
***NATIONAL INSTITUTE ON DRUG ABUSE
LANGUAGE ACCESS
IMPLEMENTATION PLAN
2014***



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OVERVIEW OF INSTITUTE FUNCTION AND RELATIONSHIP TO LIMITED ENGLISH PROFICIENT INDIVIDUALS

The mission of the National Institute on Drug Abuse (NIDA) is to lead the Nation in bringing the power of science to bear on drug abuse and addiction.

This charge has two critical components. The first is the strategic support and conduct of research across a broad range of disciplines. The second is ensuring the rapid and effective dissemination and use of the results of that research to significantly improve prevention and treatment and to inform policy as it relates to drug abuse and addiction.

To accomplish this mission, we make every effort to ensure that the public has ready access to easily understandable information on the most current state of the science on the prevention and treatment of substance abuse and addiction. To ensure that this information is useful and used, we tailor our message to fit the needs of our wide variety of customers.

NIDA manages an expansive range of resources suitable for a variety of audiences: researchers, medical and health professionals, criminal justice professionals, patients and their families, parents, teachers, teens, children, and the general public. To maximize access and impact, we use plain language and adjust the reading level to the intended target population, based on guidelines set forth in the Plain Writing Act of 2010. In addition, we ensure all web materials are Section 508 compliant.

We make every effort to be culturally sensitive. All of our resources are available online and many are available in Spanish. We developed a brochure specifically for Latino audiences. Several years ago, NIDA launched its Easy-to-Read Drug Facts website which provides essential information in an easy to understand format in both English and Spanish. We also have numerous videos in English and Spanish.

Public inquiry responses are provided in English and, when possible, in Spanish – both orally and in writing. And the few times that we have received requests in other languages, we made every effort to accommodate the request. In several cases this has included granting permission for organizations in other countries to translate materials for their own use, using their own resources. To date, several NIDA publications have been translated into Spanish, Italian, Polish, and even Farsi.

STAFFING REQUIREMENTS

**National Institute on Drug Abuse
Language Access Plan Committee Members**

Name	Title	Description of Role related to LAP Implementation
Lanette Palmquist	Program Analyst, Office of Science Policy and Communications (OSPC)	Chair, Language Access Plan (LAP)
Jack Stein, Ph.D.	Director, Office of Science Policy and Communications	LAP member
Maureen Boyle, Ph.D.	Chief, Science Policy Branch, OSPC	LAP member
Stephanie Older, J.D.	Deputy Chief, Public Information and Liaison Branch, OSPC	LAP member
Usha Charya	Project Officer, Office of Science Policy and Communications	LAP member
Gloria Dabbondanza	Program Analyst, Administrative Management Branch, Office of Management	LAP member
Mary Pfeiffer, Ph.D., MLS, MA	Assistant Director, Office of Education and Career Development, Intramural Research Program	LAP member

PLAN RESOURCES

Current language access budget expenditure:

Currently, there is not a designated budget line for language access efforts therefore we are not able to report related budget expenditures. All language access activities have been conducted under existing general communication efforts based on need and available resources.

Expected staffing requirements:

Expected staffing requirements to implement Executive Order 13166 are approximately 3 hours of staff time/week (144 hrs/year) and 2.5 hours of contractor time/week (130 hrs/year). Special projects (i.e. translation of a new product) will require additional staff/contractor time and will be based on available time and resources.

Funds needed for additional translation/interpretation services:

Funds needed for additional translation/interpretation services will be determined based on need and available resources, including any offered by the NIH Office of the Director (OD).

PERFORMANCE MONITORING

The NIDA Language Access Plan (LAP) team will have responsibility for monitoring and evaluating the progress of the Implementation Plan. This will occur on a quarterly basis via review of progress updates provided by staff responsible for action items in the plan.

All action items will be assigned a measurable metric to determine level of completion and evaluate progress. A briefing of NIDA leadership on success of the LAP will be conducted on an annual basis prior to the end of the fiscal year.

ELEMENTS AND ACTION STEPS

The NIH Language Access Plan (LAP) is comprised of ten main elements. The NIH LAP identifies specific action steps that NIH ICs and OD subcomponents must take to implement the plan. These steps are critical to providing LEP individuals with meaningful access to NIH programs and activities. Use the NIH LAP as your guide to determine how to respond to each element in your Implementation Plan.

