

Office of Professional Responsibility Language Access Plan

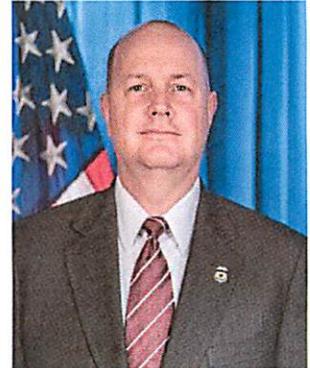


U.S. Immigration
and Customs
Enforcement

Message from the Associate Director

December 1, 2016

I am pleased to present the U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility (OPR) Language Access Plan (LAP).



OPR's mission is to promote public trust and confidence in ICE by ensuring organizational integrity. OPR accomplishes its mission by investigating allegations of employee misconduct; conducting independent reviews and audits of ICE programs, offices, and detention facilities; measuring compliance with applicable policies, regulations, and laws; and administering ICE's internal security program of protecting and securing people, information, and facilities. In carrying out this important mission, it is vital for OPR to communicate effectively with a broad-spectrum of individuals, including those with Limited English Proficiency (LEP).

The OPR LAP sets forth the standards, principles, and guidelines through which OPR will provide and improve meaningful access to Agency programs and activities to external LEP stakeholders. The ICE Office of Diversity and Civil Rights (ODCR) is responsible for coordinating, overseeing, and providing guidance to ICE program offices to ensure compliance with this Plan, and to assist in the overall improvement of language access services for external LEP stakeholders.

Inquiries related to this plan may be directed to ICE ODCR at (202) 732-0190, or by electronic mail at ICE.Civil.Liberties@ice.dhs.gov.

No Private Right

These guidelines, which may be modified, superseded, or rescinded at any time, are not intended to, do not, and may not be relied upon to create any right or benefit, substantive or procedural, enforceable at law by any party in any administrative, civil, or criminal matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Timothy M. Moynihan".

Timothy M. Moynihan
Associate Director
Office of Professional Responsibility



Office of Professional Responsibility Language Access Plan

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I. Background

Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency* (Aug. 11, 2000), requires federal agencies to examine the services they provide, identify any need for services to those persons who are limited English proficient (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them without unduly burdening the fundamental mission of the agency.¹ In 2011, the Attorney General issued a memorandum to the heads of all federal agencies reestablishing the Federal Government's commitment to ensuring the provision of language access services, titled "Federal Government's Renewed Commitment to Language Access Obligations Under Executive Order 13166" (Feb. 17, 2011).

To fulfill this commitment, the U.S. Department of Homeland Security (DHS or Department) issued its Language Access Plan (LAP) in February 2012; the DHS LAP establishes a system for implementing Executive Order 13166 throughout the Department, describes current language access initiatives, and instructs each DHS component to develop its own LAP. The DHS Office for Civil Rights and Civil Liberties (CRCL) is responsible for overseeing implementation of the DHS LAP. U.S. Immigration and Customs Enforcement (ICE) issued its LAP on August 7, 2015, and its Office of Diversity and Civil Rights (ODCR) is responsible for overseeing implementation of the ICE LAP. The Investigative Operations Unit (IOU), within ICE's Office of Professional Responsibility (OPR), will be responsible for overseeing implementation of the OPR LAP. The designated OPR LAP coordinator will monitor the Regional Operations Manager (ROM) Outlook electronic mailbox for LAP-related questions or inquiries.

As required by Executive Order 13166, DHS also issued its "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," 76 Fed. Reg. 21755 (Apr. 18, 2011); this guidance advises recipients of federal financial assistance on their legal obligations to ensure meaningful access for LEP individuals under the national origin nondiscrimination provisions of Title VI of the Civil Rights Act of 1964. The ICE OPR offices that provide federal assistance to state and local governments and other entities, whether by way of funding, in-kind assistance, training, detail of personnel, or other assistance, should ensure that these recipients of federal assistance take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

The OPR LAP -- consistent with Executive Order 13166, the Department's LAP, and the ICE LAP -- implements ICE's language access policy and describes the various means by which OPR provides LEP persons with meaningful access to its programs, services, and activities, including translation of materials, forms, and other documents; contracts for interpretation and other language services; an Inter-Agency Agreement with the U.S. Citizenship and Immigration Services (USCIS) Language Services Section (LSS) to provide interpreter services; and ICE's Foreign Language Award Program. The OPR LAP also identifies priorities for Fiscal Year 2017

¹ The information from the Background section of this LAP was taken from the ICE LAP to ensure consistent messaging regarding the mandate for the ICE Office of Management and Administration to develop its own Plan.

and beyond for OPR to improve the efficiency and effectiveness of its LAP and to develop new methods of providing language services to external stakeholders.

