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U.S. Department of Health and Human Services  
Assistant Secretary for Public Affairs

# **ASPA Language Access Plan**

*July 2024*



MEMORANDUM

To: ASPA Staff

Subject: Assistant Secretary for Public Affairs Language Access Plan

In keeping with HHS' commitment to protect the rights of individuals to access quality health care and essential human services, this Language Access Plan (LAP) is designed to guide ASPA as it supports the Department strengthen and implement a system by which persons with limited English proficiency (LEP) can meaningfully access the agency's services.

America's population reflects diverse communications needs. Nearly 20 percent of the population (55 million people) speaks a language other than English at home, 63 percent of hospitals treat LEP patients daily or weekly and more than 15 languages are frequently encountered by at least 20 percent of hospitals.

While the LAP is developed in accordance with the 2023 HHS Language Access Plan, the elements and action steps that are included in the LAP are tailored to ASPA's unique responsibilities within the Office of the Secretary.

To deliver the most effective language assistance services, we will continue to identify ways to effectively engage with and, assess the linguistically diverse customers. The LAP will also continue to evolve as the Department assesses the outcomes of its engagement with LEP and as best practices in the field emerge—including technology-supported advances.

We are committed to carrying out the LAP at all levels of ASPA. It is critical that all ASPA personnel are familiar with the concepts in this Plan and that the appropriate personnel are prepared to perform these essential functions that promote transparency, accountability, and access to critical public health and human services information to all American people.

Sincerely,

Jeff Nesbit  
Assistant Secretary for Public Affairs  
Office of the Secretary  
U.S. Department of Health and Human Services

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## **I. LANGUAGE ASSISTANCE PRINCIPLES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES**

Adoption of the following language access principles should be considered when assessing and addressing situations in which limited English proficient (LEP) persons, including those with disabilities that impact their access to HHS news and communications material, seek a direct service or benefit from the Office of the Assistant Secretary for Public Affairs:

LEP persons should be advised that they have the right to free language assistance provided by the relevant component(s). The provision of this notice and the LEP person's election should be documented in any written record generated with respect to the LEP person.

ASPA will take reasonable steps to ensure it provides interpretation services only through individuals who are competent to provide interpretative services at a level of fluency, comprehension, and confidentiality appropriate to the specific nature, type and purpose of information at issue. This includes translation of relevant documents.

ASPA will work to expand the range of language assistance measures whenever experience, changes in target or service population demographics, or new program-specific data indicates that the failure to do so may result in a denial of substantially equal and meaningfully effective services to a significant LEP population served by the component.

To the maximum extent practical, limited English proficiency shall not act as a barrier or otherwise limit access to vital information, i.e. information publicly available in English as to when, where, or how to access benefits or services from a component.

## **II. OVERVIEW, MISSION AND LANGUAGE ACCESS GOALS, ASSISTANT SECRETARY FOR PUBLIC AFFAIRS**

### **A. Overview**

The Assistant Secretary for Public Affairs serves as the Secretary's principal counsel on public affairs. ASPA conducts national public affairs programs, provides centralized leadership and guidance for public affairs activities within HHS' Staff and Operating Divisions and regional offices, manages the Department's digital communications, and administers the Freedom of Information and Privacy Acts. ASPA leads planning, development and implementation of emergency incident communications strategies and activities for the Department. The ASPA reports directly to the HHS Secretary.

This LAP is designed to ensure meaningful access for individuals with LEP and effective communication for individuals with disabilities to programs and activities administered by ASPA in accordance with Title VI of the Civil Rights Act, Section 1557 of the Affordable Care Act, Title II of the Americans with Disabilities Act, Executive Orders 13166, 13985, 13995, 14031, and 14091, and the HHS Equity Action Plan issued in April 2022.

### **B. Mission**

ASPA serves as the Department's principal Public Affairs office, leading efforts across the Department to promote transparency, accountability, and access to critical public health and human services information to the American people.

### **C. Language Access Goals**

Provide oversight of HHS news releases and communications products to ensure they promote effective communication among HHS components and persons with limited English proficiency (LEP), using the HHS Language Access Plan. Measure need and impact among HHS audiences for richer and more language access-ready news and communication products.

### **III. SPECIFIC ELEMENTS - FOR ACHIEVING LANGUAGE ASSISTANCE GOAL**

HHS considered the following ten elements essential for achieving its overall goal of providing access to timely, quality language assistance services to persons with limited English proficiency. ASPA will strive to implement each element and associated action steps and establish priorities that will best meet the needs of individuals with LEP.

**Element 1. Assessment: Needs and Capacity:** ASPA will establish mechanisms to regularly identify and assess the language assistance needs of current and potential customers as well as processes to assess agency infrastructure and capacity to meet these needs.

**Element 2. Oral Language Assistance Services:** ASPA will ensure the provision of oral language assistance for LEP customers in face-to-face and telephone encounters.

**Element 3. Written Translations:** ASPA will identify, translate and make accessible in various formats, including print and electronic media, vital documents in languages other than English in accordance with assessments for need and capacity. This section also includes considerations for leveraging existing HHS service/resources to ensure cost-effective methods for addressing this element.

