

**SPLN-3050-0001 Revision A
July 2002**

**John C. Stennis Space Center
Language Assistance Plan (LAP)
Accommodating Persons with
Limited English Proficiency
In NASA-Conducted Programs and Activities**



National Aeronautics and
Space Administration

John C. Stennis Space Center
Stennis Space Center, MS 39529-6000

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1.0 INTRODUCTION

1.1 Purpose

The SSC Language Assistance Plan (LAP) has been prepared in accordance with the requirements of Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," dated August 11, 2000. The Executive Order requires that Federal Agencies develop an implementation plan for its federally conducted and assisted programs. The SSC Language Assistance Plan (LAP) outlines the plans and goals for implementation of the Executive order.

1.2 Background

English is the predominant language of the United States. According to the 2000 Census, English is spoken by 97 percent of its residents. Of those U.S. residents who speak languages other than English at home, the 2000 Census reports that 79 percent above the age of 5 speak English "...well to very well." However, the U.S. is home to millions of national origin individuals who are "Limited English Proficient (LEP)." That is, they cannot speak, read, write, or understand the English language at a level that permits them to benefit from NASA-conducted programs and activities. Accommodation of limited English proficiency through the provision of effective language assistance will allow SSC to meet its obligations under Executive Order 13166. The policy guidance is consistent with the Department of Justice (DOJ) directive noting that recipients of federal financial assistance have an obligation, pursuant to Title VI of the Civil Rights Act of 1964, as amended, and its prohibition against national origin discrimination, to provide oral and written language assistance to LEP persons.

Initial assessment of the local community indicates that SSC has a target population falling into the very low level of limited English proficiency. The four-point assessment of the SSC programs and activities is at Attachment 1.

Limited data currently exists to determine the number of LEP individuals who are served by or benefit from current SSC activities. However, as this LAP is developed and expanded, it is hoped that the metrics gathered would provide a better picture of where we must focus our efforts in the future. Initially, the emphasis will be to initiate the goal of this LAP, knowing full well that as information is gathered our LAP will grow and encompass the needs of our community and those individuals who are LEP.

1.3 Applicability

This plan is applicable to all NASA SSC personnel who may receive requests from the public, either written or oral, for language assistance when accessing one of our programs or activities.

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1.4 Authority

- a. Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d.
- b. Regulations implementing Title VI, provided in part at 45 C.F.R. Section 80.3(b).
- c. Executive Order 13166 entitled “Improving Access to Services for Persons with Limited English Proficiency.”

1.5 References

- a. NPD 2090.5B, Nondiscrimination in Federally Assisted and Federally Conducted Programs of NASA-Delegation of Authority.

1.6 Approach

The SSC LAP for limited English proficient persons defines the overall requirements for developing and implementing the SSC LEP program and supports the achievement, over time, of the program goals and objectives. The goals represent the desired outcome. The objectives represent the process for meeting the needs of LEP persons, as required by Executive Order 13166. The seven elements, outlined in the Department of Justice (DOJ) Guidance on “Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination Against Persons with Limited English Proficiency (LEP),” serve as points of departure for the development of this LAP for NASA SSC.

Following sections of this document define the specific tasks to be accomplished for the SSC LAP. Goal(s), objective(s), responsibilities, and implementation status are provided for each task topic.

1.7 Plan Revisions

This plan will be updated as goals and objectives are achieved and as new requirements are identified for the development of a mature program.

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2.0 LAP PROGRAM PLANNING AND INITIATION

2.1 Overall Objective

The NASA SSC shall provide quality language assistance to LEP persons, as appropriate, in its respective programs and activities. The LAP shall be defined to include SSC programs that are local (communities within a 50-mile radius), regional (serving the three-state area of Mississippi, Louisiana and Alabama) and national.

2.2 Goal 1: Develop Plan and Schedule for a Mature Program

The NASA SSC shall develop a Language Assistance Plan for limited English proficient persons.

2.2.1 Responsibility

Responsible Officials: Center Director and Equal Opportunity Officer

2.2.2 Status

Initial Plan developed, staffed and signed by Center Director and Equal Opportunity Officer on August 23, 2001.

2.3 Goal 2: Initiate Immediate Interim Response Actions

In the interim, the NASA SSC, in the conduct of its respective programs or activities, shall respond to requests for language assistance in a manner that ensures equal access by LEP persons to NASA programs and activities.

