

# U.S. Department of Homeland Security

## U.S. Coast Guard



## Language Access Plan

*September 2024*

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## Purpose

The purpose of this Language Access Plan (LAP) is to establish policy and provide guidance in developing and implementing reasonable efforts to eliminate or reduce “Limited English Proficiency” as a barrier to accessing United States Coast Guard (USCG) programs, activities, or events as required by Executive Order (EO) 13166 of August 11, 2000, “Improving Access to Services for Persons with Limited English Proficiency.” This Executive Order requires that each Federal department and agency examine the services provided to the public and, accordingly, develop and implement a system by which individuals who are Limited English Proficient (LEP) can have meaningful access to those services without unduly burdening the fundamental mission of the agency. Executive Order 13166 has two fundamental goals: nondiscrimination and effective government for everyone.

## Scope

This plan covers USCG interactions with individuals who are LEP that occur within the United States and its territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, U.S. Virgin Islands), including vessels and persons at sea within 12 nautical miles (NM) thereof. Therefore, it applies to the USCG’s over more than 700 independent units, including roughly 250 ships and a wide variety of shore-based units, including small boat stations, air stations, marine safety units, aids to navigation teams, training centers, maintenance units, and other operational, support, and logistics commands. It also applies to the USCG’s nearly 60,000 personnel geographically distributed throughout the 50 United States, U.S. Territories, and other countries worldwide.

## Key Terms

The following are terms associated with the goals of the USCG Language Access Plan and its implementation:

- 1) ***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 mere *proficiency* in more than one language. Individuals who are proficient in a language may, for example, be able to greet an LEP individuals 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 previously described in ‘Interpretation and Translation’.
- 2) ***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 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. USCG components utilizing the services of interpreters should request information about certification, assessments taken, qualifications, experience, and training.

One of the USCG's critical assets toward fulfilling its mission to serve individuals who are LEP is its USCG Auxiliary Interpreter Corps (AIC), which has over 348 volunteer interpreters, offers interpretation services in 57 foreign languages, and has provided over 76,827 hours of interpretation to date. In cases involving an auxiliary interpreter's deployment, obtaining units must also consider communicating operational or physical fitness requirements in advance and providing a post-mission demobilization report to the interpreter and AIC representative.

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.

- 3) **Meaningful Access:** Meaningful access is the accurate, timely, and effective provision of agency services to a person who is LEP through language assistance at no cost to the person. For individuals who are LEP, meaningful access denotes access to Coast Guard services that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.
- 4) **Persons who are Limited English Proficient:** Persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. Individuals who are LEP may be competent in English for certain types of communication (e.g., speaking or understanding), but have limited proficiency in English in other areas (e.g., reading or writing). LEP designations are also context-specific; individuals may possess sufficient English language skills to function in one setting, but these skills may be insufficient in other settings.
- 5) **Primary Language:** An individual's primary language is the language in which an individual most effectively communicates.
- 6) **Vital Document:** A vital document is a document that contains information that is critical for obtaining any aid, benefit, or services or is required by law. Vital documents can include applications; consent and other forms that require signatures; complaint forms; notices of rights; notices on the availability of free language assistance; and letters or notices that require a response from the beneficiary, customer, or noncitizen.

## Policy

The USCG follows the policy in the DHS Language Access Plan (LAP)<sup>1</sup> and, therefore, adopts the following specific policy. Its intent is to provide meaningful access for LEP individuals to its operations (as appropriate), services, activities, and programs within the United States, its territories including surrounding waters within the 12 NM limit, and other countries by providing quality language assistance services in a timely manner. USCG units, including Headquarters directorates and relevant programs, should incorporate language access considerations into their routine strategic and business planning, identify and translate crucial documents into the most frequently encountered languages, provide interpretive services where appropriate, and educate personnel about language access responsibilities and how to utilize available language access resources as required by the Executive Order 13166 and in accordance with guidance provided by the DHS Language Access Plan. In this regard, the primary goal of this policy is to provide meaningful access to USCG programs, benefits, and services, and maintain compliance with civil rights laws by communicating effectively with LEP individuals in languages other than English.

This policy and plan is currently accessible and available to the public as well as component personnel through the internet at <https://www.dhs.gov/language-access-plan.pdf> and <https://www.uscg.mil/Language-Access-Plan>.