**Element 4. Policies and Procedures:** ASPA will develop, implement and regularly update specific written policies and procedures to ensure individuals with LEP have meaningful access to agency programs and activities. This element also calls for designating an office or official who will be responsible for the implementation of these policies/procedures.

**Element 5. Notification of the Availability of Free Language Services:** ASPA will conduct outreach to proactively inform customers of the availability of language assistance services at no cost, through both oral and written notice, in the primary language of the customer.

**Element 6. Staff Training:** ASPA will ensure that front line and managerial staff are trained on the policies and procedures of their respective agency's language assistance activities. Training will ensure that all HHS employees are capable of providing effective communication to individuals with LEP in all their programs and activities.

**Element 7. Assessing Accessibility and Quality:** ASPA will institute procedures to assess, on an ongoing basis, the accessibility and quality of language assistance activities for customers with limited English proficiency.

**Element 8. Stakeholder Consultation:** ASPA will collect and utilize stakeholder input to identify language

assistance needs of individuals with LEP, implement appropriate language strategies to ensure that LEP persons are afforded meaningful access to programs and services, in accordance with assessments of customer need and agency capacity, and conduct ongoing evaluation of progress.

**Element 9. Digital Information:** ASPA will set objectives and developing policies to ensure that, in accordance with assessments of LEP needs and agency capacity, digital information is accessible by eligible individuals with LEP in need of language assistance.

**Element 10. Grant Assurance and Compliance:** ASPA will ensure that grant recipients understand and comply with obligations under relevant civil rights statutes and regulations enforced by HHS related to language access.

## **IV. LANGUAGE ACCESS PLAN NARRATIVE SUMMARY OF ACTIVITIES BY ELEMENT AND AGENCY PROGRAM**

### **A. Narratives for Elements 1-10**

**Element 1. Assessment: Needs and Capacity:** Within a year, ASPA will have in place processes to regularly identify and assess the language assistance needs of its current and potential customers, as well as the processes to assess the agency's capacity to meet these needs according to the elements of this plan.

#### Program Description & Scope

Use digital tools to measure needs of LEP persons; Direct and Indirect Public Contact, ASPA-only.

#### Action Steps

Within 180 days, ASPA will designate a senior leader to serve as "Special Outreach Coordinator," whose function will include reviewing, editing news and communications materials that serve minority and disability groups. The coordinator will assess news trends among LEP audiences and measure interest in HHS announcements; this assessment will include determining the need for coordinated translation services. The Special Outreach Coordinator will conduct annual assessments and oversee implementation of ASPA-wide language assistance efforts as outlined in this plan.

Using Google Analytics and Census data, ASPA will track which websites and webpages users are attempting to access in alternate languages. ASPA's Digital Communications Division (DCD) will use those trends to assess needs and capacity for translated material. Website translations are also conducted when a site's objectives cannot be met without LEP audience targeting.

Within 180 days, the HHS TV Studio will coordinate an assessment of activities to identify existing procedures and plans to meet the intent of the President's Language Access Executive Order. Evaluate regularly encountered languages other than English and identify resource needs in order to comply with the Executive Order and share best practices currently in place.

#### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified annually. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 2. Oral Language Assistance Services:** ASPA will provide oral language assistance (such as qualified interpreters or staff whose proficiency in non-English languages has been documented), in both face-to-face and telephone encounters, that addresses the needs identified in Element 1. Each HHS agency will establish a point of contact for individuals with LEP, such as an office, official, or phone number.

## Program Description & Scope

Develop staff and resources for direct engagement with LEP persons; Indirect Public Contact, Department-wide.

### Action Steps

The ASPA Special Outreach Coordinator will serve as a point of contact for LEP persons engaging with ASPA and encourage ASPA staff to be able to inform LEP stakeholders about known HHS language assistance services. The Coordinator will routinely assess the impact ASPA staff has on informing LEP stakeholders and identify appropriate bilingual ASPA staff to serve in emergencies. These individuals will be those who are proficient in a second language (or more languages) other than English. They must be willing to, though not required to assist during these emergencies. They are considered proficient if, in that second (or more languages) is one that they grew up with speaking in the home, or took relevant coursework to become proficient in that second or more language. ASPA will work with Staff and Operating Divisions to identify and media train appropriate HHS spokespersons and public affairs staff to support interview requests, copy-editing, and public engagement related to LEP audiences.

Within a year, ASPA will have the capability to routinely deliver HHS TV Studio programming in Spanish language when requested by ASPA and other HHS/ partner clients. The majority of the work by the HHS TV Studio is audio-visual and posted on YouTube for consumption. YouTube has a translation function built directly into its player.

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### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 3. Written Translations:** ASPA will identify, translate and make accessible in various formats, including print and electronic media, vital documents in languages other than English in accordance with assessments of need and capacity conducted under Element 1.

## Program Description & Scope

Evaluate consumer health engagement material for LEP audiences; Indirect Public Contact, ASPA-only.





