



2015 Social Security Administration Language Access Plan

***Providing Access to Benefits and Services to Individuals with
Limited English Proficiency***

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LANGUAGE ACCESS POLICY

Vision Statement

We, the Social Security Administration (SSA), strive to deliver effective, efficient, and equitable service to the public, which includes providing access to our programs and services, regardless of its ability to speak, read, or write English.

Policy Statement

1. We value the diversity of our customers and foster an inclusive environment where we respect individual differences, including language preferences.
2. We continually work to improve service delivery options available to Limited English Proficiency (LEP) individuals that allow them to communicate effectively with us in-person, over the phone, in writing, or through video and Internet.
3. We are responsible for ensuring that individuals have access to our programs and services, regardless of their ability to communicate in English. Our employees, contractors and entities receiving Federal financial assistance from SSA will take all reasonable steps to effectively inform the public of the availability of language accessibility services.
4. Our LEP Plan, available online at www.socialsecurity.gov, conveys our policy principles and provides our LEP service delivery guidelines to the public and our employees. We will provide a copy of the Plan to any person who requests one.
5. Our LEP policy and procedures align with the five strategic goals in our Agency Strategic Plan, which are:
 - Deliver Innovative, Quality Services
 - Strengthen the Integrity of Our Programs
 - Serve the Public through a Stronger, More Responsive Disability Program
 - Build a Model Workforce to Deliver Quality Service
 - Ensure Reliable, Secure, and Efficient Information Technology Services

Purpose and Authority

We are committed to providing LEP individuals meaningful access to our programs and activities. The purpose of this plan is to establish guidelines in accordance with Executive Orders (EO) 13166 – Improving Access to Services for Persons with Limited English Proficiency, the implementation standards set forth in the Department of Justice’s (DOJ) LEP Guidance to Federal Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41,455 (June 18, 2002), and the Attorney General’s memorandum of June 28, 2010 to the heads of Department components on *Language Access Obligations Under Executive Order 13166*.

Workgroup Structure

We established a permanent working group, the LEP Oversight Workgroup, which is responsible for ongoing LEP oversight for the agency. The workgroup meets monthly to discuss language access topics. It includes a core group of agency representatives to ensure we integrate language access in our regular business processes and that it remains a focus. Representatives from all deputy-commissioner level offices serve on the workgroup and provide a broad range of expertise that is invaluable to our LEP planning process. (Please see Addendum A for the oversight workgroup chart.) Areas of expertise represented include:

- Program operations;
- Communications/Marketing;
- General Counsel;
- Quality assurance;
- Policy and regulations;
- Acquisition and contracts; and
- Information technology.

We established topical subcommittees to address the following areas:

- Data quality;
- Interpretation, translation, and general access activities;
- Policy guidance;
- Quality monitoring; and
- Training.

Workgroup leadership meets on a periodic basis with the LEP advocacy community.

Definitions

Authorized Translator¹ means an SSA employee or contractor who speaks both English and another language has demonstrated his or her competence to translate written text from one language to another, and who is authorized to do so by his or her SSA office, or by contract with SSA.

Bilingual means having the ability to speak and understand two languages fluently.

Bilingual Employee means an SSA employee who has the ability to read, write, speak, and understand English and another language fluently, and is authorized by his or her office to provide language support.

¹ For SSA translator policies and authorization criteria see the Hearings, Appeals, and Litigation Law Manual (HALLEX) I-2-5-76 Obtaining Assistance in Processing Foreign Claims and Evidence http://ssa.gov/OP_Home/hallex/I-02/I-2-5-76.html; Program Operations Manual System (POMS) GN 00301.340 Authorized Translators (<https://secure.ssa.gov/apps10/poms.nsf/lnx/0200301340>, GN 00301.345) Authorization of SSA Translators (<https://secure.ssa.gov/apps10/poms.nsf/lnx/0200301345>, and GN 00301.350) Authorizing Non SSA Translators (<https://secure.ssa.gov/apps10/poms.nsf/lnx/0200301350>).

Interpretation means the act of listening to a communication in one language and orally converting it to another language while maintaining the same meaning.

Interpreter means an individual who speaks both English and another language fluently and acts as an intermediary between an individual needing language assistance and SSA staff that is not proficient in the individual's preferred language.

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

Multilanguage Gateway means the SSA Internet site designed to assist members of the public who prefer to conduct business with SSA in a language other than English - <http://socialsecurity.gov/multilanguage/>.

