

## **Office of Global Affairs' Language Access Plan 2024**

### **Overview and Language Access**

The Office of Global Affairs (OGA) serves as the primary point of contact in HHS for setting priorities for international engagements and developing and strengthening relationships with US government agencies, foreign ministries of health, multilateral partners at headquarters and in the field, and with civil society and the private sector. OGA provides policy recommendations and staff support to the Secretary, Deputy Secretary and other senior HHS leadership in the areas of global health and social issues and coordinates international health and social matters across HHS, including major crosscutting global health initiatives.

In addition, OGA is the organizational home of the U.S.-Mexico Border Health Commission (BHC), established as a binational commission in 2000 to provide international leadership that optimizes health and quality of life along the U.S.-Mexico border. The BHC supports health promotion efforts throughout the 10 U.S. and Mexico border states to raise awareness about public health issues and challenges faced by populations living on both sides of the border; create the necessary venues and partnerships to mobilize the actions needed to improve health status; and serve as a reliable information portal regarding border health issues.

OGA's interagency partners include National Security Council staff, the Department of State, the Department of Defense, and the U.S. Agency for International Development, among others. Multilateral partners include the World Health Organization; the Pan American Health Organization; the Global Fund to Fight AIDS, Tuberculosis and Malaria; the UN Joint Program on HIV/AIDS; the Organization for Economic Cooperation and Development; the African Union, and the Asia Pacific Economic Cooperation.

OGA does not provide direct services to US citizens and, as such, does not have beneficiaries or customers in the traditional sense. OGA's contact with US citizens interested in global health affairs is through [globalhealth.gov](http://globalhealth.gov), which people consult to learn about the US government and HHS's global health activities. At the time of writing, OGA has never encountered an individual who has needed/requested translation services while consulting its website. However, as with any website OGA's has the capacity to be translated into any language upon request. The Office of Global Affairs' Agency Liaison and Front Office will be tasked with implementing the plan: [OGA-ALO@hhs.gov](mailto:OGA-ALO@hhs.gov).

### **Element 1: Assessment and Needs Capacity**

In March of each year, OGA will assess the extent that language assistance or in-language material was requested and/or accessed or otherwise needed by customers, including beneficiaries, and/or other health care and human services partners, and develop a budget request to meet anticipated language assistance needs for the coming year.

OGA will, on an ongoing basis, assess the language assistance needs of current and potential customers to inform policy, processes, and budgeting necessary to increase awareness of and implement language assistance services that increase access to respective programs, activities, and services for persons with LEP.

This assessment will include 1.) identifying the non-English languages, including American Sign Language (ASL) or other sign languages, spoken by the population likely to be accessing or otherwise in need of and eligible for the agency's services, and 2.) the barriers – including resource barriers – that hinder provision of effective interpretation and written communication with individuals with LEP.

#### Action Steps:

- a. Each year, a representative from OGA's front office, will participate in at least one listening session, hosted by HHS as a whole, to learn about challenges and opportunities for improvement in the agency's language access efforts, and consult subject matter experts to determine whether the agency's current language access program is effective and complies with Section 1557 of the Affordable Care Act, as well as this Language Access Plan.
- b. OGA's front office must regularly participate on at least one inter- and/or intra agency language access working group to identify methods for improving agency proficiency in providing language assistance services, such as hiring and equitably supporting qualified bilingual and multilingual staff, and staff proficient in ASL, to provide direct "in language" communication and also ensuring the availability and effective use of contract interpretation and translation services.
- c. OGA must take specific steps to develop or amend policies or practices that ensure the agency's language assistance services are adequate to meet customer needs and advise agency officials on updating the agency language access plan as needed.

OGA staff should not make assumptions about an individual's primary language based on race, color, national origin, or disability status. Individuals who are deaf or hard of hearing may not communicate using ASL and may have limited proficiency in written and spoken English. They may require a different auxiliary aid or service, such as support in a sign language from another region or country or the procurement of a Deaf or Certified Deaf interpreter. Additional considerations when identifying language include asking about the individual's region, municipality, village, or specific community, to ensure the correct identification of language.