## Action Steps

Within 180 days, ASPA's Special Outreach Coordinator will identify HHS communication products that should be produced in languages other than English. The Coordinator will work with the ASPA Publications Manager to ensure Staff and Operating Divisions track which publications are available in languages other than English and ensure they serve LEP populations. The Coordinator will conduct annual assessments and oversee implementation of ASPA-wide language assistance efforts as outlined in this Plan.

The HHS TV Studio will explore opportunities to use and promote the translation function on YouTube to support better understanding of our video products by LEP persons and stakeholders.

Currently, the DCD does not distribute, specifically, consumer engagement material to LEP audiences, but has done so in the past. When necessary, the DCD will utilize existing contracts to produce material in 27 languages. For more information on digital engagement, please see Element 9 below.

As funding is available, ASPA will contract out translation to outside contractors.

## Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 4. Policies and Procedures:** ASPA will develop, implement and regularly update written policies and procedures that ensure individuals with LEP have meaningful access to agency programs and activities.

## Program Description & Scope

Develop and implement HHS and ASPA Language Access Plans; Indirect Public Contact, ASPA-only

## Action Steps

Upon completion of the document, the Special Outreach Coordinator will include the HHS Language Access Plan and the ASPA Language Access Plan among current vital documents for all ASPA staff to access. ASPA will update the current Public Affairs policies and guidance documents to account for language access plan implementation, using feedback from HHS working groups and news analysis.

ASPA DCD translation procedures require a Spanish version to be translated within 24 hours of English-language material "going live" (being released for public review to news wires or Internet posting). This ensures that LEP persons have meaningful access to agency information in a timely fashion. For urgent requests, the DCD will translate material in four hours or less depending on the complexity of the task. DCD has a Translation Manager who ensures the timely and accurate execution of this procedure.

ASPA's DCD will support the Section 508 Program iv, requiring all Web site content to be equally accessible to people with disabilities. This applies to Web applications, public-facing Web pages, and the internal-facing Intranet. The goals of the program are to assist HHS OPDIVs and STAFFDIVs in:

- Testing websites, Web pages, Web applications, widgets, documents, and email blasts for 508 compliance;
- Provide guidance on how to remediate 508 issues within existing websites and documents; and
- Empower OPDIVs with the knowledge and resources to ensure the compliance of future websites through various training sessions and materials.

#### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 5. Notification of the availability of free language services:** ASPA will, in accordance with agency needs and capacity and in plain language, will proactively inform individuals with LEP that language assistance is available at no cost.

#### Program Description & Scope

Market ASPA products available for LEP persons; Indirect Public Contact, ASPA-only.

#### Action Steps

Within a year, and regularly after that, the Special Outreach Coordinator will look to expand awareness of all ASPA-managed HHS websites that can offer HHS news and communication products in languages other than English. ASPA will look to make its Web sites accessible to the widest possible audience, including LEP persons. HHS will do this through implementation of Section 508 of the Rehabilitation Act regulations and the HHS Secretary's Section 508 Implementation Policy.

The HHS TV Studio and ASPA's News Division will support tagging and describing our video products in YouTube so LEP users are aware of the translation function.

#### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 6. Staff Training:** ASPA will commit resources and provide employee training as necessary to ensure management and staff understand and can implement the policies and procedures of this plan and their respective agency Language Access Plan. Agency-designed training will help ensure all HHS employees understand the importance of and are capable of providing effective communication to individuals with LEP in all their programs and activities.

#### Program Description & Scope

Train and evaluate ASPA staff that support LEP persons; Indirect Public Contact, ASPA-only

#### Action Steps

On a rolling basis, the Special Outreach Coordinator will introduce the HHS and ASPA Language Access Plans to new ASPA staff and provide these materials for discussion and planning. The Coordinator will seek appropriate training to afford necessary communication skills and vision to observe trends and make recommendations related to the production and delivery of HHS news and communication material. ASPA will define and make available additional guidance, policies, and procedures related to its language access assistance activities, as well as necessary resources available in each program, to ASPA staff.

The ASPA DCD will take steps to train front-line and managerial staff concerning the policies and procedures of its language assistance activities, and the resources available to each program. In respect to section 508, DCD will provide a layered, modular training program designed to accommodate the various roles and functions within HHS. The program includes introductory training, evaluation training, remediation training, issue management, and special-topics-in accessibility training.

#### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 7. Assessing accessibility and quality:** ASPA will regularly assess the accessibility and quality of language assistance activities for individuals with limited English proficiency, maintain an accurate record of language assistance services, and implement or improve LEP outreach programs and activities in accordance with customer need and agency capacity.

#### Program Description & Scope

Ensure quality of ASPA products available for LEP persons; Indirect Public Contact, ASPA-only

#### Actions Steps

As part of the Special Outreach Coordinator's duty to identify and review HHS news and communication

material of interest to the LEP community and stakeholders, the Coordinator will develop an annual summary report providing evaluation and analysis of the impact of our outreach.

The ASPA DCD's language contractor will run quality assurance scans on HHS translated, published material daily. These scans will provide information on broken links, bad graphics, missing text and other errors that may otherwise devalue the usefulness of translated content. With these scans, DCD will be able to routinely fix errors that limit the accessibility and quality of language materials for customers with LEP.

