NASA HEADQUARTERS
LANGUAGE ASSISTANCE PLAN

FOR ACCOMMODATING
LIMITED ENGLISH PROFICIENT INDIVIDUALS

Prepared by the Headquarters Equal Opportunity and Diversity Management Division

November 4, 2011
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
HEADQUARTERS

LANGUAGE ASSISTANCE PLAN FOR ACCOMMODATING THE OTHER-
THAN-ENGLISH LANGUAGE NEEDS OF LEP PERSONS IN NASA-
CONDUCTED PROGRAMS AND ACTIVITIES

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National Aeronautics and Space Administration Headquarters
Equal Opportunity and Diversity Management Division
Washington, DC 20546

Judith A. Phillips
Director, Equal Opportunity and Diversity Management Division

_________________________________________________________________________________________
NAME AND TITLE OF RESPONSIBLE OFFICIAL

[Signature]
11/4/2011
DATE

Jay M. Herr
Executive Director, Headquarters Operations

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11/4/2011
DATE
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I. INTRODUCTION


A person who has limited English proficiency (LEP) is defined as an individual who does not speak English as their primary language and who has limited ability to read, write, speak or understand the English language and may require language assistance with respect to a particular type of service, benefit or encounter. Because of their language differences and inability to speak or understand English, LEP persons are often excluded from programs, experience delays and/or denial of services or receive care and services based on inaccurate or incomplete information. Executive Order No. 13166, “Improving Access to Services for Persons with Limited English Proficiency,” dated August 11, 2000 (65 Fed. Reg. 50121, Aug. 16, 2000) requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities, who due to limited English proficiency (LEP) cannot fully and equally participate in or benefit from those programs and activities.

The Executive Order and Department of Justice (DOJ) LEP Guidance advises each federal agency to “take reasonable steps to ensure meaningful access to the information and services they provide.” The guidance also requires agencies to provide the services at no cost to the LEP individuals.

This Language Access Plan is consistent with the DOJ guidance, “Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs,” issued May 2011. The DOJ guidance document instructs agencies to consider six elements in developing LEP guidance for their recipients:

1. Understanding How LEP Individuals Interact with Your Agency;
2. Identification and Assessment of LEP Communities;
3. Providing Language Assistance Services;
4. Training Staff on Policies and Procedures;
5. Providing Notice of Language Assistance Services; and

The DOJ guidance also identifies eight key components of language access self-assessments and implementation plans as follows:

1. Officials Charged with Implementing the Plan;
2. Services, Benefits, and Activities Provided Directly to the Public: How NASA Interacts with LEP Communities;
3. Identification and Assessment of LEP Communities;
4. Language Assistance Services;
5. Notice of Availability of Free Language Service to LEP Persons;
6. Collaboration with LEP Communities and Other Stakeholders;
7. Training Staff on Policies and Procedures;

The eight components of a language access implementation plan fully incorporate the six elements of the self assessment. Accordingly, the NASA HQ Language Assistance Plan is based on the eight components.

II. Eight Components

1. Officials Charged with Implementing the Plan

At the HQ level, the Director of the Equal Opportunity and Diversity Management Division reports directly to the Executive Director, HQ Operations. The HQ LEP Coordinator is appointed by and reports directly to the Director, EODM.

2. Services, Benefits, and Activities Provided Directly to the Public: How NASA Interacts with LEP Communities

Contacts with NASA HQ are made through its office in Washington, DC. These contacts are made through telephone calls via main telephone lines directly to offices, mail, Internet web sites, e-mail and in person. A review of HQ services reveal the following services/organizations have the most potential for impact on the LEP population in the Washington DC Metropolitan area: the Office of Communications, the Office of Education, the Office of Legislative and International Affairs, the Office of Small Business Programs, and the Human Resources Management Division.\(^1\) In addition, organizations that have daily public contact as part of on-going agency operations are the Office of Protective Services and the Library, which includes the Information Center. Overviews of those services/organizations are as follows:

a. Communications and Public Outreach

The Office of Communications provides policy guidance, advice, and consultation to Mission Directorates, Mission Support Offices, as well as management of all internal and external communications. The office coordinates, targets, and directs resources (e.g. NASA Television, guest services, astronaut appearances, Speakers Bureau, public communications and inquiries, audiovisual products, news operations, and websites) to the media and

\(^1\) It should be noted that Agency-level LEP services provided by these organizations are reflected in the Agency-level LEP Plan.
public. It issues press releases, organizes press conferences, and targets specialized-audience press. It provides daily satellite video to television stations and arranges interviews with the press.