Multilanguage Resources means the SSA Intranet site designed for employees who serve people who prefer to conduct business with SSA in a language other than English - <http://eis.ba.ssa.gov/nes/>. (This Intranet link is available only to SSA and State Disability Determination Services (DDS) employees.

Multilingual means having the ability to speak and understand more than two languages fluently.

Multilingual Employee means an SSA employee who has the ability to read, write, speak, and understand English and at least two other languages fluently, and is authorized by his or her office to provide language support.

Qualified Interpreter² means an SSA employee or contractor who speaks both English and another language, has demonstrated his or her competence to interpret spoken language from one language to another, and who is authorized to do so by his or her SSA office, or by contract with SSA.

SSA means the Social Security Administration.

Telephone Interpreter Services (TIS) means a contracted agency-wide service to provide interpretation over the telephone in more than 100 languages and dialects.

Translation means the act of converting written text from one language to another while maintaining the same meaning.

We means the SSA.

² For SSA interpreter qualification criteria see HALLEX I-2-1-70 Foreign Language Interpreters http://ssa.gov/OP_Home/hallex/I-02/I-2-1-70.html; POMS GN 00203.011 Special Interviewing Situations: Limited English Proficiency (LEP) or Language Assistance Required. <https://secure.ssa.gov/apps10/poms.nsf/lnx/0200203011>; and POMS DI 23040.001 DDS: Interpreters for Individuals with Limited English Proficiency (LEP) or Individuals Requiring Language Assistance <http://secure.ssa.gov/apps10/poms.nsf/lnx/0423040001>.

SUMMARY OF OUR LEP SERVICE DELIVERY STRUCTURE

Resource Allocation

We carefully consider the needs of LEP individuals in determining our resource and budget allocations and incorporating service delivery initiatives. As we deliver more services electronically, we will continue to assess the allocation of resources for LEP services.

We use an annual review process to make decisions regarding priority language workloads.

Service Delivery

We deliver services through a nationwide network of over 1,400 offices that includes regional offices, field offices (including Social Security card centers), teleservice centers, processing centers, hearing offices (including satellite offices, national hearing centers, and national case assistance centers), the Appeals Council, and our headquarters in Baltimore, Maryland.

Our field offices and card centers are the primary points of contact for in-person support for the public. Our teleservice centers handle telephone calls to our National 800 Number. Employees in our processing centers primarily handle Social Security retirement, survivors, and disability payments, but also perform a wide range of other functions, including answering telephone calls to our National 800 Number.

We depend on State employees in 50 States and 4 territorial disability determination service (DDS) agencies to make determinations on disability claims. Our administrative law judges in hearing offices and the administrative appeals judges in the Appeals Council make decisions on appeals of denied Social Security and Supplemental Security Income (SSI) claims.

We provide quality service to our LEP customers in more than 100 languages through our cadre of bilingual and multilingual employees, and through our national telephone interpreter and translator services contracts. LEP individuals access our services in-person, by telephone, online, and via video service delivery. We tailor language access strategies to meet the needs of the LEP community. We have established policies, procedures, and guidelines for identifying LEP individuals and their preferred language, both spoken and written. Our Program Operations Manual System (POMS) and Hearings, Appeals, and Litigation Law Manual (HALLEX) provide our employees with guidance on how staff can use language assistance services to assist customers.

Bilingual and Multilingual Staff

One of the most effective methods for providing quality customer service to LEP individuals is with bilingual or multilingual public-contact employees.³ We identify bilingual or multilingual hiring needs through the continual assessment of national trends in demographics and language preferences. We advertise bilingual-skilled positions to hire individuals with the language skills

³ Our personnel in Puerto Rico are bilingual in Spanish and English. Our policies for providing services and access to benefits for individuals in Puerto Rico with limited English proficiency are consistent with this plan.

necessary to communicate with our LEP customers. We recognize that conducting business in languages other than English often requires more time. We encourage our managers to consider the time requirement when they assign work and assess employee productivity.

Interpreter Services

As a policy, we do not require individuals who need language assistance to provide their own interpreters; rather, we provide an interpreter free of charge to any individual requesting language assistance. To ensure quality interpretation, we encourage customers to utilize our free interpreter services.

If an LEP customer prefers to use his or her own interpreter, such as a family member, friend, or third party, we must determine whether the individual meets our interpreter requirements. Given the nature and complexities of our business processes, we generally do not permit children under the age of 18 to serve as interpreters.

