



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Improving Access to Treasury's Services by Persons with Limited English Proficiency

A. Background

On August 11, 2000, President Clinton signed Executive Order (EO) 13166, "Improving Access to Services for Persons with Limited English Proficiency." The purpose of this EO was to eliminate to the maximum extent possible limited English proficiency (LEP) as an artificial barrier to full and meaningful participation in all federally assisted and conducted programs and activities.

The EO required Treasury, as well as all other Federal agencies, to examine the services the Department provides directly to the public (federally conducted programs), identify any need to offer language services to those with LEP, and to develop and implement a plan to provide LEP persons meaningful access to those services consistent with, and without unduly burdening, the fundamental mission of the agency. Agencies were required to begin implementing their plans by December 11, 2000, and to send copies of their plans to the Department of Justice (DOJ), the coordinating agency for this EO. The Department of the Treasury prepared its first language access plan (LAP) in 2000. This is the Department of the Treasury's updated plan. In preparing this plan, the Department followed the guidance provided by the DOJ in 2000.

DOJ advised agencies to take reasonable steps to provide meaningful access to LEP individuals using a "4-factor" analysis. The Treasury Office of Civil Rights and Diversity (OCRD) led the bureaus in reviewing or establishing their LAPs. OCRD provided training and technical assistance to the bureau Equal Employment and Civil Rights (EEO/CR) Officers.

Factors considered by the Treasury bureaus in preparing their plans were the:

- number or proportion of LEP persons in the eligible service population;
- frequency with which LEP individuals come into contact with the program;
- importance of the service provided by the program; and
- the resources available to the bureau.

B. Key Terms

1) Limited English Proficient (LEP) Persons: Persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

2) Bilingual Persons: Persons who are bilingual are fluent in two languages and are able to conduct the business of the workplace in either of those languages. This is to be distinguished from proficiency in more than one language. An individual who is proficient in a language may, for example, be able to greet an LEP individual in his or her language, but not conduct agency business in that language. Interpretation and translation require the interpreter to be fluently bilingual, and also require additional specific skills as described below in (c).

3) Interpretation and translation: Interpretation involves oral communication. Translation involves written communication. Interpretation involves the immediate communication of meaning from one language into another. An interpreter conveys meaning orally. Interpretation requires skills different from those needed for translation. Interpreting is a complex task that combines several abilities beyond language competence in order to enable delivery of an effective professional interpretation in a given setting. From the standpoint of the user, a successful interpretation is one that faithfully and accurately conveys the meaning of the source language orally, reflecting the style, register, and cultural context of the source message, without omissions, additions, or embellishments on the part of the interpreter.

Professional interpreters are subject to specific codes of conduct and should be trained in interpretive skills, ethics, and subject-matter language. Treasury bureaus and offices utilizing the services of interpreters should request information about certification, assessments taken, qualifications, experience, and training.

Interpreters may be physically present, or, in appropriate circumstances, may appear via videoconferencing or telephonically. When videoconferencing or telephonic interpretation are used, options include connecting directly to a specific professional interpreter with known qualifications, or using a company that provides telephonic interpretation services and has in place quality control and privacy safeguards.

If bilingual staff is asked to interpret or translate, staff should be qualified to do so. Assessment of ability, training on interpreter ethics and standards, and clear policies, as noted below, that delineate appropriate use of bilingual staff, or contract interpreters and translators, will help ensure quality and effective use of resources.

4) Effective Communication: Communication sufficient to provide the LEP individual with substantially the same level of access to services received by individuals who are not LEP. For example, staff must take reasonable steps to ensure communication with an LEP individual is as effective as communications with others when providing similar programs and services.

5) Language Assistance Services: Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by the Department.

6) Meaningful Access: Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual.

7) Vital Document: Paper or electronic written material that contains information that is critical for accessing a component's program or activities, or is required by law.

C. Treasury's LEP Goal and Policies

Each Treasury program and activity shall provide access to LEP individuals by providing timely, quality language assistance services without unduly burdening the fundamental mission of the agency.

Individuals who come into contact with the Department of the Treasury should have access to our programs regardless of their ability to communicate in English. The Department will not require individuals who need language assistance to provide their own interpreters; rather, we will provide an interpreter free of charge to any individual requesting language assistance or, when it is evident such assistance is necessary to ensure that the individual is not disadvantaged.

The Department of the Treasury will notify the public, as well as Treasury employees who come in contact with the public, of the availability of language services and how to access those services.

Each Treasury bureau is responsible for complying with the following policy principles:

1. Resource Allocation: Treasury bureaus will consider the needs of LEP individuals in all of their policies and long-range business and strategic plans. The service needs of LEP individuals will be carefully considered in our resource allocation, and we will adopt service delivery initiatives that we can fully fund and are sustainable. As the bureaus deliver more services electronically, we will continue to assess the allocation of resources for LEP services.
2. Service Delivery: Treasury bureaus with field offices in contact with the public will develop strategies tailored to the needs of their communities to provide efficient and effective service. Through a variety of outreach activities, field offices will also create and maintain cordial working relationships with different LEP communities.
3. Bilingual/Bicultural Staffing: The most effective method for providing quality service to LEP individuals is through bilingual/bicultural or multilingual public-contact employees. The Treasury bureaus will identify bilingual/bicultural hiring needs through the continual assessment of changing language and cultural demographics.
4. Qualified Interpreter Services: The Treasury bureaus will use either qualified office based interpreters or telephone interpreters. If the LEP individual prefers to use his/her own interpreter, such as a family member, friend, or third party, the bureaus will determine whether the interpreter meets our requirements. In general, we will not permit

a child under age 18 to serve as an interpreter (due to the nature and complexities of our business processes).

5. **Public Information:** The Treasury bureaus recognize the value of public information to educate, improve access to our services, to address LEP concerns, to promote program integrity, and to build public confidence in the programs we administer.