The language used in all translated materials is based on a master glossary to ensure accuracy and reliability. This glossary has been developed through years of translation and vetted by HHS Staff and Operating Division partners to ensure HHS conforms to industry-accepted translation terminology.

The HHS TV Studio will analyze hhs.tv web site for downloads of Spanish-language resources.

### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 8. Stakeholder Consultation:** ASPA will consult with stakeholder communities, in accordance with this and other federal policies to identify language assistance needs of individuals with LEP, implement appropriate language access strategies to ensure individuals with LEP have meaningful access in -accordance with assessments of customer need and agency capacity, and evaluate progress on an ongoing basis.

### Program Description & Scope

Engage directly with LEP persons, stakeholders; Direct and Indirect Public Contact; Department wide

### Action Steps

The Special Outreach Coordinator will participate in the HHS working groups that support language access planning. The Coordinator will follow LEP news trends and develop relations with LEP stakeholders to strengthen engagement and to ensure their feedback is considered in the development of HHS news and communications material. The Coordinator will include LEP stakeholder input into practices, policies, and strategy to help ASPA engage more with LEP persons.

The ASPA DCD will use email outreach, social media, blogs, podcasts, and other forms of new media to promote LEP content to underserved communities. This outreach traditionally accounts for a significant amount of the inbound traffic ASPA receives through our Spanish-language sites. When needed, DCD will consult with translation experts through existing contract to develop, distribute and improve LEP

materials.

The HHS TV Studio will work with our Digital Media Team to coordinate efforts to reach LEP populations more effectively.

### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 9. Digital Information:** ASPA will develop and implement specific written policies and procedures to ensure that, in accordance with assessments of LEP needs and agency capacity, digital information is accessible by communities in need of language services.

### Program Description & Scope

Use Internet-based systems to reach LEP persons; Direct and Indirect Public Contact, Department wide.

### Action Steps:

The Special Outreach Coordinator will explore opportunities to leverage social media to increase awareness of HHS services, programs, and news for LEP and disabled persons. The coordinator will seek feedback from HHS LEP workgroups LEP persons and on their experience accessing digital HHS news and communication materials to ensure their voices are heard. The coordinator will identify and make recommendations for content on the HHS website based on feedback from LEP group stakeholders.

The ASPA DCD currently offers some web properties in a language other than English:

While these are among our key public sites, they are currently only offered in Spanish, but can be offered through 27 language options. These services can be called upon, as needed, with task orders (and funding) from Staff and Operating Divisions throughout the Department to better serve LEP communities.

In addition to ASPA efforts to promote non-English LEP content, DCD has an extensive 508 Program to meet the needs of those with other access and functional needs. Websites will be checked routinely to ensure compliance with 508 regulations. An extensive workflow will be used to identify, remediate, and close 508 failures.

The HHS TV Studio and the ASPA News Division support tagging and describing of our video products in YouTube so LEP users are aware of the translation function.

### Cost Estimate & Monitoring

Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.

**Element 10. Grant Assurance and Compliance:** ASPA will ensure that grant recipients understand and comply with their obligations under civil rights statutes and regulations enforced by HHS related to language access.

### Program Description & Scope

N/A – ASPA does not manage grants.

### Action Steps:

N/A-ASPA does not manage grants.

### Cost Estimate & Monitoring

N/A-ASPA does not manage grants.


## **B. ASPA LANGUAGE ACCESS PLAN NARRATIVE SUMMARY-GRAPH OF ACTIVITIES BY ELEMENT AND AGENCY PROGRAM**

The following graph provides an agency-wide snapshot of ASPA efforts to provide meaningful access to benefits and services for LEP individuals.

PLAN ELEMENTS	PROGRAM DESCRIPTION & SCOPE	ACTION STEPS	COST& MONITORING
<p><b>Element 1.</b>  <b>Assessment:</b> Needs and Capacity:            Within a year, ASPA will have in place processes to regularly identify and assess the language assistance needs of its current and potential customers, as well as the processes to assess the agency's capacity to meet these needs according to the elements of this plan. _</p>	<p>Use digital tools to measure needs of LEP persons; Direct and Indirect Public Contact, ASPA-only. _</p>	<p>Within 180 days, ASPA will designate a senior leader to serve as "Special Outreach Coordinator," whose function will include reviewing, editing news and communications materials that serve minority and disability groups. The coordinator will assess news trends among LEP audiences and measure interest in HHS announcements; this assessment will include determining the need for coordinated translation services. The Special Outreach Coordinator will conduct annual assessments and oversee implementation of ASPA-wide language assistance efforts as outlined in this plan.</p> <p>Using Google Analytics and Census data, ASPA will track which websites and webpages users are attempting to access in alternate languages. ASPA's Digital Communications Division (DCD) will use those trends to assess needs and capacity for translated material. Website translations are also conducted when a site's objectives cannot be met without LEP audience targeting.</p> <p>Within 180 days, the HHS TV Studio will coordinate an assessment of activities to identify existing procedures and plans to meet the intent of the President's Language Access Executive Order. Evaluate regularly encountered languages other than English and identify resource needs in order to comply with the Executive Order and share best practices currently in place.</p>	<p>Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified annually. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>