ELEMENT 1: Assessment of Needs and Capacity

ELEMENT 2: Oral Language Assistance Services

ELEMENT 3: Translation of Written Materials

ELEMENT 4: Policies and Procedures

ELEMENT 5: Notification of the Availability of Free Language Assistance

ELEMENT 6: Staff Training on the Provision of Language Assistance

ELEMENT 7: Assessment of the Accessibility and Quality of Services

ELEMENT 8: Stakeholder Consultation

ELEMENT 9: Digital Information

ELEMENT 10: Grant Assurance and Compliance

ELEMENT 1: ASSESSMENT OF NEEDS AND CAPACITY

- a. LAP Liaison appointed along with a LAP Committee consisting of representatives from the Office of Science Policy and Communications, Office of Management, and Intramural Research Program: April 2014
- b. Needs assessment completed utilizing the Language Access Assessment Checklist provided by the NIH EDI: May 2014
- c. Survey NIDA staff and contractors to develop a list of individuals qualified to serve as *ad hoc* interpreters for various languages: January 2015
- d. Identify needs by analyzing existing data sources on drug trends, conducting staff surveys, seeking input from constituent organizations, and tracking/analyzing public inquiry requests for language access services: June 2015
- e. Consider the feasibility and usefulness of issuing a Request for Information (RFI) to assess language access needs and strategies: May 2015
- f. Develop customer satisfaction questions to obtain feedback on services as regulations and budget allow: June 2016
- g. Share information about needs and capacity data with EDI and NIH Institutes and Centers (ICs) as appropriate: Ongoing
- h. Keep updated on EDI's research on new procedures and practices proven to enhance the provision of more efficient language assistance services and incorporate those practices whenever feasible: Ongoing
- i. Track and regularly report on NIDA's implementation and improvements of LEP policy and practices: Ongoing
- j. Conduct annual assessments to ensure that NIDA adheres to its language access policy directives, plans, and procedures to provide meaningful access to LEP persons: September 2015 & 2016

Cost estimate to implement:

30 staff/contractor hours and budget resources as necessary

ELEMENT 2: ORAL LANGUAGE ASSISTANCE SERVICES

NIH will provide oral language assistance services to help ensure meaningful access to LEP individuals, affording them an equal opportunity to participate in the services, activities, and programs administered by the NIH.

Description of services currently provided:

Most public inquiries are received via email or letter format. Oral requests for information received in languages other than English are handled on a case-by-case basis. If the request is in Spanish, NIDA attempts to offer Spanish-speaking staff (employees, contractors, Hispanic Association of Colleges and Universities (HACU) interns) to respond.

Identified gaps:

Currently, there is not a formal system in place to provide oral language assistance services for LEP individuals.

Proposed implementation strategy:

NIDA will develop a database consisting of program and contractor staff able to respond to requests for oral language assistance based on the major languages identified during the assessment phase (Element 1). We will also seek to identify resources available in the NIH community (e.g., NIH library) to expand our response options. The LAP Committee will serve as a conduit to access these resources. This information will then be organized into an online resource and incorporated into the overall implementation strategy for oral language assistance.

Action steps and estimated timeframe to full implementation:

- a. Conduct survey of program and contractor staff: Jan 2015
- b. Identify other resources available from NIH: March 2015
- c. Compile information into online database and resource guide: April 2015
- d. Conduct orientation of all identified oral language assistance experts: June 2015
- e. Conduct pilot trial of system and refine accordingly: Sept 2015

Cost estimate to implement:

40 staff/contractor hours and budget resources as necessary.

ELEMENT 3: TRANSLATION OF WRITTEN MATERIALS

NIH will identify, translate and make accessible in various formats (including print and electronic media) vital documents in languages other than English, in accordance with assessments of needs and capacity conducted under Element 1.

Description of services currently provided:

NIDA has a long history of responding to the needs of Spanish-speaking audiences by providing translation of its most popular consumer-based educational materials. Translation of NIDA materials into other languages occurs on an *ad hoc* basis dependent on dissemination needs and available resources.

Identified gaps

Consumer-based NIDA materials are only available in Spanish and English. No other languages are currently available.

Proposed implementation strategy:

NIDA will continue to make available its current array of Spanish language materials. Based on information gleaned during the assessment phase (Element 1), we will identify what other languages may benefit from translation services. Based on available resources, NIDA will prioritize those materials slated for translation and initiate implementation.

Action steps and estimated timeframe to full implementation:

- a. Review existing Spanish language materials and revise as needed: Feb 2015
- b. Identify languages of highest priority to consumers of NIDA services: June 2015
- c. Prioritize NIDA publications most in need of translation and in what languages: Aug 2015
- d. Determine resources to initiate translations: Sept 2015
- e. Ensure all relevant new contracts include potential translation services in their SOW: Sept 2015
- f. Post translated materials on NIDA website and promote via social media/other dissemination vehicles: June 2016

Cost Estimate to Implement:

40 staff/contractor hours, dependent on results of needs assessment.