- **Ciencia@NASA** (Science@NASA). This Spanish language Web site is maintained by NASA HQ. Spanish was selected based on the demand expressed by visitors to the NASA Web site and the size of the potential national population that would benefit. The stories are aimed at an adult science-attentive audience and focus on some of the more exciting aspects of NASA science, and are available in both written and audio versions.

b. Education Programs and Activities

NASA, through the **Office of Education**, supports the country’s educators who play a key role in preparing the minds that will manage and lead the Nation’s laboratories and research centers tomorrow. To prepare the Agency’s future workforce and leverage the Agency’s unique resources, it partners with other agencies, and collaborates with the education community. In the NASA Strategic Plan, the Agency articulates education-related Strategic Goals of “sharing NASA with the public, educators, and students to provide opportunities to participate in our Mission, foster innovation, and contribute to a strong national economy” and to “inform, engage, and inspire the public by sharing NASA’s missions, challenges, and results.”

It should be noted that many of the HQ education and outreach programs are conducted in conjunction with local school systems, which generally provide their own interpreters.

c. International and Interagency Relations

The **Office of International and Interagency Relations** provides executive leadership and coordination for all NASA international activities and partnerships, including directing NASA’s international relations, and managing foreign travel by NASA employees among a host of other roles and responsibilities. Its Resources Management Division manages the Agency-wide interpretation/translation service and Visa processing contract. The interpretation/translation service provides a single channel through which to access such services on an as-needed basis.

d. NASA Visitors’ Centers (Library, Exchange Council Store)

While Centers providing displays, exhibits, and guided tours may experience thousands of visitors annually, HQ has traditionally had very limited contact with the general public, with visitors primarily visiting the Library and the Exchange

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Council Store. The HQ Library serves as the HQ Visitor Center. One of its functions is to enhance the public’s appreciation of the space program through access to the Library’s collection of resources. The Library is also used for meetings between NASA employees and members of the public. The Exchange Council Gift Store is open to the general public.

e. Business Opportunities

The **Office of Small Business Programs** is responsible for the development and management of woman-owned small businesses, veteran-owned small businesses, service-disabled veteran-owned small businesses, and historically underutilized business zoned small businesses, and also including minority-serving higher-education institutions.

f. Employment Services

The **Human Resources Management Division** manages and oversees human resources activities at HQ. Since the implementation of NASA Shared Services Center (NSSC) the division has limited contact with the public, occasionally participating in recruitment career fairs and public outreach activities such as visiting elementary and middle schools throughout the Washington DC Metropolitan area for student career exploration days and to share information about NASA careers.

g. Security

The **Facilities and Administrative Services Division** is responsible for the safety of the HQ employees. All visitors must enter NASA HQ via the West Lobby. OPS guards serve as the first point of contact for all visitors. They conduct the security screening process to allow visitors access to the building and are available to respond to all emergency situations (e.g. fire, security, and law enforcement).