<p><b>Element 2. Oral Language Assistance Services:</b>  ASPAs will provide oral language assistance (such as qualified interpreters or staff whose proficiency in non-English languages has been documented), in both face-to-face and telephone encounters, that addresses the needs identified in Element 1. Each HHS agency will establish a point of contact for individuals with LEP, such as an office, official, or phone number. _</p>	<p>Develop staff and resources for direct engagement with LEP persons; Indirect Public Contact, Department-wide. _</p>	<p>The ASPA Special Outreach Coordinator will serve as a point of contact for LEP persons engaging with ASPA and encourage ASPA staff to be able to inform LEP stakeholders about known HHS language assistance services. The Coordinator will routinely assess the impact ASPA staff has on informing LEP stakeholders and identify appropriate bilingual ASPA staff to serve in emergencies. These individuals will be those who are proficient in a second language (or more languages) other than English. They must be willing to, though not required to assist during these emergencies. They are considered proficient if, in that second (or more languages) is one that they grew up with speaking in the home, or took relevant coursework to become proficient in that second or more language. ASPA will work with Staff and Operating Divisions to identify and media train appropriate HHS spokespersons and public affairs staff to support interview requests, copy-editing, and public engagement related to LEP audiences.</p> <p>Within a year, ASPA will have the capability to routinely deliver HHS TV Studio programming in Spanish language when requested by ASPA and other HHS/ partner clients. The majority of the work by the HHS TV Studio is audio-visual and posted on YouTube for consumption. YouTube has a translation function built directly into its player.</p>	<p>Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>
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<p><b>Element 3. Written Translations:</b> ASPA will identify, translate and make accessible in various formats, including print and electronic media, vital documents in languages other than English in accordance with assessments of need and capacity conducted under Element 1.</p>	<p>Evaluate consumer engagement material for LEP audiences; Indirect Public Contact, ASPA-only.</p>	<p>Within 180 days, ASPA's Special Outreach Coordinator will identify HHS communication products that should be produced in languages other than English. The Coordinator will work with the ASPA Publications Manager to ensure Staff and Operating Divisions track which publications are available in languages other than English and ensure they serve LEP populations. The Coordinator will conduct annual assessments and oversee implementation of ASPA-wide language assistance efforts as outlined in this Plan.</p> <p>The HHS TV Studio will explore opportunities to use and promote the translation function on YouTube to support better understanding of our video products by LEP persons and stakeholders.</p> <p>Currently, the DCD does not distribute, specifically, consumer engagement material to LEP audiences, but has done so in the past. When necessary, the DCD will utilize existing contracts to produce material in 27 languages. For more information on digital engagement, please see Element 9 below.</p> <p>As funding is available, ASPA will contract out translation to outside contractors.</p>	<p>Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>

<p><b>Element 4. Policies and Procedures:</b>  ASPAs will develop, implement and regularly update written policies and</p>	<p>Develop and implement HHS and ASPA Language Access Plans; Indirect Public Contact, ASPA-only</p>	<p>implementation, using feedback from HHS working groups and news analysis.</p> <p>ASPAs DCD translation procedures require a Spanish version to be translated within 24 hours of English-language material "going live" (being released for public review to news wires or Internet posting). This ensures that LEP persons have meaningful access to agency information in a timely fashion. For urgent requests, the DCD will translate material in four hours or less depending on the complexity of the task. DCD has a Translation Manager who ensures the timely and accurate execution of this procedure.</p> <p>ASPAs DCD will support the Section 508 Program iv, requiring all Web site content to be equally accessible to people with disabilities. This applies to Web applications, public-facing Web pages, and the internal-facing Intranet. The goals of the program are to assist HHS OPDIVs and STAFFDIVs in:</p> <ul style="list-style-type: none"> <li>• Testing websites, Web pages, Web applications, widgets, documents, and email blasts for 508 compliance;</li> <li>• Provide guidance on how to remediate 508 issues within existing websites and documents; and</li> <li>• Empower OPDIVs with the knowledge and resources to ensure the compliance of future websites through various training sessions and materials.</li> </ul>	<p>Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>
<p><b>Element 5. Notification of the availability of free language services:</b></p>	<p>Market ASPA products available for LEP persons;</p>	<p>Within a year, and regularly after that, the Special Outreach Coordinator will look to expand awareness of all ASPA-managed HHS websites that can offer</p>	<p>Existing ASPA staff and budget resources will be utilized to support</p>