In some instances, we may deem it necessary for customers to utilize interpreter services to ensure adequate language access.

Training

Our staff is required to know how to identify LEP customers and the procedures for accessing our language assistance services. We make training available for new and existing staff to ensure effective implementation of our policies and procedures.

We provide training on LEP services, cultural diversity, and unconscious bias for all SSA and DDS employees to help them deliver effective and efficient language access services to our LEP customers. We deliver this training via a blended approach, using a variety of tools, such as interactive video training, and video-on-demand, that are accessible through the SSA Learning Management System (SSALMS) to enhance skills, including the language skills of our employees.

We utilize and maintain a centralized electronic Intranet-based policy repository containing all LEP policy and procedure references. The multilanguage resources are available to our employees through our Intranet. We also develop and review training materials and consider recommendations from stakeholders to maintain and improve basic language access training. Some of our offerings include training on:

- Implementing policies and procedures for providing effective language access services to LEP individuals;
- Identifying, assessing, and recording the language preferences of LEP customers at the earliest point of contact;
- Accessing language assistance through multilingual services, including in-house bilingual interpreters, translators, and telephone interpreter services;
- Facilitating requests for translation of non-English documents; and
- Identifying language needs in the communities we serve.

We effectively collaborate with the Federal Interagency Working Group on the development of LEP training for government-wide use.

Written Communications and Translation of Vital Documents

To make it easier to understand our programs and to improve administrative effectiveness, our authorized translators produce written communications in languages other than English. They also translate vital documents received from the public.

We evaluated our process for identifying materials requiring translation, identified the languages our LEP customers use most frequently, developed a priority order for our translation workloads, and allocated resources to translate the materials. We established regular periods for reassessing the materials requiring translation to ensure that we maintain current and effective public information materials.

Public Information Materials

We maintain a Spanish language website (www.segurosocial.gov) for people who prefer to conduct business with us in Spanish. Our Multilanguage Gateway (MLG), available at www.socialsecurity.gov/multilanguage/, contains Social Security information in 18 languages and includes specific instructions in all 18 languages to help people request free interpreter services. These publications and instructions are accessible by selecting the “Other languages” link at the top of any www.socialsecurity.gov webpage or by selecting “Publications” on our homepage. All publications are accessible via a computer, tablet, or smartphone.

Outreach to LEP Customers

We actively work with a wide range of language access advocates and other government entities to ensure we have a broad perspective when determining the best way to serve our LEP customers.

The LEP Oversight Workgroup leadership hosts quarterly meetings with national language advocacy groups to obtain their feedback and perspectives about our language access service delivery. Our Office of External Affairs also hosts national conference calls with over 200 advocates, and we use these opportunities to hear from them and share updates related to our LEP customer needs. Within our 10 regions, we create and maintain effective working relationships with diverse LEP populations and their advocates through a variety of outreach activities led by our regional public affairs specialists. We consider all of these recommendations and feedback to determine whether we need to make modifications to our policies and procedures, ensuring quality language access for our LEP customers.

Based on an advocate recommendation, we developed the LEP Communication Feedback Loop, a process that allows the public, advocates, representatives, or LEP individuals to share language access concerns, issues, or feedback with our [Regional Communications Directors \(RCD\)](#), who serve as external points of contact for language access issues within our regions. We provide information about this process on our MLG at www.socialsecurity.gov/multilanguage/. This communication method allows us to capture valuable information and data that will assist us to

better identify problems or issues. Analysis of this data will help us identify areas where we may need to revise our policies and processes or identify areas where additional training is needed.

Federal Financial Assistance

When we provide [financial assistance](#) to an entity, we require the recipient, as well as any [sub-recipients](#), to take reasonable steps to ensure that LEP individuals have meaningful access to the programs and activities they conduct. Through our oversight and quality assurance activities, we ensure that all recipients of assistance adhere to our policies and our defined expectations as to meaningful language access for customers.

Technology Driven Decision Making

We use technology to record and properly identify our customers' language preferences. Our employees use the data to arrange for services in an individual's preferred language, whether they access our services in person, over the Internet, through video, or by telephone. We firmly commit to ensuring that our data accurately reflects our LEP customers' language preferences.

