



# U.S. DEPARTMENT OF ENERGY

## Language Access Plan to Ensure Access to Federally Conducted Programs and Activities by Individuals with Limited English Proficiency December 5, 2024

### Table of Contents

I.	Purpose and Authority .....	2
II.	Policy Statement.....	3
III.	Definitions .....	4
IV.	Responsibilities .....	5
V.	Operational Guidelines for Providing Language Assistance Services.....	6
VI.	Language Services.....	11
VII.	Notice to Limited English Proficient Individuals.....	12
VIII.	Training on Policies and Procedures .....	13
IX.	Departmental Element Language Access Procedures .....	13
X.	Outreach, Monitoring, Conducting Reassessments, and Updating Language Access Procedures.....	14

## I. Purpose and Authority<sup>1</sup>

The purpose of this updated U.S. Department of Energy (the Department or DOE) Language Access Plan (Plan) is to ensure that DOE, through its Departmental Elements, including Field Sites and Power Marketing Administrations, takes reasonable steps to:

1. Provide meaningful access to DOE programs, activities, and services to limited English proficient (LEP) members of the public; and
2. Eliminate or reduce limited English proficiency as a barrier to accessing Department programs, activities, and services.<sup>2</sup>

Failure to provide timely language assistance services may result in a denial of meaningful access to DOE programs, activities, or services that are accessible to non-LEP individuals.<sup>3</sup>

This Plan establishes guidelines in accordance with Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, 65 Fed. Reg. 50,121 (Aug. 16, 2000), which requires federal agencies to develop plans to improve access to federal programs and activities for persons with limited English proficiency.<sup>4</sup> The Plan reflects that it is DOE's responsibility, and not that of an individual seeking services, to take reasonable steps to ensure meaningful access to all DOE programs, activities, and services for individuals who interact, or may interact, with DOE over the phone, in writing, in person, or through electronic methods.<sup>5</sup>

---

<sup>1</sup> This Plan is intended only to improve the internal management of the Department's language access program, and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person. Because this document is intended for the internal management of the Department's language access program, it is not intended to be cited in any judicial or administrative proceeding. Administration of the programs discussed herein is within the sole discretion of the Department.

<sup>2</sup> This plan does not in any way modify DOE or federal acquisition regulations or any other regulatory or statutory requirements. Should questions regarding this Plan arise, Elements may consult with DOE's Language Access Program Coordinator and Program Counsel for appropriate guidance.

<sup>3</sup> According to the U.S. Census Bureau, almost 21.7 percent of individuals in the United States speak a language other than English at home, and of that population, 8.2 percent meet the definition of having limited English proficiency. U.S. Census Bureau, 2022 American Community Survey, *Why We Ask Questions About Languages Spoken At Home* (Nov. 14, 2022), available at <https://www.census.gov/acs/www/about/why-we-ask-each-question/language/>.

<sup>4</sup> Executive Order 13166 also required the Department to issue guidance to recipients of federal financial assistance regarding their legal obligation to ensure meaningful access for LEP individuals under Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, and national origin. While this Plan only concerns the facilitation of language access for DOE-conducted programs, activities, and services, the Department has also issued separate guidance regarding these obligations for recipients of DOE federal financial assistance. See the Department's Interim Policy Guidance, *Nondiscrimination in Federally Assisted Programs Enforcement of Title VI of the Civil Rights Act of 1964 – Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency (LEP)*, 69 Fed. Reg. 50,366 (Aug. 16, 2004).

<sup>5</sup> Although DOE's Language Access Plan focuses on providing language assistance to persons with LEP, DOE also has a separate responsibility to ensure effective communication with individuals with disabilities, as required by

This Plan supersedes the Department’s 2007 Plan titled, *Ensuring Access to Federally Conducted Programs and Activities by Individuals with Limited English Proficiency*.<sup>6</sup> Questions about this Plan or requests for guidance about language access services can be sent to DOE’s LEP Program Coordinator, located in the Office of Civil Rights and Equal Employment Opportunity, at [lep@hq.doe.gov](mailto:lep@hq.doe.gov).