<p>ASPA will, in accordance with agency needs and capacity and in plain language, will proactively inform individuals with LEP that language assistance is available at no cost.</p>	<p>Indirect Public Contact, ASPA-only</p>	<p>HHS news and communication products in languages other than English. ASPA will look to make its Web sites accessible to the widest possible audience, including LEP persons. HHS will do this through implementation of Section 508 of the Rehabilitation Act regulations and the HHS Secretary's Section 508 Implementation Policy.</p> <p>The HHS TV Studio and ASPA's News Division will support tagging and describing our video products in YouTube so LEP users are aware of the translation function.</p>	<p>this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>
<p><b>Element 6. Staff Training:</b> ASPA will commit resources and provide employee training as necessary to ensure management and staff understand and can implement the policies and procedures of this plan and their respective agency Language Access Plan. Agency-designed training will help ensure all HHS employees understand the importance of and are capable of providing effective communication to individuals with LEP in all their programs and activities.</p>	<p>Train and evaluate ASPA staff that support LEP persons; Indirect Public Contact, ASPA-only</p>	<p>On a rolling basis, the Special Outreach Coordinator will introduce the HHS and ASPA Language Access Plans to new ASPA staff and provide these materials for discussion and planning. The Coordinator will seek appropriate training to afford necessary communication skills and vision to observe trends and make recommendations related to the production and delivery of HHS news and communication material. ASPA will define and make available additional guidance, policies, and procedures related to its language access assistance activities, as well as necessary resources available in each program, to ASPA staff.</p> <p>The ASPA DCD will take steps to train front-line and managerial staff concerning the policies and procedures of its language assistance activities, and the resources available to each program. In respect to section 508, DCD will provide a layered, modular training program designed to accommodate the various roles and functions within HHS. The program includes introductory training, evaluation training,</p>	<p>On a rolling basis, the Special Outreach Coordinator will introduce the HHS and ASPA Language Access Plans to new ASPA staff and provide these materials for discussion and planning. The Coordinator will seek appropriate training to afford necessary communication skills and vision to observe trends and make recommendations related to the production and delivery of HHS news and communication material. ASPA will define and make available</p>

		<p>remediation training, issue management, and special-topics-in accessibility training.</p>	<p>additional guidance, policies, and procedures related to its language access assistance activities, as well as necessary resources available in each program, to ASPA staff.</p> <p>The ASPA DCD will take steps to train front-line and managerial staff concerning the policies and procedures of its language assistance activities, and the resources available to each program. In respect to section 508, DCD will provide a layered, modular training program designed to accommodate the various roles and functions within HHS. The program includes introductory training, evaluation training, remediation training, issue management, and special-topics-in</p>
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			accessibility training.
<p><b>Element 7. Assessing accessibility and quality:</b> ASPA will regularly assess the accessibility and quality of language assistance activities for individuals with limited English proficiency, maintain an accurate record of language assistance services, and implement or improve LEP outreach programs and activities in accordance with customer need and agency capacity.</p>	<p>Ensure quality of ASPA products available for LEP persons; Indirect Public Contact, ASPA-only</p>	<p>As part of the Special Outreach Coordinator's duty to identify and review HHS news and communication material of interest to the LEP community and stakeholders, the Coordinator will develop an annual summary report providing evaluation and analysis of the impact of our outreach.</p> <p>The ASPA DCD's language contractor will run quality assurance scans on HHS translated, published material daily. These scans will provide information on broken links, bad graphics, missing text and other errors that may otherwise devalue the usefulness of translated content. With these scans, DCD will be able to routinely fix errors that limit the accessibility and quality of language materials for customers with LEP.</p> <p>The language used in all translated materials is based on a master glossary to ensure accuracy and reliability. This glossary has been developed through years of translation and vetted by HHS Staff and Operating Division partners to ensure HHS conforms to industry-accepted translation terminology.</p> <p>The HHS TV Studio will analyze hhs.tv web site for downloads of Spanish-language resources.</p>	<p>Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>
<p><b>Element 8. Stakeholder Consultation:</b> ASPA will consult</p>	<p>Engage directly with LEP persons, stakeholders;</p>	<p>The Special Outreach Coordinator will participate in the HHS working groups that support language access planning. The Coordinator will follow LEP news trends and develop relations with LEP</p>	<p>Existing ASPA staff and budget resources will be utilized to support this</p>

<p>with stakeholder communities, in accordance with this and other federal policies to identify language assistance needs of individuals with LEP, implement appropriate language access strategies to ensure individuals with LEP have meaningful access in - accordance with assessments of customer need and agency capacity, and evaluate progress on an ongoing basis.</p>	<p>Direct and Indirect Public Contact; Department wide</p>	<p>stakeholders to strengthen engagement and to ensure their feedback is considered in the development of HHS news and communications material. The Coordinator will include LEP stakeholder input into practices, policies, and strategy to help ASPA engage more with LEP persons.</p> <p>The ASPA DCD will use email outreach, social media, blogs, podcasts, and other forms of new media to promote LEP content to underserved communities. This outreach traditionally accounts for a significant amount of the inbound traffic ASPA receives through our Spanish-language sites. When needed, DCD will consult with translation experts through existing contract to develop, distribute and improve LEP materials.</p> <p>The HHS TV Studio will work with our Digital Media Team to coordinate efforts to reach LEP populations more effectively.</p>	<p>element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>
<p><b>Element 9. Digital Information:</b> ASPA will develop and implement specific written policies and procedures to ensure that, in accordance with assessments of LEP needs and agency capacity, digital information is accessible by communities in</p>	<p>Use Internet-based systems to reach LEP persons; Direct and Indirect Public Contact, Department-wide</p>	<p>The Special Outreach Coordinator will explore opportunities to leverage social media to increase awareness of HHS services, programs, and news for LEP and disabled persons. The coordinator will seek feedback from HHS LEP workgroups LEP persons and on their experience accessing digital HHS news and communication materials to ensure their voices are heard. The coordinator will identify and make recommendations for</p>	<p>Existing ASPA staff and budget resources will be utilized to support this element. Specific costs to implement action steps for this element will be identified on a yearly basis. ASPA will consider, develop, and</p>