To develop the OPR LAP and assess language access, OPR consulted with representatives from its three operational divisions. As part of its efforts, the OPR LAP Coordinator studied information concerning OPR's interactions with LEP persons and began the LAP planning process. All OPR program offices were provided the opportunity to review the proposed LAP.

Ensuring external LEP stakeholders are provided access to language services is vital to the success of OPR operations. OPR has the duty of maintaining employee accountability and integrity, including the impartial, independent, and thorough investigation of alleged employee misconduct. It is also the responsibility of OPR to screen potential and existing ICE employees for character and suitability. OPR inspects ICE offices, detention centers, operations, and processes to provide executive management with an independent assessment of the agency's organizational health and to evaluate its overall effectiveness and efficiency. OPR consists of the following three operational divisions: (1) Investigations, (2) Inspections and Detention Oversight, and (3) Security.

Investigations Division

- The Investigations Division is responsible for conducting criminal and administrative investigations of alleged misconduct by ICE employees, contractors, and other Department employees and contractors as designated by the Secretary.

The Investigations Division has special agents deployed in 26 field offices across the United States, including Puerto Rico. These office locations are divided into four regional areas of responsibility (AOR): Northeast, Southeast, Central, and West; each of these regional AORs has subordinate office locations within its AOR.

Inspections and Detention Oversight Division

- The Inspections and Detention Oversight (IDO) Division evaluates and inspects ICE offices, programs, and detention facilities to ensure compliance with agency rules, regulations, policy, and applicable detention standards. IDO also reviews ICE offices, programs, and processes to provide executive management with an independent review of the agency's organizational health and to assess the effectiveness and efficiency of the overall ICE mission.

Security Division

- The Security Division is responsible for internal security operations in order to protect and secure ICE personnel, information, and facilities by implementing agency-wide security programs. These programs include the vetting of personnel and contractors, implementing and maintaining the physical security of ICE facilities, and protecting sensitive and classified information.

Each OPR division will play a vital role in implementing the OPR LAP. The OPR LAP Coordinator will be responsible for the following: (1) leading OPR's efforts to enhance the language access services provided to the external LEP stakeholders with whom OPR agents interact, and (2) ensuring programmatic compliance with OPR's established milestones, guidelines, and procedures. An alternate LAP Coordinator will be available for contact and assistance if the designated LAP Coordinator is unavailable.

II. Policy

OPR adheres to the ICE policy on language access set forth in the ICE LAP. It is ICE policy to ensure that external LEP stakeholders have meaningful access to its programs, services, and activities by providing quality language assistance services in a timely manner. These services include providing timely and effective communication to members of the public who are seeking access to ICE's programs, activities, and services; LEP individuals subject to ICE enforcement actions; and LEP individuals in ICE custody. These services also include identifying and translating vital documents into the most frequently encountered languages, providing interpretive services where appropriate, and educating OPR personnel about language access responsibilities and how to utilize available language access resources. When conducting its business and strategic planning, OPR will consider processes for enhancing language access services for programs and activities that include external stakeholders, provided that such processes do not unduly burden the Agency mission.

The OPR LAP applies to the investigative functions in which OPR employees and contractors interact with members of the public, persons involved in law enforcement exchanges, persons detained in federal custody, and persons subject to reporting requirements with OPR. This interaction includes, but is not limited to, email, telephone, and in-person contact.

III. Key Terms

The following definitions apply for purposes of this LAP:

Limited English Proficient (LEP) Person – A person who does not speak English as his or her primary language and who has a limited ability to read, speak, write, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

Primary Language – The language in which a person communicates most effectively.

Bilingual Person – A person who is bilingual is fluent in two languages and is able to conduct the business of the workplace in either of those languages. This fluency 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 or translator to be fluently bilingual, and also require additional specific skills for interpretation and translation as described below.

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; as a result, 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. ICE 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.

