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Language Access Plan



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National Aeronautics and Space Administration Language Access Plan

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LANGUAGE ACCESS PLAN UNDER EXECUTIVE ORDER 13166: IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

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Introduction

The National Aeronautics and Space Administration (NASA) has developed this Language Access Plan (LAP) to meet the objectives of Executive Order (E.O.) 13166, "Improving Access to Services for Persons with Limited English Proficiency."¹ The E.O. requires Federal agencies to take steps to provide meaningful access to its programs and activities to members of the public who are limited in their English proficiency (LEP). The primary purpose of the E.O. is to ensure that people for whom English is not a first language who may be limited in their English proficiency may still enjoy meaningful access to the programs and services offered by Federal agencies free of charge. NASA developed this LAP to meet Department of Justice (DOJ) guidance emphasizing that, to avoid discrimination against LEP persons on grounds of national origin, Federal agencies must take adequate steps to ensure that people who are not proficient in English can effectively participate in and benefit from its conducted programs and activities.²

In the spirit of increasing equity for all, including people with limited English proficiency, NASA has prioritized improved language access in our Equity Action Plan.³ In addition, accommodation of the language assistance needs of LEP persons helps NASA to meet its obligations under the National Aeronautics and Space Act of 1958, which requires NASA to provide the widest possible dissemination of information on its activities.⁴ Throughout its history, NASA has routinely shared its scientific breakthroughs and space exploration achievements with the public. E.O. 13166 challenges us to ensure greater access to our programs and our story as an Agency.

To the maximum extent practical, NASA will provide language assistance services to LEP individuals who wish to participate in its programs and activities. NASA-conducted and -funded programs and activities with the highest probability of encountering LEP persons include:

- NASA visitors' centers
- Educational programs, activities, and products
- Communications and public outreach activities, such as NASA websites, social media channels, NASA TV, and public consultations
- Notices advising individuals of their rights under Federal law, including information on how to file a civil rights complaint with NASA

¹ E.O. 13166, "Improving Access to Services for Persons with Limited English Proficiency," August 11, 2000.

² U.S. Department of Justice (DOJ), Civil Rights Division, Federal Compliance and Coordination Section, "Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs," (May 2011) (Language Access Planning Tool).

³ <u>NASA Equity Action Plan</u>, 2023. See also, <u>E.O. 13985</u>, "Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government" and <u>E.O. 14091</u>, "Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government."

⁴ Section 203 (a)(3) of the National Aeronautics and Space Act of 1958, as amended.

NASA's Language Access Plan

U.S. Department of Justice (DOJ) guidance on language access assessment and planning under E.O. 13166 identifies the key components of language access self-assessments and implementation plans.⁵ The elements of the self-assessment roughly approximate the key components of a language access implementation plan, as identified by DOJ.⁶ NASA utilized this guidance shaping the LAP that follows.

1. Officials Charged with Implementing the Plan

a. Agency Level

i. Agency Language Access Coordinator

The Director of the Policy, Programs, and Analytics Division (PPAD), Office of Diversity and Equal Opportunity (ODEO), serves as the Agency's Language Access Coordinator. The Agency Language Access Coordinator has the following main roles and responsibilities:

- Development and oversight of Agency language access policies and procedures to provide meaningful access to LEP persons;
- Oversight, performance, and implementation of the LAP; and
- Oversight and assistance in development of Center-level language access plans implementing the Agency-level plan.

ii. Agency Offices and Directorates

The following Agency organizations (and their Center counterparts) are key Agency stakeholders because of their roles and responsibilities in Agency programs and activities most likely to include LEP program participants:

- Office of the Chief Information Officer (OCIO)
- Office of Communications (OCOMM)
- Office of STEM Engagement (OSTEM)
- Environmental Management Division (EMD)

Agency offices and their Center counterparts are responsible for ensuring that all bilingual staff or contracted personnel who serve as translators or interpreters for official business:

- Demonstrate proficiency in and ability to communicate information accurately in both English and in other languages (e.g., through translator certification);
- Identify and employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, or sight translation), translating, or can communicate fluently in the target language;

⁵ Ibid.

⁶ The six elements are as follows: 1) Understanding how LEP Individuals Interact with the Agency; 2) Identifying and Accessing LEP Communities; 3) Providing Language Assistance Services; 4) Training Staff on Policies and Procedures; 5) Providing Notice of Language Assistance Services; and 6) Monitoring, Evaluating and Updating. DOJ, Language Access Planning Tool, Sec. II, p. 3.

- Have knowledge in both languages of any specialized terms or concepts peculiar to the agency's program or activity and of any particularized vocabulary used by the LEP person; and
- Understand and follow confidentiality, impartiality, and ethical rules to the same extent as NASA staff.

iii. Agency Employees

All NASA employees and contractors⁷ are responsible for reviewing their conducted activities to determine whether translation or interpretation services must be provided under the standard discussed in Section 4 of this plan. Employees should also consider whether the reach and effectiveness of the activity would be enhanced if offered in languages other than English, and whether providing language access would otherwise further one of the strategic goals stated in the Agency's most recent <u>Strategic Plan</u>.