## The USCG Language Access Plan (LAP) Roles and Responsibilities

The Civil Rights Director (CG-00H) is responsible for the Language Access Plan overall and is responsible for designating a Primary and Alternate LAP Coordinator. The office responsible for LAP compliance is the Equity, Policy, and Compliance Division located within the USCG Civil Rights Directorate. The role of the primary LAP Coordinator is to monitor and assess program management responsibilities in the implementation of this plan. This person also has responsibility related to the prevention of discrimination on the basis of race, color, national origin, disability, and age in services provided by the USCG, and in programs and activities receiving Federal Financial Assistance (FFA). The Alternate LAP Coordinator assumes program management responsibilities during the absence of the LAP Coordinator. The Primary and/or Alternate LAP Coordinators will participate as members of the DHS Language Access Working Group with the purpose of developing and implementing Agency-wide standards for ensuring quality of language services, sharing best practices, and disseminating information on existing language technologies as well as the appropriate use of these technologies.

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<sup>1</sup> It is the policy of DHS to provide meaningful access for individuals with limited English proficiency to operations, services, activities, and programs that support each Homeland Security mission area by providing quality language assistance services in a timely manner. DHS Components, therefore, should incorporate language access considerations into their routine strategic and business planning, identify and translate crucial documents into the most frequently encountered languages, provide interpretive services where appropriate, and educate personnel about language access responsibilities and how to utilize available language access resources. (DHS Language Access Plan, November 2023)

The CRD LAP Coordinator will:

- Lead the development and implementation of the USCG's efforts (e.g., policy, training) to coordinate compliance with EO 13166.
- Coordinate implementation of the DHS Language Access Plan and USCG's Language Access Plan and related policies.
- Participate as USCG's lead for the DHS Language Access Working Group.
- Coordinate and conduct quarterly meetings with USCG's Language Access Working group.
- Identify major contracted LAP services and assess the resources necessary to provide language services, identify existing resources, and describe funding and procurement needs.
- Coordinate the development and implementation of a tool to collect, track, and manage data on language needs.
- Coordinate with the DHS Office for Civil Rights and Civil Liberties to review complaints filed by members of the public that allege a denial of meaningful language access to USCG's programs, services, and activities, and if appropriate, make recommendations to remedy deficiencies.

The CRD Alternate LAP Coordinator will:

- Perform the LAP Coordinator duties in the absence of the Primary LAP Coordinator.
- Participate as a member of the DHS Language Access Working Group and serve as USCG's lead representative in the absence of the Primary LAP Coordinator.

## **The Coast Guard Language Access Plan (LAP) Working Group**

The USCG Civil Rights Directorate has formed a LAP working group consisting of several offices/representatives to assist in implementing, evaluating and updating the USCG LAP. The working group works collaboratively to ensure implementation of language access activities and ongoing monitoring.

The USCG LAP Working Group consist of the following offices/representatives:

- CG-00H - Civil Rights Directorate
- CG-BSX-1 - Auxiliary Interpreter Corps (AIC)
- CG-MLE-3 - Office of Law Enforcement
- CG-BSX-22 - Boating Safety Division/Grants
- CG-NRC - National Response Center
- CG-NCC - National Command Center
- CG-612 – Section 508 Program Management Office (advisory)

The CG-00H (Civil Rights Directorate) representatives will:

- Serve as lead for the USCG LAP Working Group.
- Establish and implement a recurring meeting schedule for the USCG's LAP Working Group.

- Apprise USCG LAP Working Group of updates/changes to laws, regulations, Executive Orders, etc. impacting language access requirements.
- Collaborate with the USCG LAP Working Group to develop, implement, and maintain a data tool to capture language access activities and statistics.
- Collect and report the USCG language access data to DHS-CRCL.

The CG-BSX-1 Auxiliary Interpreter Corps (AIC) representative will:

- Update the group on the number of volunteer interpreters who provided interpretation services, number of hours for interpretation services provided, foreign languages interpreted, types of incidents, and locations.

The CG-MLE (Maritime Law Enforcement) representative will:

- Receive input on USCG interactions through law enforcement contact, which require additional language skills or training.
- Share concerns from field units with working group to develop courses of action to address shortfalls in training or equipment.

The CG-BSX-22 - Boating Safety Division/Grants representative will:

- Provide information on the number of USCG grants awarded where the grantee will provide services to LEP persons.