This policy applies to all OGA staff.

#### **Element 2. Oral Language Assistance Services**

OGA will ensure the provision of oral language assistance for LEP customers in face-to-face and telephone encounters.

#### **Element 3. Written Translations**

OGA 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. OGA will leverage existing HHS service/resources to ensure cost-effective methods for addressing this element.

#### **Element 4: Policies, Procedures, Practices**

OGA must establish and maintain an infrastructure designed to implement and improve language assistance services within the agency. The results of the assessment from Element 1 should be used to inform the development of policies, procedures, and practices appropriate for the agency to promote accessibility for individuals with LEP they serve or are likely to serve.

**Action Steps:**

- a. Designate an office or official responsible for developing and implementing written language access policies and procedures to ensure each element of the HHS Language Access Plan is implemented in OGA's respective programs and activities, including during public health emergencies.
- b. The designated office or official will participate on at least one inter- and/or intra-agency working group that is focused, at least in part, on identifying and implementing effective practices for improving access for persons with LEP. The designated office or official will propose effective practices to the agency head to ensure policies and procedures are effectively administered.
- c. Develop policies and procedures for receiving and addressing language assistance concerns or complaints from customers with LEP and customers with disabilities who require auxiliary aids or services for effective communication of programs and activities that are funded or administered by OGA's and establish policies and procedures to improve services.
- d. Ensure policies, procedures, and all language assistance activities are developed and implemented in alignment with the National Standards for Culturally and Linguistically Appropriate Services (CLAS) in Health and Health Care.
- e. Share with the HHS Language Access Steering Committee policies and procedures, highlighting those that might be more effective or efficient if adopted on a Department- or government wide basis so the Language Access Steering Committee can include the information in the annual progress report.
- f. Continually collect and share metrics to monitor implementation and efficacy of the plan. This may include, but is not limited to: conducting an inventory of languages most frequently encountered, identifying the primary channels of contact with LEP community members (whether telephonic, in person, correspondence, web-based, etc.), reviewing component programs and activities for language accessibility, maintaining an inventory of who attended language access training (including topics discussed), reviewing the annual cost of translation and interpretation services, and consulting with outside partners or health care and human services partners.

**Element 5. Notification of the Availability of Free Language Services**

OGA will conduct outreach where applicable 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**

OGA will commit resources and provide employees training as necessary to ensure management and staff understand and can implement the policies and procedures of this plan and the HHS Language Access Plan. HHS and agency-designed training should also ensure all HHS employees have access to performative information and training opportunities that support their capacity and capability to provide meaningful communication to individuals with LEP.

The staff training should include the following components:

- a. The Department and agency's legal obligations to provide language assistance services.
- b. Department and agency language access resources and designated points of contact.
- c. Identifying the language needs of an LEP individual.
- d. Working with an interpreter in person or on the telephone.
- e. Requesting documents for translation.
- f. Accessing and providing language assistance services through multilingual employees, in-house interpreters and translators, or contracted personnel.
- g. Duties of professional responsibility with respect to LEP individuals.
- h. Interpreter ethics.
- i. Tracking the use of language assistance services.
- j. Tips on providing meaningful assistance to LEP individuals.
- k. How to request translation and interpretation services.
- l. How the public can request services or file a complaint.

Online training should be available to all employees on a regular basis.

In order to ensure that OGA employees understand the importance of and are capable of providing both interpretation and written translation language assistance services in all their programs and activities to individuals with LEP, managers and public facing employees consider training on how to provide language assistance services to their customers in a timely manner. OGA will designate an office or official to regularly monitor the efficacy of language assistance training provided to managers and public facing staff.

Action Steps:

- a. Designate an office or official responsible for developing, implementing, and committing resources necessary to train agency-designated employees to implement elements of this plan that address delivery of language assistance services.
- b. Develop a process that ensures overall employee awareness of the OGA Language Access Plan.
- c. Determine which staff members should receive training in the provision of language assistance services and related policies, procedures, and effective practices.
- d. Work with the agency's management and communications offices to notify employees that OGA provides language assistance and informs employees on how to provide assistance or otherwise contact the office or official responsible for ensuring the provision of language assistance services.
- e. Link and disseminate training materials, whether newly developed or pre-existing, that assist management and staff in procuring and providing meaningful communication for

individuals with LEP. The federal learning management system (LMS) could be a useful resource to consult for training materials regarding, for example, Section 508 and CLAS standards.