## **II. Policy Statement**

### **A. Commitment to Meaningful Access**

The Department of Energy is committed to providing LEP individuals with meaningful access to its programs, activities, and services provided by the Department. Meaningful access includes language assistance that results in accurate, timely, and effective communication at no cost to an LEP individual.

### **B. Language Assistance Measures**

The following outlines measures that the Department is committed to taking to provide meaningful access to LEP individuals to DOE’s programs, activities, and services. These measures will be further addressed through this Language Access Plan.

1. Departmental Elements, as appropriate, will develop methods for identifying LEP individuals who contact their respective organizations by phone, in writing, in person, or through electronic methods (e.g., email or website inquiry), and who may need language assistance.
2. Upon determining the need for language assistance services, Departmental Elements will take reasonable steps to ensure that all Departmental communication with LEP individuals is conducted with the use of a bilingual staff member, or with the use of a qualified contract interpreter or translator, or through telephonic or video interpretation with qualified interpreters.
3. Department Elements will take reasonable steps to ensure that “vital” documents related to DOE’s programs, activities, and services are translated into the most frequently encountered languages of those LEP individuals affected by the programs, activities, or services.

---

Sections 504 and 508 of the Rehabilitation Act of 1973. This may mean ensuring that communications are compliant with both this Plan and DOE’s responsibilities under the Rehabilitation Act of 1973.

<sup>6</sup> The Department’s 2007 Language Access Plan may be found on the DOE Office of Civil Rights and Equal Employment Opportunity (OCR-EEO) LEP website: [Limited English Proficiency | Department of Energy](#). Once the 2024 Language Access Plan is finalized, it will be made available to the public on the same DOE OCR-EEO LEP website.

4. Departmental Elements shall ensure that DOE staff who interact with the public participate in training provided by the Office of Civil Rights and Equal Employment Opportunity (OCR-EEO) on language access policies and procedures, including how to access language assistance services and how to identify and work with LEP individuals, interpreters, and translators. Department staff who encounter and identify LEP individuals should maintain a record of their contacts and the primary languages spoken.

### III. Definitions

- A. *Bilingual Staff* – Any DOE staff member who has demonstrated proficiency in English and at least one other language. A bilingual staff member may speak or write directly to an LEP individual in a language other than English. A staff member who has a rudimentary familiarity with a language other than English will not be considered “bilingual staff.”
- B. *Departmental Element* – Refers to all DOE Program and Staff Offices, Field Site Offices, and Power Marketing Administrations.
- C. *Effective Communication* – Communication sufficient to provide the LEP individual with substantially the same level of access to DOE programs, activities, or services as individuals who are not LEP. DOE staff must take reasonable steps to ensure communication with an LEP individual is as effective as communication with non-LEP individuals when providing similar programs, activities, or services.
- D. *Interpretation* – The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- E. *Interpreter* – An individual who conveys meaning orally from one language (the source language) into another language (the target language).
- F. *Language Assistance Services* – Oral or written language services (i.e., interpretation or translation services) needed to assist LEP individuals in communicating effectively with DOE staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the Department’s programs, activities, and services.
- G. *Limited English Proficient (LEP) Individuals* – Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, 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).<sup>7</sup>

---

<sup>7</sup> The U.S. Department of Justice has determined that Executive Order 13166 applies only to persons who are located within the United States and its territories and does not apply extraterritorially.

- H. *Meaningful Access* – Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs, activities, or services provided to English proficient individuals.
- I. *Nationally Prominent Languages* – The top languages spoken at home by LEP individuals, as identified by the American Community Survey (ACS). At the time of the issuance of this Language Access Plan, the top seven languages spoken in the United States by LEP individuals are Spanish (or Spanish Creole), Chinese (including the spoken languages of Mandarin and Cantonese and the written languages of Simplified and Traditional Chinese), French (including Patois, Cajun, Creole, Haitian), Tagalog (including Filipino), Vietnamese, Arabic, and Korean.
- J. *Primary Language* – An individual’s primary language is the language in which an individual most effectively communicates. Staff should avoid making assumptions about an individual’s primary language, and they should make every effort to ascertain an individual’s primary language to ensure effective communication.
- K. *Programs, Activities, or Services* – The terms “programs,” “activities,” or “services” refer to all the operations of the Department.
- L. *Translation* – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- M. *Translator* – An individual who conveys written text from one language (source language) into an equivalent written text in another (target language).
- N. *Vital Document* – Paper or electronic written material that is critical for accessing the Department’s programs, activities, or services or is otherwise required by law. Classification of a document as “vital” depends on the importance of the program, information, encounter, or service involved, and the consequence to the LEP individual if the information in question is not provided accurately or in a timely manner.