Bilingual employees who serve as interpreters or translators should be qualified to do so. ICE Program Offices should take reasonable steps to ensure that bilingual staff who serve as interpreters or translators or are competent to do so by assessing the employees' proficiency in a language other than English. Bilingual employees who communicate with LEP individuals should be trained on policies, standards, and ethics applicable to interpreters and translators.

Direct Communication – Monolingual communication in a language other than English between a qualified bilingual employee or representative and an LEP individual (e.g., Spanish to Spanish).

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.

External Stakeholder – A person who is not an ICE employee or contractor and who has contact with, or is seeking information or services from, ICE programs or activities. External stakeholders include, but are not limited to, members of the general public; detainees; friends, family members or visitors of detainees; and individuals subject to ICE enforcement operations.

Meaningful Access – Language assistance that results in accurate, timely, and effective communication and that is available at no cost to the LEP person. For LEP persons, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to program or activity access provided to English proficient persons.

Language Assistance Services – Oral and written language services needed to enable LEP individuals to communicate effectively with staff and to gain access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by ICE.

Proficiency – The ability of a person to speak, read, write, and understand a language.

IV. OPR Current Language Access Activities, Policies/Procedures, Tracking, and Training

OPR recognizes the importance of effective and accurate communication between its personnel and LEP stakeholders, and is committed to providing persons involved in OPR operations with appropriate interpretation and translation services consistent with the requirements of the DHS and ICE LAPs. To that end, OPR will extend and pursue the necessary resources to provide essential information to LEP individuals in their primary languages.

A. Activities

- OPR Special Agents are directed to communicate with victims and/or subjects in their preferred language during the course of an OPR investigation. Agents should conduct a preliminary assessment to determine if any parties associated with an OPR investigation will require language assistance. If language assistance is necessary, the following resources should be utilized:
 - Contact the OPR LAP Coordinator via e-mail at OPRLAP@ice.dhs.gov for guidance.
 - If the OPR LAP Coordinator is unavailable, contact the HSI or Enforcement and Removal Operations (ERO) LAP Coordinator for collateral assistance. Contact information for the HSI and ERO LAP Coordinators is available through ODCR at ICE.Civil.Liberties@ice.dhs.gov.
 - Contact ODCR at ICE.Civil.Liberties@ice.dhs.gov for questions regarding the ICE Translation, Transcription and Interpretation Services Blanket Purchase Agreement (BPA); this BPA is available for use by OPR.
- To conduct law enforcement interviews with LEP individuals, OPR uses either OPR personnel whose foreign language competency has been assessed through the Foreign Language Award (FLA) Program, or contracted interpreters. In certain instances involving victims and/or subjects in ICE custody or individuals housed in secure facilities, the use of contracted interpretation personnel may not be feasible due to security protocols. In exigent circumstances, OPR will make efforts to communicate to the LEP individual that an interview will be scheduled and that language access will be provided.
- OPR is a named service recipient of the interpretation/translation contract with Lionbridge Technologies. Lionbridge provides services via an Interagency Agreement with ICE to conduct telephonic interpretation and provide document translation and audio transcription/translation from foreign languages. OPR offices may access a supplemental phone line operated by Lionbridge, available 24 hours a day, seven days a week, and 365 days a year. All linguists are required to pass a Minimum Background Investigation (MBI) prior to working on the contract. The current contract is also available for use by ERO, M&A, HSI, and OPLA when language assistance services are needed, including: interpretation (oral), translation (written), transcription (audio to text), and website localization. For interpretation, simply call the number below and

enter the PIN corresponding to your Field Office. For all other services (Translation/Transcription), you must submit the Lionbridge Translation Request Form located on the ODCR inSight page at <https://insight.ice.dhs.gov/mgt/dcr/Pages/cld/languageAccessProgram.aspx> under the ICE Interpretation and Translation Resources tab. This form must be uploaded to the Lionbridge [portal](#) (where the document is also located) with all related documents or files needing translation or transcription. Each directorate and field office has its own set of unique PINS. The PINS will be assigned to field offices upon coordination with OPR Headquarters. Do not distribute your Field Office PIN to anyone not in your directorate and field office.