- f. Link to the HHS dedicated resource webpage in the intranet that can serve as a repository of Standard Operating Procedures, guidance documents, materials, training opportunities, etc.

### **Element 7: Assessment & Accountability: Access, Quality, Resources, Reporting**

To increase availability and quality of language assistance services, OGA must designate an office or official to establish an infrastructure to annually assess OGA's language assistance program and make recommendations for improvements. Specifically, the designated office or official will assess the efficacy and availability of services provided to individuals with LEP and people with disabilities, including customer waiting time; quality of written translations and interpretation utilization of appropriate communication channels; barriers to providing services; and overall customer satisfaction with the language assistance services provided.

#### **Action Steps:**

- a. Designate an office or official responsible for developing, implementing, and committing resources necessary to regularly monitor and annually assess relevant practices and procedures, focusing on progress made by OGA to improve and ensure the quality and accuracy of language assistance services provided to individuals with LEP and people with disabilities, while also addressing challenges.
- b. Implement methods for measuring improvements in language access in individual programs and activities and take steps to ensure that such information is collected in a manner that increases comparability, accuracy, consistency across programs and activities and takes into consideration guidance provided by the Language Access Steering Committee.
- c. Implement an agency process to annually report to the Language Access Steering Committee on agency progress implementing each element of this plan, effective practices, and barriers to improving the language access program, in accordance with the Language Access Steering Committee reporting timelines.
- d. Address, in accordance with policies and procedures developed under Element 4, complaints received regarding language assistance services and products, or other services provided by the agency, in a timely manner, and retain a record of any resolution of such complaints. Whenever feasible, resolutions and agreements should be made public.
- e. Implement methods for measuring improvements in language access in individual programs and activities and take steps to ensure that such information is collected and reported to the Language Access Steering Committee.

### **Element 8: Consultations with Health Care and Human Services Partners**

OGA 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 needs and agency capacity; and conduct ongoing evaluation of progress.

### **Element 9: Digital Information**

To help ensure individuals with LEP have digital/online access to in-language program information and services, and to help ensure they are aware of and can obtain language assistance needed to access important program information and services, OGA will designate an office or official responsible for and capable of establishing and maintaining an infrastructure that effectively distributes in-language information online in a manner that promotes meaningful access for individuals with LEP. In addition, the designated office or official will regularly monitor the efficacy, quality, readability, and accessibility of translated materials provided online to promote ease of use and access. OGA is encouraged to work with its internal web content staff and the Office of the Chief Information Officer (OCIO) to periodically assess and monitor translated digital content to improve meaningful access for persons with LEP. OGA must also comply with Section 508 of the Rehabilitation Act of 1973 (Section 508), which requires federal agencies to ensure that their information and communication technology, including websites, electronic documents, and software applications, are accessible to individuals with disabilities. OGA shall work with OCIO and its own Section 508 Program Managers to ensure that translated digital content meets Section 508 requirements to improve access for people with disabilities. In addition to the requirements of Section 508, Section 504 requires that HHS take appropriate steps to ensure effective communication with people with disabilities, including through the provision of appropriate auxiliary aids, application of plain language principles, and services such as sign language interpreters.

For example, at virtual meetings this means that HHS may be required to provide a sign language interpreter and that the virtual meeting platform used should be able to accommodate a screen for a sign language interpreter that can be seen by the person with a disability who requires the interpreter. OGA is also encouraged to provide timely information, such as deadlines or significant policy shifts, through videos in sign language.