#### **IV. Responsibilities**

##### **A. Office of Civil Rights and Equal Employment Opportunity (OCR-EEO)**

1. OCR-EEO is responsible for monitoring DOE compliance with Executive Order 13166 and implementation of DOE’s Language Access Plan.
2. OCR-EEO will provide and/or facilitate training and technical assistance to Departmental Elements related to their respective responsibilities pursuant to Executive Order 13166 and DOE’s Language Access Plan.

3. OCR-EEO will designate an LEP Program Coordinator to serve as a subject matter expert on the Department's Language Access Plan. The LEP Program Coordinator will:
  - Serve as a primary point of contact for Departmental Elements related to DOE's Language Access Plan;
  - Liaise with Departmental Elements regarding the conduct of LEP self-assessments and the development of Departmental Element-specific language access procedures;
  - Facilitate technical assistance and training related to the requirements of Executive Order 13166 and the Department's Language Access Plan; and
  - Regularly monitor and evaluate the Department's provision of language assistance services.

## **B. Departmental Elements**

The Department's mission is to ensure America's security and prosperity by addressing its energy, environmental, and nuclear challenges through transformative science and technology solutions. DOE's mission is carried out by over 50 Departmental Elements, including Field Offices and Power Marketing Administrations.

Given the varied activities and the specific missions, programs, and services of DOE's many offices, the type and frequency of contact and interaction with the public and LEP individuals may vary across offices. In response to this, each of DOE's Departmental Elements will take the reasonable steps identified in Section V., *Operational Guidelines for Providing Language Assistance Services*, below to ensure that LEP individuals have meaningful access to all programs, activities, and services.

## **V. Operational Guidelines for Providing Language Assistance Services**

The Office of Civil Rights and Equal Employment Opportunity is available to provide technical assistance regarding these Guidelines.

### **A. Identification and Assessment of LEP Communities and Individuals**

#### **1. Self-Assessment by Departmental Elements**

Each Departmental Element shall conduct a self-assessment of its programs, activities, and services to identify how it interacts with – or how it should interact with – the public, e.g., public access to Departmental Element website; materials intended for public distribution; public meetings and hearings; outreach programs; telephone numbers used by the public; programs, activities, or services open to applicants and participants; etc. Any interaction with the public, direct or indirect, has the potential to include interaction with LEP individuals.

Each Departmental Element shall also identify the target audience for all programs, activities, and services and use available data on languages spoken and English ability to determine the linguistic characteristics of the target audience.<sup>8</sup>

Any time a Departmental Element initiates a new program, activity, or service, it shall assess the need for providing language assistance services.

The Office of Civil Rights and Equal Employment Opportunity will provide a template to Departmental Elements for use in conducting the self-assessment.

## **2. Point of First Contact—Identification of LEP Individuals**

Department staff shall, at the point of first contact with an LEP individual, conduct or arrange for an initial assessment of the need for language assistance services. Staff may use one or more of the following methods:<sup>9</sup>

- Self-identification by the LEP individual or a companion;<sup>10</sup>
- Verification by a bilingual staff person or interpreter; or
- Using an “I Speak” language identification card or poster.

Upon determining the need for language assistance services, Department staff shall take reasonable steps to ensure that all communication is conducted with the use of a qualified interpreter or translator in a timely manner.

### **B. Language Assistance Requirements**

All Departmental Elements will take reasonable steps to respond in a timely and effective manner to LEP individuals who need assistance or information. DOE staff will advise LEP individuals that they may choose to either: use the services of an interpreter provided by DOE at no cost to them, or, at their own expense, secure the assistance of an interpreter of their own choosing. To ensure that the language assistance services are accurate, meaningful, and effective, each Departmental Element will, on a case-by-case

---

<sup>8</sup> The U.S. Department of Justice’s (DOJ’s) LEP.gov website provides

<https://www.lep.gov/maps>

<sup>9</sup> Additional examples are available on DOJ’s LEP.gov website at: <https://www.lep.gov/translation>.