6. **Written Communications:** The Treasury bureaus will assess the importance of their publications, information materials, notices, and forms, and will ensure that vital documents are translated as necessary.

7. **Outreach:** The Treasury bureaus will maintain open the lines of communication for LEP individuals and the groups that represent them, to allow feedback about the effectiveness of the bureau language access measures.

8. **Training:** The Treasury bureaus will train their employees, especially those who come in contact with the public, about the requirements of the EO, and the availability of language services within the bureau. The bureaus will also provide training to enhance the skills of our bilingual employees.

9. **Monitoring:** The bureaus will collect and track LEP contact data on an ongoing basis to determine the needs of the community and to allocate resources accordingly. OCRD will investigate any complaints about the denial of services because of LEP.

D. About the Process Treasury Followed to Update its Language Access Plan

In 2008, OCRD began the process of updating the Department of the Treasury's language plan. Each Treasury EEO\CR Officer was offered training, materials and assessment forms to assist in the process of working with their bureau's program offices. The EEO Officers submitted their bureau language access plans to be part of the Treasury LAP and to be compiled into this document.

The Treasury bureaus have unique missions and have different levels of contact with the public. Instead of dictating a one-sided solution for all the bureaus, each bureau was allowed to develop a LAP to fit its unique needs.

The Treasury Bureaus

- Departmental Offices (DO)
- Internal Revenue Service (IRS)
- U.S. Mint
- Bureau of Engraving and Printing (BEP)
- Alcohol and Tobacco Tax and Trade Bureau (TTB)
- Office of the Comptroller of the Currency (OCC)
- Bureau of the Fiscal Service (formerly the Financial Management Service and the Bureau of Public Debt)

- Financial Crimes Enforcement Network (FinCen)
- Office of the Inspector General (OIG)
- Treasury Inspector General for Tax Administration (TIGTA)
- Special Inspector General for the Troubled Asset Relief Program (SIGTARP)

This plan is intended only to improve the internal management of the Department's language access program, and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person. This document is not intended to be cited in any judicial or administrative proceeding. Administration of the programs discussed herein is within the sole discretion of the Department and its bureaus.

E. Language Access Roles and Responsibilities at the Department of the Treasury

1. Office of Civil Rights and Diversity - Under Treasury Order 102-02, Delegation of Authority Concerning Equal Opportunity Programs; and the Treasury Directive 12-41, Delegation of Authority Concerning Equal Employment Opportunity (EEO) Programs and Treasury Complaint Center (TCC); the OCRD is responsible for providing guidance and oversight for implementing the provisions of Executive Order 13166 and this LAP. To ensure consistency and accountability across the agency, OCRD will, among other things:

- a) Coordinate efforts to implement the provisions of this LAP and serve as a clearinghouse of best practices and opportunities for leveraging resources across the Department of the Treasury, and research and disseminate information on existing language technologies and the appropriate use of these technologies.
- b) Monitor and coordinate language access activities across the Department and its bureaus.
- c) Provide ongoing technical assistance to the bureaus in the development and monitoring of their LAP.
- d) In accordance with Treasury complaint processing procedures, review complaints filed by members of the public that allege a denial of meaningful language access to Treasury's programs, services, and activities, and if appropriate, make recommendations for corrective actions.
- e) Support the bureaus' and offices' efforts to train their managerial and front-line employees on language access responsibilities and protocols.
- f) To augment existing language services, facilitate interagency access to existing Federal resources such as the National Virtual Translation Center (NVTC), which offers qualified translators in support of national security; the FBI's Language Services Unit, which offers language skills testing and interpreter certification; and the National Language Service Corps, chartered by Congress as part of the Department of Defense (DOD) plan

to address future surge requirements and the National Security Language Initiative (NSLI).

2. Office of the Deputy Assistant Secretary for Human Resources and Chief Human Capital Officer (DASHR/CHCO) - The DASHR/CHCO supports this LAP by performing related human resources duties associated with implementation of the plan (e.g., professional pay issues, working with unions).

3. The Treasury Bureaus – The Treasury bureaus and offices are responsible for developing their individual LAP and updating such plans. In developing their plans, the bureaus will follow the guidance provided by the DOJ and this document.

F. Guiding Principles for Bureau Plan Development

Each Treasury bureau having contact with the public was required to develop a LAP that fully incorporates the Treasury LEP policy established by this plan. Bureau LAPs must be based on the most recent self-assessments. OCRD discussed the plans and provide feedback through the process.

Each bureau LAP should include the following elements:

- 1) Responsible Staff: In addition to listing a primary LEP coordinator for the bureau, the LAP should identify senior management staff, workgroups, committees, or other staff who will have the authority and be responsible for developing and modifying the office or bureau LAP, as well as establishing and implementing operational procedures and guidance. If not designated otherwise, the Bureau EEO/CR Officer will be the responsible staff person;
- 2) Oversight: Establish protocols for authority and oversight;
- 3) Notice to Employees: Establish methods for explaining to employees their responsibilities and available language resources;
- 4) Prioritization: Include a plan for prioritizing language services based on importance of services or encounter, frequency of use, and demographics;
- 5) Language Access Procedures and Guidance: Set out the language access procedures or protocols that staff should follow to provide language services to LEP persons encountered in their daily activities, including: recognizing the LEP status of an individual, identifying the language spoken, identifying situations requiring appropriate language assistance, providing information on how to access this language assistance, and recording the contact. Unless countervailing considerations are explained in detail, protocols should include limits on the use of family members, friends, or other persons associated with LEP persons to rare situations and nonessential information;