3. Identification and Assessment of LEP Communities

The primary focus of the NASA HQ Language Assistance Plan (LAP) is to ensure the accessibility of all NASA programs and activities to all persons in the eligible population. NASA HQ is located in Washington, DC, consequently, the Washington Metropolitan Area must be considered when identifying the LEP communities serviced.

a. Estimate of Eligible LEP Individuals

Census Bureau data is used to determine the languages that may require interpretation and translation services in the Washington DC Metropolitan area. According to the demographic profile of the U.S. Census Bureau Washington Metropolitan Area, immigrant communities exhibiting the largest growth rate and the greatest concentration of LEP populations are Hispanics and Asian/Pacific
Islanders. The primary languages, other than English, spoken by persons five and older in the Washington DC Metropolitan Area are: Spanish, African, Chinese, Korean, French, Vietnamese, and other Asian languages. When considering the number or proportion of LEP individuals in a language service area, NASA must also consider the LEP parent(s) when their English-proficient or LEP minor children and dependents are potential or actual participants or beneficiaries of NASA conducted programs and activities.

In addition, the HQ’s LEP Coordinator shall collaborate with key stakeholders to identify LEP contacts and trends and identify community associations which serve LEP individuals.

b. Determining the Frequency with Which LEP Individuals Interact with HQ

HQ will conduct an annual analysis of LEP contacts to determine the frequency with which LEP individuals interact with HQ. It is expected that HQ will use the data in Sec. 3(a) above as a point of departure for determining appropriate language assistance services for its geographic service area and describe additional analysis, e.g., frequency of contact with LEP populations.

4. Language Assistance Services

The HQ LEP Coordinator must consider the appropriate balance of written translations and oral language assistance needed to ensure meaningful access to HQ services, benefits, and activities.

NASA HQ has the capacity to deal with requests for language assistance including both oral language assistance and translation of written materials, particularly non-technical documents. Currently, HQ organizations procure language services by submitting a Service Request Form, NASA Form 1681, directly to the contracted interpreter/translations services provider. Interpretation and translations services for official international agreements for final signature is provided by the State Department on a reimbursable basis.

a. Oral Language Assistance

HQ will arrange for the provision of oral language assistance to LEP persons in both face-to-face and telephone encounters in its conducted programs and activities where such assistance is requested and/or anticipated.

HQ has an existing contract for interpreting services. Interpreter services can be scheduled when activities are assessed and requests made 48 hours in advance of program initiation. Access to telephonic contract interpreter services is also covered in the contract. Walk-ins or phone calls will be addressed via the

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3 U.S. Census Bureau, American FactFinder Data Set: 2009 American Community Survey 1-Year Estimate
contract telephone translation service. (NASA does not use volunteer interpreters for official business.) If previously unidentified, language identification cards (or “I speak cards”) can be used to identify the language of communication and are available for download at http://www.usdoj.gov/crt/cor/13166.htm. (Appendix E)

Displays at HQ, on tour, and in the traveling exhibits can be accommodated in languages other than English by audiotapes and recorders, or videotapes if requested in advance.

Many of the NASA HQ education and outreach programs are conducted in conjunction with local school systems, which generally provide their own interpreters. In the event interpreter services are not provided by the local school system, NASA HQ education and outreach officials will assess the need for LEP assistance. Their assessments will include but not be limited to: asking at the time of program initiation, checking websites or other sources, and reviewing metropolitan area demographics.

b. Translation of Written Materials

Translation is the replacement of a written text from one language (source language) into an equivalent written text in another language (target language). Each NASA Center will produce vital documents in languages other than English where there is significant number or percentage of LEP persons in the target audience(s) of the respective conducted programs and activities.

NASA HQ provides written translation services on a case-by-case basis as determined by each program/activity coordinator. Written materials may include but are not limited to paper and electronic documents such as:

- Consent forms
- Announcements of programs and/or activities (or discontinuation of programs and/or activities)
- Notices advising LEP persons of free language assistance
- Security or safety brochures for visitors to HQ facilities
- Applications to participate in a program or activity
- Websites
- Correspondence

Additionally, NASA’s webpage for educators has several Spanish language NASA sites at: http://www.nasa.gov/about/highlights/En_Espanol.html