<sup>10</sup> During telephone or in-person contact, if relatives, friends, acquaintances, neighbors, or children are present with the individual, staff may rely on these individuals to conduct a first inquiry as to the primary language of the LEP individual. However, staff generally should not rely on these individuals to provide interpretation services because this could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation.

basis, determine which services (interpretation or translation) should be provided. To accomplish this, each Departmental Element will make reasonable efforts to ensure that:

- LEP individuals who call or visit a Departmental Element receive prompt interpretation or translation from a staff person who has been identified as qualified to provide language assistance in the language of the customer or through a telephonic/virtual interpretation service;
- If DOE staff encounter LEP individuals during a site visit, staff will arrange for the assistance of an available bilingual staff person, an interpreter, or a telephonic/virtual interpretation service provider; and
- LEP individuals who are unable to access documents written in English receive a translation or oral interpretation, depending on the Departmental Element's determination of the importance of the document to accessing the specific program, activity, or service and the needs of the LEP individual.

#### **1. Oral Language Services (Interpreters)**

- a. Departmental Elements will not require LEP individuals to provide their own language assistance services when communicating with the Department. Oral interpretation services will be provided by each Departmental Element at no cost to the LEP individual. Generally, the Departmental Element will need to arrange for oral language assistance to LEP individuals in face-to-face and telephonic/virtual contact using bilingual staff or contracted interpretation services, including telephonic/virtual interpretation services, as appropriate. LEP individuals who wish to select their own interpreters will bear the responsibility for costs.
- b. Each Departmental Element will take reasonable steps to ensure that it provides interpretation services through individuals whose level of fluency and comprehension is appropriate to the specific nature, type, and purpose of the information at issue. In addition, each Departmental Element will take reasonable steps to ensure that these individuals understand their ethical obligations, and must emphasize confidentiality, impartiality, accuracy, avoidance of a conflict of interest, refraining from communicating with the LEP individual beyond that which is necessary to carry out professional duties, and not adding to, editing, summarizing, or embellishing the LEP individual's statement with the purpose of ensuring that LEP individuals have meaningful access to all programs, activities, and services.
- c. Except in unusual circumstances, the Department should not rely on family members, neighbors, friends, acquaintances, bystanders, and children to provide interpreter services. Informal interpreters may be used in very limited



circumstances, e.g., initial assessment to identify an individual’s primary language, but staff must provide notice of the right to free, competent, and confidential language assistance services.

## **2. Translation of “Vital” Documents, Web Content, and Social Media Content<sup>11</sup>**

The Department prioritizes the translation of “vital” documents.

- a. Each Departmental Element shall establish a process for identifying and prioritizing “vital” documents, including website content and social media content, for translation.
  - Classification of a document as “vital” depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.
  - “Vital” documents must be translated when a significant number or percentage of the population eligible to be served, or likely to be directly affected by the program or activity, is LEP.
  - Where the target audience is nationwide, Departmental Elements shall translate vital documents into the nationally prominent languages, as identified by the American Community Survey.<sup>12</sup> Where the target audience is narrower, Departmental Elements must identify language(s) for translations.
  - At a minimum, a Departmental Element shall provide accurate oral interpretation of a “vital” document until a written translation can be provided.
  - Documents that could be considered “vital” generally fall into two broad categories: documents primarily geared toward the general public or a broad audience; or specific written communication regarding a matter between an individual and a Departmental Element.
- b. Documents geared toward the general public or a broad audience that may be considered “vital” may include, but are not limited to, certain:

---

<sup>11</sup> DOJ’s LEP.gov website identifies resources related to digital services and creating multilingual websites, which is available at <https://www.lep.gov/digital-services-and-websites> and <https://digital.gov/communities/multilingual/>.

<sup>12</sup> While a list of the top seven nationally prominent languages (as of the date of the issuance of this Language Access Plan) is provided on page 5 of this Plan, Departmental Elements are strongly encouraged to consult the American Community Survey for the most current data.