2.3.1 Target Date

Immediately and Ongoing.

2.3.2 Responsibility

Same as for Objective 1.

2.3.3 Status

SSC responds to requests for all types of assistance, including language assistance and follows a policy of non-discrimination in its respective programs and activities.

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3.0 Perform Needs and Capacity Assessment (Element 1 – DOJ Guidance)

3.1 Objective

NASA SSC shall have in place mechanisms to assess, on an ongoing basis, the LEP status and language assistance needs of their target audience(s) in their respective conducted programs and activities, as well as mechanisms to assess their capacity to meet those needs according to the elements of this plan. Initial data will be gathered from statistics available from numerous sources, including the U.S. Census Bureau.

3.2 Goal 1: Define Reporting System

Define a reporting system (examples: a semiannual request for input; a form to be completed for each request received, etc.) that will provide metrics to be used for assessing the success of the SSC LAP. Cost information shall be included in the reporting system. The metrics obtained will be valuable, not only in defining the effectiveness of the LAP, but will provide insight into areas of the plan that require changes or modifications.

3.2.1 Responsibility

EO Officer for overall assessment; various employees (particularly, Office of Public Affairs and Office of Education, Webmaster and Chief Information Officer) to ensure reporting occurs.

3.2.2 Due Date

Define the reporting system by mid FY02 - measure against metrics annually.

3.2.3 Status

In April 2002, SSC Form 758 (See Attachment 2) was developed for the reporting and tracking of requests for language assistance. This form is posted on the SSC internal web site and is available for use by all employees. Action complete.

3.3 Goal 2: Publicize LAP to SSC

Present the LAP to the Director and Senior Staff, and after their approval, utilize various media (Newsletter, SSC Intranet Home Page, SSC Bulletin Board, etc.) to notify SSC employees of the purpose and mechanics of the LAP. Ensure that those who have responsibility are clearly defined and notified so they will understand their accountability.

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3.3.1 Responsibility

Center Director and EO Officer

3.3.2 Due Date

Present the LAP and begin the process of notifying SSC employees by the second quarter of FY02 - provide informational updates annually based on the metrics.

3.3.3 Status

LAP presented to Director and Senior Staff in August 2001. Notification of SSC employees accomplished through various media in May and June 2002.

3.4 Goal 3: Promote LAP Externally

Advertise the LAP to our customers outside of SSC, especially in communities with LEP persons. Have a statement on our Home Page and utilize handouts, news releases and other outlets so our customers know of the LAP. Advertisements for specific events should also have a statement concerning the availability of assistance for LEP persons, if applicable.

3.4.1 Responsibility

EO Officer, working with other responsible components.

3.4.2 Due Date

Begin advertising as soon as SSC employees have been notified (estimated to be first half of FY02). Assess, modify if necessary, and provide reminders to the public annually.

3.4.3 Status

The LAP is on the SSC web site to make our plan available to those requesting assistance. Since Spanish has been identified as the most spoken language other than English in the local area, the SSC web site information page has been translated into Spanish. Due to the very-low to low number of LEP individuals in the SSC local area, this action will be reassessed as metrics are developed to determine additional areas of need. SSC will respond to individual requests and track those requests to develop the metrics.

4.0 Provide Oral Language Assistance (Element 2 – DOJ Guidance)

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4.1 Objective

NASA SSC will arrange for the provision of oral language assistance to LEP persons in both face-to-face and telephone encounters in its conducted programs and activities where such assistance is requested and/or anticipated.

4.2 Goal 1: Identify Resources for Oral Language Assistance

Proactively identify resources that can be used based on anticipated requests from the public for oral language assistance. Identify bilingual SSC employees ahead of time and ask for their assistance. Based on their response, we may need to procure a formal interpreter. This applies to requests for speakers, booth staffers, Visitor Center Tours, and for certain outreach events.

4.2.1 Responsibility

EO Officer to begin the process and inform others. Once informed, it will be the responsibility of the individual offices to locate, utilize, and report on the resources that have been identified.

4.2.2 Due Date

Start the process by mid FY02. Update as necessary each year.

4.2.3 Status

SSC will use the NASA HQ Contract for interpretation and translation services as needed. A list of employee volunteers available for interpretation and translation is now maintained in the Equal Opportunity Office.

4.3 Goal 2: Implement Bilingual Volunteer Process

Institute a formal process for identifying sources for assistance from volunteer bilingual SSC employees and outside contract or volunteer sources. Ensure that the list is made available to support Center needs.