All employees and contractors shall work with their leadership to prioritize public-facing conducted activities for translation or interpretation, and identify resources to fund language services. Employees, contractors, and their leadership shall work with their relevant Center Language Access Coordinator to identify activities most appropriate for translation, access local language access vendors, and ensure quality. Figure 1 below depicts the chains of command for authority and oversight for language access, demonstrating coextensive responsibility and coordination with other agencies, NASA Agency offices, and Centers.

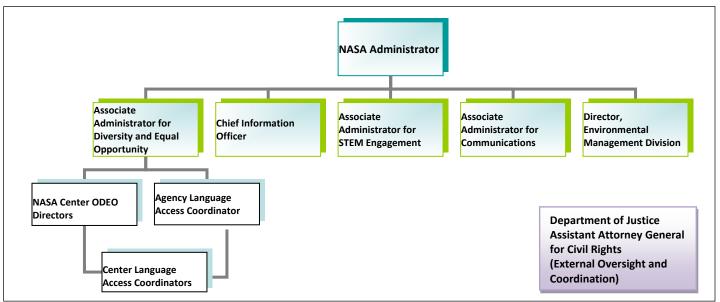


Figure 1. Agency Authority for Language Access

b. Center Level

⁷ For contractors, language access requirements should be included in statements of work to ensure compliance is contractually mandated. To ensure contract provisions comply with federal contracting law, consult the Office of Procurement.

Each NASA Center has named a Language Access Coordinator who is located in the Center ODEO.⁸ Center LAPs detail the chains of command for authority and oversight. Center Language Access Coordinators are responsible for:

- Developing and overseeing implementation of a Center LAP, consistent with the Agency LAP;
- Communicating with the Center Director and other top Center management on the development and implementation of the plan;
- Seeking the needed resources for plan deployment;
- Ensuring appropriate training is provided to Center staff with roles and responsibilities under the plan; and
- Monitoring the Center plan's progress and periodically reporting to the Agency Language Access Coordinator.

2. Services, Benefits, and Activities Provided Directly to the Public: How NASA Interacts with LEP Communities

NASA's conducted programs and activities directly facing the public primarily fall within four main areas: Communications and Public Engagement; Education Programs, Activities, and Products; Public Consultations Required for Environmental or Cultural Management; and NASA Visitors' Centers. Although OCOMM, OSTEM, EMD and OCIO are key Agency stakeholders, responsibility for these activities is distributed among many divisions and offices and the need or opportunity to provide language services must be considered by all offices involved in these activities. For example, while OSTEM leads the Agency's educational work, educational activities are also conducted by the Science Management Directorate, the Space Technology Management Directorate, the Astronaut Office, and others.

a. Communications and Public Engagement

NASA communicates with the public through a variety of media, with the Agency's websites and social media activities serving as the primary means of informing and engaging the public on our missions and resulting accomplishments. OCOMM is responsible for shaping NASA's public messaging, including NASA TV. OCIO is responsible for access to information technology at NASA. A number of other Agency offices are responsible for development of key public documents, outreach materials, and other items of public interest residing on NASA's web pages and social media channels.

The plan identifies the main areas of focus for the Agency in improving LEP access in the communications arena, both from compliance and a "promising practices" perspective:

i. NASA News Events and Public Engagement Activities. This includes press releases, fact sheets, status reports, and significant events reports, responses to media requests from non-English language news organizations, written language components of displays of space artifacts and other exhibits, Speaker's Bureau and related activities, e.g., public lectures, national conferences, technical symposia, IMAX movies, and community events. NASA's Engagement team is developing a new approach for participating in outreach events that will reach more untapped audiences, to include

⁸ Contact information for each Center ODEO is available at: <u>https://www.nasa.gov/offices/odeo/center-EO-offices</u>.

limited English proficient populations. NASA OCOMM and OCIO developed multi-lingual tools that were integrated into the new agency website, launched in 2023. NASA uses these tools to support the posting of NASA materials and information which have been translated into Spanish. Tool options also allow for posting of translations into other languages if, and when, such translations are planned.

ii. Mission Oriented Materials and Information. This includes material residing on NASA's webpages, specifically information about current NASA missions and achievements, including robotic and human spaceflight programs, important developments in aeronautics, and other fields of science and technology. These materials are focused on a range of audiences, from children to adults. Recently, NASA's Space Technology Mission Directorate launched *First Woman: NASA's Promise for Humanity*, a graphic novel series, inspired by real NASA astronauts and the Artemis missions, which will land the first female astronaut and first astronaut of color on the lunar surface. The <u>first and second issues</u> of the graphic novel are available in English and in Spanish, as well as an audio format via NASA's SoundCloud. The audio format was made with guidance from The Virginia School for the Deaf and the Blind and features voice performances, bringing the story to life for more audiences.