#### **Action Steps:**

- a. Designate an office or official responsible for and capable of establishing and maintaining an infrastructure that effectively distributes in-language information online in a manner that promotes meaningful access for individuals with LEP, and regularly monitor efficacy, quality, readability, and accessibility of translated materials.
- b. Prominently display links and/or symbols at the top-right corner of the agency's English language website, to pages and documents that are also available for viewing or downloading in languages other than English including sign language.
- c. Prominently display links on the agency's English language homepage that effectively steers visitors to telephonic interpreter services in the visitor's language.

- d. Notify visitors with LEP to HHS webpages that language assistance is available at no cost in alignment with the action steps outlined in Element 5, including multilingual technical support and alternatives for individuals who cannot navigate digital spaces.
- e. Serve on at least one inter- and/or intra-agency working group that focuses in part on making government websites more accessible to persons with LEP in multiple languages and people with disabilities through various multimedia formats.
- f. Use and promote the resources on [www.lep.gov](http://www.lep.gov) by providing links to the LEP.gov website on agency and program websites.
- g. Develop procedures for creating, posting, and updating multilingual web content, digital materials, and social media posts that are accessible to all audiences.
- h. Leverage social media, email dissemination, and/or text message services to increase awareness and utilization of agency programs, activities, language assistance services, and products available in non-English languages by individuals with LEP and people with disabilities.
- i. Leverage HHS digital policies and U.S. Web Design Standards for guidance on multilingual display guidance and options:  
<https://designsystem.digital.gov/components/language-selector/>.
- j. Conduct a usability test with visitors with LEP every two (2) years to collect data (including intersectional and disaggregated demographic data), identify features, and components that might need to be addressed to improve access and navigation of webpages, products, or services online. Manage visitors' expectations by also considering URL best practices and general site functionality. If displaying or showcasing forms, consider what the experience is for the user clicking on call-to-action buttons and their journey across the digital ecosystem. Ensure that multiple last names, short names, and/or diacritics are acceptable by the fields created.
- k. Regularly monitor the efficacy, quality, readability, and accessibility of translated materials provided online to promote ease of use and access. Regularly consider and evaluate advancements in technology such as artificial intelligence, including machine learning, to expedite translation while committing qualified human translators and editors for review.
- l. Develop benchmark efforts and regularly evaluate through data (including intersectional and disaggregated data), analytics, user feedback, and customer feedback mechanisms such as customer satisfaction surveys (in-language) to assess the usefulness of information to determine and address gaps and focus resources on critical online information and services.
- m. Maintain a list of all in-language content provided on the agency's webpages or separate websites.
- n. For virtual meetings, ensure that the platform being used provides for closed captioning and that the captioning function is enabled by the host. As a best practice, consider using real time translation services such as Communication Access Realtime Translation (CART) to ensure better accuracy of captions.

- o. For virtual meetings, ensure that participants are able to highlight another participant's screen and keep focus on that screen so that sign language users can focus on a sign language interpreter, even if the interpreter is not speaking.
- p. As a best practice for virtual meetings, provide attendees the option to request auxiliary aids and services or reasonable modifications in the meeting invitation so that individuals with disabilities may take part in the meeting. In practice, this will generally amount to requests for captioning and/or sign language interpreters so that attendees with disabilities may participate. The invitation may require that any requests for auxiliary aids and services or reasonable modifications be made by a certain date prior to the meeting to allow the meeting organizer sufficient time.

OGA will work with HHS OCIO (and other divisions as appropriate) to revise our digital contact to ensure we are compliant with existing laws and regulations, such as from the 21st Century Integrated Digital Experience Act (IDEA), which requires any public federal agency website created after December 2018 to follow the U.S. Web Design System (USWDS).

**Element 10. Grant Assurance and Compliance:**

OGA does not administer grants.

## Definition of Terms

Document Terminology	Terminology Defined
Agency	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.
Applicant	Any person who inquires about or submits an application for public assistance benefits under any program or service.
Auxiliary Aids and Services	Tools or assistance provided to communicate with people who have communication disabilities.
Beneficiary	Anyone who has applied for and is receiving Medicare, Medicaid, or other health benefit.
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	An academic recognition demonstrating the successful completion of a program of study, usually based on amount of instructional time and a minimum grade.
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.
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 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 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.