

**NASA Johnson Space Center
Language Assistance Plan**

For Accommodating
Limited-English-Proficient Individuals



Prepared by the Johnson Space Center Office of
Equal Opportunity and Diversity

August 30, 2010

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I. Introduction

The Office of Equal Opportunity and Diversity (OEOD) administers the Johnson Space Center (JSC) Language Assistance Plan (LAP) and provides the general framework for accomplishing the goals set forth in the Executive Order and the NASA Policy Statement.

II. Purpose

On August 11, 2000, **Executive Order 13166** (65 FR 50121), "**Improving Access to Services by Persons with Limited English Proficiency (LEP)**," was issued. Executive Order 13166 requires all Federal agencies to assess and address the needs of otherwise eligible persons seeking access to Federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...once finalized, such plans are to be filed with the Department of Justice as the central repository of agencies' plans." In compliance with Section 2 of Executive Order 13166 and the NASA Policy Statement, this Plan will detail Johnson Space Center's strategy to improve access to its Federally conducted programs and activities by eligible persons with limited English proficiency.

III. Background

English is the predominant language of the United States; however, the United States is also home to millions of national origin minority individuals who are "limited English proficient." An LEP person is defined as an individual who does not speak English as their primary language and who has limited ability to read, write, speak or understand the English language and may require language assistance with respect to a particular type of service, benefit or encounter.

Many people who are eligible for Federal services cannot effectively use Government services because they are not proficient in English. Executive Order 13166 was enacted in recognition of the fact that language barriers prevent the Federal Government from effectively serving a large number of people in this country who were eligible to participate in these programs but are LEP.

The Department of Justice (DOJ) issued a general guidance document (LEP Guidance), "Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with Limited English Proficiency," 65 FR 50123, August 16, 2000. This document sets forth the four factors that Federal agencies must consider in order to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations. The four factors in determining reasonable steps are:

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- (1) Number or proportion of LEP individuals eligible to be served or likely to be encountered by the program or activity;
- (2) Frequency with which LEP individuals come into contact with the program or activity;
- (3) Nature and importance of the program or activity to people’s lives; and
- (4) The resources available and cost.

IV. Analysis of Factors

Factor 1: Number or Proportion of LEP Individuals in the Eligible Population

The primary focus of the JSC Language Assistance Plan (LAP) is to ensure that JSC’s programs and activities are accessible to all persons in the eligible population – the Houston Metropolitan Area. This plan will enable JSC to review its present and future policies for any exclusionary effects. When considering the number or proportion of LEP individuals in a language service area, JSC must also consider the LEP parent(s) when their English-proficient or LEP minor children and dependents are potential or actual participants or beneficiaries of NASA conducted programs and activities.

Census Bureau data was used to determine the languages that may require interpretation and translation services in the Houston Metropolitan area. According to the 2000 Census, the primary languages, other than English, spoken by persons five and older in the Houston Metropolitan Area are: Spanish (33.28%) and Vietnamese (1.65%).

Factor 2: Frequency of Contacts with the Program

All contacts made at JSC are made in building 110, Visitor’s Center. These contacts would primarily be made in person. No data currently exists to determine the precise number of LEP individuals that are served by or benefiting from JSC activities. However, a preliminary assessment of JSC services revealed that the following organizations have the most potential for impact on the LEP population in the Houston Metropolitan area: the External Relations Office, which includes the Education Office, Office of Communications & Public Affairs, and the Visitor’s Center. The office of Security, Building 110, has been informed of these procedures and has agreed to contact OEOD anytime there is an LEP who engages their office.

Factor 3: Importance of the Service Provided by the Program

JSC has a variety of information and products designed to present and distribute information to the public. Many of JSC’s outside contacts presumably are made through the External Relations Office with the issuance of pertinent press releases, organization of press conferences, coordination with media, and contacts with students through the various education programs.