<p>need of language services.</p>		<p>content on the HHS website based on feedback from LEP group stakeholders.</p> <p>The ASPA DCD currently offers some web properties in a language other than English:</p> <p>While these are among our key public sites, they are currently only offered in Spanish, but can be offered through 27 language options. These services can be called upon, as needed, with task orders (and funding) from Staff and Operating Divisions throughout the Department to better serve LEP communities.</p> <p>In addition to ASPA efforts to promote non-English LEP content, DCD has an extensive 508 Program to meet the needs of those with other access and functional needs. Websites will be checked routinely to ensure compliance with 508 regulations. An extensive workflow will be used to identify, remediate, and close 508 failures.</p> <p>The HHS TV Studio and the ASPA News Division support tagging and describing of our video products in YouTube so LEP users are aware of the translation function.</p>	<p>evaluate data collection and analysis methods to ensure successful implementation of the element above.</p>
<p><b>Element 10. Grant Assurance and Compliance:</b> ASPA will ensure that grant recipients understand and comply with their</p>	<p>N/A – ASPA does not manage grants.</p>	<p>N/A – ASPA does not manage grants.</p>	<p>N/A – ASPA does not manage grants.</p>

obligations under civil rights statutes and regulations enforced by HHS related to language access.			
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**APPENDIX A: Definitions**

**Note:** Any related definitions that may be issued under Section 1557 will complement or supersede the broad working definitions set forth below.

Document Terminology	Terminology Defined
Agency	<p>Agency refers to HHS Operating Divisions (such as CDC, FDA or NIH) and Staff Divisions (such as the Office for Civil Rights or the Office of the Assistant Secretary for Public Affairs). Operating Divisions focus on specific programs and activities as authorized by Congress. Staff Divisions are part of the Office of the Secretary and serve in a coordinating role for the Department.</p>
Applicant	<p>Any person who inquires about or submits an application for public assistance benefits under any program or service.</p>
Auxiliary Aids and Services	<p>Tools or assistance provided to communicate with people who have communication disabilities.</p>
Beneficiary	<p>Anyone who has applied for and is receiving Medicare, Medicaid, or other health benefit.</p>
Bilingual/Multilingual Staff	<p>A staff member who has advanced proficiency (e.g., proficiency at or above the Federal Interagency Language Roundtable (<a href="https://www.govtilr.org/https://www.govtilr.org">https://www.govtilr.org/https://www.govtilr.org</a>) level 3 in listening, reading, and speaking or above the American Council on the Teaching of Foreign Languages “Superior” level in listening, reading, and speaking)) in English and at least one other language and has knowledge of and experience with specialized terminology necessary for meaningful communication. A staff member who only has a rudimentary familiarity with a language other than English shall not be considered Bilingual/Multilingual Staff.</p> <p>Bilingual/Multilingual Staff should not interpret or translate unless they have separately met the requirements of being a qualified interpreter or translator. Bilingual/Multilingual Staff must be given clear roles and expectations regarding whether they are performing their job duties in-language or serving as qualified interpreters or translators.</p> <p>A distinction should be made between Bilingual/Multilingual Staff who provide services directly in a non-English language (e.g., call center staff) and those who interpret, as the assessment and skills required for each differ.</p>
Certificate	<p>An academic recognition demonstrating the successful completion of a program of study, usually based on amount of instructional time and a minimum grade.</p>

Certification	Institutional recognition demonstrating successful passing of an examination that tests knowledge, skills, and abilities related to an occupation.
Contractor	Any entity that performs work or provides services on behalf of an agency or division under a contractual agreement with reimbursement.