ELEMENT 4: POLICIES AND PROCEDURES

NIH will develop, implement and regularly update written policies and procedures that help ensure individuals with LEP have meaningful access to agency programs and activities.

Description of services currently provided:

No written policies regarding language assistance services currently exist at NIDA.

Identified gaps:

No written policies regarding language assistance services currently exist at NIDA.

Proposed implementation strategy:

Relying on the NIDA Language Access Implementation Plan, we will develop and maintain a written language access policy to include procedures for staff to follow for receiving and addressing language access concerns or complaints from customers with LEP. These guidance documents will be disseminated to staff and available on the NIDA Intranet and/or SharePoint site.

Action steps and estimated timeframe to full implementation:

- a. NIDA's Administrative Management Branch and Management Analysis Branch will work with the Intramural Research Program and NIDA's LAP Committee and to create and disseminate policies to conform to the EO: April 2015
- b. NIDA's LAP Committee will develop a system for receiving, tracking and analyzing concerns or complaints from customers with LEP: April 2015
- c. Policies and procedures will be reviewed every 5 years or sooner if the need arises: September 2020

Cost estimate to implement:

40 staff/contractor hours

ELEMENT 5: NOTIFICATION OF THE AVAILABILITY OF FREE LANGUAGE ASSISTANCE SERVICES

Description of services currently provided:

NIDA currently has a link at the top of every page on our website linking viewers to our Spanish language landing page. In addition, while reading an online document in English, a user can click on the Spanish language icon and it will redirect the user to the Spanish language version, if available.

Identified gaps:

Currently, only Spanish language assistance is made available to consumers of NIDA services.

Proposed implementation strategy:

Upon creation of language access resources beyond those in Spanish, NIDA will establish an LEP landing page linking to relevant resources made available free of charge. Information about these services will also be conveyed to NIDA's constituent database consisting of approximately 200 professional and consumer advocacy organizations. NIDA will also utilize its social media platforms to promote these services.

Action steps and estimated timeframe to full implementation:

- a. Launch LEP landing page: January 2016
- b. Include information on available services in relevant publications: Feb 2016
- c. Issue announcement to constituent organizations: June 2016
- d. Promote services via social media platforms: July 2016

Cost estimate to implement:

20 staff hours and budget resources as necessary

ELEMENT 6: STAFF TRAINING ON THE PROVISION OF LANGUAGE ASSISTANCE SERVICES

NIH will provide employees with training, as necessary, to help ensure that appropriate staff understand and can implement the policies and procedures of the NIH Language Access Plan and each IC Implementation Plan.

Description of services currently provided:

NIDA does not currently have a formal training plan to offer language access services.

Identified gaps:

NIDA does not currently have a formal training plan to offer language access services.

Proposed strategy:

NIDA will develop a comprehensive approach to train program and contractor staff in their respective roles and responsibilities to implement language access services. This will include attention to established policies and practices; monitoring and tracking services conducted; and evaluating success in responding to requests.

Action steps and estimated timeframe to full implementation:

- a. Develop training plan: Sept 2015
- b. Brief NIDA senior staff on language access services and implementation plan: Oct 2015
- c. Schedule and conduct staff training: Nov 2015
- d. Assess staff skill in responding to language access requests: Sept 2016

Cost estimate to implement:

10 staff/contractor hours and budget resources as necessary

ELEMENT 7: ASSESSMENT OF ACCESSIBILITY AND QUALITY OF SERVICES

NIH will regularly assess the accessibility and quality of language assistance services for individuals with LEP.

Description of services currently provided:

On a monthly basis, NIDA's Communication Office compiles detailed reports on requests for publications received and responses provided, including those in Spanish.

Identified gaps:

NIDA's monitoring of language access services is provided only for Spanish language requests.

Proposed implementation strategy:

As access to languages in addition to Spanish are addressed, service requests and responses will be incorporated into the current tracking system.

Action steps and estimated timeframe to full implementation:

- a. Assess current tracking system for ways to enhance tracking of language access services: May 2015
- b. Revise tracking system accordingly: July 2015
- c. Implement tracking upon expansion of language access services: September 2015
- d. Identify and utilize any monitoring/evaluation tools provided via NIH: September 2015

Cost estimate to implement:

20 staff/contractor hours and incorporate expanded tracking into current contract requirements

ELEMENT 8: STAKEHOLDER CONSULTATION

NIH will consult external stakeholder communities to identify language assistance needs of individuals with LEP.