- OPR personnel who have not been tested for proficiency through the OPR FLA program should refrain from using those language skills until approved by the agency to do so. If an agent has not been tested and certified by the agency to use his or her language skills, the agent should contact the OPR LAP Coordinator to facilitate testing through the OPR FLA Program Manager.
- The OPR LAP Coordinator should be contacted via the OPRLAP mailbox for unplanned or unexpected encounters with LEP individuals which may require immediate interpretation conducted via telephone.
- OPR endorses the “I Speak...Language Identification Guide” poster and/or booklet to identify the languages spoken by LEP individuals. The poster aids in identifying over 70 languages and dialects. The poster must be visible to detainees at detention facilities.
- OPR, through the use of the FLA program, first attempts to locate OPR personnel who have a demonstrated language proficiency of S2+ to be assigned to investigations in the field. If a proficient agent cannot be obtained, the OPR LAP Coordinator should be contacted for assistance.
- OPR uses bilingual special agents and forensic interview specialists who have been tested and certified at the International Language Roundtable (ILR) scale of S2+ to communicate in another language when interviewing victims and/or minors in person.
- OPR has access to a variety of translated notices, forms, and documents such as ICE Form 73-025, “Statement of Rights.” These materials are available to OPR personnel on the OPR Sharepoint Collaboration site in the resources section. Additional or updated translation documents will be uploaded to the Sharepoint site when needed.
- OPR considers the four below factors when analyzing program language service needs, including the translation of materials:
 - Number or proportion of LEP individuals encountered or likely to be encountered;
 - Frequency of contact with LEP individuals;
 - Nature and importance of the program, activity, or service provided; and

- Resources available and costs to provide the meaningful access.

B. Policies / Procedures

OPR staff shall take reasonable steps to provide LEP individuals with meaningful, timely access to services and benefits provided through OPR programs and investigative activities. OPR relies on the following ICE Directive to meet its mission of assisting OPR staff in communicating with LEP persons:

- ICE Directive 1007.1 (former number: 1-9.0), “Foreign Language Proficiency Awards for Non-Bargaining ICE Law Enforcement Officers,” dated July 25, 2007 (with an effective date of January 1, 2008), along with its attachments, “Foreign Language Testing Application,” and “Foreign Language Reporting Document.”

This Directive states that ICE’s mission requires that law enforcement officers (LEOs) interact with persons who speak languages other than English in conducting investigations and interviews. ICE LEOs who are proficient in one or more foreign languages may need to utilize their foreign language skills in the performance of their official duties. Title 5, United States Code (U.S.C.), Section 4523 authorizes Federal agencies to compensate their LEOs for this ability. This ICE Directive provides policy and procedures for paying cash awards to ICE LEOs who are proficient in and utilize a foreign language in the performance of their official duties.

The Directive further states that ICE may award an annual discretionary cash award of up to 5 percent of basic pay to non-bargaining LEOs for demonstrated proficiency (S2+ or greater) and substantial use of one or more foreign languages in the performance of their official duties. LEOs must be full-time employees and must have achieved at least a “pass” or “fully successful” rating on the most recent performance appraisal to be eligible for a foreign language proficiency award.

It is also required that an attributable number of hours utilizing¹ a foreign language must be at least 10 percent of a basic work schedule (equivalent to at least 208 hours annually) in the performance of official duties.

- OPR will continue to fill vacancies and transfers by recruiting investigative personnel of varied and comprehensive language skills in order to supplement the cadre of field offices that currently maintain staff with foreign language proficiency.

Identifying LEP Individuals

- OPR personnel may come into contact with LEP individuals in a variety of ways, including civilians and external stakeholders currently in detention or undergoing removal who are part of an OPR investigation. These individuals may be involved as a subject, witness, or possible source of information. OPR personnel may also come into

contact with detained LEP individuals during the course of a detention facility compliance inspection.

- Upon initial assessment of an investigation, OPR personnel make reasonable efforts to assess the need for language assistance services and to obtain such services if they are required to effectively communicate with an individual involved in the investigation. OPR personnel aim to avoid assumptions about an individual's primary language and attempt to determine whether a person needs language assistance in several ways:
 - Self-identification by LEP individuals or by their relatives, friends, or acquaintances;
 - Asking open-ended questions to determine an individual's proficiency;
 - Inquiring as to the primary language of the individuals if they have self-identified as needing language assistance services;
 - Asking a qualified interpreter to identify an individual's primary language;
 - Using an "I Speak...Language Identification Guide" language poster or booklet developed by ODCR (<http://www.dhs.gov/xlibrary/assets/crcl/crcl-i-speak-booklet.pdf>)
- When an LEP individual appearing in person is not able to convey his or her primary language, OPR staff should use language identification cards to identify the individual's language need. OPR staff and other employees who may reasonably expect to have contact with LEP individuals should keep a copy of the "I Speak...Language Identification Guide" materials readily accessible. Requests for booklets can be made to ICE.Civil.Liberties@ice.dhs.gov.
- OPR personnel shall avoid using family members (including children), friends, acquaintances, or bystanders (including other detainees) to provide interpretation services. The use of such individuals could result in a breach of confidentiality, a conflict of interest, or inadequate interpretation.
- To assist with locating appropriate interpretation services, OPR field staff can contact the OPR Language Access Coordinator via the ROM Outlook mailbox. A secondary resource is ODCR at ICE.Civil.Liberties@ice.dhs.gov.