iii. Agency Accountability and Compliance Documents and Activities. These include the Agency's Performance and Accountability Plans and Reports, which are intended to provide the Administration, Congress, and most importantly, the American public, with a detailed and transparent accounting of NASA's activities. They also include information about NASA's civil rights responsibilities, including information on how to file a civil rights complaint with NASA. For example, the Agency has translated information on how to file a complaint of federally prohibited discrimination in NASA-conducted education programs into Chinese, Japanese, Korean, Spanish, Tagalog, and Vietnamese. NASA has also translated information regarding discrimination in NASA-funded programs into Spanish. The Agency also engages in required consultations with communities regarding potential environmental or cultural impacts. When appropriate, the Agency translates notifications regarding these consultations and ensures translators are available during the consultations.

iv. **NASA TV Programming.** NASA TV provides video on Center news releases (where appropriate) to Headquarters to post via satellite to television networks for news broadcasts. It also provides daily satellite video to television stations across the globe to use in news story development and arranges interviews with the press and "live shots" in English and Spanish for scientists on national and local television news programs. The NASA TV staff works with television producers or motion picture industry personnel who are writing or filming space productions, publishers verifying NASA facts, and toy and game manufacturers producing facsimiles of NASA products. They also work with video and photo organizations to disseminate aerospace footage, satellite imagery, aerial views of Earth, and digital images of other planets taken by our latest planetary probes. The main goal of NASA TV is "accessibility for all," and that includes creating and distributing Spanish-Language content via NASA's own Spanish-Language division called NASA Español.

v. Spanish Language Communications Program. Launched in 2019, this program covers NASA news and events in the second most-spoken language in the United States. The program supports communications teams at all 10 Centers; ensures the presence of a Spanish-language component in key communication campaigns and other high-profile agency events; provides support to media relations with Spanish-language media outlets; identifies and coaches Spanish-speaking experts for

outreach events; and maintains a vibrant presence across several social media outlets. NASA's central hub for Spanish content is nasa.gov/es; the hub links to all of NASA's Spanish websites and social media channels. NASA's biggest Spanish website is *Ciencia@NASA*, which is aimed at an adult science-attentive audience and are written at the high school senior/first year college level. *Ciencia@NASA* is primarily maintained by the Science Mission Directorate. Stories range from news to profiles of Hispanic NASA employees, evergreen features, and updates on the research at the International Space Station. Between March 1, 2022, and March 1, 2023, *Ciencia@NASA* published 230 stories. The total annual readership was 1,874,000. Other products of the Spanish language communications program include, but are not limited to, live shows, informative handouts, a weekly newsletter with about 100,000 subscribers, and a podcast pilot series. NASA's X account in Spanish, *@NASA_es, is the most popular Spanish language Twitter account in the Federal government.*

b. STEM Engagement Programs, Activities, and Products

NASA's Science, Technology, Engineering, and Mathematics (STEM) engagement activities are conducted by numerous components across the Agency. The STEM engagement community includes NASA's Centers, Mission Directorates, mission offices, and OSTEM. NASA's Strategic Plan states that the Agency seeks to strengthen STEM education through inspirational missions and collaboration with the academic community.⁹ Strategic Objective 4.3 is to "Engage students to build a diverse future STEM workforce." This encompasses national objectives that impact LEP individuals, particularly elementary and secondary school students. For example, these objectives include attracting diverse groups of students to STEM through learning opportunities that spark interest and provide connections to NASA's mission and work; creating unique opportunities for a diverse set of students to contribute to NASA's work in exploration and discovery; and building a diverse future STEM workforce by engaging students in authentic learning experiences with NASA's people, content, and facilities.¹⁰

NASA's STEM engagement programs and activities are often connected to the programs of NASA's Mission Directorates, such as the launch of the James Webb Space Telescope, developments in the Artemis Program, or natural events such as solar or lunar eclipses. For example, NASA has provided a variety of educational materials to students and the general public regarding solar eclipses visible from the US mainland. NASA has published <u>educational and safety materials for such events</u> in Arabic, Chinese, French, Japanese, Korean, Spanish, Tagalog, and Vietnamese.

NASA STEM engagement programs' encounters with LEP populations may include:

- Presentations to and webinars for K-12 students and teachers
- STEM engagement products including educator and student guides, curriculum support materials, videos, brochures, and lithographs
- Interactive websites, including <u>Space Place</u>, an elementary education-focused website available in English and Spanish
- Information regarding NASA's international programs, including the International Global Learning and Observations to Benefit the Environment (GLOBE) Program, a citizen science initiative providing students and the public worldwide with the opportunity to meaningfully contribute to our understanding of the Earth system and global environment. <u>The GLOBE app is</u>

⁹ 2022 NASA Strategic Plan (February 2022), p.52.