Factor 4: Resources Available

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JSC organizations will have access to four basic types of interpreting and translation services in both technical and non-technical areas:

a) Interpretation Services. Multilingual interpretation services in languages for meetings, conferences, litigation proceedings, briefings, training, escort services and various other forms of voice communications. The service also provides telephone conference service to translate conversations arising from an emergency situation involving an LEP individual, i.e. security or medical emergencies.

b) Language Training and Educational Materials. Instructional training and or educational materials, to include but not limited to foreign language training, language immersion training, publication, software, audio, video, and various other forms and products in support of translation and interpretation language services.

c) Translation Services. Multilingual translation services in native languages to include but not limited to the translation of business, legal and technical documents, software, manuals, websites, internet, video and audio in writing, graphic, electronic, multi-media and various other forms of communications.

Additionally, OEOD's webpage for educators has several Spanish language NASA sites at: <http://www.nasa.gov/offices/oeod/>

V. MAJOR COMPONENTS OF THE JSC LAP

The NASA LAP plan guidance lists seven elements to be addressed by each NASA Center. The JSC LAP addresses the seven elements as follows:

Assessment: Needs and Capacity

JSC, 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 these needs according to the elements of this plan.

OEOD conducted a needs assessment to all Organizations at the Center to determine LEP needs. A plan is in place to ensure correct procedures and contracts are in place for each Organization. The survey included the following questions:

**Does your Office have program activities involving general public contact?
If YES, please address the remainder of the following assessment.**

Communication with the Public: *Please describe each type of communication your group has with the public and answer the questions appropriately.*

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Will persons likely to participate in the activity be able to do so if they are Limited English Proficient (LEP)? *Please indicate accordingly and explain.*

YES NO

If the answer is NO, what corrective actions have you used in the past to ensure the individuals participation in the activity?

Each LAP program/activity that was identified through the aforementioned survey questions will identify a point of contact (POC) for contracting interpreter/translation services as necessary. Using the POCs, each of the JSC organizations should be reassessed annually to determine if there has been any change in their need for LEP assistance.

Oral Language Assistance

JSC 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.

Oral language assistance to LEP individuals will be provided as and where needed. Access to telephonic contract interpreter services would need to be covered in the contract. Walk-ins or phone calls will be addressed via the contract telephone translation service. (NASA does not use volunteer interpreters for official business.) If previously unidentified, language identification cards (or “I speak cards”) can be used to identify the language of communication and are available for download at <http://www.usdoj.gov/crt/cor/13166.htm>.

Displays at JSC, on tour, and in the traveling exhibits can be accommodated in languages other than English by audiotapes and recorders, or videotapes if requested in advance.

Many of the JSC education and outreach programs are conducted in conjunction with local school systems, which generally provide their own interpreters. In the event that interpreter services are not provided by the local school system, JSC education and outreach officials will assess the need for LEP assistance. Their assessments will include but not be limited to: asking at the time of program initiation, checking websites or other sources, and reviewing metropolitan area demographics.

Translation of Written Materials

Translation is the replacement of a written text from one language (source language) into an equivalent written text in another language (target language). JSC will produce vital documents in languages other than English where there is significant number or percentage of LEP persons in the target audience(s) of the respective conducted programs and activities.

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JSC will provide written translation services on a case-by-case basis as determined by each program/activity coordinator based on the application of the four factor criteria for language assistance and whether vital documents are involved.

The assessment will also consider census data reflecting the population speaking a language other than English. The OEOD is available to assist with the assessment determination.

Written materials may include but are not limited to paper and electronic documents such as:

- Consent forms
- Announcements of programs and/or activities (or discontinuation of programs and/or activities)
- Notices advising LEP persons of free language assistance
- Security or safety brochures for visitors to JSC facilities
- Applications to participate in a program or activity
- Websites
- Correspondence

JSC programs and activity announcements information will be provided in languages other than English if it is determined to be necessary and reasonable after the application of the four factors for language assistance. Program/activity announcements and notices containing information regarding the process to be followed for participation in a program or activity will be available in regularly encountered languages other than English. Organizational POCs will utilize Service Request Form, NASA Form 1681, to procure a translated program or activity document in languages other than English for distribution. The organizations need to provide the Office of External Relations with a purchase request out of their organization’s funding in order to access these translation services.

Procedures

JSC 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.

The Service Request Form 1681 will be a major source of assessment information. OEOD has collaborated with each of the identified organizations at JSC to assess their program activities for LEP. Responsible staff and POCs will be identified in this process. The POC list will be updated on an as needed basis.