Translation services are available to all HQ organizations. Costs are the responsibility of the organization requiring LEP resources for a program or activity. Use of the service is subject to availability of funding for the organization requesting the service. Use of this service has been primarily for correspondence/document translation services which do not fall under the jurisdiction of the Language Assistance Plan, which covers access to federally
conducted programs or activities. In the event that interpretation/translation costs significantly increase, those documents applicable to the LAP would be evaluated using the eight components described previously and a process for prioritizing documents that most benefit the public will be created. In addition, the HQ LEP Coordinator will ensure that the need for funding for such services is communicated to the Executive Director, and efforts are made to secure increased funding, as needed. Historically, HQ contact with LEP individuals has been minimal; however, should the frequency of LEP contacts increase, HQ should be prepared to identify, the following:

- The additional resources needed;
- a funding source; and
- the required steps to obtain additional funding resources

Contractor information and the NASA point of contact are listed in Appendix C.

5. **Notice of Availability of Free Language Service to LEP Persons**

HQ informs the target audiences of its conducted programs and activities, through oral or written notice in the relevant primary language, that free language assistance is available. Signage has been placed in key locations in the building, e.g. the Exchange Council Store, the Library and the Visitors’ Entrance; notifying visitors (in various languages) that free language assistance is available upon request. In addition, LEP brochures in English and Spanish, with appropriate contact information for assistance, are available in the West Lobby Security Post, the Library and in the EODM Information Kiosk. EODM will also disseminate the information via the HQ EEO website. Copies of the U.S. Census 2004 Language Identification Flashcards in 38 languages will be available at the Visitors Entrance located in the West Lobby to assist NASA HQ employees in identifying walk-in visitors’ language assistance requirements.

6. **Collaboration with LEP Communities and Other Stakeholders**

While organizations external to NASA that have significant contact with LEP persons, such as schools, religious organizations, community groups, and groups working with new immigrants can potentially be very helpful in linking LEP persons to the Agency’s programs and its language assistance services; at the HQ Center, annual assessments have not indicated significant contact with external LEP Communities and stakeholders.

7. **Training Staff on Policies and Procedures**

All HQ employees will receive annual written notice informing them of their obligation to provide meaningful access for LEP persons to HQ services, benefits, and activities. In addition, new employees are notified of the requirements of the program during New Employee Orientation and periodic briefings on the HQ LAP will be provided to senior staff.
In addition, HQ will provide annual training to appropriate program staff on the policies and procedures of its respective language assistance activities. Each directorate with potential access to LEP communities shall identify a Schreiber Technical Monitor (for a listing, see Appendix D). The HQ LEP Coordinator will provide LAP training annually. This training will include the Office of International and Interagency Relations and the Office of Protective Services communities; however, other staff that may potentially interact or communicate with LEP individuals will be included.

The annual training will include LEP policies and procedures, including the procedures for identifying the language needs of LEP individuals; procedures to arrange for interpretation/translation services; and how to monitor and track the use of HQ language assistance services.

HQ has identified a cadre of bilingual staff volunteers to assist unexpected visitors/telephone callers in gaining access to HQ programs and activities. These volunteers are only utilized to assist LEP with unofficial business for brief periods, e.g. 10 minutes or less. Assessment of services of services provided by bilingual staff volunteers indicates additional training is not deemed necessary.

8. Monitoring, Continuous Assessment, and Updating LEP Plans

EODM will conduct an annual assessment of ongoing programs for LEP potential and requirements and as necessary, update and modify the HQ LAP annually. Information gathered through the general public contact points during the previous year will be included in the annual assessment. The LEP Coordinator will conduct the annual assessment by obtaining and analyzing the Service Request Forms (NASA Form 1681) submitted to the contractor by the Point of Contacts (POCs). Information provided on these forms will be used to ascertain the frequency of requests that are applicable to the LAP and languages requested.

Each LAP program/activity has identified a POC for contracting interpreter/translation services. Using the POCs, each of the following HQ organizations should be assessed annually to determine if there has been any change in their need for LEP assistance: the Office of Communications, the Office of Education, the Office of Legislative and International Affairs, the Office of International and Interagency Relations, the Office of Small Business Programs; Human Resource Management Division, the Facilities and Administrative Services Division and the Library. All new programs should include an assessment for LEP potential as part of the development effort.