- 6) Quality Control Procedures: Describe quality control procedures that ensure staff employees who use their foreign language skills do so in an accurate and competent manner as well as ensuring high quality language services from contractors;
- 7) Data Tracking: Outline steps for implementing and maintaining a mechanism for collection and management of data relating to non-English needs, especially through existing databases or tracking systems;
- 8) Resources: Assess the resources necessary to provide language services, identifying existing resources to the extent practical and describing funding and procurement needs;
- 9) Outreach to LEP Communities: Describe collaboration or engagement with LEP communities and other external stakeholders to assess effectiveness of language services;
- 10) Employee Duties: Where appropriate, expand job descriptions to include interpretation and translation activities within the scope of employees' duties; assess these employees' language abilities to ensure their competency to perform language services for particular duties; and describe plans for enhancing employees' language abilities;
- 11) Timeframes: Describe the timeframes and benchmarks for steps to be undertaken;
- 12) Training: Where appropriate, include a plan for managerial and front line staff training on language access responsibilities, including identifying LEP persons, accessing available language services, and working with interpreters;
- 13) Notice to the Public: Provide for notice of free language assistance services and points of contact for additional information; and
- 14) Monitoring and Evaluation: Provide for monitoring and evaluating and, if appropriate, updating the plan, policies, and procedures, including monitoring performance, quality assurance, and internal review processes as well as evaluating the impact, if any, of demographic shifts.

G. Treasury Bureaus and Offices Self-Assessments

OCRCD developed an assessment form for the Treasury bureaus. The form was meant to assist the Treasury bureaus in assessing their language needs and capabilities and incorporated the DOJ four factor analysis. The bureaus' plans are attached to this LAP and appear in the Appendices 1 to 10. A copy of the Treasury Self-Assessment form is included in Appendix 11.

H. Challenges

While progress has been made, challenges remain. As part of the self-assessment, bureaus provided the information they had on the languages of LEP persons served or

encountered, but most have not tracked LEP data. Procedures for employee access to language services are very strong in some program areas, but weaker in others. The Department's focus, as the bureaus and Office plans are crafted and implemented, will yield important benefits in improved services and improved ability to carry out Treasury's vital mission, which require communication with every segment of the American public—including the more than roughly 8% who have LEP.

I. Resources

- 1) Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, can be found at:
<http://www.justice.gov/crt/about/cor/Pubs/eolep.php>.
- 2) Department of Treasury LEP Guidance, 70 FR 6067 (February 4, 2005), Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, can be found at:
http://www.lep.gov/guidance/depttreas_lep_guide_final.pdf.
- 3) Federal Interagency Working Group on Limited English Proficiency: www.lep.gov contains resources, tools, technical assistance, and updated information on language access activities for agencies of the Federal government, recipients, and other entities that support language access.
- 4) U.S. Department of Justice, Civil Rights Division, Federal Coordination and Compliance Section, Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs, May 2011, contains helpful guidance agencies may wish to review in creating their Language Access Plans:
http://www.lep.gov/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf

Appendices - Bureau Language Access Plans

- Appendix 1 – Bureau of Engraving and Printing (BEP)
- Appendix 2 – Bureau of the Fiscal Service
- Appendix 3 – Financial Crimes Enforcement Network (FINCEN)
- Appendix 4 – Internal Revenue Service (IRS)
- Appendix 5 – United States Mint (US Mint)
- Appendix 6 – Office of the Comptroller of the Currency (OCC)
- Appendix 7 – Office of the Inspector General (OIG)
- Appendix 8 – Treasury Inspector General for Tax Administration (TIGTA)
- Appendix 9 – Alcohol and Tobacco Tax and Trade Bureau (TTB)
- Appendix 10 – DO
- Appendix 11 – Bureau Assessment Tool

Appendix 1 – Bureau of Engraving and Printing (BEP) Language Access Plan

Types of language services and policies are already provided/instituted. BEP conducts ongoing assessments of its services and activities, in compliance with Executive Order 13166 (EO), for individuals who are limited in English proficiency (LEP). BEP's public involvement is limited to its tours, website, and educational materials. In addition to occasional Freedom of Information Act requests, as is the case with all federal agencies.

The following areas within the Bureau have public contact:

- Web pages on the Moneyfactorystore.gov site
 - The website gives the user the option to translate the pages into 24 languages Educational materials on counterfeit and youth education. The brochures are available in 24 languages
- Tours of the production facilities
 - A tour video is available in Hebrew, Chinese, German, Japanese, Mandarin and Spanish
- Freedom of Information Act program
 - Requests made in languages other than English are handled on a case by case basis

Are current language services and policies formally written down and shared with LEP persons, their representatives, and internally? If not, what steps will the Bureau take to ensure that this happens?

Yes, the tour brochure states that tours can be conducted in other languages upon request. The tour brochure is available in over 24 languages.

If you have identified some services and/or policies that are reasonable and necessary under Section 1, but that are not currently being provided, please identify them here. There are portions of the BEP overall website that do not have the translation option. The BEP will continue to review its services for any new areas in which services should be provided. The BEP will provide updates to staff regarding the EO and providing a contact for any questions.

What steps will the bureau take to provide the services and/or adopt/change the policies identified above? What steps will the agency take to inform staff and the public of these services/policies?

A memorandum will be written by senior leadership reminding its workforce of the Language Access Plan *and* BEP's responsibility under the EO.

What steps will the bureau take to review and update the needs assessment and plan, and the implementation of the plan on at least an annual basis?

The Office of Equal Employment and Diversity Management (OEODM) is responsible for monitoring the language access program. OEODM will review the plan annually with the Office of External Relations.

Appendix 2 – Bureau of the Fiscal Service

LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH PROFICIENT (LEP) INDIVIDUALS BUREAU OF THE FISCAL SERVICE, FY 2014 – FY 2015

The Bureau of the Fiscal Service is the newest bureau of the Department of the Treasury and formed from the consolidation of the Financial Management Service (FMS) and the Bureau of the Public Debt (BPD). Our mission is to promote the financial integrity and operational efficiency of the U.S. government through exceptional accounting, financing, collections, payments, and shared services.

The following information discusses the translation services available and a brief description of the bureau's programs and customers.