Requests for language assistance can be initiated orally or in writing, or in any other format or medium that is convenient and practical for the individual. Agency guidance directs each Center to have an individual, the “Language Assistance Official” (LAO), who

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will decide whether or not to grant a request for language assistance. OEOD is responsible for administering the LAP and will designate an LAO. OEOD has identified an LAO. However, due to the highly specialized nature and breadth of the various work products and activities performed by various organizations, each organization will decide on its own whether to grant a request for LEP assistance. The OEOD LAO functions solely as the JSC resource person for the LAP, and will be available for consultation to ensure the organization considers and responds to LEP requests in accordance with the LAP.

The LAO will provide each organization information and assistance in connection with processing a request for language assistance, including applying and interpreting the four-factor analysis to ensure consistency throughout the Center. Costs are the responsibility of the organization requiring LEP resources for a program or activity.

OEOD will conduct an assessment annually of ongoing programs for LEP potential and requirements. Information gathered through the general public POCs during the previous year will be included in the annual assessment. All new programs should include an assessment for LEP potential as part of its development effort. In accordance with Agency LAP guidelines, the JSC LAP will be updated on an annual basis.

Specific Program Procedures

JSC has the capacity to deal with requests for language assistance including both oral language assistance and translation of written material, particularly non-technical documents. JSC organizations will procure language services by submitting a Service Request Form, NASA Form 1681, directly to the contracted interpreter/translators services provider. Interpretation and translation services for official international agreements for final signature will be provided by the State Department on a reimbursable basis.

Notification of Availability of Free Language Services

JSC 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.

LEP brochures in English and Spanish, with appropriate contact information for assistance, will be available in the Security Office and building 110. OEOD will also disseminate the information via the OEOD website. In addition, copies of the Language Identification Flashcards in 38 languages will also be available in the Security Office to help address walk-in visitor language assistance requirements. Once the language is determined, the telephonic interpreter contractor will be contacted and in conjunction with a staff it will be determined how to address the visitor’s requirements.

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Staff Training

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

As the need for use of language assistance services at JSC is presumably very limited, JSC employees will receive an annual notification of the JSC LAP and guidance for obtaining translation services. OEOD will provide training on an as needed basis to appropriate program staff on the LEP policies and procedures, including the procedure for arranging translation services. Briefings on the JSC LAP will be provided to senior staff.

Monitoring Accessibility and Quality

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

On an annual basis, the JSC LEP program will be monitored for effectiveness and evaluated to assess the need for modification. OEOD will conduct the annual review of the program to ensure that the scope and nature of language assistance services provided under the plan reflect updated information on relevant LEP populations (i.e. 2010 Census), language assistance needs, and component experience under the plan. The review may consist of but not be limited to assessing changes in the following:

- LEP populations in the area or population affected or encountered;
- Frequency of encounters with LEP language groups;
- Nature and importance of activities to LEP persons;
- Availability of resources, including technological advances and sources of additional resources and the costs imposed;
- Whether existing assistance is meeting the needs of LEP persons;
- Whether the staff is familiar with the LAP and its applications; and
- Whether identified sources for assistance are still available and viable.

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(02/13/2008)

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STI Contacts

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Translation Requirements

STI REQUIREMENTS FOR TRANSLATION

Source and Target Languages

Content

Guidance (intended use, target audience, formatting, other, etc...)

Approval to Start – signed NASA Form 1681
(per terms of **BPA #NNH08CC33C**)

FILE TYPES AND RECEIPT/DELIVERY

RECEIPT of electronic file formats: MS Office file types (.doc, .ppt, .xls), Word Perfect, PDF, DeskTop Publishing (DTP), etc...

DELIVER via: Email, Removable media (Zip disk, CD, DVD, etc...), Secure File Transfer Protocol (FTP), facsimile or hard-copy

Based on your technical requirements, we adjust to your needs!