C. Tracking

- OPR maintains a database of special agents who participate in the OPR FLA Program. These special agents are required to establish their foreign language competency in foreign languages by means of independent testing conducted by an outside vendor. The testing is modeled on U.S. Foreign Service language testing and rating standards.

These standards are also used by the ILR. The special agents in the FLA Program are financially compensated based on their General Schedule (GS) level and ILR score.

- OPR utilizes the Joint Integrity Case Management System (JICMS) for tracking, documentation, and recordkeeping of OPR investigations. OPR offices can document the use of interpretation services in the “Notes” section of the data entry fields. OPR field staff can also contact the OPR Language Access Coordinator.

D. Training

- OPR will support ODCR’s measures to facilitate the deployment of general ICE-wide training materials as related to the ICE LAP and to provide technical assistance and resources for ICE personnel regarding language access responsibilities, identifying LEP persons (including persons with disabilities who communicate through sign language), accessing available language services, and working with interpreters.
- OPR will support ODCR’s plans to integrate training on language access responsibilities within ICE’s existing systems and training academies, including training on the Performance and Learning Management System (PALMS).
- OPR will provide additional or supplemental training as needed in conjunction with materials provided by ODCR.

E. Outreach

Due to the nature and sensitivity of OPR’s mission of investigating allegations of misconduct and criminal wrongdoing involving ICE employees, OPR does not engage in any overt outreach programs or activities related to language access.

V. Future Priorities and Program Goals

As OPR implements this plan, OPR will continue to look for ways to improve the efficiency and effectiveness of its LAP and to develop new methods of providing language services to external stakeholders.

A. Planning and Procedures

- OPR will utilize any contracted translation/interpretation service that provides the necessary resources to fulfill the OPR mission.

B. Compliance with the DHS PREA Regulations/Standards

- OPR will assure compliance with the DHS regulation titled, “Standards to Prevent, Detect, and Respond to Sexual Abuse and Assault in Confinement Facilities,” 79 Fed. Reg. 13100, including 115.16 and 115.116, which require the agency and all detention facilities and holding facilities to “take steps to ensure meaningful access to all aspects of the agency and facility efforts to prevent, detect, and respond to sexual abuse and assault to detainees who are limited English proficient, including steps to provide in-person or telephonic interpretive services that enable effective, accurate, and impartial interpretation, both receptively and expressively, using any necessary specialized vocabulary.” These provisions will be primarily implemented by ERO for their own personnel and in their own holding facilities, and through working with immigration detention facilities to provide guidance, technical support, and background on ICE’s expectations of meaningful access. OPR will also be responsible for implementing these requirements as they apply to OPR’s investigations of sexual abuse and assault. OPR will ensure that interpretation provided meets the requirements listed in 115.16(c) and 115.116(c).

The OPR Prevention of Sexual Assault (PSA) Coordinator will conduct regular case monitoring and remain cognizant of these requirements, providing technical assistance when necessary.

C. Training, Technical Assistance, and Resources for Personnel

- OPR will coordinate with ODCR regarding the deployment of training material, technical assistance, and resources for ICE personnel. If needed, OPR can assist ODCR with resource distribution via e-mail broadcast messages to all OPR field offices.
- OPR will increase awareness of the LAP Quick Reference Guide, prepared by ODCR, through e-mail broadcasts and regional notifications.
- OPR will facilitate distribution of the Fact Sheet entitled, “Encountering Limited English Proficient (LEP) Individuals.”

- The OPR LAP Coordinator will consult with and advise regional OPR managers to ensure OPR personnel understand, and, when applicable, utilize the fact sheets entitled, “Limited English Proficiency (LEP) Callers Interpretation Guide,” and “Tips for Working with Telephone Interpreters.”