¹⁰ Ibid., p. 53.

translated into 12 languages. Select other GLOBE resources have been translated into other languages.

• Information regarding the International Space Station, including <u>Spot the Station</u>, an educational app aimed to broaden access and awareness of the station and NASA globally. The Spot the Station app is available in 10 languages.

NASA may also make available results from evaluation studies to provide awareness of the achievement of programmatic objectives and the context for evidence-based decision-making for continuous improvement.

c. NASA Visitors' Centers

Each NASA Center has a visitors' center near or onsite that is open to the public. The visitors' centers provide information and interactive experiences relating to NASA missions, including displays, exhibits, and guided tours. Thousands of visitors tour NASA's visitors' centers every day, learning about and experiencing the excitement of aerospace. This includes over two million people who visit the Kennedy Space Center Visitors' Complex annually. The focus from an LEP perspective is on ensuring meaningful access to these programs and activities, including information posted on visitors' center websites and emergency evacuation signage.

3. Identification and Assessment of LEP Communities

LEP individuals are those who do not speak English as their primary language; and have a limited ability to read, write, speak, or understand English. 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).

The Agency's assessment of its LEP communities is based on the elements of DOJ's model Self-Assessment, "Identification and Assessment of LEP Communities." Consistent with DOJ's guidance, this plan outlines, from an Agency perspective, an estimate of the percentage of LEP individuals who are eligible to receive each service, benefit, or activity.

a. Estimate of Eligible LEP Individuals

This Plan shows the analysis conducted to assess the number or proportion of LEP persons from each language group in the Agency's service area, i.e., the whole country. Data for each geographic area in which a NASA Center is located is also provided (see Figure 2 and Table 1). For these estimates, NASA relied on American Community Survey (ACS) language data from the <u>U.S. Census Bureau</u> and the U.S. Department of Education <u>Civil Rights Data Collection</u> (CRDC).

NASA is headquartered in Washington, DC, with NASA Centers (field offices) located in virtually every region of the country. Two are on the West Coast: Ames Research Center and Armstrong Space Flight Center (both in California) and four are located on the East Cost: Goddard Space Flight Center (Maryland), Kennedy Space Center (Florida), Langley Research Center (Virginia), and NASA Headquarters (Washington, DC). The Southeast hosts three Centers: Marshall Space Flight Center (Alabama), Stennis Space Center (Mississippi), and the NASA Shared Services Center (Mississippi). Glenn Research Center (Ohio) is located in the Midwest and Johnson Space Center (Texas) is located in the Southwest. Each

Center is required to conduct its own analysis of the number and proportion of LEP persons it serves or is likely to encounter in its own region of the country, and to include and periodically update this analysis in its Center language access plan.

According to the ACS data for 2021, 92 percent of U.S. residents aged five or older speak English "very well." Seventy-eight percent of U.S. residents speak only English, while 22 percent speak a language other than English. Of those who speak another language, 8 percent speak English less than "very well" or not at all. These LEP individuals may have trouble speaking, reading, writing, or understanding English at a level that would permit them to benefit from NASA-conducted or -funded programs and activities.

Over 63 percent of speakers of languages other than English are Spanish speakers. While 60 percent of Spanish speakers also speak English "very well," 40 percent do not speak English well. Among speakers of Chinese, the second most widely spoken language other than English, 52 percent speak English less than very well. Vietnamese is the third most common non-English language spoken in the United States; 58 percent of speakers of Vietnamese speak English less than very well. Figure 2 shows the top 25 languages spoken by individuals with limited English proficiency.

States hosting NASA Centers follow similar trends, with Spanish the most widely spoken language in most cases. In Texas, Florida, and California, Spanish speakers make up an overwhelming majority of LEP individuals, at 83 percent, 78 percent, and 63 percent, respectively. Table 1 illustrates the top ten languages other than English spoken in the states in which NASA Centers are located, depicting both number of LEP speakers and percentage of all LEP individuals in the state who speak each language.