The CG-NRC (National Response Center) representative will:

- Provide updates for language line services requested and utilized frequently/regularly for their 24/7 operations.
- Provide updates on all Communication Service Authorizations requested and authorized by USCG.

The CG-NCC (National Command Center) representative will:

- Update the group on the telephonic interpretation services that are used regularly, by the USCG-NCC limited interpretation capabilities. When subunits request interpretation services, the NCC provides that service via phone conferencing.

The CG-612 – Section 508 Program Management Office (as advisor role) will advise on language use and customer experience as related to Section 508 accessibility

## **Implementation**

USCG LAP Working Group members will execute this plan through fulfilling duties as outlined herein--meeting quarterly or at least four times a year to provide updates on language access efforts or initiatives for their program area of responsibility. Group members will use the established mechanism/data collection tool to input information on language access activities quarterly. Language access data will be analyzed quarterly and used to identify strengths and gaps in USCG's services provided to LEP populations. The USCG LAP Working Group will



conduct biannual review and update of this plan or as required by the Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL).

## **Indigenous and Rare Languages**

USCG LAP Working Group will monitor for indigenous and/or rare language speakers encounters through its data collection tool. If indigenous or rare language speaker encounters are identified, USCG will adjust its policy and practices, where needed, to accommodate the language needs of such speakers.

## **Surge Response**

USCG is exploring through two vendors new technologies to augment its current language services provided to LEP persons. These technologies (handheld translation devices) will provide real time translation aid and will assist in fulfilling gaps where traditional interpretation mediums are unavailable, in instances of surges, and can be readied for new languages in the event of shifts in demographics of the LEP populations. The USCG anticipates completing prototype testing and evaluation of the language translation technologies from both vendors between June 2024 and January 2025, with updates to be made based on user feedback. On an ongoing basis, USCG will review its use of the handheld translations devices and provide information to DHS-CRCL about how the quality of language services is ensured when using these technologies.

## **Component Interactions with the Public**

USCG personnel interact and communicate with the public in a variety of ways. The types of interactions vary, based primarily on mission responsibilities, types of USCG assets involved (i.e. shore-based units, ships, boats, helicopters, and fixed-wing aircraft), and their respective crew sizes, as well as the available means of communication (e.g. face-to-face meetings, telephone calls, radio communications, published documents, web-based resources, etc.).

Due to its maritime nature, many USCG interactions with the public occur at sea. Examples of public interactions with shore-based USCG facilities include responses to visits, phone calls, letters, radio communications, and emails from the public, as well as outreach activities such as teleconferences, website postings, etc.

The following are specific examples of USCG interactions with the public:

- A vessel in distress may contact a USCG Station for assistance.
- Search and Rescue (SAR) operations may involve communications with shore-based units, aircraft, cutters, and/or boats, often by individuals who are either in distress or require some sort of maritime assistance.
- Pollution Responders respond to discharge of oil or hazardous substance release from foreign vessels. As part of local area and regional spill response planning, the captain of the Port (COTP) and Federal On-Scene Commander (FOSC) may interact with the public.



- A Coast Guard law enforcement boarding team conducts a boarding on a vessel at sea to ensure compliance with Federal statutes and regulations.
- Other types of incidents such as casualty investigations.

Other facts about the average USCG daily interaction with the public are found on the USCG Boating Safety Center website, [United States Coast Guard | Boating Safety \(usUSCGboating.org\)](https://www.uscgboating.org/) [United States Coast Guard | Boating Safety \(usUSCGboating.org\)](https://www.uscgboating.org/).

## **The USCG National Response Center (NRC)**

The National Response Center (NRC) is a 24/7 communications center for the National Response Team (NRT) serving as the sole federal point of contact for the reporting of all pollution, railroad and port security incidents occurring in the United States and its territories. Its primary purpose is to improve environmental quality by minimizing environmental damage and ensuring regulatory requirements are being met through mandated incident reporting allowing for timely and efficient response efforts. Each year the NRC takes approximately 75,000 phone calls per year resulting in the processing of 32,000 incident reports and transmitting over 766,000 notifications to Federal, State, Jurisdictional and Tribal On-Scene Coordinators for incident response. Approximately 71% of all reports consist of environmental pollution reports, 18% consist of security/suspicious activity reports, and 11% consist of railroad incidents. As the designated point of contact for incident reporting, the NRC maintains a telephonic foreign language line for LEP individuals. Relative to incident reporting, the USCG conducts several public outreach programs, including the *Sea Partners Campaign*, a marine environmental protection education and outreach program that targets the public at large and DHS *See Something Say Something* program a national campaign that raises public awareness of the signs of terrorism and terrorism-related crime, and how to report suspicious activity to state and local law enforcement. The USCG participation in these outreaches and recruiting activities will typically involve interaction with a myriad of individuals who speak languages other than English, or who have limited English proficiency. USCG has an agreement with a language services vendor to provide language services. Free language support services can also be obtained directly from the AIC at [interpreters@cgauxnet.us](mailto:interpreters@cgauxnet.us).