There are bureau five programs where LEP individuals may interact with the Fiscal Service:

- 1) Retail securities program - service and redemption of paper saving bonds and other Treasury securities in electronic form in the TreasuryDirect program;
- 2) Delinquent debt collection and offset programs;
- 3) Payment programs - payments to the public (social security, veterans, tax refunds, etc.);
- 4) Revenue collections programs - tax payments and other types of payments owed to the federal government;
- 5) Freedom of Information Act program (FOIA).

Assistance for LEP individuals:

For the customers of these five programs, the Fiscal Service provides language access services.

The easiest way to learn about our programs in any language is through our websites. *Google Translate* is available on our three primary websites: Fiscal.Treasury.gov, TreasuryDirect.gov, and FMS.treas.gov, which will eventually go away when all the information moves to <http://www.fiscal.treasury.gov/>

Printing paper material has stopped. Because we have current information on our websites, the Fiscal Service has stopped printing almost all materials and publications for its Treasury securities programs. This also is true for almost all of its customer programs.

Interpretation/ oral assistance is provided. Our call centers employ bi-lingual staff, mostly Spanish-speaking individuals. If there is a need for other languages not available at a center, the bureau will use translation services found through the Government Services Administration (GSA) website.

Translation services are provided. Bureau employees who are fluent in other languages also are available to translate letters or emails. We also have successfully used *Google Translate* to scan paper correspondence written in languages other than English. We also have the option of a GSA translation service, if needed.

1) Retail Securities Services Program:

We provide two customer service help desks for the bureau's securities customers. LEP services are available in both locations. The volume of service required is extremely small because our securities programs for individuals, small businesses and organizations, is entirely voluntary and is offered as a service to the public.

Information about paper savings bonds (i.e., how to cash or reissue bonds) is found on TreasuryDirect. Only a small number of paper U.S. Savings Bonds are now being sold - through the tax time bond program (purchase I bonds with a tax refund - IRS Form 8888). Because of the volume of paper savings bonds outstanding, we will continue to provide service for years to come.

Very few paper marketable securities, a program discontinued in 1986, remain outstanding. The Legacy Treasury Direct system, the all-electronic application that replaced the paper program for marketable securities, also is being phased out. No new securities are being sold in this system. Customers are being encouraged to move their securities to TreasuryDirect; as a result, the number of funded accounts in the legacy system has dropped to fewer than 33,720 and continues to decline. Staff is available to assist LEP customers who own securities in either system.

A new retirement savings account will be introduced in 2015 and options for language translation are being considered.

2) Delinquent Debt Collection and the Treasury Offset Program call line:

We provide two customer service help desks for the delinquent debt collection program. Many employees are bilingual, especially Spanish speaking individuals. They talk with LEP individuals on the phone, via email, and also via correspondence. Almost 16,300 LEP individuals are served by our debt collection program annually. Approximately 1,400 people use the LEP services monthly. With proper authorization, the bureau allows LEP individuals to provide their own interpreters, most often family members. Initial and periodic training is given to staff regularly assisting LEP individuals and interpreters.

3) The Payments Program:

The bureau maintains two call centers for individuals who have not received their payments (social security, veterans, etc.) or whose payments appear to be in error. They receive inquiries through the call center, email messages, and mailed correspondence. They support LEP individuals with bilingual staff and a dedicated pool of interpreters and translators. The interpreters are on contract. Spanish and English are the most used

languages and the TTY (Telecommunications Device for the Deaf). Contact with LEP persons is on a daily basis.

4) Collections Program:

We provide two methods for customers to make their payments electronically: through Pay.gov and the Electronic Federal Tax Payment System (EFTPS). Nearly 90,000 limited English proficiency (LEP) customers are assisted annually and monthly, approximately 7,400 LEP persons access the programs on our phone lines or on websites. Bilingual staff is available to answer questions and assist customers. They receive LEP training annually.

5) Freedom of Information Act (FOIA) Program:

All of the information a person needs to learn about FOIA and to file a FOIA request is on the Fiscal Service website, fiscal.treasury.gov and published on TreasuryDirect.gov. As noted above, language services are provided using *Google Translate*. We are not aware of ever receiving a FOIA request in a language other than English. If a request were to be filed in another language, the bureau will use a translation service provided by a GSA contractor.

Appendix 3 - The Financial Crimes Enforcement Network's (FINCEN's)

Language Access Plan (LAP) to Improve Access to Programs and Activities by Limited English Proficient (LEP) Persons

PURPOSE

The purpose of this plan is to assist FinCEN in fulfilling its obligations pursuant to Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP), applicable to its conducted programs and activities as required under Executive Order 13166 (August 11, 2000).

Who is a Limited English Proficient (LEP) individual? Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be LEP, or entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," was created to improve access to federally conducted and federally assisted programs and activities for persons who as a result of national origin, are limited in their English proficiency (LEP). The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental

mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Department of Justice Guidance

To assist Federal agencies in carrying out these responsibilities, the U.S. Department of Justice issued LEP Guidance that set forth the compliance standards that recipients of Federal financial assistance must follow to ensure that their programs and activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination.

The policy guidance is not a regulation but rather a guide. Title VI and its implementing regulations require that recipients take responsible steps to ensure meaningful access by LEP persons. This guidance provides an analytical framework that recipients may use to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient.

Reasonable steps to provide LEP individuals with meaningful access

FinCEN's mission is to enhance U.S. national security, deter and detect criminal activity, and safeguard financial systems from abuse by promoting transparency in the U.S. and international financial systems. FinCEN carries out its mission by receiving and maintaining financial transactions data; analyzing and disseminating that data for law enforcement purposes; and building global cooperation with counterpart organizations in other countries and with international bodies. To accomplish these activities, FinCEN employs a team comprised of approximately 320 federal employees, including analysts, regulatory specialist, international specialists, technology experts, administrators, managers, and federal agents.