Description of services currently provided:

NIDA maintains a database consisting of approximately 200 professional and advocacy organizations with an interest in substance abuse research, policy, and practice. Ongoing communication with these organizations provides a bi-directional opportunity to disseminate and receive information and feedback on NIDA services.

Identified gaps:

NIDA does not formally request information from stakeholders on language access services.

Proposed implementation strategy:

NIDA will build on its strong existing relationships with its Council and stakeholders to solicit information and insight regarding needed services. A number of stakeholder organizations specifically focus on international or ethnic groups that may benefit from language access services (e.g., the National Alliance for Hispanic Health, the National Asian Pacific American Families Against Substance Abuse, and the National Council of La Raza). We intend to take advantage of existing communication channels such as the NIDA Web site, social media platforms, and more traditional information dissemination mechanisms like *NIDA Notes* and *What's New at NIDA*. In addition, language access needs will be addressed during regular meetings held with constituent groups and during conferences in which NIDA participates.

Action steps and estimated timeframe to full implementation:

- a. Present Language Access Implementation Plan to NIDA Advisory Council for feedback and suggestions: Feb 2015
- b. Promote Plan to NIDA constituent organizations: March 2015
- c. Consider issuing a Request for Information on language access needs: May 2015
- d. Incorporate language access discussions into stakeholder meetings and conferences: Ongoing

Cost estimate to implement:

30 staff/contractor hours and budget resources as necessary.

ELEMENT 9: DIGITAL INFORMATION

NIH will develop and implement strategies to help ensure that digital information is accessible to LEP individuals.

Description of services currently provided:

All of NIDA's current English and Spanish language materials are available online. NIDA's Main and Teen Websites have been developed with responsive design technology and are accessible via mobile devices. Spanish language information available on the Website is available via mobile and tablet devices. NIDA currently has a button at the top of every page on our website linking viewers to our Spanish language landing page. In addition, while reading an online document in English, a user can click on the Spanish language icon and it will redirect the user to the Spanish language version, if available.

Identified gaps:

Information is only available in Spanish.

Proposed implementation strategy:

As noted under Element 3, NIDA will continue to make available its current array of Spanish materials online. Also as noted in Element 3, based on information gleaned during the assessment phase (Element 1), we will identify what other languages may benefit from translation services. Based on available resources, NIDA will prioritize those materials slated for translation and initiate implementation, publishing the translated materials online and promoting them via social media and other means of dissemination.

Action steps and estimated timeframe to full implementation:

NIDA will take the following steps: (per Element 3):

- a. Review existing Spanish language materials and revise, as needed: Feb 2015
- b. Identify languages of highest priority to consumers of NIDA services: June 2015
- c. Prioritize NIDA publications most in need of translation and in what languages: Aug 2015
- d. Determine resources to initiate translations: Sept 2015
- e. Launch LEP Landing Page: January 2016
- f. Post translated materials on NIDA website and promote via social media/other dissemination vehicles: June 2016

Cost estimate to implement:

30 staff/contractor hours

ELEMENT 10: GRANTS ASSURANCE AND COMPLIANCE

NIH will help ensure that extramural grant recipients are aware of their obligations under Title VI of the Civil Rights Act of 1964 and implementing regulations, as well as applicable grants policies related to language access and program accessibility.

Description of services currently provided:

An authorized official of an applicant institution seeking NIH grants must sign an HHS 690 Assurance of Compliance form (<http://www.hhs.gov/forms/HHS690.pdf>) with the HHS Office for Civil Rights, assuring that they will comply with federal civil rights laws including Title VI; however, Program Directors and/or Principal Investigators and their staffs may not be aware of, or fully understand their obligations.

Identified gaps:

The Office of Equity Diversity and Inclusion (EDI) is working with the Office of Extramural Research (OER) to create an implementation Plan for Element 10.

Proposed strategy:

EDI is working with OER to ensure that NIH grantees are aware of their obligations under Title VI of the Civil Rights Acts that prohibits discrimination on the basis of language ability.

APPENDIX A: Project Implementation Plan Approval

The undersigned acknowledges that he/she has reviewed the Language Access Implementation Plan presented within this document. Changes to this **Project Implementation Plan** will be coordinated with, and approved by, the Chair of the IC Liaison Committee, or their designated representatives.

Signature: /s/ Date: 9/26/14
Print Name: Glenda Conroy
Title: Executive Officer