In FY 24, the NRC took additional steps to increase access to its hotline for persons with limited English proficiency; specifically, the NRC revised its hotline main menu to include a “Spanish” option. To that end, the NRC’s hotline main menu is no longer English only, and is now available in Spanish as well. In addition, NRC collaborated with U.S. Environmental Protection Agency (EPA) Office of Land and Emergency Management, which has increased access to information about how to report an oil or chemical spill through the NRC hotline by publicizing information in multiple languages. The USCG’s NRC page includes links to this multilingual information.

## **The USCG Language Assistance Services**

The USCG interacts with members of the public, including LEP persons, in the course of carrying out its obligations under the National Environmental Policy Act (NEPA). In implementing the NEPA process, Coast Guard, will, as required by Executive Order (EO) 13166, take reasonable steps to ensure that eligible LEP persons have meaningful access to the agency's NEPA documents and activities. In carrying out its obligations under EO 12898 to achieve environmental justice, USCG will also consider the language needs of limited-English proficient populations in providing opportunities for public participation in the NEPA process and access to information on matters relating to human health and the environment.

Some written brochures and other printed materials distributed to the public are sometimes translated into frequently encountered languages and made available through the USCG Auxiliary National Supply Center. Examples include ANSC stock item #3026SP - Pamphlet, AWW Spanish, and ANSC stock item #4064A - Sticker, Oil Pollution Spanish."

All USCG radio communications are conducted in English as governed by international law and U.S. regulations (IMO NAV 46/INF.4 and 33 CFR 26.04 & 26.07, respectively). In 1973, the International Maritime Organization (IMO) Maritime Safety Committee agreed at its twenty-seventh session that, where language difficulties arise, English should be used as a common language for navigational purposes. Consequently, the Standard Marine Navigational Vocabulary (SMNV) was developed, adopted in 1977, and amended in 1985. In 1992, the IMO Maritime Safety Committee at its sixtieth session instructed the IMO Sub-Committee on Safety of Navigation to develop a more comprehensive standardized safety language than the SMNV of 1985, taking into account the changing conditions in modern seafaring and covering all major safety-related verbal communications. Under the International Convention on Standards of Training, Certification and Watch-Keeping for Seafarers, 1978, as revised 1995, the ability to understand and use the Standard Marine Communications Phrases (SMCP) is required for the certification of officers in charge of a navigational watch on ships of 500 gross tonnages or more. No person may use the services of, and no person may serve as, a person required to maintain a listening watch under Section 5 of the Act, 33 U.S.C. 1204, unless the person can communicate in the English language. This pertains to the radiotelephone required for the exclusive use of the master or person in charge of the vessel, or the person designated by the master or person in charge to pilot or direct the movement of the vessel, who shall maintain a listening watch on the designated frequency.

At sea, interactions with the public are most often via telephone or radio communication with USCG boats, ships (cutters), aircraft, and/or shore stations. Face-to-face meetings between afloat personnel and the public are also typical, generally during boarding. A boarding typically involves a small contingent of personnel delivered to a private vessel by a USCG or USCG Auxiliary boat. USCG and Auxiliary boats are normally based on shore units, and in some cases USCG boats are deployed from USCG cutters."

Face-to-face interactions at sea differ somewhat from those at shore-based units, largely due to the limited resources immediately available to the members of the boarding party, relative to

those typically available at a shore unit (i.e. a small boarding party may be less likely to have a certified Foreign Language Program linguist or interpreter than a large station crew, and may have reduced access to some communications options, such as telephonic interpretation services). In many cases, however, boarding parties deployed from large cutters or nearby shore units may be able to utilize the more robust language and/or communications resources of the larger platform. Similar to boarding parties, aircraft crews are generally relatively small and often operate at large distances from other units.