<b>Document Terminology</b>	<b>Terminology Defined</b>
Customer	Individuals, businesses, and organizations that interact with an HHS agency or program. The term customer is inclusive of beneficiaries and health care and human services partners.
Digital Information	Information, as defined in OMB Circular A-130, which the government produces and provides digitally to help individuals access HHS conducted programs and activities for which they are individually eligible to participate. OMB Circular A-130 defines digital information as any communication or representation of knowledge such as facts, data, or opinions in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms.
Direct “in-language” communication	Monolingual communication in a language other than English between a multilingual staff and a person with LEP (e.g., Korean to Korean).
Disaggregated Data	Data that separates out subgroups to provide the most descriptive and detailed information possible; for example, rather than using data about “Asian languages” or “Native American languages,” disaggregated data would indicate which specific languages are spoken by an individual or at the community level. Disaggregated data may also include information about varied dialects, as well as more specific national origin information.
Effective Communication	For communication disabilities, it refers to aids and services to ensure that communication with people with disabilities, such as people who are deaf or hard of hearing, is as effective as communication as for people without disabilities. Auxiliary aids and services must be provided when needed to achieve effective communication.
Health Care and Human Services Partner	Beneficiaries, including recipients of federal financial assistance, contractors, vendors, advocacy groups, religious institutions, non- governmental organizations, hospital administrators, health insurers, translators, interpreters, community health clinics, and representatives from a broad cross-section of the language access community, individuals with disabilities, etc.
Interpretation	The act of listening, understanding, analyzing, and processing a spoken communication in one language (source language) and then faithfully orally rendering it into another spoken language (target language) while retaining the same meaning. For individuals with certain disabilities that affect communication, this can include understanding, analyzing, and processing a spoken or signed communication in the source language and faithfully conveying that information into a spoken or signed target language while retaining the same meaning.

Intersectional Data	Data that combines or otherwise includes information about more than one demographic or other characteristic; for example, intersectional data would include data regarding national origin and LEP status, and/or data regarding Native American women (thus analyzing data about the intersection of race and gender). It may also include data about literacy rates, poverty rates, familial status or other
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Document Terminology	Terminology Defined
	characteristics relevant to social determinants of health.
Language Access	The ability of individuals with LEP to communicate with HHS employees and contractors, and meaningfully learn about, apply for, or participate in HHS programs, activities, and services.
Language Assistance Services	All oral, written, and signed language services needed to assist individuals with LEP and people with disabilities to communicate effectively with HHS staff and contractors and gain meaningful access and an equal opportunity to participate in the services, activities, programs, or other benefits administered by HHS.
Limited English Proficiency (LEP)	An individual who does not speak English as his or her preferred language and who has a limited ability to read, write, speak or understand English in a manner that permits him or her to communicate effectively with HHS and have meaningful access to and participate in the services, activities, programs, or other benefits administered by HHS. Individuals with 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 (e.g., conversing in English with coworkers), but these skills may be insufficient in other settings (e.g., addressing court proceedings). An individual who is deaf or hard of hearing may also have limited proficiency in spoken or written English.
Machine Translation	Automated translation that is text-based and provides instant translations between various languages, sometimes with an option for audio input or output.
Meaningful Access	Language assistance that results in accurate, timely, and effective communication at no cost to the individual with LEP needing assistance. Meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English-proficient individuals.
Participant	Any person who has applied for and is receiving public assistance benefits or services under any HHS program or service.
Plain Language	Plain language as defined in the Plain Writing Act of 2010 is writing that is “clear, concise and well organized.”
Preferred/Primary Language	The language that LEP individuals identify as the preferred language that they use to communicate effectively. The language that LEP individuals identify as the preferred language that they use to communicate effectively.

Qualified Interpreter or Translator

A bilingual/multilingual person who has the appropriate training and experience or demonstrated ability to fully understand, analyze, and process and then faithfully render a spoken, written, or signed message in one language into a second language and who abides by a code of professional practice and ethics. In the context of disabilities, a qualified interpreter is one who is able to interpret effectively, accurately and impartially, both receptively and expressively, using

Document Terminology	Terminology Defined
	any necessary specialized vocabulary. A child shall not be considered a qualified translator or interpreter, nor shall a family member or employee who does not meet the minimum qualifications specified above.
Sight Translation	The oral or signed rendering of written text into spoken or signed language by an interpreter without change in meaning based on a visual review of the original text or document.
Sign Languages	Languages that people who are deaf or hard of hearing use in which hand movements, gestures, and facial expressions convey grammatical structure and meaning. There is no universal sign language. Different sign languages are used in different countries or regions. For example, British Sign Language (BSL) is a different language from ASL, and Americans who know ASL may not understand BSL.
Sub-recipient	An entity that, on behalf of and in the same manner as a recipient of federal financial assistance, provides services to and has contact with applicants to and participants in a program administered by a recipient of federal financial assistance, but does not include an individual applicant or participant who is a beneficiary of the program.
Tagline	Brief message that may be included in or attached to a document. Taglines in languages other than English are used on documents (including websites) written in English that describe how individuals with LEP can obtain translation of the document or an interpreter to read or explain the document. Section 1557 and Title VI will prescribe the languages that must be included in such tagline notices but covered entities may also add more languages.
Translation	The process of converting written text from a source language into an equivalent written text in a target language as fully and accurately as possible while maintaining the style, tone, and intent of the text, while considering differences of culture and dialect.
Vital Document	Paper or electronic written material that contains information that is critical for accessing a component's programs or activities or is required by law. Vital documents include, but are not limited to: critical records and notices as part of emergency preparedness and risk communications; online and paper applications; consent forms; complaint forms; letters or notices pertaining to eligibility for benefits; letters or notices pertaining to the reduction, denial, or termination of services or benefits that require a response from an individual with LEP; written tests that evaluate competency for a particular license, job, or skill for which knowing English is not required; documents that must be provided by law; and notices regarding the availability of language assistance services for individuals with LEP at no cost to them.