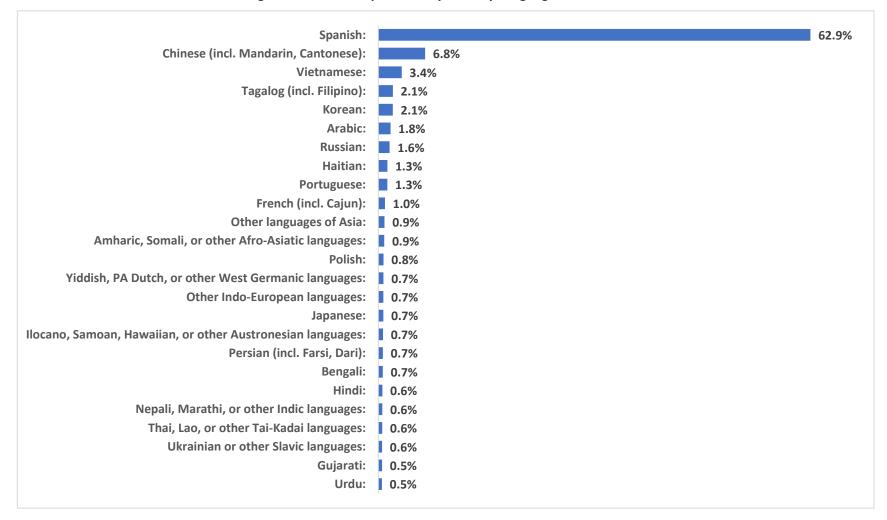


Figure 2. U.S. LEP Population, by Primary Language: 2021

Source: U.S. Census Bureau, American Community Survey (ACS 1-Year Estimates) Language Census 2021, Table B16001, "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over." Notes: Percentages may not add to 100 percent due to rounding. The LEP population is defined as individuals in the United States who are 5 years of age and older who speak English "less than very well" (25.9 million).

NASA Centers	Top 10 Languages										
Ames Research Center	(ARC) and	Armstrong	Flight Reseau	ch Center (/	AFRC)						
Top 10 Languages in California	Spanish	Chinese	Vietnamese	Tagalog	Korean	Persian	Armenian	Arabic	Russian	Punjabi	All Other Languages
Number Who Speak This Language Who Are LEP	4,065,731	669,748	327,605	265,816	189,480	89,604	87,185	81,430	70,348	67,961	534,392
Percentage of LEP Population that Speak this Language	63.0%	10.4%	5.1%	4.1%	2.9%	1.4%	1.4%	1.3%	1.1%	1.1%	8.3%
Glenn Research Center	(GRC)										<u>.</u>
Top 10 Languages in Ohio	Spanish	Other Germanic	Chinese	Other Indic languages	Other Afro- Asiatic	Arabic	French	German	Russian	Japanese	All Other Languages
No. Speakers LEP	92,777	22,435	21,250	16,494	15,811	14,387	10,340	8,663	7,072	6,784	80,768
% of LEP Population	31.3%	7.6%	7.2%	5.6%	5.3%	4.8%	3.5%	2.9%	2.4%	2.3%	27.2%
Goddard Space Flight Co	enter (GSF	C)									
Top 10 Languages in Maryland	Spanish	Chinese	French	Korean	Other Afro- Asiatic	Other African languages	Vietnamese	Russian	Tagalog	Urdu	All Other Languages
No. Speakers LEP	232,741	35,485	17,292	15,253	12,562	12,264	10,499	8,849	8,091	7,821	74,117
% of LEP Population	53.5%	8.2%	4.0%	3.5%	2.9%	2.8%	2.4%	2.0%	1.9%	1.8%	17.0%
Headquarters (HQ)											n
Top 10 Languages in Washington, DC	Spanish	Chinese	Korean	Vietnamese	Other Afro- Asiatic	Arabic	French	Persian	Urdu	Other African languages	All Other Languages
No. Speakers LEP	354,491	39,444	30,227	28,429	27,263	18,411	16,549	13,746	13,058	11,248	95,264
% of LEP Population	54.7%	6.1%	4.7%	4.4%	4.2%	2.8%	2.6%	2.1%	2.0%	1.7%	14.7%
Johnson Space Center (JS	6C)		,						,		μ
Top 10 Languages in Texas	Spanish	Vietnamese	Chinese	Arabic	Korean	Tagalog	Hindi	Other Dravidian	Urdu	Other Indic languages	All Other Languages
No. Speakers LEP	2,959,726	127,626	83,150	34,641	30,130	21,915	18,558	17,998	17,799	15,908	229,177
% of LEP Population	83.2%	3.6%	2.3%	1.0%	0.8%	0.6%	0.5%	0.5%	0.5%	0.4%	6.4%
Kennedy Space Center (KSC)											
Top 10 Languages in Florida	Spanish	Haitian	Portuguese	Vietnamese	Chinese	Russian	French	Arabic	Tagalog	Other Indo- European	All Other Languages
No. Speakers LEP	1,915,251	170,188	56,409	41,456	35,289	32,043	21,386	21,144	17,990	13,313	140,733
% of LEP Population	77.7%	6.9%	2.3%	1.7%	1.4%	1.3%	0.9%	0.9%	0.7%	0.5%	5.7%

