the CP3 LAP, related policies, and coordination with the Strategic Communication Division of the Research and Strategy department for successful implementation of language assistance services provided by CP3.
- The Strategic Communication Taskforce Lead has overall responsibility for the LAP implementation and will develop and execute the LAP across all CP3's efforts. The TF lead shall also be responsible for all internal/external communications regarding the LAP.
- The Training and Curriculum Specialist will assist with training CP3 staff on the CP3 LAP and the use of the language assess service with the support provided by the Strategic Communication Division.
- The CP3 LAP TF will assist the Strategic Communication Taskforce Lead in implementing, developing, and deploying the LAP. This includes providing standard language assistance information and procedures for CP3's language access. Please refer to the LAP TF duties in the previous section.
- CP3 staff, specifically the Service Delivery Division, will use the LAP as a guide and initiate LAP protocols to effectively communicate with LEP individuals, or refer to LAP TF members to ensure adequate services are provided to LEP persons or communities.

Limited English Proficiency Communities Served or Encountered

To identify the languages of critical importance to the CP3 mission, CP3 referenced internal feedback and the 2020 U.S. Census Bureau data. CP3 has previously identified Spanish as the language of critical importance to the mission because it's the most common language in the United States besides English.

CP3 has also initially identified several other languages that may broaden the reach of CP3 services and resources. These include but are not limited to Arabic [Modern Standard], Persian, Cantonese, Filipino [Tagalog], French, Haitian, Korean, Mandarin, Pashto, Hindi, Portuguese, Russian, and Vietnamese. Please note this is not an exhaustive list. CP3 acknowledges that in the context of language access, especially regarding interpretation services, various languages and dialects may be essential. CP3 also plans to examine considerations regarding language needs of Indigenous and rare

language speakers.

As CP3 continues to develop prioritization procedures, customized to meet the specific objectives for each product, service, and LOE, CP3 will leverage four analysis factors to assess meaningful access needs. These include:

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

While many individuals who communicate using American Sign Language (ASL) are not LEP, CP3 is also committed to making its programs and services accessible to persons who are deaf or hard of hearing through ASL and other auxiliary aids and services.

Procedures and Prioritization

CP3 will continue assessing which additional vital documents should be translated and what interpretation services are needed based on input from internal and external stakeholders. CP3 acknowledges that language access priorities may be subject to change, and language access surges may occur. CP3 plans to examine mechanisms to efficiently augment language capacity in a surge or sudden demographic change.

The LAP Taskforce will establish internal language access policies and procedures in alignment with the DHS language access policy and Executive Order 13166 by the end of FY25. The LAP policy and procedures will provide a framework for CP3's access initiatives and activities to build trust and working relationships with diverse populations and promote community engagement.

By the end of FY25, the LAP TF will assess language service needs, share best practices, and establish CP3-wide language services, and consider the use of technologies in coordination with the CP3 Strategic Communications team. The TF will also disseminate information on language services and technologies and the appropriate use of these services and technologies.

CP3 will gather feedback through the LAP TF internal data calls, assessments, and stakeholder engagement to identify language access needs across CP3. CP3 will use this feedback to tailor the strategic priorities for language access services.

CP3 is developing language access procedures with CP3 staff who provide resources and services to 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 CP3 and LEP individuals.

Staff Training

CP3 will train employees regarding this language access plan upon onboarding by the end of 2024 calendar year. DHS's Office for Civil Rights and Civil Liberties (CRCL) is developing basic language access training, and this will be available to CP3 to use and/or adapt. CP3 expects the training to be completed this year. Language Access Training (LAT) will support the CP3 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 that are available, and are prepared to work effectively with the public as well as translation and interpretation providers. CP3 has now made LAT a part of the CP3 onboarding process, and it will be maintained by the CP3 Front Office. Training will include understanding how to request language translation and interpretation services via DHS resources and other relevant trainings such as:

- Plain Language Training (plainlanguage.gov)
- Language Access 101: What You Need to Know About Executive Order 13166 and Census Data on Key Populations
- Limited English Proficiency Videos | LEP

Demographic Assessments

CP3's main stakeholder audience is any prevention provider. Prevention providers are skilled and knowledgeable professionals who directly or indirectly prevent violence by helping people develop the knowledge, attitudes, and skills they need to achieve safe, positive, healthy outcomes. Prevention providers may include organizations or individuals applying for the CP3 Targeted Violence and Terrorism Prevention annual grant funding opportunities. Additionally, CP3 provides general information to the public about terrorism prevention.

CP3 continually works to assess language access needs for educational awareness, products, and training for those prevention providers. CP3 assesses the quantity, type, and language of materials requested by CP3 staff to determine the demand for language translations. CP3 also works closely with our contracted vendor to determine language access needs as requested from CP3's LOEs.