To achieve this, we will continue to:

- Emphasize to staff the importance of language data collection accuracy;
- Review our data collection business process;
- Conduct ongoing data reviews to ensure reliability;
- Invest resources to address data quality; and
- Expand our data transparency efforts in coordination with our [Open Government](#) initiatives.

Oversight and Quality Assurance

Our oversight and quality assurance efforts help us to monitor the effectiveness of our language access services. These efforts include:

- Policy review;
- Contract review;
- Customer satisfaction surveys; and
- Advocate and customer feedback.

Analysis of the feedback and data allows us to provide guidance on how to enhance our LEP service delivery and training. Each SSA office takes reasonable steps to ensure that contractors and staff who provide language access services meet our policy guidelines.

Performance Measurement and Evaluation

Annually, the LEP Oversight Workgroup establishes priorities, and assesses our language access services, policies, and procedures. Biannually, the LEP Oversight Workgroup will review and update our LEP Plan. We also review our language access policies on a periodic basis to ensure alignment with the Plan, our Agency Strategic Plan, and the changing needs of the public.

We conduct ongoing reviews of our language access services contracts to ensure that contractors are providing quality LEP services. In our reviews, we ensure that our contracts and interagency agreements:

- Contain language that adequately describes our language needs, requirements, and quality expectations;
- Provide a means to hold our contractors accountable for meeting our quality standards; and
- Provide a means to assess whether our contractors' delivery of language access services meet our quality standards.

Tracking and Reporting

The LEP Oversight Workgroup and its Subcommittees routinely review policies and business processes to ensure that our LEP Plan remains current. They also monitor for trends or areas that could benefit from improvement, additional policies, or resources. Data may include:

- Frequently requested languages;
- Communication Feedback Loop data;
- Customer surveys; and
- Customer complaints.

As part of our transparency efforts, we will continue to publish yearly and quarterly [data for spoken language preferences on our Open Government website](#) for claims related to:

- [Retirement and Survivors Insurance \(quarterly data\)](#) | [Retirement and Survivors Insurance \(yearly data\)](#)
- [Disability Insurance \(quarterly data\)](#) | [Disability Insurance \(yearly data\)](#)
- [End Stage Renal Disease \(quarterly data\)](#) | [End Stage Renal Disease \(yearly data\)](#)
- [Supplemental Security Income – Disabled \(quarterly data\)](#) | [Supplemental Security Income – Disabled \(yearly data\)](#)
- [Supplemental Security Income – Aged \(quarterly data\)](#) | [Supplemental Security Income – Aged \(yearly data\)](#)

If you have feedback or concerns about our language access services, you can write us at the following address:

Social Security Administration
Office of Public Inquiries
Attention: LEP
6401 Security Boulevard
Baltimore, MD 21235

Addendum A

Social Security Administration's (SSA) Limited English Proficiency (LEP) Oversight Workgroup

Office of the Deputy Commissioner

SSA's Deputy-Level Component Representatives

Office of Operations

- Programmatic & Operational Support
 - Field Offices
 - Teleservice Ctrs.
 - Program Service Centers
 - Disability Determination Services

Office of Budget, Facilities, Quality and Management

- Budget & Finance
- Acquisition & Grants
 - Title VI
- Facilities
- Quality

Office of Retirement Disability Programs

- Program Policy
 - Retirement
 - Disability
 - SSI
 - Title VI Programs

Office of Human Resources

- Training
- Personnel
- Recruitment
- Diversity & Inclusion
- Veterans Programs
- EWD Reasonable Accommodations
- Title VII – EEO Program
- Section 504

Office of Communications

- External Affairs
- Communications Planning & Technology

Office of the Chief Strategic Officer

- Strategic Planning
- Open Government

Office of Legislation & Congressional Affairs

- Legislation
- Congressional Affairs

Office of Systems

- IT Strategic Planning
- Systems Process Improvement
- Enterprise Architecture
- SSA Lines of Business & Mgmt. Information: Title 2, Title 16, Title 18
- Service Delivery Channels (WEB, Phone)
- Section 508 (Usability)
- IT Security & Infrastructure

Office of Disability Adjudication Review

- Hearings & Appeals
- Office of Chief Administrative Law Judges/Hearing Offices/National Case Assistance Centers
- Office of Appellate Operations/Appeals Council
- ODAR LEP Workgroup

Office of the Inspector General

- Communications

Office of the General Counsel

- General Law
- Federally Conducted Programs

Office of the Actuary

- Actuarial Projections & Analysis