Table 1. Top 10 Languages of the LEP Populations Near NASA Centers: 2021

NASA Centers	Top 10 Languages										
Langley Research Center (LaRC)											
Top 10 Languages in Virginia	Spanish	Korean	Vietnamese	Chinese	Arabic	Other Afro- Asiatic	Tagalog	Urdu	Persian	Other Indic languages	All Other Languages
No. Speakers LEP	249,154	28,656	25,938	20,724	19,631	14,200	11,010	10,340	9,573	8,295	77,781
% of LEP Population	52.4%	6.0%	5.5%	4.4%	4.1%	3.0%	2.3%	2.2%	2.0%	1.7%	16.4%
Marshall Space Flight Center (MSFC)											
Top 10 Languages in Alabama	Spanish	Korean	Vietnamese	Chinese	Tagalog	Hindi	Portuguese	Russian	Japanese	Other Indic languages	All Other Languages
No. Speakers LEP	68,637	7,705	5,398	3,784	1,245	905	896	842	789	767	7,272
% of LEP Population	69.9%	7.8%	5.5%	3.9%	1.3%	0.9%	0.9%	0.9%	0.8%	0.8%	7.4%
NASA Shared Services Ce	enter (NSS	C) and Stenni	s Space Cent	er (SSC)		•					
Top 10 Languages in Louisiana	Spanish	Vietnamese	French	Arabic	Chinese	Haitian	Other Tai- Kadai	Portuguese	Urdu	Korean	All Other Languages
No. Speakers LEP	72,238	11,093	6,604	4,642	2,831	2,099	1,680	1,655	1,584	1,480	9,661
% of LEP Population	62.5%	9.6%	5.7%	4.0%	2.4%	1.8%	1.5%	1.4%	1.4%	1.3%	8.4%
Top 10 Languages in Mississippi	Spanish	Vietnamese	Chinese	Arabic	French	Other Native languages of North America	Tagalog	German	Korean	Other African languages	All Other Languages
No. Speakers LEP	30,973	3,309	2,097	1,202	992	638	526	499	436	401	3,800
% of LEP Population	69.0%	7.4%	4.7%	2.7%	2.2%	1.4%	1.2%	1.1%	1.0%	0.9%	8.5%

Table 1. Top 10 Languages of the LEP Populations Near NASA Centers: 2021 (continued)

Source: U.S. Census Bureau, American Community Survey (ACS 1-Year Estimates) Language Census 2021, Table B16001, "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over." Notes: Percentages may not add to 100 percent due to rounding. The LEP population for each Center is defined as individuals in the state who are 5 years of age and older who speak English "less than very well." "All Other Languages" are the additional non-English languages spoken by LEP individuals in the state. Given the location of NSSC and SSC near the Mississippi-Louisiana border, these Centers take into account the local population of both states.

Another indicator of the LEP population near NASA Centers is the percentage of students in local school districts who are English language learners. According to the 2017 Department of Education Civil Rights Data Collection, the Houston, TX; San Francisco, CA; and Greenbelt, MD school districts reported the highest percentage of public-school students who were English learners (20 percent or higher), followed by Lancaster, CA (17.1 percent), Orange County, FL (15.0 percent), and District of Columbia Public Schools (14.4 percent). An additional five states identified less than 10.0 percent of their students as English learners: Cleveland, OH (7.4 percent), Huntsville, AL (5.5 percent), Orleans Parish, LA (3.2 percent), Bay St. Louis, MS (1.7 percent), and Hampton County, VA (1.7 percent).

Center	School District (State)	Percentage of Students Who are English Learners
AFRC	Lancaster School District (California)	17.1%
ARC	San Francisco Unified (California)	28.1%
GRC	Cleveland Municipal City (Ohio)	7.4%
GSFC	Prince George's County Public Schools (Maryland)	19.9%
HQ	District of Columbia Public Schools (Washington, DC)	14.4%
JSC	Houston Independent (Texas)	31.5%
KSC	Orange County (Florida)	15.0%
LaRC	Hampton County Public Schools (Virginia)	1.7%
MSFC	Huntsville City (Alabama)	5.5%
NSSC	Orleans Parish School Board (Louisiana)	3.2%
and SSC	Bay St. Louis Waveland (Mississippi)	1.7%

Table 2. Eng	glish Learner	Enrollment in	School Districts	Near NASA Centers
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Source: U.S. Department of Education, Civil Rights Data Collection, percentages of English learner students enrolled, 2017. Given the location of NSSC and SSC near the Mississippi-Louisiana border, these Centers take into account the local population of both states.

b. Determining the Frequency with Which LEP Individuals Interact with NASA

Determining the frequency with which LEP individuals interact with NASA is difficult as many of our contacts are virtual, and difficult to separate into unique visitors (versus repeat contacts). The diffuse nature of NASA offerings in languages other than English also makes it difficult to measure the demand for these materials and programs. NASA Centers will conduct individual analyses of the frequency with which LEP individuals interact with NASA, including requesting visitors' centers make reasonable efforts to assess interactions with LEP individuals. Where data is unavailable, Centers should rely on estimates of the LEP populations present in their service area and incorporate this information into their LAPs. Centers should refer to the guidance provided by DOJ in its Language Access Assessment and Planning Tool (2011) and use the related self-assessment tool.