4.3.1 Responsibility

EO Officer and Chief, Office of Public Affairs, to coordinate beginning of the process and inform others. Responsibility lies with Public Affairs, Education or Human Resources as they deal with public outreach, education, and SSC employee management, respectively.

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4.3.2 Due Date

Start the process by the beginning of FY02. Update as necessary each year.

4.3.3 Status

See 4.2.3 status. Also, this item will be included in employee training to ensure that all employees who are involved in public outreach are aware of the procedures.

5.0 Translate Written Materials (Element 3 – DOJ Guidance)

5.1 Objective

NASA SSC will produce vital documents in languages other than English where there is a significant number or percentage of LEP persons in the target audience(s) of the respective conducted programs and activities. These written materials may include, but not be limited to, paper and electronic documents such as program and/or activity announcements, notices, Web sites and correspondence.

5.2 Goal 1: Define LEP Target Audiences

Define the LEP target audiences for the local, regional, and national conducted programs and activities. Utilize past history, input from members of Speakers Bureau and other SSC employees, as well as input from the local community.

5.2.1 Responsibility

EO Officer to oversee process of contacting internal and external sources to identify potential LEP target audiences. Data should then be analyzed and shared with other responsible offices.

5.2.2 Due Date

Start the process by the end of FY01. Update as necessary each year.

5.2.3 Status

Most LEP audiences are expected to be contacts through the Office of Public Affairs, Office of Education and Office of Human Resources. Past history did not reveal any requests for language assistance. One email directed to the SSC Webmaster was received in Spanish and was translated by an employee volunteer and responded to. Analysis of information gathered through the use of tracking forms will be kept in the EO database and analyzed annually.

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5.3 Goal 2: Identify Written Materials for Translation

Identify written materials to be translated. Consider level of material, appropriateness for translation and impact in furthering NASA's mission. In most cases, "entry level" materials will be considered appropriate (Visitor Center brochures, Education Program brochures, Human Resources brochures, etc.). Informational Web sites should also be identified.

5.3.1 Responsibility

EO Officer to meet with the appropriate people to identify materials for translation. EO Officer to also identify potential funding sources for translation and printing costs. Metrics should also be established to ensure that materials translated are used.

5.3.2 Due Date

Start the process by the end of FY01. Measure use as needed, and redefine needs annually.

5.3.3 Status

Due to the low levels of requests for translation, the main focus for translating and printing materials will be at the NASA Visitor Center for use by the visiting public. The need for additional translations will be based on annual analysis of the tracking documents.

5.4 Goal 3: Identify Sources for LEP Announcements

Identify LEP sources for announcements, notices and news releases. Define when it would be appropriate to have multilingual media prepared and ensure that responsible employees understand that criteria.

5.4.1 Responsibility

EO Officer to meet with Office of Public Affairs personnel and any other responsible personnel to outline the requirements needed, document the process and disseminate to SSC employees. Public Affairs to define LEP sources within their organization, document their process, and ensure their employees document and report requests from the public for language assistance.

5.4.2 Due Date

Start the process by the beginning of FY02. Measure use as needed, and redefine needs annually.

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5.4.3 Status

The SSC Office of Public Affairs has begun the continuing process of meeting the need to translate certain written materials with widespread audiences. The SSC web page now has a link to a Spanish version.

6.0 Develop Procedures (Element 4- DOJ Guidance)

6.1 Objective

NASA SSC shall have in place specific procedures related to each of the plan elements and designated staff that will be responsible for implementing activities relating to their respective LAP.

6.2 Goal: Define and Document Procedures

Define and document procedures to be used in the administration of the LAP. Ensure that each element has procedures, and that responsible staff are identified and held accountable for their activities. As a minimum, these procedures should be reviewed annually.

6.2.1 Responsibility

EO Officer to maintain written procedures and provide annual review and any updates, as necessary.

6.2.2 Due Date

Start the process by mid FY02. Written procedures should be in place by the end of FY02. Review and updates should be completed annually.

6.2.3 Status

Initial procedures are outlined in this document. As metrics are developed indicating need, more detailed procedures will be initiated.

7.0 Provide Notification of Availability of Free Language Services (Element 5 – DOJ Guidance)

7.1 Objective

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NASA SSC shall inform the target audiences of its conducted programs and activities, through oral or written notice in the relevant primary language, that free language assistance is available and how to request it.

