

# **U.S. Railroad Retirement Board's Plan to Improve Service to Individuals with Limited English Proficiency**

*(Adopted in compliance with Executive Order 13166)*

## **Profile of the Railroad Retirement Board**

The Railroad Retirement Board (RRB) is an independent agency in the executive branch of the Federal Government charged with administering retirement, survivor, disability, unemployment and sickness insurance benefit programs for the nation's railroad workers and their families under the Railroad Retirement Act (45 U.S.C. § 231 et seq.) and the Railroad Unemployment Insurance Act (45 U.S.C. § 351 et seq.). The agency was created by legislation enacted in the mid-1930's. Rail unemployment insurance legislation followed at the end of the decade because of administrative problems that interstate rail employment caused the new State unemployment insurance plans.

The RRB is headed by a three-member Board appointed by the President with the advice and consent of the Senate. One member of the Board is appointed upon the recommendation of railroad labor organizations and another is appointed upon the recommendation of railroad employers. The third Board member serves as Chairman of the Board, without recommendation by either labor or management. The agency employs approximately 900 full-time equivalent employees who work in its Chicago headquarters and in over 50 field offices throughout the country.

## **Railroad Retirement Board Mission Statement**

The RRB's mission is to administer retirement/survivor and unemployment/sickness insurance benefit programs for railroad workers and their families under the Railroad Retirement Act and the Railroad Unemployment Insurance Act. These programs provide income protection during old age and in the event of disability, death or temporary unemployment and sickness. The RRB also administers aspects of the Medicare program and has administrative responsibilities under the Social Security Act and the Internal Revenue Code.

In carrying out its mission, the RRB will pay benefits to the right people, in the right amounts, in a timely manner, and will take appropriate action to safeguard our customers' trust funds. The RRB will treat every person who comes into contact with the agency with courtesy and concern, and respond to all inquiries promptly, accurately and clearly.

## **Limited English Proficiency (LEP) Contacts**

The RRB currently has over 50 field offices which serve as the initial point of contact for the RRB's customers in requesting benefits or information. Field offices provide customer service in a variety of ways, including personal office visits, telephone calls, and personal visits at customer outreach program service locations.

## Profile of RRB Customers

- **Description of General Population.** The RRB is unique among Federal agencies in that it provides benefits and services to a single industry. The RRB's primary customers are the employees and employers of the rail industry. The customers include currently active employees, employees who have retired on the basis of age or disability, and employees who are temporarily not working due to layoffs, injuries or illness. In addition, the RRB's customers include the family members of retired and deceased railroad employees.
- **Profile of LEP Population.** As with the general population, the LEP population served by the RRB is comprised of employees and their family members. Overall, the number of LEP customers served by the RRB is extremely limited due to a critical need for proficiency in the English language in the performance of most work in the railroad industry. However, there exists a number of jobs that can be performed by employees with LEP. These employees may also be illiterate or only marginally literate in their native language. LEP family members served by the RRB include dependents and survivors of both LEP employees and employees proficient in the English language. More frequently than not, the LEP family members tend to be older individuals, or individuals who have been in the United States for only a short period of time.
- **Frequency of LEP Contacts.** Field offices had a wide range of contacts with LEP individuals, from zero contacts to as many as 6,000 annually. About 60 percent of field offices have fewer than 20 LEP contacts per year, with 13 of 53 reporting none. However, most of the remaining field offices have between 20 and 100 contacts per year. Five offices reported more than 100 contacts per year. By far, the two offices with the most LEP contacts are located in Covina, California, and Fort Worth, Texas. Covina reports almost 1,900 contacts, while Fort Worth has about 6,000, although many of the individuals served by the Fort Worth office do understand some English. In any event, the overall volume of LEP contacts in the vast majority of the RRB's 53 field offices is very limited.
- **Scope of Languages.** The predominant language spoken by the RRB's LEP customers is reported as Spanish. However, a myriad of additional languages is encountered regionally. These languages include Vietnamese, French, German, Chinese, Italian, Greek, Russian, and Korean. Five offices in the western part of the country also report several LEP contacts from customers who speak Navajo.