- Notices, letters, or forms pertaining to eligibility for Department services or the reduction, denial, or termination of services or programs;
- Services or benefits outreach or education materials;
- Safety outreach or education materials;
- Notices of public engagement or publications in the federal register;
- Environmental reports or assessments;
- Conditions of settlement or resolution agreements pertaining to the public;
- Notices of rights, requirements, or responsibilities; and
- Notices regarding the availability of free language assistance services for LEP individuals.

**Federal Register:** For “vital” documents that may be published in the Federal Register, the Departmental Element will determine whether to include, as an appendix to the document, a statement in the nationally prominent languages that language assistance services are available.

**Public Comment Documents:** For “vital” documents that may accept public comment that are not published in the Federal Register (e.g., significant guidance documents), the Departmental Element will determine whether to include a statement in the nationally prominent languages that language assistance services are available.

**Long Documents:** For long documents, Departmental Elements shall determine whether a complete translation is necessary, or whether translation of “vital” information contained within a document provides adequate notice of the document’s contents.

**Websites:** Departmental Elements will take reasonable steps to translate public website content and electronic documents that contain “vital” information about DOE programs, benefits, and/or services. Departmental Elements will identify the appropriate languages for translation and determine which electronic documents contain “vital” information. Entire websites generally need not be translated, so long as all “vital” information on the website is translated and the website includes notice of the availability of free language assistance services.

- c. Written communications with an individual that may be considered “vital” documents may include, but are not limited to:
- Letters or notices pertaining to the reduction, denial, or termination of services or programs or that require a response from the LEP person;
  - Complaint, consent, release, or waiver forms;
  - Claim or application forms;
  - Conditions of settlement or resolution agreements; and

- Time-sensitive notices, including hearing notices or other notices with investigation or litigation deadlines.
- d. Additional Translation Considerations for Departmental Elements that Provide Federal Financial Assistance

Departmental Elements that provide Federal financial assistance may also consider translating solicitation notices for grants or programs that may be of interest or may affect areas with large populations of LEP individuals. For example, a Departmental Element may decide to translate solicitation notices into Spanish if the grant or program is aimed at benefiting individuals in Puerto Rico.

## **VI. Language Services**

### **A. Federal Bilingual Staff**

The Department encourages each Departmental Element to consider whether the employment of federal employee bilingual staff is a more cost effective, efficient, and practical solution for language assistance services than using contracted providers, depending on its programs, activities, and services.

Departmental Elements that choose to employ a federal employee bilingual staff, whose responsibilities shall include providing language assistance services, should consult with the Office of Human Capital to prescribe a hiring process for bilingual staff, provide a mechanism for designating jobs as bilingual, determine when and how to test competency of prospective or current staff, and define which staff are bilingual.

### **B. Contracting for Language Services<sup>13</sup>**

Consistent with federal acquisition regulations, Departmental Elements will need to procure language access services if they do not have bilingual staff to sufficiently satisfy their need to provide language access services. Contracted language assistance service providers should have:

- Qualified translators and interpreters;
- Mechanisms to ensure confidentiality and to avoid conflicts of interest;
- Ability to meet the Element's demand for language assistance services in a timely manner;
- Adequate quality control, such as second checks for translations;

---

<sup>13</sup> The Office of Civil Rights and Equal Employment Opportunity will explore the potential for a procurement vehicle that may be used across the DOE complex against which Departmental Elements may prepare specific task orders funded by the respective Departmental Element. However, in the interim, Departmental Elements must arrange for the provision of language assistance to ensure that LEP individuals have meaningful access to all programs, activities, and services.

- Reasonable cancellation fees; and
- An effective complaint resolution process.

### **C. Quality Control**

Each Departmental Element shall take reasonable steps, whether for federal employee or contractor providers, to ensure the competency and quality of interpreters and translators. Considerations may include:

- Proficiency in and ability to communicate information accurately in both English and the target language;
- Knowledge in both languages of any specialized terms or concepts;
- Cultural competency and/or cultural humility;
- Understanding and following confidentiality, impartiality, and ethics rules; and
- Independent review of translated materials by a qualified translator.