7.2 Goal: Notify Audiences

Based on LEP target audiences already defined, begin the task of notifying these audiences that free language assistance is available. Notices can be added to already existing written materials, Web pages can be modified to include a statement, and outreach personnel can include such a statement in their presentations.

7.2.1 Responsibility

EO Officer to coordinate this process in the beginning, with transition to responsible offices once the process is set up.

7.2.2 Due Date

Start the process once the internal components are ready. Estimate this to be no later than mid-FY02.

7.2.3 Status

Identification of appropriate documents began in early FY02. Organizations such as Office of Public Affairs, Office of Education and Office of Human Resources are completing the identification process and will include a statement on appropriate documents. The SSC information web site has been translated into Spanish. It is expected that the documents identified will be low in numbers due to the results of the four-point analysis. The need for additional documents to be translated will be re-addressed annually as the metrics from our tracking process are developed.

8.0 Staff Training

8.1 Objective

NASA SSC will provide training to appropriate program staff on the policies and procedures of its respective language assistance activities.

8.2 Goal

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Provide high-level briefings to members of Senior Staff; provide in depth briefings to those with responsibilities tied to the LAP; provide overview briefings to interested SSC employees; and utilize newsletters, Web sites and other internal media to disseminate basic information concerning SSC's LAP to the SSC population.

8.2.1 Responsibility

EO Officer to provide these briefings, and coordinate with any other personnel needed as part of the briefing process. EO Officer to work with responsible persons to utilize various media needed to disseminate basic information to the SSC population.

8.2.2 Due Date

Begin the process by mid of FY02. Continue until all defined briefings/information dissemination has taken place, no later than the end of FY02. Provide briefings/updates on an as-needed basis.

8.2.3 Status

A LAP Team was formed in July 2002. The team consists of representatives of organizations with responsibilities tied to the LAP. The team meets as needed and is familiar with the plan and their responsibilities. Notifications to SSC employees took place in May and June 2002.

9.0 Develop Quality Assurance Procedures (Element 7 – DOJ Guidance)

9.1 Objective

NASA SSC will institute procedures to monitor the accessibility and quality of language assistance activities for LEP persons in its conducted programs and activities.

9.2 Goal 1: Record Keeping and Feedback for Continuous Improvement

Ensure that those with LAP responsibilities understand the need for record keeping and feedback, and that they understand that changes will be made to the LAP as needed. This initial LAP represents a beginning, with future LAP's to evolve based on monitoring, feedback and changes as necessary. They need to understand that they have a critical role in this process. Measurements need to be taken regularly, and those involved in the process need to receive feedback so they can understand the continuous nature of the changes as they are implemented.

9.2.1 Responsibility

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EO Officer to ensure that information is shared as the metrics of the LAP are measured and changes are made.

9.2.2 Due Date

Begin the process with the briefings explained in 1.6.1. Continue to provide updates as needed.

9.2.3 Status

All initial briefings to be completed in May 2002. More in-depth briefings will be done with those individuals who will be responsible in their organization for record keeping. Each year, after the analysis of the tracking metrics, the EO Officer will determine the appropriate need for briefings and see that they are accomplished. This LAP will be updated annually after the analysis of the metrics.

9.3 Goal 2: Analysis and Reporting

Identify the personnel with primary responsibility for analyzing and updating the LAP as needed. This person should have access to needed information, and the ability to gather information as needed, at least on an annual basis.

9.3.1 Responsibility

EO Officer to designate the LAP report writer.

9.3.2 Due Date

Designation should be made in conjunction with the briefings explained in 1.6.1.

9.3.3 Status

The Office of Equal Opportunity will assume the role of LAP report writing until the need for a change in process is apparent.