D. Assessing Language Capabilities

- The OPR LAP Coordinator will work with the OPR FLA Program Manager to update assessments of OPR employees who indicate that they are proficient in a language other than English and volunteer to use that linguistic skill to productively communicate with LEP persons involved in the OPR investigative process.
- When needed, OPR will seek guidance from ODCR when developing procedures to efficiently identify employees who are bilingual and able to provide language assistance, and to identify the parameters of the language assistance that the employee can provide (i.e., speaking, understanding, reading, and/or writing).

E. Language Access/Detention

- During a detention facility compliance inspection, OPR Office of Detention Oversight (ODO) inspectors who are fluent in a language spoken by a detainee/s in a facility may communicate with LEP detainees directly.
- When necessary, ODO inspectors will use ERO’s language line services during a detention facility compliance inspection to communicate with LEP detainees.
- OPR will consult with counterparts from ERO and HSI to ascertain best practices that may be beneficial to OPR’s interaction with detained LEP individuals who may be involved in an OPR investigation as a subject, witness, or possible source of information.
- The OPR LAP coordinator will routinely seek feedback from OPR regional managers regarding field-level initiatives to improve access to OPR resources for detained LEP individuals.

F. Tracking

- OPR will examine tracking capabilities available in the OPR JICMS for investigative cases requiring language assistance. These capabilities could include a menu selection incorporated into the case details input screen, or specific mention in the investigative notes section.

G. Translation of Crucial Documents

- OPR will identify vital materials, forms, and other documents provided to LEP individuals during interaction with OPR to determine those which require translation to achieve OPR's investigative mandates.
- OPR will conduct an inventory of documents and materials already translated to identify additional significant languages in which translation is needed. OPR will then establish a schedule for document translation as necessary.
- OPR will prioritize the translations of documents based on the importance of the information, encounter, or service involved; frequency of use; and regional demographics.

H. Quality Assurance

- The OPR Personnel Security Unit (PSU) will continue to work with several ICE directorates to meet linguist contract support applicants' security clearance fitness vetting under ICE Management Directive 6-8.0. The Directive gives the OPR Chief Security Officer authority to implement the minimum standards outlined in the Directive and responsibility to administer the Personnel Security and Suitability Programs.

I. Resource Allocation for Language Access

- OPR will explore other available language resources and resource allocations to include additional budget expenditure if authorized.

J. Monitoring and Evaluation

- The OPR LAP Coordinator will be responsible for implementing this LAP. The LAP Coordinator will conduct a bi-annual review of the OPR LAP to identify any necessary updates and/or revisions, and to facilitate the required modifications.
- The OPR LAP Coordinator will also periodically distribute an electronic survey to the OPR field offices to solicit input and determine any particular regional needs for service.

VI. Contact Information and Assistance

The OPR LAP Coordinator may be contacted by E-mail at OPRLAP@ice.dhs.gov for more information about OPR's LAP.

Complaints about language access in ICE programs and activities may be filed with the DHS CRCL. For more information about filing complaints with CRCL, see www.dhs.gov/crcl, or call CRCL at (202) 401-1474 or (866) 644-8360. Complaints may be filed in any language.

VII. Appendix

1. Languages Frequently Encountered by OPR Employees

ICE employees and contractors interact with external LEP stakeholders who speak a variety of languages. *Spanish* is the predominant non-English language spoken by external OPR LEP stakeholders.

2. Acronyms

CDF	Contract Detention Facilities
CRCL	Office of Civil Rights and Civil Liberties
DHS	Department of Homeland Security
ERO	Enforcement and Removal Operations
HSI	Homeland Security Investigations
ICE	U.S. Immigration and Customs Enforcement
IGSA	Inter-Governmental Service Agreement
LAP	Language Access Plan
LAWG	Language Access Working Group
LEA	Law Enforcement Agencies
LEP	Limited English Proficiency
LSS	Language Services Section
M&A	Management and Administration
MOA	Memorandum of Agreement
NGO	Nongovernmental Organization
OAS	Office of Assistant Secretary
ODCR	Office of Diversity and Civil Rights
ODO	Office of Detention Oversight
OPA	Office of Public Affairs
OPR	Office of Professional Responsibility
PREA	Prison Rape Elimination Act
PSA	Prevention of Sexual Assault
USCIS	U.S. Citizenship and Immigration Services