# Selective Service System



## Language Access Plan

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#### I. AGENCY BACKGROUND

The Selective Service System is an independent Federal agency that has been a distinguished part of America's history, spanning eras of conflict and peace. It has a longstanding statutory role to register men and maintain a system that, when authorized by the President and Congress during national emergencies, allows the nation to meet the Department of Defense's personnel needs in a fair and equitable manner, while managing an alternative service program for conscientious objectors to fulfill their two-year national service obligation in lieu of serving in the U.S. military.

SSS has enjoyed the support of Presidential administrations since its formal establishment as an independent agency in 1940, which was built on its initial formation in 1917 during World War I as part of the Department of War. In 1940, the Selective Training and Service Act was signed into law by President Franklin Roosevelt and more than 10 million draftees were inducted into the U.S. Armed Forces during World War II. A few years after World War II, Congress passed the Military Selective Service Act (MSSA), granting statutory authority for the Federal government to maintain SSS as an independent Federal agency within the executive branch responsible for delivering qualified men for induction into the U.S. Armed Forces. At the end of the Vietnam War in 1975, SSS entered a state of "deep standby" until 1980, when President Jimmy Carter signed Presidential Proclamation 4771 to reinstate the SSS registration requirement. It remains in effect today.

The Selective Service System (SSS) has approximately 120 full-time employees who are geographically dispersed in four locations (Arlington, VA; Marietta, GA; North Chicago, IL; and Aurora, CO). The Agency has up to 56 State Directors, who serve as part-time employees, representing each of the 50 states, Guam, the Northern Mariana Islands, Puerto Rico, the U.S. Virgin Islands, the District of Columbia, and New York City. SSS also has approximately 175 Reserve Service Members from the Army, Navy, and Air Force who provide support to the mission.

In addition to SSS employees and Reserve Service Members, there are approximately 6,000 men and women across the nation who serve as Board Members and State Resource Volunteers. Volunteer Board members are responsible for the classification process for inductees seeking deferments, exemptions, or postponements when conscription is authorized by the Congress and the President.

#### II. GENERAL LANGUAGE ACCESS PLAN

#### A. POLICY

The Selective Service System (SSS) is committed to providing an outstanding customer experience for all and eliminating barriers to the service it provides, which helps to ensure that the language assistance services it delivers are meaningful and effective.

#### **B. PURPOSE**

This Language Access Plan (LAP) ensures equal access to services provided by SSS to individuals with limited English proficiency (LEP). This plan also provides the structure and overarching guidance to help eliminate or reduce language as a barrier to accessing existing SSS information and services.

#### C. LEGAL AUTHORITY

This LAP establishes guidelines in accordance with Executive Order 13166, which requires each agency to "examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency." Federal agencies shall also "prepare a plan to improve access to its federally conducted programs and activities... including the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's program and activities."

#### D. SCOPE

SSS employees who conduct or have the responsibility for programs and services where they may interact with LEP individuals will take appropriate and reasonable steps to provide language assistance services when they encounter LEP individuals while fulfilling the Agency mission.

#### **III. RESPONSIBILITIES**

#### A. EQUAL EMPLOYMENT OPPORTUNITY DIRECTOR

The Equal Employment Opportunity (EEO) Director is designated as the Agency's lead for LAP efforts, to include ensuring that the Agency's offices and directorates establish and implement policies and procedures for providing language assistance in accordance with Executive Order 13166.

To advance language access within SSS and support the EEO Director in their efforts, a Language Access Working Group (LAWG) was established. It is responsible for the monitoring and implementation of the Agency's LAP. The LAWG is chaired by the SSS Chief of Staff and composed of a representative from each SSS directorate, the Office of the General Counsel, the Office of Enterprise Integration, and the Human Resources Office. LAWG meetings occur quarterly to evaluate Agency compliance with language access and to review and update Agency LEP services, policies, plans, and best practices as necessary.

#### **B. DIRECTORATES AND OFFICES**

SSS senior leaders in the Office of the Director, Associate Directors, and managers are responsible for enforcing the guidelines in Section IV of the LAP as it applies to covered programs, services, and activities provided to LEP individuals. In general, they are to evaluate their organization's interface with the public, including the information and services they may provide, and take appropriate and reasonable steps to provide language assistance services when they encounter LEP individuals while fulfilling the Agency mission. Some directorates and offices with higher levels of interaction with the public will have greater language assistance requirements while others will have little or none.

The Public and Intergovernmental Affairs (PIA) Directorate manages all internal and external communications, outreach, legislative and social media, call center, mail center, and registration lines of operations. Through this directorate, SSS maintains and enhances relationships with all levels of government, educational and community-based organizations, professional associations, the media, and the public. PIA disseminates information using various means regarding SSS's mission and the registration requirement for men. The Data Management Center within PIA is responsible for registration operations and managing functions related to SSS's Registration, Compliance, and Verification system for registrants born after 1959, some of whom are LEP individuals.