In addition to “typical” USCG operations and interactions with fixed, shore-based units and cutters, boats, and aircraft assets, USCG response operations occasionally involve the stand up of incident-specific organizational components, sometimes in different locations than established USCG facilities. Additionally, when incidents such as earthquakes, floods, and oil spills occur, normal means of communications may be less reliable or unavailable. Nonetheless, the USCG seeks to establish regional language access services appropriate to the incident. In response to the Haitian government formal request for assistance following the catastrophic 7.2 earthquake on August 15, 2021, U.S. Coast Guard mobilized various aerial and surface resources including language translators to deliver humanitarian aid.

The USCG Auxiliary Interpreter Corps (AIC) covers a broad range of language services including many Asian and Southeast Asian languages, Russian, Haitian Creole, Spanish, and American Sign Language. AIC linguists are available free of charge on short notice remotely by phone or video link supporting USCG’s mission, the U.S. Department of Defense, and other U.S. agencies to include the U.S. Citizenship and Immigrations Service, U.S. Customs and Border Protection, and the National Oceanic and Atmospheric Administration, for verbal language interpretation and written document translations to assist persons with Limited English Proficiency (LEP), within the USCG’s own ranks, the public, or encounters with foreign nationals. The AIC also often deploys in-person volunteer linguists for personnel under USCG travel orders domestically and internationally. AIC linguists provide in-person and remote support for USCG Headquarter directorates, Districts, Sectors, Stations, and USCG Cutter Forces for a multitude of missions including USCG recruiting and training, Alien Migrant Interdiction (AMIO) patrols, Illegal Unreported Unregulated (IUU) Fishery patrols, Boarder Boundary Line patrols, USCG international conferences, Search & Rescue (SAR), USCG Marine Casualty, and Civil and Criminal Investigations.

Recent examples of AIC missions include:

- The January 2021 Huntington Beach, CA Anchor Strike Marine Pollution investigation including two boardings with Ukrainian and Croatian interpreters.
- AIC Spanish interpreters deployed for Mexican Navy and USCG conferences (MEXUS Plan), Spanish interpreters for North American Maritime Security Initiative (NAMSI) conferences, French interpreters for AFRICOM conferences in the USA and Botswana, and a Japanese interpreter for the International Boating and Water Safety Summit conferences.
- Interconnection Security and Vessel Traffic Safety Agreement translations in French for Straits of Juan de Fuca for the U.S. and Canadian Coast Guard.

- USCG marine causality investigation support including the M/V GRANDE COSTA DAVORIA fire casualty (Italian, Romanian), the M/V EVER FORWARD grounding (Mandarin), the M/V CUYAHOGA (Lake Erie Fire Casualty), the M/V CL HUANG HE (missing person), and the M/V PAOVOSA WISDOM (missing person)
- Many deployments for Alien Migrant Interdiction Operations (AMIO) patrols, Illegal, Unregulated Unreported (IUU) fishery patrols, Arctic Maritime Boundary Line Patrols, and support of Operation Vigilant Sentry, WESTPAC, Arctic Shield, Blue Pacific, Obangame Express 2023, North Pacific Guard, Atlantic Venture, South East Watch, and Southern Shield on USCG cutters including LEGARE, MUNRO, TAMPA, SPENCER, STRATTON, MOHAWK, DEPENDABLE, WAESCHE, ACTIVE, TAHOMA, KIMBALL, MIDGETT, SIR WILFRID LAURIER and others.
- Support for multiple languages - Mandarin, Russian, Vietnamese, Filipino/ Tagalog, Spanish, French, Portuguese, Dari, Ukrainian, Croatian, Japanese, Korean, Haitian Creole, Turkish, Italian, German, Indonesian, Finish, Uzbek, Arabic, Georgian, Hungarian, Burmese, Urdu, Hindi, ALS, Hebrew, and Cambodian.

The USCG also provides grants to States, U.S. Territories, and non-profit organizations to assist and support boating safety initiatives. For example, someone seeking a Masters License may visit a USCG facility; and while a LEP individuals may not be eligible to receive a license, he/she must be provided meaningful access to information about the licensing process. These activities are federally funded and governed by Title VI of the Civil Rights Act of 1964, which requires recipients of Federal Financial Assistance to ensure meaningful access to their programs and activities by LEP persons.