The annual assessment will take into consideration:
- LEP populations in the area or population affected or encountered;
- Frequency of encounters with LEP language groups;
- Nature and importance of activities to LEP persons;
- Availability of resources, including technological advances and sources of
additional resources and the costs imposed;
• Whether existing assistance is meeting the needs of LEP persons;
• Whether the staff is familiar with the LAP and its applications; and
• Whether identified sources for assistance are still available and viable.

This plan may also be modified as necessary based on input and feedback from ODEO and HQ key stakeholders, additional guidance from DOJ and other information received that the Agency views as critical to enhancing this Plan’s effectiveness.
II. APPENDIX A

OPERATING PROCEDURES FOR LANGUAGE ASSISTANCE REQUEST

Specific Procedures:

NASA HQ has the capacity to deal with requests for language assistance including both oral language assistance and translation of written material, technical documents and information, as well as non-technical documents such as general policy matters, public information, and social topics. Translators and interpreters shall translate and interpret to and from English technical documents and information which involve, as a minimum, the following disciplines: engineering, aeronautical science, micro-gravity, earth science and life sciences. Requests for language assistance can be initiated orally or in writing, or in any other format or medium that is convenient and practical for the LEP individual. During performance under task order, translation and interpretation services for completion of specific tasks may be required on a twenty-four hour basis.

The Office of International and Interagency Relations Resources Management Division manages the Agency-wide interpretation/translation service. The current NASA interpretation/translation service is provided through a contract with Schreiber Translations, Inc. (STI) to provide translation, interpretation. This contract provides a single channel for HQ organizations to access LEP services on an as-needed basis.

The HQ LEP Coordinator is responsible for administering the HQ Language Assistance Plan (LAP). Due to the highly specialized nature and breadth of the various work products and activities performed by various HQ organizations, each organization will be responsible for determining whether to grant a request for LEP assistance. The LEP Coordinator located in the Equal Opportunity and Diversity Management Division functions as the HQ resource person for the LAP, and will be available for consultation to ensure the organization considers and responds to LEP requests in accordance with the HQ LAP.

Organizational POCs, e.g. STI Technical Monitors, will utilize Service Request Form, NASA Form 1681 (see Appendix B), to procure a translated program or activity document in languages other than English. Translation/interpretation costs will be the responsibility of the organization requesting the service. In order to access these services, the STI Technical Monitors will need to provide the Office of International and Interagency Relations with a purchase request out of their organization’s funding, prior to submitting the Service Request Form. After

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4 The nature and importance of the program or activity to people’s lives should be considered.

5 HQ individuals responsible for submitting translation/interpretation service requests to the contractor.
providing the funding information, the Technical Monitor should submit the Service Request Form directly to the contracted interpreter/translations services provider, Schreiber Translations, Inc. (STI).

The Contractor will ordinarily be issued a written task order at least five working days in advance of the need of services by NASA HQ. However, for the primary languages OIIR may place verbal task orders with as little as four (4) hours’ notice. Oral task orders will most frequently be for written translation services. The contractor shall be able to receive and deliver documents by hard copy, electronic mail, on diskette in the standard, current word processor format, and by facsimile.

HQ will arrange for the provision of oral language assistance to LEP persons in both face-to-face and telephone encounters in its conducted programs and activities where such assistance is requested and/or anticipated. The contract can be used to provide on-site interpreting services when requests made 48 hours in advance. If previously unidentified, language identification cards (or “I speak cards”) can be used to identify the language of communication and are available for download at http://www.usdoj.gov/crt/cor/13166.htm. (Appendix E) Once the language is determined the telephonic interpreter contractor will be contacted and in conjunction with HQ staff to determine how to address the visitor’s requirements.

Unscheduled walk-ins or phone calls can be addressed via the contract telephone translation service without advance notice. HQ organizations also have the option to utilize volunteer interpreters for unofficial business⁶ for brief periods of time (generally defined as 10 minutes or less).