When in full operation, the Agency will expand agency infrastructure, initiate conscription and activate boards to adjudicate claims in every state and territory. During active standby (i.e., when conscription is not authorized), the Operations Directorate recruits, trains, and exercises SSS board members, some of whom could be LEP individuals.

#### IV. OPERATIONAL GUIDELINES FOR LANGUAGE ASSISTANCE SERVICES

#### A. QUALITY CONTROL

Ensuring the quality and accuracy of language assistance services provided by SSS is critical to providing LEP individuals with meaningful access to programs and activities. SSS will take reasonable steps to ensure that all personnel who translate or communicate with LEP persons are trained. Factors indicating competency may include:

- Demonstrated proficiency in communicating information accurately in English and other languages.
- Identifying and employing the appropriate mode of interpreting (e.g., consecutive, simultaneous, or sight translation), translating, or communicating fluently in the target language.
- Knowledge in both languages of any specialized terms or concepts particular to the Agency's program and of any vocabulary used by the LEP person.
- Understanding and following confidentiality, impartiality, and ethical rules.

- Implement best practices for LEP assistance as appropriate.
- Understanding and adhering to the role of interpreter, translator, or multilingual individual.

Supervisors overseeing translators will review and assess the quality of any translated written text through feedback from the recipients of these services. Instituting an online survey after receiving services can assist in assessing quality, the improvement, and the professionalism of the delivery of interpreters / translators. The online survey will provide a telephone number for customers in need of LEP-related services to provide feedback (e.g., reporting that they did not receive adequate language access services).

SSS shall ensure that all multilingual personnel and contracted individuals who serve as translators or interpreters or communicate directly in-language with persons with LEP are competent to provide language assistance. SSS will also explore partnerships with federal, state and local agencies and other stakeholders to ensure access to needed translation is available as requested, ensuring competent translation support is accessed.

#### **B. IDENTIFYING LEP INDIVIDUALS**

Individuals who do not read, write, speak, or understand English can be LEP and are entitled to language assistance.

At the point of first contact with an LEP individual, SSS employees will make reasonable efforts to conduct or arrange for an initial assessment of the need for language assistance services and make reasonable efforts to obtain such services if they are needed to effectively communicate with the individual.

SSS employees will determine whether a person needs language assistance by:

- Inquiring if the individual identifies themself as a non-English speaker, LEP individual, or companion thereof.
- Inquiring as to the primary language of the individual who identified themself as needing language assistance services.
- Asking a multilingual staff to verify an individual's primary language.
- Observing the individual's use of an "I speak ... [language]" identification card or poster.

#### C. TRACKING AND REPORTING

The LAWG will collect data regarding the Agency's implementation of the LAP and provide relevant data to the Office of Enterprise and Integration (OEI), with periodic briefings to SSS senior leaders, to assess and communicate the program's effectiveness. This will include the number of calls received by Call Center customers in need of LEP-related services; the number customer inquiries related to LEP services received in the information@sss.gov inbox; feedback from customers seeking LEP-related services(include via telephone and online survey); the number of non-English forms

requested by customers; the native language of each customer seeking LEP-related services; and the cost of any language assistance provided. The LAWG will request and receive this data on a quarterly basis. By regularly collecting and updating this language data, SSS will be able to accurately identify, monitor, and address the changing needs of the LEP communities.

SSS employees will be trained to ask customers in need of LEP-related services whether they would like their contact information provided to the LAWG in order to be contacted to provide insights on how SSS can have more engagement with members of LEP communities. Customers in need of LEP-related services may also opt-in to this program via the online survey.

#### D. EMPLOYEE TRAINING

The LAWG will ensure that new and existing staff members who work with LEP individuals receive annual training on the LAP; proactively identify language access needs; and ensure language assistance services are provided to LEP individuals in a timely fashion. Training may include, but is not limited to:

- Identifying the language needs of LEP individuals.
- Working with interpreters in-person or on the telephone.
- Requesting documents for translation.
- Accessing and providing language assistance services through multilingual employees, in-house interpreters, and translators or contracted personnel.
- Interpreter ethics.
- Tracking the use of language assistance services.
- Tips on providing effective assistance to LEP individuals.

#### E. ORAL LANGUAGE INTERPRETATION

SSS will assist LEP persons in face-to-face and telephonic encounters with oral interpretations from employees. At the point of first contact, the SSS employee will determine whether the person has LEP by determining the person's primary language and implementing or procuring the appropriate language assistance.