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ATTACHMENTS


Attachment 1 — Four-point Assessment of LEP Persons in SSC Community

Programs and Activities	Target Population	Factor #1 #of LEP persons .0 -> 1.0	Factor #2 Contact Frequency .0 -> 1.0	Factor #3 Importance .0 -> 1.0	Factor #4 Resources Available .0 -> 1.0	LEP Index (1+2+3+4) (<4.0)
SSC Visitors Center	General Public	Unpredictable (.2)	Very Seldom (.1)	Not Vital - Enjoyment & Information (.3)	N/A (.0)	0.6
Press Releases	General Public	Very Few (.1)	Very Seldom (.1)	Non-Vital Information (.2)	N/A (.0)	0.4
Web Sites	General Public	Unpredictable (.2)	Unpredictable (.2)	Non-Vital Information (.2)	Sec. 504 Plan in Progress (.7)	1.3
Educational Outreach	Specific Audiences	Very Few (.1)	Very Seldom (.1)	Non-Vital Information (.2)	N/A (.0)	0.4
Special Emphasis Programs	Employees and Specific Guests	Very Few (.1)	Very Seldom (.1)	Informational (.5)	Interpreters as Needed (.5)	1.2

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Section I			
Date Request Received	Method of Request <input type="checkbox"/> In Person <input type="checkbox"/> Phone <input type="checkbox"/> E-mail <input type="checkbox"/> Mail <input type="checkbox"/> Other		List Other
Name of Person Requesting Assistance		Phone Number	E-Mail Address
Type of Assistance Requested: <input type="checkbox"/> Translation of Written Material <input type="checkbox"/> Web Page Translation <input type="checkbox"/> Employment Information <input type="checkbox"/> Translation of Oral NASA Material <input type="checkbox"/> Assistance with Phone Call <input type="checkbox"/> Contract/Procurement Information <input type="checkbox"/> Other <i>(describe below)</i>			
Describe the Material <i>(please be as specific as possible)</i>			
If requested for an Export Control Document, contact the Export Control Office at 688-3931.			
Language Translation: <input type="checkbox"/> Spanish <input type="checkbox"/> French <input type="checkbox"/> German <input type="checkbox"/> Japanese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Other <i>(Type Below)</i>			
Name of Employee Receiving Request		Mail Code	E-Mail Address
Were you able to Complete the Action? <input type="checkbox"/> Yes <input type="checkbox"/> No Please forward the form within 3 days to: EO Officer, Mail Code AAOO			
Please describe the action taken or needed:			
Section II — EO Office Use			
Follow-up Action			
Cost Information			
<input type="checkbox"/> No Cost <input type="checkbox"/> Used Employee Volunteer Translator	Referred to		Estimated Cost
Cost Attributed to: <input type="checkbox"/> Use of NASA-wide Translation Contract <input type="checkbox"/> Printing of Translated Document(s) <input type="checkbox"/> Other <i>(please describe below)</i>			
Posted to EO Office Log:			

Stennis Plan	SPLN-3050-0001	A
	<i>Number</i>	<i>Rev.</i>
	Effective Date: July 22, 2002	
	Expiration Date: Until revised or rescinded	
Responsible Office: AA00/Office of Equal Opportunity		
SUBJECT: SSC Language Assistance Plan (LAP) Accommodating Persons with Limited English Proficiency in NASA-Conducted Programs and Activities		

<p>SSC LANGUAGE ASSISTANCE PLAN TRACKING DOCUMENT INSTRUCTIONS <i>(Implemented by Executive Order 13166)</i></p>
<p>Use: This form is to be submitted by all NASA/SSC employees who receive a request from the public or from an employee seeking language assistance.</p> <p>Examples: A visitor who has limited proficiency in the English language and cannot read brochure information at the visitor center; someone who needs help with information on a job application; someone who has difficulty understanding a speech or presentation and requires an interpreter; a firm or individual interested in doing business with NASA who does not have full English capability; a school that requests educational materials in another language.</p> <p>Those who have limited English proficiency should have access to NASA programs and activities as required by Executive Order 13166.</p> <p>Instructions:</p> <ul style="list-style-type: none"> • This form is necessary for SSC to compile a record of requests and responses to requests for Language Assistance. • If the request is for an export control document, contact the SSC Export Control Office at 688-3931. • Metrics will be maintained in the Equal Opportunity Office. • All NASA employees who receive a request for language assistance should complete this form and take responsibility for ensuring that individuals requesting assistance are helped in a timely manner. • Provide your own contact information in case there are questions. • Complete the form through Section I. • Section II is for EO Office use. • If you finalize action on the request, please estimate any costs involved such as procuring translation services, in-house solutions, or other costs related to granting the request. • There is a NASA-wide contract that provides translation services, and there are a few employee volunteers who have agreed to provide assistance with translations. Contact the EO Officer at 8-2079 for information on these services.

SSC-758 (04/2002) (Reverse) (MS Word 2000) C.G. (04/2002) pc