While FinCEN does not provide "benefits and services" in the traditional sense as reflected throughout the Order and guidance. Part of FinCEN's mission is to ensure that institutions subject to the Bank Secrecy Act (BSA) are aware of the BSA requirements applicable to them. In addition, FinCEN activities contribute to the development of BSA guidance, outreach, training, and education to financial institutions. The BSA requires many financial institutions to create "paper trails" by keeping records and filing reports on certain transactions. These reports are submitted to the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN). FinCEN collects and analyzes the information to support law enforcement investigative efforts and to provide U.S. policy makers with strategic analyses of domestic worldwide money laundering developments, trends and patterns. BSA regulations require certain Money Services Businesses (MSBs) to register with FinCEN and prepare and maintain a list of agents, if any. In addition, BSA regulations require certain MSBs to report suspicious activity to FinCEN. (See 31 CFR 103.20)

Plan Requirements

The Department of Treasury has identified the following FinCEN conducted programs:

- (1) Web pages maintained by FINCEN.
- (2) Freedom of Information Act program.
- (3) Publications, Report, and Forms to the general public.

Self-Assessment of Language Needs – Conduct an assessment of language needs of the population served.

The following four factors assist in identifying what constitutes reasonable steps to ensure meaningful access:

- (1) The number or proportion of LEP persons served or encountered in the eligible service population
- (2) The frequency with which LEP persons come in contact with the program
- (3) The nature and importance of the program, activity, or service provided by the program
- (4) The resources available to the recipient and costs

These four factors are useful in conducting a balanced analysis to determine particular language occur on an infrequent basis. Justice Department guidance clarifying LEP responsibilities under Title VI indicates that if reasonable steps are possible, the agency should have a plan for what to do if an LEP individual seeks services. The following steps are designed to assist in designing an LEP plan.

(1) Identify LEP Individuals who need language assistance

The first two factors in the four-factor analysis require an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters. This requires recipients to identify LEP persons with whom it has contact.

(2) Language Assistance Measures

The plan will include information on at least the following: Types of language services available, where to obtain those services, how to respond to LEP callers, how to respond to written communication, ensure competency of interpreters and translation service.

(3) Training Staff

Staff should know policies, procedures and obligations to provide meaningful access to information and services for LEP persons. Ensure that all employees in public contact positions are properly trained.

(4) Provide notice to LEP

It is important for the recipient to let LEP persons know that those services are available and that they are free of charge.

(5) Monitoring and updating the LEP plan

Establish a system where appropriate on an ongoing basis, at least annually, conduct review of whether new documents, program services, and activities need to be made accessible for LEP individual.

FinCEN will evaluate its programs and activities in an effort to better serve LEP persons interested in receiving information regarding requirements of the BSA.

Appendix 4 - Internal Revenue Service (IRS)

Internal Revenue Manual (IRM); Part 22, Taxpayer Education and Assistance; Chapter 31, Multilingual Initiatives; Section 1, IRS Language Services

The IRS' language access measures are published in the IRM which provides guidance to implementing the Language Services Program through the IRS. The relevant portion of the IRM can be accessed by all interested in the IRS.gov web site and by following this web link: http://www.irs.gov/irm/part22/irm_22-031-001.html

Appendix 5 - United States Mint

Language Assistance Plan to Improve Access to United States Mint Programs and Activities by Limited English Proficient Persons

Purpose: The purpose of this plan is to identify the responsibilities of the United States Mint for providing limited English proficient (LEP) individuals with meaningful access to United States Mint programs and services. (Executive Order 13166 and Title VI of the Civil Rights Act of 1964.)

Specifically, the Department of the Treasury determined that the following six United States Mint activities should be addressed to improve access by LEP persons:

1. Web pages maintained by the United States Mint.
2. Public tours of the United States Mint at Denver and Philadelphia buildings.
3. United States Mint sales areas.
4. The customer service telephone line.
5. Freedom of Information Act Program, and
6. Publications, reports, and forms to the general public.

Language Access Plan (LAP)

1. Assessment of Language Needs – Conduct a bureau-wide assessment of the language needs of the LEP persons who seek services from the United States Mint. Put in place operating procedures to regularly assess the LEP status and language assistance needs of current and potential customers as well as operating procedures to assess the bureau's capacity to meet these needs.

- Identify the number, purpose and importance of non-English languages spoken in contacts with the United States Mint. Identify the proportion of contacts each language represents and the frequency of the contact. This will be accomplished by maintaining a log of telephone calls and correspondence received where a language barrier occurs and by surveying staff with public contact responsibilities. This may also be done by considering prior experiences with

non-English speaking individuals and determining the language assistance that was needed.

- For United States Mint facilities with public tours or sales areas, use census, workforce, United States Mint field staff experience, or other population data to show high percentages of particular non-English language groups.
- Identify the points of contact where language assistance is likely to be needed in United States Mint facilities.
- Identify the resources needed and potential costs to provide effective language assistance.
- Identify the availability of existing language assistance resources.
- Identify the arrangements that must be made and potential costs associated with acquiring these language assistance resources in a timely fashion.
- Identify other bureaus/agencies with similar operations with which we could coordinate and collaborate in determining the language assistance services.

2. Provide Oral Language Assistance – Provide for oral language assistance based on the assessment of the language needs of LEP persons seeking services from the United States Mint.

3. Provide Written Translation Services – Produce vital¹ documents in languages other than English where there is a significant number or percentage of LEP persons who are seeking services from the United States Mint.

4. Notification of Available Language Assistance Services – Provide notices to LEP persons in a language that they can understand of the availability of United States Mint language assistance. Notices will be based on the assessment of the language needs of LEP persons seeking services from the United States Mint.