## **LEP Communities Served or Encountered**

The Coast Guard started its formal foreign language program in 2005. A 1999 Coast Guard study, known as the Foreign Language Needs Assessment (FLNA), formed the basis of the USCG Foreign Language Program. According to the FLNA the foreign languages needed to support USCG operational missions (units that routinely deploy to the Caribbean, Central and South America, and the Far East) include the following languages: Spanish, Haitian-Creole, Russian, Vietnamese, Mandarin Chinese, Japanese and Korean. Eighty percent of the need is for the Spanish language. The USCG anticipate reevaluating language needs in the near future and updating its Language Access Plan (LAP) every two years or as needed by the Department of Homeland Security, Office of Civil Rights and Civil Liberties.

## **Tracking and Monitoring Procedures**

The USCG provides between 30-40 individual grants to, at least, a dozen non-profit organizations and an additional 56 grants directly to U.S. states and territories to support recreational boating safety initiatives. With regard to the USCG grants, the USCG Civil Rights Directorate Equity, Policy, and Compliance Division and the USCG Grants Office will work in a collaborative manner to increase efforts that emphasize training, tracking, collecting and managing data in both USCG funded and USCG conducted activities. Methods to ensure

compliance with USCG funded activities include reviews by the DHS Office for Civil Rights and Civil Liberties (CRCL) using the Civil Rights Evaluation Tool. CRCL and USCG can work together in conducting and reviewing compliance reviews, identifying the gaps in providing services to LEP persons and providing technical assistance to achieve compliance for USCG recipients.

## Goals and Objectives

The USCG's LAP primary goal is to eliminate or mitigate LEP as a barrier to accessing USCG's programs, activities, or events. In this regard, the USCG's priorities will focus on identifying and developing a tracking mechanism to be able to collect information on the most common and the most critical language access needs. Another goal is to ensure the LAP Working Group is properly trained on pertinent areas of Title VI. Below are current objectives with the target dates for implementation:

- Identify protocols in place for USCG personnel/units/operational components to identify language access services provided to LEP persons. (March 2025)
- Establish training schedule for appropriate personnel with language access responsibilities, identifying LEP persons, accessing available language services, and working with interpreters. (March 2025)
- Conduct evaluation of USCG recipient organizations, at least two per year.

## Language Assistance Resources and Measures

Language Access Resources. The USCG offers interpretation and translation services through the following resources:

- The USCG Foreign Language Program (USCG FLP). There are approximately 561 certified including Required Yearly Qualification for AUX-CT interpreter positions allocated to 103 cutters and patrol boats and 70 shore-based units, based on historical operational requirements and projected future needs. These allocated positions provide interpretive services as a collateral duty function, in addition to primary duty responsibilities to a particular USCG unit. Units may designate a number of interpreters to certain qualification levels based on the USCG Foreign Language Program guidance. Interpreters must meet criteria outlined in the USCG Foreign Language Program, including passing the Defense Language Proficiency Test (DLPT). In addition to collateral duty interpreter, the USCG FLP also has 132 certified linguists with language skills necessary as part of their primary assignment. The USCG FLP includes Arabic and the seven languages deemed to be of strategic importance to USCG missions: Spanish, Haitian Creole/French, Russian, Vietnamese, Chinese (Mandarin), Japanese, and Korean. Eighty percent (80%) of USCG FLP requirements are for Spanish.
- AIC interpreter support can be requested by contacting [interpretermissions@cgauxnet.us](mailto:interpretermissions@cgauxnet.us) (preferred) or via the Auxiliary International Affairs website: <http://icdept.cgaux.org>.
- Virtual Translation. The National Pollution Fund Center (NPFC) utilizes the National Virtual Translation Center (NVTC) to assist with written translations.

- Other resources: The USCG may explore national or regional language access services, including use of a DHS-wide blanket purchase agreement for language services. The use of “I Speak” language identification guides (i.e. provided to USCG stations boarding team leads, Search and Rescue assets, etc.), and technology solutions such as hand-held translators may also be currently in use.