Each Element shall develop a process for soliciting feedback from LEP individuals on the language assistance services provided and resolving complaints.

## **VII. Notice to Limited English Proficient Individuals**

OCR-EEO will collaborate with the Office of Public Affairs to include notice of the availability of free language assistance services in each of the nationally prominent languages on the DOE homepage.

Similarly, each Departmental Element shall include notice of the availability of free language assistance services in each of the nationally prominent languages on their respective Departmental Element homepage.

Each Departmental Element shall also include notice of free language assistance services in “vital” documents in each of the nationally prominent languages, when the document is intended for the general public or in whatever language is relevant, when the document is targeted to a different audience that may include an LEP population who speaks a language other than one of the nationally prominent languages. In addition, each Departmental Element with a physical office open to the public shall display a notice at the office.

When language assistance services are not readily available within a Departmental Element or an LEP individual does not know about the availability of language assistance services, LEP individuals will be less likely to participate in or benefit from an Element’s programs, activities, or services. As a result, many LEP persons may not seek out DOE benefits, programs, information, or services.

## **VIII. Training on Policies and Procedures**

OCR-EEO will provide and/or facilitate training and technical assistance to Departmental Elements related to their respective responsibilities pursuant to Executive Order 13166 and DOE's Language Access Plan.

Each Departmental Element shall periodically provide relevant staff with training on this Plan and the Departmental Element-specific procedures. Relevant staff include staff who may interact with LEP individuals and their supervisors/managers.

Should a Departmental Element elect to use bilingual federal employee staff to provide language assistance services, the Departmental Element must provide technical training on proper interpreting and translation techniques, ethics, and specialized terminology.

## **IX. Departmental Element Language Access Procedures**

Each Departmental Element shall develop language access procedures, which outline steps for Departmental Element staff to follow with respect to the provision of language assistance services, gathering data related to language assistance services that the Departmental Element has provided, and delivering services to LEP individuals. Procedures may explain how to:

- Provide notice of the availability of language assistance services, both on the website and related to "vital" documents;
- Respond to telephone calls from LEP individuals;
- Identify the language needs of LEP individuals;
- Track and record an individual's primary language, services provided, and cost;
- Respond to written correspondence from LEP individuals;
- Identify "vital" documents for translation;
- Access an interpreter or secure written translations;
- Work with an interpreter;<sup>14</sup> and
- Quality control, including soliciting feedback from LEP individuals on the language assistance services provided;

Departmental Element procedures should also establish a process for assessing LEP needs related to new programs, activities, and services and for periodically evaluating and updating procedures.

---

<sup>14</sup> Resources on how to work with interpreters are available at <https://www.lep.gov/interpretation>.

## **X. Outreach, Monitoring, Conducting Reassessments, and Updating Language Access Procedures**

### **A. Outreach to LEP Communities and Stakeholders**

Departmental Elements with significant contact with LEP individuals should conduct outreach to stakeholders to solicit input on the effectiveness of the Departmental Element's language assistance services. Stakeholders may be able to provide input on what "vital" documents to prioritize for translation, the accuracy of translations, how best to notify LEP communities of the Departmental Element's programs, activities, services, and how best to serve LEP communities. The frequency of such collaborations should be informed by each Element's self-assessment.

### **B. Monitoring**

Each Departmental Element shall collect data regarding its provision of language assistance services and provide the data to OCR-EEO during regular reporting periods. OCR-EEO will identify the data to be collected, which may include the number of cases, matters, or outreach initiatives in which language assistance services were provided; the primary languages of communication with the LEP persons; the cost of any language assistance services provided; the type of language assistance provided; and the amount of time to secure the required services.

### **C. Reassessment and Updates to Language Access Procedures**

Every two years, each Departmental Element shall conduct a reassessment of its programs, activities, and services to evaluate its engagement with LEP individuals, and, where appropriate, update its language access procedures to improve the provision of language assistance services. Updates may respond to changes in programs, activities, and services; changes in the demographics of the target audience; data collected regarding services provided; feedback received from staff about providing services; feedback received from LEP individuals about receiving services; complaints filed by LEP individuals regarding language access; changes in technology; quality control concerns; or other relevant factors.