SSS may identify an individual's primary language using the following:

- "I speak ... [language]" identification cards, which should be procured depending on the facility's language needs. A sample "I speak..." card can be found at: <u>http://www.justice.gov/crt/lep/resources/ISpeakCards2004.pdf.</u>
- Displaying language identification posters within work units that typically serve LEP persons.
- Verifying foreign language proficiency by using a qualified interpreter (e.g., inperson, telephonically, or through video interpretation services).

Customers in need of LEP-related services may call 847-688-6888, or toll-free 888-655-1825, or email <u>LanguageAccess@sss.gov</u> to request and access language assistance services. Customers with LEP may also provide feedback at these numbers.

SSS will prioritize Spanish as the non-English language for translation. The LAWG, utilizing data obtained under Section IV(C), will determine which additional languages to prioritize.

#### F. TRANSLATION OF AGENCY INFORMATION

#### Translation of Written Materials:

This is the replacement of written text from one language (source) into equivalent written text in another language (target).

Written materials may include but are not limited to: documents containing important information regarding the SSS registration requirement or participation in the SSS Board Program; information on benefits or penalties related to registration; notices of appeal rights; notices that require responses from beneficiaries; notices advising LEP individuals of the availability of free language assistance; and other outreach materials. Translation may include all or part of a document. SSS will translate vital printed documents, which shall include, but not limited to, SSS Forms 1, 2, 3A, 3B, 3C, and the Status Information Letter Request Form.

SSS employees will determine, on a case-by-case basis, the extent of the obligation to provide translated documents. Employees should consider translating any document or information if it contains critical information for accessing SSS services.

To determine the resources available to provide language assistance to LEP persons and the costs associated with those resources, SSS will explore the most cost-effective means of delivering competent and accurate language services. This exploration includes determining costs associated with translating documents, contracting interpreters, and securing other language assistance methods as needed in addition to using SSS employees who can assist customers in specific languages.

#### Translating SSS's Public Website Content:

Executive Order 13166 also applies to materials provided as part of the Agency's public website content. SSS will take reasonable steps to translate public website content and electronic documents containing vital information about SSS programs and services. Translations of its website content may include important information for the public such as information about services, volunteer programs, and rights for individuals under the law.

Directorates and offices determine, and the LAWG will validate, which electronic documents contain vital information, identify the appropriate languages for translation,

and translate that information. SSS will update its public website pages to include information describing the availability of language assistance. This will include posting the LAP on the public-facing website at the following link: <u>Reports & Publications | Selective Service System : Selective Service System (sss.gov)</u>.

Individuals in need of LEP-related services will be notified of the services available to them by the conspicuous posting of language translation services on the public-facing website, social media, and in mailings. Additionally, Call Center personnel will be trained to advise customers that LEP-related services are available.

The Digital Advertising Team will create multilingual digital content (including content that notifies customers of language assistance services).

#### G. PERFORMANCE MEASUREMENT AND EVALUATION

The LAWG will periodically reassess and update this LAP to ensure that the scope and nature of language assistance services provide SSS-wide information on relevant LEP populations, language assistance needs, changes in technology, and experience under the LAP. Further, SSS will make reasonable efforts to ensure that any in-house or contract language services, directory of translated documents, signs, and internet-based services meet current language needs.

#### H. COMPLIANCE AND ENFORCEMENT

The EEO Director is responsible for ensuring compliance with the LAP and will assess if organizational procedures allow LEP persons to overcome language barriers and participate meaningfully in programs and services. Prohibited practices include:

- Providing services to LEP persons that are more limited in scope, not as effective or lower in quality, than those provided to others proficient in English.
- Subjecting LEP persons to unreasonable delays in the delivery of services.
- Limiting participation in a program or activity based on English proficiency.

#### I. RESOURCES

- Limited English Proficiency <u>https://www.lep.gov/</u>
- Executive Order 13166 <u>https://www.lep.gov/executive-order-13166</u>
- Language Access Planning https://www.lep.gov/language-access-planning
- Digital Services and Websites <u>https://www.lep.gov/digital-services-and-websites</u>
- Commonly Asked Questions <u>https://www.lep.gov/commonly-asked-questions</u>
- Census Bureau Language Use in the United States: 2019 -<u>https://www.census.gov/library/publications/2022/acs/acs-50.html</u>

#### **Appendix A: Definitions**

- 1. 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).
- 2. 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.
- 3. Limited English Proficiency (LEP). Describes individuals who:
  - a. Do not speak English as their primary language; and
  - b. 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). 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 and may not be proficient in American Sign Language or any other recognized sign language.

- 4. Language Assistance Services. Oral and written language services used to provide individuals with LEP meaningful access to, and an equal opportunity to participate fully in, the services, activities, and other programs administered by SSS.
- 5. 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.
- 6. Primary Language. The language in which an individual most effectively communicates when interacting with the Department. An individual's primary language may be a language variant.
- 7. Sight Translation. 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.
- 8. 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.