5. Development of a Written Policy on Language Access – After the assessment has been completed, the Diversity Management and Civil Rights Division, with the assistance of the facility EEO Managers, will develop and implement a written policy that will ensure meaningful communication with LEP persons. The policy will likely include the following components:

- Identification and assessment of the language needs of LEP contacts
- Oral language services
- Written translation services
- Staff training on language assistance obligations, policies, and procedures
- Monitoring language accessibility for LEP individuals

¹ The Department of Justice defines vital documents as containing “...information that is critical for obtaining the services and/or benefits, or are required by law. These written materials could include but are not limited to notices of rights, complaint forms and procedures, and explanations of critical benefits. Vital written materials should be translated when a significant number or percentage of those eligible to be served, need information in a language other than English to communicate effectively. For many larger documents, translations of vital information contained within the documents will suffice. The documents need not be translated in their entirety.”

6. Training – Train United States Mint staff likely to have contact with LEP persons on the policy and their areas of responsibilities. The Diversity Management and Civil Rights Division, with the assistance of the facility EEO Managers, will ensure training is provided.

- United States Mint should provide a copy of the LEP policy to employees likely to have contact with LEP persons.
- Provide periodic training for employees with frequent contact with LEP persons.

7. Monitoring – Conduct regular monitoring of the language assistance program to ensure that LEP persons have meaningful access to United States Mint programs and services. To assure that the LEP program continues to provide meaningful access to LEP persons, the United States Mint Diversity Management and Civil Rights Division, with the assistance of the facility EEO Managers, will monitor the program at least annually.

Appendix 6 - Office of the Comptroller of the Currency

Limited English Proficiency Assistance Program

Self-Assessment

The OCC Units that responded to the LEP Self-Assessment Questionnaire are The Ombudsman's Office, Public Affairs Operations, Communications, Community Affairs, and External Outreach & Minority Affairs - March 12, 2014

Demography

Has your bureau developed a demographic profile of the population served or likely to be served by your Federally conducted programs and activities?

- The OCC understands the demographic profile of the population that is served or likely to be served by our federally conducted programs and activities. However, we have not developed a formalized demographic profile of the population.

Is your bureau working with any community-based organization(s) that is (are) familiar with the language needs of individuals participating in any of your programs and activities, or to whom you provide services or encounter?

Yes.

- Community Affairs (CA) Division and External Outreach and Minority Affairs (EOMA) office, maintain relationships with the National Council of La Raza, LULAC, Congressional Hispanic Caucus Institute (CHICI), National Congress for American Indians, National Asian American Coalition, NAACP, CBC, and other community groups, which often inform their Spanish-speaking constituents of our practices. In addition, EOMA maintains relationships with the Hispanic Association of Colleges and Universities and the Congressional Hispanic and Asian Pacific American Caucuses.

- Both OCC's Community Affairs Division and External Outreach and Minority Affairs participate in conferences and events serving Spanish-speaking populations and provide the OCC's consumer materials in Spanish.

Frequency of Contact

Does your bureau have a process for surveying, collecting and/or recording primary language data for individuals that participate in your programs and activities?

- Yes. The OCC monitors Web traffic to its Spanish-language Web sites to determine use and demand for Spanish-language Web content. Spanish content is centralized on HelpWithMyBank.gov at <http://www.helpwithmybank.gov/espanol/index-espanol.html> and is accessible from occ.gov. The data is analyzed using WebTrends based on IIS logs. Traffic to our Spanish-related content represents about 1% of total traffic.
- The OCC also distributes its Public Service Advertisements in Spanish for print and radio.

Importance

Do you conduct compulsory activities? (For example, do you require applications, consent, interviews, or other activities prior to participation in any of your programs and/or activities, in order to obtain some benefit, service, or information, or in order to participate in a higher level program?)

- No. The exception may be the ability to file a complaint and get assistance through the OCC Customer Assistance Group in Spanish. The complaint form, brochures, and general information are available in English and Spanish and Spanish-language phone support is available. The public can request FOIA information through the Helpwithmybank.gov, which provides information in Spanish.

Do you conduct involuntary programs or activities (like custodial interrogations hearings, trials, evictions, etc.) or provide compulsory education or other mandatory programs or activities?

- No.

Do you conduct programs or activities that have serious consequences, either positive or negative, for a person who participates? (Including but not limited to, for example: health, safety, economic, environmental, educational, law enforcement, housing, food, shelter, protection, rehabilitation, discipline, transportation, etc.).

- Yes. The OCC Customer Assistance Group assists customers of national banks with complaints and questions regarding national banks. That process is supported in Spanish.

Have you determined the impact on actual and potential participants of delays in the provision of services or participation in your programs and/or activities (economic, educational, health, safety, housing, ability to assert rights, transportation costs, etc.)?

- No. The processing of complaints in Spanish is not delayed in comparison with English language. The volume of Spanish-language questions and complaints represent less than 1% of the total volume of complaints received.

Resources

Have you identified the resources needed to provide meaningful access for LEP persons and are those resources currently in place?

- Yes. Based on the volume of consumer content and demand on OCC Web sites, we have resources to translate and update Spanish Language content on a regular basis.
- OCC's Public Service Advertisements are also produced and distributed in Spanish and that cost is included in the Public Affairs Operations budget.
- Additional resources have been committed by the Customer Assistance Group to assist national bank customers with Spanish-language questions and complaints.
- The OCC also accesses external resources to translate publications and material on an as needed basis and spends between \$3,000 and \$12,000 annually on these services.

Is there a staff member in your bureau assigned to coordinate language access activities?

- Yes. Carol Buchman, Writer Editor.

Have you identified the points of contact where a LEP person interacts with your bureau?

- Yes. That information is available on HelpWithMyBank.gov for LEP to contact the OCC Customer Assistance Group online, by phone, or in writing.

Given the identified points of contact, is language assistance available at those points?

- Yes. Spanish-language assistance is available.

By language spoken, how many employees in your bureau fluently speak a language other than English?

- The OCC Customer Assistance Group has bilingual staff available to assist LEP persons through call center contract support with Peckham, Inc. Lansing, Michigan.

What percent of the total employees in your bureau are bilingual and able to competently assist LEP persons in the LEP person's language?

- LEP persons are assisted by FTE staff and call center contract staff provided by Peckham Inc., as needed based on demand.