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Translation TIPS

- ✓ **Client involvement is always appreciated, but not expected.**
- ✓ **Reference Material:**
 - Previous Translations
 - Glossary and/or Terminology Lists
 - Internal Listing for Acronyms (work culture)
 - Links to related content
- ✓ **Warning Orders for upcoming work**
- ✓ **Dedicated Point of Contact for Project Request**
- ✓ **Concerns or problems, please contact STI ASAP.**

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Delivery: Routine & Expedited Typical Turn-around Times

Routine:

5 business days per 5000-6000 words
1 business day per extra 2000-2500 words

Expedited:

1 business day per 2000-2500 words a day

(NOTE: Assume 250 words/page based)

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About Interpreting Services

Telephone. When you have a need to place a call to a foreign client or counterpart or conduct a teleconference with them, we can set you up with a qualified interpreter who can provide his/her services over the phone, saving you time and money. Be advised that you should have conference calling capability.

Escort. If you are expecting foreign visitors or you will be traveling outside the country, we can provide the services of a qualified interpreter to accompany you or your visitors professional excursions.

Consecutive. For smaller business meetings, we can furnish professional interpreters to relay information back and forth between speakers of different languages.

Simultaneous. (Also called Conference). For conferences and special presentation situations, we can provide teams of highly qualified interpreters together with the appropriate interpreting equipment to help make your event proceed smoothly.

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Interpreting Service Checklist (see also hand-out)

1. Language(s)
2. Date, time and number of hours required
3. Types of interpreting: simultaneous, telephonic, or consecutive
4. Location of assignment
5. Interpreter(s)' point of contact for assignment
6. Description of the assignment, including number of participants, names and titles (if appropriate), subject matter involved, etc...
7. Is there available preparation material (in either language), such as talking points or agendas or information containing any highly specialized, specific terminology that may be involved?



Driver's Support for Events

1. Event Schedule – as detailed as possible to include changes
2. Language(s)
2. Date, time and number of hours required if necessary
3. Location(s) of assignment
4. Point of contact (POC) for assignment
5. Description of the assignment, including number of participants, names and titles (if appropriate), subject matter involved, etc...
6. Other Specific Information that is relevant to the success

The NASA POC initiating/coordinating the event should communicate with the STI PM on an active basis during planning and execution of the event. This is not a fire and forget service...

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Options for submitting Requests & NASA Form 1681

1. STI Website:

<http://www.schreibernet.com/site.nsf/ContactInformationHTML>
<http://www.schreibernet.com/site.nsf/free-translation-estimate>

2.

 National Aeronautics and Space Administration		Service Request Form		CONTRACT: _____ SR NUMBER: _____ DATE: _____
POINT OF CONTACT	PHONE NUMBER	E-MAIL ADDRESS		FAX NUMBER
BRIEF DESCRIPTION OF PROJECT/MEETING (Attach additional pages, if needed)				
DATES SERVICE NEEDED		LANGUAGE	LOCATION (Country) (WHERE SERVICE IS NEEDED)	
BEGIN: _____	END: _____	FROM: _____ TO: _____		
TYPE OF SERVICE NEEDED				
<input type="checkbox"/> 1. INTERPRETATION ESTIMATED NUMBER OF HOURS: _____ REQUIREMENTS: _____ <small>(Attach additional pages, if needed)</small>		<input type="checkbox"/> 3. LOGISTICAL, ADMINISTRATIVE, CLERICAL, AND IN-COUNTRY TRANSPORTATION SUPPORT (continued) <input type="checkbox"/> CLERICAL ESTIMATED NUMBER OF HOURS: _____		
<input type="checkbox"/> 2. TRANSLATION ESTIMATED NUMBER OF WORDS: _____ <small>3. LOGISTICAL, ADMINISTRATIVE, CLERICAL, AND IN-COUNTRY TRANSPORTATION SUPPORT (NOTE: This support is primarily intended for use in the newly independent States of the Former Soviet Union and China.)</small>		<input type="checkbox"/> ADMINISTRATIVE ESTIMATED NUMBER OF HOURS: _____ REQUIREMENTS: _____ <small>(Attach additional pages, if needed)</small>		
<input type="checkbox"/> LOGISTICS REQUIREMENTS: _____ <small>(Attach additional pages, if needed)</small>		<input type="checkbox"/> TRANSPORTATION SUPPORT: REQUIREMENTS: _____ <small>(Attach additional pages, if needed)</small>		
TECHNICAL MONITOR'S TYPED NAME, SIGNATURE, AND DATE				
NASA FORM 1681 JUL 05 PREVIOUS EDITIONS ARE OBSOLETE				