Language Access Measures. The level and standards of methods and measures used by the USCG to provide language access services to individuals who are LEP depend on several factors such as Asset Communications Capabilities, Staff Capabilities, and types of interactions:

- Asset communications capabilities: Language access may be limited based on the type of unit providing the service and the different types of capabilities. For example, small boats and certain aircraft may have fewer communications options than large cutters or shore-based units. Afloat/in-flight units may lack access to telephonic services available to shore units. Response Operations may face reduced communications capabilities during or after natural disasters such as earthquakes, floods, hurricanes, etc., due to damaged infrastructure. Some assets/units may have real-time interpreting capabilities, where others may have the ability to record communications for delayed translation.
- Staff capabilities: Smaller assets (boats and aircraft) will, generally, have fewer personnel and are less likely to have certified interpreters aboard, especially taking into consideration that only 25 percent (173 of 705) USCG units have certified collateral duty interpreters assigned. USCG District 7 has a scalable Creole interpreter contract in place to support this mission need.
- Types of interactions. Face-to-face communications may allow use of “I Speak” or other similar materials.
- In some cases, telephone, radio, and other voice-only communications may be recorded and translated (with time delay).

## **Employee Duties and Development**

The USCG Foreign Language Program (FLP) linguists are assigned with language skill requirements as part of their primary duties. Although, some linguists are assigned and performing duties within the scope of Executive Order 13166, the majority of 132 FLP linguists are assigned extraterritorially and consequently, outside of the scope (i.e. within three nautical miles) of the USCG LEP population. The USCG periodically assesses its need for FLP linguists to ensure mission capability and it also requires that assigned linguists achieve a score of at least 2/2 on the Defense Language Proficiency Test (DLPT) to qualify as an interpreter.

## **Levels of Competency**

AIC linguist personal qualification standards (PQS) are aligned with the Defense Language Institute Proficiency Test requiring the International Language Roundtable (ILR) score of 2+ or higher in oral communication, verbal interpretation and written translation. The linguist qualification is always the primary duty qualification, but AIC linguists may also bring collateral



qualifications such as culinary assistants (CA), public affairs specialists (PA), emergency management specialists (EM), instructors (IT), and communication watch standers. The Defense Language Institute (DLI) uses the Interagency Language Roundtable (ILR) scale to score the Defense Language Proficiency Test (DLPT). The ILR scale is a measurement of language ability that ranges from 0 to 5, with 0 representing no practical proficiency and 5 representing native or bilingual proficiency. The scale also includes plus levels for when a person's proficiency is between base levels. For example, if someone has high limited working proficiency, but not quite professional working proficiency, their level would be rated as 2+.

## **Resources**

The USCG will assess the resources necessary to fund and support LEP projects identified as critical to the successful implementation of this plan. This may include Agency-wide, regional, or unit specific funding and personnel requirements with appropriate tracking mechanism so as to maximize the efficiency and effectiveness of the program.

## **Notice to LEP Persons**

The USCG will make reasonable efforts to ensure the public is aware of its LEP policy and existing options to access language assistance services through internet postings. The USCG will also work to establish and implement a process for the public to submit requests for free language services, including written translation or oral interpretation of a publicly available documents, or to request documents in alternate formats. This information will be provided in English and translated into most frequently used language(s), other than English, based on the relevant population.

## **Contact Information and Assistance**

For more information about USCG's language services and to request assistance related to language access at USCG, members of the public may contact the Civil Rights Directorate at [SMB-COMDT-LanguageAccessInquiries@uscg.mil](mailto:SMB-COMDT-LanguageAccessInquiries@uscg.mil).

Complaints about language access in USCG programs and activities may be filed with the DHS Office for Civil Rights and Civil Liberties (CRCL). For more information about filing complaints with CRCL, please visit <https://www.dhs.gov/file-civil-rights-complaint>. Complaints may be filed in any language.

## **Conclusion**

The USCG policy and intent is to provide meaningful language access to individuals with Limited English Proficiency. Accordingly, USCG will continue to work with all its stakeholders to ensure compliance with the goals of nondiscrimination as required by Executive Order (EO) 13166 and Title VI of the Civil Rights Act of 1964.



## **Acronyms**

AIC - Auxiliary Interpreter Corps

USCG - U.S. Coast Guard

USCG FLP - Guard Foreign Language Program

DHS - U.S. Department of Homeland Security

DLPT - Defense Language Proficiency Test

EO - Executive Order

LEP - Limited English Proficiency

LQE - Language Qualification Examiners

NPFC- National Pollution Funds Center

SMNV - Standard Marine Navigational Vocabulary