Do you utilize employees in your bureau as interpreters? (Interpreting is a different skill than being bilingual and able to communicate in more than one language. Interpretation requires particular skills. For more information, see LEP.gov).

- No. The OCC Customer Assistance Group does not utilize interpreters.

All questions that related to interpreter services are not applicable, as we do not provide interpreter services.

If additional resources are needed to ensure meaningful access, have you identified the cost of those resources?

- Yes. The OCC Customer Assistance Group has a contractual arrangement with Peckham, Inc. to provide bilingual contract employees to assist LEP persons as needed.

Are there any limitations in resources (dollars and personnel) that could impact the provision of language assistance services?

- No.

Appendix 7 - Office of the Inspector General

[Updated version is pending.]

Appendix 8 - Treasury Inspector General for Tax Administration (TIGTA) 2011

Limited English Proficiency (LEP) Language Access Program

Background

On August 11, 2000, the President signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so that LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Limited Access Program Self-Assessment

When using the Treasury guidance to conduct a self-assessment, there is a four-fold assessment which includes:

1. Demography;
2. Frequency of Contact with LEP persons;
3. Importance of the programs or services; and
4. Resources.

The results of the self-assessment are outlined below.

Demography

According to the Fiscal Year (FY) [2000 Census](#), English is the only language spoken at home by an estimated 82.4 percent of the population five years of age and older. The remaining 17.6 percent speak a language other than English. There is a current barrier that exists and a future potential of that barrier widening as our country continues to become more diverse.

The Washington, D.C. area is comprised of a very diverse group of people from all walks of life and from many different places around the world. According to the [2000 Census](#) taken in Washington, D.C., 22.8 percent of the population that speaks a language other than English at home speaks English either “not well” or “not at all.”

Frequency of Contact

The Treasury Inspector General for Tax Administration (TIGTA) was established in January 1999, in accordance with the *Internal Revenue Service (IRS) Restructuring and Reform Act of 1998*, to provide independent oversight of IRS activities. We provide audit, inspections and evaluations, and investigative services which promote economy, efficiency, and integrity in the administration of the Internal Revenue laws. Our contact with the general public, including those with limited English proficiency, is minimal at best.

In FY 2011, the Office of Civil Rights and Diversity Division (OCRD) requested an update of TIGTA’s plan to address the access of LEP individuals to TIGTA’s conducted programs and activities. The OCRD has identified the following programs, products, and activities to be addressed:

1. Web pages maintained by TIGTA;
2. Investigations;
3. Inspector General Hotline complaints;
4. Materials and publications (i.e. Semiannual Report (SAR), Management Challenges, etc.); and
5. The Freedom of Information Act (FOIA) Program.

In response to item 1, the Office of Information and Technology has not received any requests from the general public to offer languages other than English on TIGTA’s public website. However, some preliminary research was conducted to review options of using a free translation service (e.g. Google Translate or Babel Fish), or developing a Hispanic website to mirror the English content public website. After a limited review, it was decided the resources and funding are not available to pursue this at this time.

In response to item 2, the Office of Investigations has investigation awareness contact cards which address what to do if a person thinks they have been offered a bribe, assaulted or threatened. This information is available in both English and Spanish.

In response to item 3, managing the Inspector General Hotline complaints, it is estimated that TIGTA receives three to five calls each week from LEP individuals during the filing season (mid-January through April 30). During FY 2010, the Hotline logged approximately 8,326 calls. The total estimated calls from Hispanics were approximately .012 percent. When a person calls the hotline, there are options to dial 1 for English or 2 for Spanish. If the caller chooses option 2, he or she is transferred to the IRS Taxpayer Advocates Service, and will be able to continue selecting Spanish speaking options. If an LEP taxpayer selects option 5 from the call menu, they are connected to one of the Hotline staff members for assistance. TIGTA has employees on different staffs who speak Spanish and can assist the caller. If someone is not immediately available, TIGTA will record their message and have a Spanish-speaking employee return their call.

In response to item 4, TIGTA only has certain publications printed in Spanish, such as our career brochures. The SAR is distributed to the Congress, the IRS, the IRS oversight Committee, and the Council of Inspector General Integrity and Efficiency, and upon request. There has not been a request for the SAR to be printed in any language other than English.

In response to item 5, , members of the general public submit written FOIA requests to TIGTA's Disclosure Officer in Counsel's Disclosure Branch and submit written FOIA appeals to the Chief Counsel staff. Telephone inquiries and e-mails received from the public are minimal. There was only one written Spanish FOIA request submitted several years ago that was translated into English by a TIGTA Counsel employee who was fluent in Spanish. When the FOIA request was processed by the Disclosure Branch, the response was translated into Spanish by the Counsel employee for the benefit of the requester.

In FY 2010, the Office of Communications received only two communications from non-English speaking taxpayers. Both were telephone calls of which one was in Spanish and the other was in French and Swahili. TIGTA's Communications Director is fluent in Spanish and conversant in French so she was able to provide the assistance the taxpayers requested. The Communications Director plans on attending the Internal Revenue Service (IRS) Language Services Summit meeting in FY 2011 to receive current information on the IRS's system of serving taxpayers with needs for multilingual communication assistance. TIGTA plans to use that information to develop a plan for multilingual outreach in the future.

Some of TIGTA's employees speak languages other than English and can assist from time to time with interpretation/translation as needed. TIGTA does not have a central repository of information about employees who are bilingual and what languages they speak fluently. However, each Function Head can reach out to their managers to identify

individuals who can speak languages other than English for assistance with public requests.