4. Language Assistance Services

Each NASA Center, including the leadership for NASA missions directorates and missions support entities, located at NASA Headquarters, shall consider the appropriate balance of written translations and oral language assistance needed to ensure meaningful access to the Agency's services, benefits, and activities. For purposes of this plan, "meaningful access" is 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. Translation and interpretation services are defined and described further in subsections b and c.

a. Center-by-Center Language Service Acquisition

NASA does not have a centralized purchase process or specific funds set aside for language services for the public. NASA Centers purchase, on an as-needed basis, translation and interpretation services from GSA-approved vendors, as detailed in each Center's LAP. Purchases are made from the funds of the office or directorate conducting the activity the services will support (e.g., printing of visitors' center brochures in foreign languages is paid for out of the visitors' centers' operating funds). NASA Centers may establish Center-wide contracts for translation or interpretation services, if the Center determines this approach is more efficient.¹¹

Although Centers have latitude to select vendors or hire qualified staff to provide language services, all personnel should note:

- Machine translation that has not been reviewed for accuracy by an appropriately qualified human translator should not be used in any official NASA communications.
- While NASA appreciates the translation contributions of bilingual employees who have not been hired for their language skills or otherwise certified to perform translation and interpretation, these employees should not be asked to provide translations or interpretations of vital documents or matters.
- All staff, contractors, or vendors hired to serve as interpreters or translators must be certified¹² to perform the tasks they are hired to perform, or otherwise demonstrate appropriate proficiency that the Agency has verified.
- Staff engaged in projects requiring language services should periodically check the quality of translations by having a second, independent translator "check" the work of the primary translator. Staff should also consider community input and the use of audits to maintain and improve its ability to provide timely and accurate language assistance.

b. Translation

Translation is the replacement of written text from one language to another. With due consideration to DOJ's Self-Assessment and Planning Tool guidance, Agency organizations and NASA Centers shall make decisions about what documents or publications to translate and in what languages, prioritizing vital documents, but also considering the utility of translating documents to further NASA's strategic goal of engaging students to build a diverse future STEM workforce.

A document is "vital" if it contains information critical for obtaining the federal services and/or benefits or is required by law. Vital documents at NASA include, for example: consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; and letters or notices that require a response from the beneficiary or client.

¹¹ If NASA establishes an agency-level contract for the purchase of these services, Center language access plans and procedures will be updated to refer service requests to the agency-level contract.

¹² See DOJ tip sheet, <u>"What does it mean to be a certified linguist?"</u>, for further guidance.

The Agency and Center Language Access Coordinators will provide support and guidance to Agency organizations and Center organizations in determining translation-related priorities. As a general matter, however, Agency organizations and Centers shall give priority consideration to the following:

- Integrating notification of availability of free language assistance services for participants in announcements of Agency events attended by members of the public and at NASA visitors' centers. For example, notices inviting prospective participants to NASA-conducted educational and training programs and activities should include notice of the availability of free language assistance services.
- Close coordination with external partners in Agency or Center events held onsite or offsite at which LEP individuals are likely to be participants to determine whether translation services will be needed for written materials associated with the event and if so, in which languages translation is needed. For example, where a NASA official is speaking at an event hosted by a third party, NASA should inquire as to whether the host has included notification of language services in the event invitation.
- Ensuring recipients of NASA funds understand their responsibility to provide free language services to those participating in NASA-funded programs, consistent with Title VI of the Civil Rights Act of 1964. Grantees should understand both their obligation to provide language services free of cost and to provide notice to beneficiaries of the availability of these services. Provision of language services is an allowable expense in NASA grant programs.
- Visitors' center-related written information, especially signage relating to exhibits, displays, and emergency evacuation procedures.
- Any notices of rights, consent forms, complaint forms, and notices of meetings seeking consultation of input from the public regarding NASA activities which may have an environmental or community impact.

As with documents or websites published in English, documents or websites published in a foreign language must be made accessible to individuals with disabilities. Please see <u>NASA's 508 document</u> <u>compliance</u> website for additional resources.

c. Interpretation

Interpretation is the rendering of a message spoken in one language into one or more languages and can take place in person, telephonically, or via internet or video interpreting. With due consideration to DOJ's Self-Assessment and Planning Tool guidance, Agency organizations and NASA Centers shall make decisions about when to provide interpretation assistance and how to provide that assistance in a timely and effective manner, appropriate to the circumstance. Each organization shall take appropriate steps to ensure that it makes reasonable efforts to provide language assistance as needed for in-person contact with LEP individuals.