In addition, CP3 works collaboratively with interagency partners to develop language access priorities. Through interagency collaboration, CP3 works with CRCL and other partners to identify prevention providers that work in communities where individuals with LEP need expanded access to language translations.

Current Language Access Activity

CP3 provides targeted violence and terrorism prevention training and materials to the public and tailors content for specific audiences such as prevention providers. CP3 plans to input all language access activity under this section. To date, CP3 has the following printed material available in the following languages:

As of April 26, 2024, CP3 has translated the TVTP Grant Program Fact Sheet into 14 languages and published to CP3's Applicant Resources webpage as part of CP3's commitment to equity and access for the TVTP Grant Program. The languages,

identified in partnership with DHS CRCL, include Arabic, Cantonese, Filipino, French, Haitian Creole, Hindi, Spanish, Korean, Mandarin, Pashto, Persian, Portuguese, Russian, and Vietnamese.

As of June 7, 2024, CP3 has translated the Mitigating Harm from Violent Visual Content: CP3 Prevention Resource into 14 languages: Arabic, Cantonese, Filipino, French, Haitian Creole, Hindi, Spanish, Korean, Mandarin, Pashto, Persian, Portuguese, Russian, and Vietnamese. This resource is available on CP3's Publications and Resources webpage. It aims to provide practical, evidence-based guidance to help protect communities, families, and individuals from exposure to violent images, videos, and other disturbing content following an act of targeted violence or terrorism.

Language Access Priorities for Future Years

When developing this plan, CP3 assessed its priorities and planned activities to improve language access.

Beginning in FY24, CP3 initiated manual tracking of the necessity and types of language materials to make available through the CP3 website. CP3 must translate corresponding vital documents or information within the document into the primary language of LEP person(s). CP3 will continue to identify vital documents, assess mechanisms for translations, and translate documents based on priorities and needs of communities that are LEP in FY25-FY26.

CP3 will partner with organizations servicing underserved communities to achieve the following priorities:

- 1. Enhancing Recidivism Reduction and Reintegration Capabilities.
- 2. Advancing Equity in Awards and Engaging Underserved Communities in Prevention.
- 3. Addressing Online Aspects of Targeted Violence and Terrorism.
- 4. Preventing Domestic Violent Extremism.

CP3 will take a proactive role through CP3's Strategic Communications plan in ensuring the contractor/vendor requirements to translate such materials and will work with CRCL to keep up to date with language access best practices (translations, new technologies, etc.).

Evaluation Tools/Mechanisms

CP3 is committed to incorporating effective mechanisms to implement our language access efforts. As such, the DHS Office of Strategy, Policy, and Plans (PLCY) senior leadership have reviewed and approved this language access plan. The CP3 Language Access Plan Task Force and a delegate from CP3's senior leadership will be responsible for coordinating and implementing all language access activities.

To evaluate language access efforts and ensure implementation of strategy, CP3 will take the following actions:

- 1. Solicit feedback from those individuals and communities who the LAP serves to bolster the LEP needs.
- 2. CP3 Director designate a CP3 Coordinator to be the LAP Liaison. This

employee will represent CP3 on the language access working group meetings held by CRCL and will assume responsibility for the coordination of all language access projects.

- 3. Meet each quarter for the selected Coordinator to report to CP3 leadership on progress made regarding language access projects.
- 4. Continue to ensure high quality translation services through available funding and identify and utilize trustworthy vendors for translation service in accordance with DHS minimum standards for a qualified linguist. Depending on the budget, CP3 will also utilize the external and internal translation verification services to ensure the best possible translations.
- 5. Assess cost and feasibility of offering public trainings such as the Community Awareness Briefing in other languages.
- 6. Evaluate this CP3 language access plan every two years and report to DHS CRCL and CP3 Senior Leadership on the status of the plan, including recommendations for improvements.

Allocation of Resources

Each CP3 Line of Effort should consider the appropriate resources needed when engaging stakeholders that have language access needs. CP3 has third party contract for language interpretation and translation services for materials shared with the public and stakeholders.

Contact Information

CP3 provides information to the public on the availability of language services through CP3 materials such as the quarterly CP3 newsletter, prevention resources, grant documents, and educational one-pagers.

All materials and educational products are available for public use and may be downloaded or ordered free of charge on the CP3 website. The website identifies languages available for each awareness product. Those wishing to order materials may do so by submitting a request form through the CP3 website or by emailing the order to <u>CP3Communications@hq.dhs.gov</u>. The option for ordering materials in print form is subject to availability of funds and current inventory for the fiscal year. All CP3 materials are confirmed for Section 508 compliance prior to release.