Appendix 9 - Alcohol and Tobacco Tax and Trade Bureau (TTB)

Language Assistance Plan (LAP) for Improving Access to Services for Persons with Limited English Proficiency (LEP) 2008

Introduction

On August 11, 2000, Executive Order 13166 was issued, "Improving Access to Services for Persons with Limited English Proficiency," (reprinted at 65 Federal Register 50121 on August 16, 2000). Under that order, every Federal agency that provides financial assistance to non-Federal entities must publish guidance on how their recipients can provide meaningful access to Limited English Proficiency (LEP) persons and thus comply with Title VI regulations forbidding funding recipients from "restrict[ing] an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program" or from "utiliz[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects individuals of a particular race, color, or national origin."

The mission of the Alcohol and Tobacco Tax and Trade Bureau (TTB) is to collect alcohol, tobacco, firearms, and ammunition excise taxes; to ensure that these products are labeled, advertised, and marketed in accordance with the law; and to administer the laws and regulations in a manner that protects the consumer and the revenue, and promotes voluntary compliance. Although the TTB does not provide financial assistance to non-Federal entities, we do have contact with the public. In recognizing that some individuals do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, we have taken measures to address the needs of parts of the LEP population. TTB has translated our internet website into Spanish, French, and Chinese (Mandarin). This effort is to assist the general public, to include TTB's industry members, to help give perspectives and assistance to exporters and importers on how to comply with our regulations.

The purpose of this Language Assistance Plan (LAP) is to fulfill the requirements of Executive Order 13166 and Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d, and its prohibition of discrimination on the basis of national origin.

Background

Although a majority of people living in the United States read, write, speak and understand English, there are many for whom English is not their primary language. Based on the 2000 census, over 26 million individuals speak Spanish and almost 7 million individuals speak an Asian or Pacific Island language at home. To the extent

these individuals have a limited ability to read, write, speak, or understand English, they have limited English proficiency, or "LEP."

Language for LEP individuals can be a barrier in accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. The Federal government funds an array of services that can be made accessible to otherwise eligible LEP persons. The Federal government is committed to improving the accessibility of these programs and activities to eligible LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English.

In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from Federally assisted programs and activities may violate the prohibition under Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d . This guidance clarifies existing legal requirements for LEP persons to the extent they apply to the TTB.

Legal History

Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, provides that "no person shall on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Section 602 authorizes and directs Federal agencies that are empowered to extend Federal financial assistance to any program or activity "to effectuate the provisions of [section 601] * * * by issuing rules, regulations, or orders of general applicability." 42 U.S.C. 2000d-1.

The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted regulations promulgated by the former Department of Health, Education, and Welfare, to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination. In *Lau*, a San Francisco school district that had a significant number of non-English speaking students of Chinese origin was required to take reasonable steps to provide them with a meaningful opportunity to participate in federally funded educational programs.

On August 11, 2000, the President signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries².

² This policy "does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person." E.O. 13166, §5.

To assist Federal agencies in carrying out these responsibilities, the U.S. Department of Justice (DOJ) issued a general policy guidance, "Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons With Limited English Proficiency" (reprinted at 67 F.R. 41455 on June 18, 2002). This LEP Guidance sets forth the compliance standards that recipients of Federal financial assistance must follow to ensure that their programs and activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination. It is directed toward DOJ recipients, and also serves as a model for other agency recipient guidance.

Subsequently, Federal agencies raised questions regarding the requirements of the Executive Order, especially in light of the Supreme Court's decision in *Alexander v. Sandoval* (the court held that there is no private right of action for individuals to file a lawsuit for disparate impact discrimination pursuant to Title VI of the Civil Rights Act of 1964). On October 26, 2001, Ralph F. Boyd, Jr., Assistant Attorney General for the Civil Rights Division, issued a memorandum for "Heads of Departments and Agencies, General Counsels and Civil Rights Directors." This memorandum clarified and reaffirmed the DOJ LEP Guidance in light of *Sandoval*. The Assistant Attorney General stated that because *Sandoval* did not invalidate any Title VI regulations that proscribe conduct that has a disparate impact on covered groups--the types of regulations that form the legal basis for the part of Executive Order 13166 that applies to federally assisted programs and activities--the Executive Order remains in force. This LAP is thus published pursuant to Executive Order 13166.

Steps for Improving Access

The TTB interacts with the general public to include industry members who may have limited English proficiency and may not be able to communicate or understand our programs or services. We continue to take reasonable steps to ensure that LEP persons receive the language assistance necessary to afford them meaningful access to our services where appropriate. In accordance with the DOJ's guidance on LEP, TTB uses the following four factors to assist our Bureau in identifying what constitutes reasonable steps to ensure meaningful access:

1. The number of proportion of LEP persons who may not receive the TTB's services absent efforts to remove language barriers;
2. The number and frequency with which LEP persons come into contact with the TTB's programs or services;
3. The importance of the services provided by the TTB to the individuals' lives; and
4. The resources available to the TTB to provide access.

These four factors are useful in conducting a balanced analysis to determine whether reasonable steps are possible when contacts with persons speaking a particular language occur on an infrequent basis. The DOJ's LEP Guidance clarifying LEP responsibilities under Title VI indicates that if reasonable steps are possible, the agency should have a

plan for what to do if an LEP individual seeks services. This guidance further states that, "Claims of limited resources from large entities will need to be well substantiated." (Federal Register, August 16, 2000, Vol. 65, No. 159)

There is no universal solution for Title VI compliance with respect to LEP persons. The determination of compliance will be based on the end result — whether TTB has taken necessary steps to ensure that LEP persons have meaningful access to its programs and services.

TTB's Plan for Persons with Limited English Proficiency

TTB's plan is to continue providing prompt and courteous response to all customers who contact us. Our Bureau has included Spanish, French, and Chinese language options on our internet web site. Additionally, we will obtain interpreter and translator services for other languages on an as-needed basis through the General Services Administration and/or Small Business companies.

TTB will periodically review any contacts with persons with limited English proficiency to determine the types and frequency of contacts, the language used, and how the contacts were handled. This information will be used to determine whether additional efforts are needed, and this Plan will be updated to reflect any additional changes.

Appendix 10 – Departmental Offices Language Access Plan

[Space reserved]