The Agency and Center Language Access Coordinators shall provide support and guidance to Agency organizations and Center organizations in determining interpretation-related priorities. As a general matter, however, Agency organizations and Centers shall give priority consideration to the following:

• LEP persons who are: patrons of the visitors' center or participating or wanting to participate in NASA-sponsored STEM engagement and educational events.

- Coordination with partners in Agency events held onsite or offsite at which LEP individuals are likely to be participants, to determine whether interpretation services will be needed for the event and if so, in which languages interpretation is needed. Notification of availability of free language assistance services for participants should be included in the event invitation.
- Determining the native language of unexpected visitors by using language identification cards (or "I speak cards"), which invite LEP persons to identify their language needs to staff. An example of the type of tools used by other federal agencies includes the Department of Homeland Security's "<u>I Speak</u>" booklet; other examples and resources are available at <u>http://www.lep.gov</u>.

5. Notice of Availability of Free Language Service to LEP Persons and Complaints Process

Each NASA Center, including Headquarters, shall inform the target audiences of its conducted programs and activities, through oral or written notice in the relevant languages, that free language assistance is available. Recipients of NASA funds should also be notified of their duty to provide similar notification under Title VI of the Civil Rights Act of 1964.

In deciding how notice will be provided to intended beneficiaries, Centers and Agency organizations should consider:

- How will your organization or Center notify intended beneficiaries of the availability of services, benefits, and activities in their native language? Are the methods by which you advertise their ability to English-speaking persons sufficient, or are other methods preferred by LEP populations?
- What is the appropriate mix of written and oral notices? Please consider that although most languages have a written form, some languages, such as Hmong, are primarily spoken and, therefore, the most effective means of communication may be oral.
- Related to the above question is, what is the appropriate mix of print, television, internet, or other media for notices? Possible avenues for notices include public-service announcements, specific announcements for specific events, internet-provided notice, and written onsite notices in other languages. Non-English newspapers, radio stations, internet sites, etc., may reach some LEP persons more effectively.
- Are there local organizations that assist LEP persons who may want to work with your organization to assist in communicating the availability of services to LEP individuals? Working with organizations representing the interests of LEP individuals, including community-based organizations, may be one of the measures that organizations use to make the availability of language services known to LEP individuals.

Members of the public may provide informal feedback regarding NASA's provision of language services by contacting the relevant Language Access Coordinator listed in the Appendix. Complaints of discrimination on the basis of language in NASA's programs or in programs funded by NASA may be filed with the NASA Office of Diversity and Equal Opportunity by writing to <u>civilrightsinfo@nasa.gov</u>. When filing a complaint, please include information regarding the specific program or event where the discrimination took place, a description the facts that led you to file the complaint, and your contact information.

6. Collaboration with LEP Communities and Other Stakeholders

Organizations external to NASA that have significant contact with LEP persons, such as schools, religious organizations, community groups, and groups working with new immigrants, can potentially be very helpful in linking LEP persons to the Agency's programs and its language assistance services. Periodically, Agency directorates and offices, and their Center counterparts, should consider consulting with stakeholder groups for input for improving language access policies and programs, such as advocacy groups, civil rights organizations, community organizations, or other Federal agencies. Centers should continue to closely collaborate with local school districts to ensure partnerships to facilitate access for LEP students.

7. Training Staff on Policies and Procedures

Agency and Center staff with LEP roles and responsibilities as identified in this plan must be aware of their obligation to provide meaningful access for LEP persons to Agency services, benefits, and activities. Periodically and as appropriate, senior agency staff will remind all employees of their language access duties. Training in some form is provided at the Center level and reflected in Center plans.

8. Monitoring, Continuous Assessment, and Updating LEP Plans

NASA's approach to monitoring for this plan is as follows:

- The Agency ODEO in collaboration with the Center language access coordinators, will periodically monitor Center LAP performance in regard to the accessibility and quality of language assistance activities for LEP persons in the Center's conducted programs and activities. This may be accomplished by written requests to the Centers to provide information and outcomes regarding each of their plan elements, e.g., providing language services, collaborating with LEP communities, etc., as well as assessment of any complaints received regarding language access in NASA conducted or assisted programs.
- The Agency ODEO will modify this Plan based on input and feedback from Agency and Center stakeholders, additional guidance from DOJ on E.O. 13166 in the conducted programs context, and other information received that the Agency views as critical to enhancing this plan's effectiveness.
- The Agency and its Centers will review and revise their language access plans no less than every five years.

Conclusion

NASA has prepared this LAP and will implement it in the spirit of E.O. 13166. That is, the Agency will hold the same standards as Federal civil rights laws, and with a goal of serving an ever-growing and ever more diverse population.

Appendix: Center Language Access Coordinators

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