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⁶ Professional interpretation services must be used for all official business. (Interpretation and translation services for official international agreements for final signature will be provided by the State Department on a reimbursable basis.)
IV. APPENDIX B

SERVICE REQUEST FORM, NASA FORM 1681
Service Request Form

POINT OF CONTACT | PHONE NUMBER | E-MAIL ADDRESS | FAX NUMBER

BRIEF DESCRIPTION OF PROJECT/MEETING (Attach additional page, if needed)

DATES SERVICE NEEDED
BEGIN: ___________________ END: ___________________

LANGUAGE
FROM: ___________________ TO: ___________________

LOCATION (Country) WHERE SERVICE IS NEEDED

TYPE OF SERVICE NEEDED

☐ 1. INTERPRETATION
   ESTIMATED NUMBER OF HOURS: ______
   REQUIREMENTS:
   (Attach additional page, if needed)

☐ 2. TRANSLATION
   ESTIMATED NUMBER OF WORDS: ______

☐ 3. LOGISTICAL, ADMINISTRATIVE, CLERICAL, AND IN-COUNTRY TRANSPORTATION SUPPORT (Continued)
   REQUIREMENTS:
   (Attach additional page, if needed)

☐ CLERICAL
   ESTIMATED NUMBER OF HOURS: ______

☐ ADMINISTRATIVE
   ESTIMATED NUMBER OF HOURS: ______

☐ TRANSPORTATION SUPPORT
   REQUIREMENTS:
   (Attach additional page, if needed)

TECHNICAL MONITOR'S TYPED NAME, SIGNATURE, AND DATE

NASA FORM 1681 JUL 05 PREVIOUS EDITIONS ARE OBSOLETE.
V. APPENDIX C

INTERPRETER/TRANSLATION SERVICES PROVIDER CONTACT INFORMATION

Schreiber Translations, Inc.
51 Monroe Street, Suite 101
Rockville, MD 20850

Telephone: 301.424.7737
FAX: 301.424.2336
Email: translation@schreibernet.com

PRIMARY SUPPORT:
Contractor Representative – April Bukoski, x135

NASA HQ Point of Contact:

DeVon Fleming
Director, Resources Management Division
Office of International and Interagency Relations
Phone: 202-358-1622
FAX: 202-358-4329
**VI. APPENDIX D**

HEADQUARTERS ORGANIZATION POINTS OF CONTACT (August 2011)

**OFFICE OF INTERNATIONAL AND INTERAGENCY RELATIONS SCHREIBER**

**TECHNICAL MONITORS**

**TA000 OER Front Office**

<table>
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<tbody>
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<td>Alexander, Tina</td>
<td>358-0418</td>
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<tr>
<td>Spencer, Bridgette</td>
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**TB000 Resources Management Division**

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<tr>
<td>Devon Fleming, Director</td>
<td>358-1622</td>
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<td>Carter, Kim</td>
<td>358-1387</td>
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<td>Shephard, Patricia</td>
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**TD000 Advisory Committee Management Division**

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<tr>
<td>P. Diane Rausch, Director</td>
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<td>Burch, Susan</td>
<td>358-0550</td>
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<tr>
<td>Jones, Brenda</td>
<td>358-3636</td>
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<td>King, Marla</td>
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**TE000 Space Operations Division**

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<td>358-1703</td>
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<tr>
<td>Blackberry:</td>
<td>202 213-4621</td>
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<tr>
<td>Bowie, Monica</td>
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**TF000 Exploration Systems and Aeronautics Research Division**

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<tr>
<td>Kent Bress, Director</td>
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<td>Copeland, Sherry</td>
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**TG000 Science Division**

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<tr>
<td>Karen Feldstein, Director</td>
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Dove, Judy    358-4634

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Chief of Staff

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VII: APPENDIX E

U.S. CENSUS 2010 LANGUAGE IDENTIFICATION FLASHCARD
Mark this box if you read or speak English.