## Resources Available to LEP Customers

Since its inception, the RRB has always strived to provide superior service to all of its customers. This is reflected in the agency's mission statement. Presently, a variety of resources exists to assist LEP individuals. The RRB's field office staff is its greatest strength in the service provided to all of its customers, including LEP individuals. It is not uncommon for a railroad employee to have contact with only one field office from the time he or she begins working in

the railroad industry until long after his or her retirement. As a result, a sincere desire to provide their clientele with superior service is repeatedly demonstrated by field personnel.

**Bilingual Claims Representatives.** Approximately 40 percent of the RRB's field offices have at least one individual on staff who is able to translate for LEP customers. Those offices that do not have a bilingual staff member enlist the assistance of a bilingual RRB employee from another office when necessary. In addition, many offices report that the majority of the LEP population they serve appears to be more limited in their ability to speak and read English than in their ability to understand English. In those instances, issues are frequently resolved by a combined effort on the part of the RRB representative and the LEP customer, taking time to work through the communication limitations.

**Written Materials.** The RRB does not publish any written material in any languages other than English or Spanish. The literate Spanish-speaking LEP population is accommodated by the RRB through the publication of five documents. These documents include application receipt forms for individuals who have filed applications for an employee or a spouse annuity under the Railroad Retirement Act, a pocket guide to railroad retirement and survivor benefits (Form RB-4A), and handbooks covering unemployment and sickness benefits payable under the Railroad Unemployment Insurance Act (Forms UB-10S and UB-11S, respectively). In addition to the agency publications available in Spanish, correspondence is occasionally customized for an LEP individual in his or her native language. Such letters are unique to the individual circumstances and are usually drafted by a bilingual field representative, though on rare occasions translation services have been used to prepare a letter in a foreign language.

**Technological Resources.** The RRB's website includes a page entitled "Publicaciones en Español." This page lists three RRB forms available in Spanish. This page also displays a link to the Social Security Administration's "Glosario de Terminología del Seguro Social," an English-Spanish glossary of social security terminology. Due to the similarity of the responsibilities of the RRB and the Social Security Administration, much of the terminology applicable to social security benefits is also applicable to benefits paid by the RRB. In addition, the RRB's website will include a link to the Centers for Medicare & Medicaid Services web page that provides Medicare-related documents in Spanish, Chinese, Korean, Russian and Vietnamese. This link will be included in the Medicare sections on the RRB website under "Benefit Forms & Publications" and "General Benefit Information," both of which are under the "Beneficiaries & RR Employees" tab on the home page.

**Resources Outside of the RRB.** When a bilingual RRB representative is not available to assist an LEP individual, the RRB has utilized a variety of resources. The most frequently used resource is a family member or friend who is fluent in English. Bilingual labor union representatives will sometimes accompany an LEP individual and, on occasion, assistance has been provided by bilingual individuals in neighboring offices who have no connection with either the RRB or the LEP customer. When conducting hearings with LEP individuals, the services of court-certified interpreters are employed by the RRB's hearings officers.

## **LEP Working Group**

The agency has selected RRB personnel to serve on a working group to evaluate and monitor LEP service performed by the RRB. The goal of the working group is to insure that LEP individuals can meaningfully access services needed to receive benefits paid by the RRB. The responsibilities of the LEP working group include reporting to the agency regarding the activities noted below.

- Study LEP Service
- Identify Critical Insufficiencies
- Evaluate Suggested Improvements
- Implement Economical Suggestions
- Prioritize Suggested Improvements

## **Economical Solutions**

Because of the limited number of LEP customers served by the RRB, the extent of improvements which may be performed while still allowing the RRB to carry out its mission is limited. However, improvements that have been identified which would require minimal use of resources, yet could provide significant improvement to services received by LEP individuals, will be implemented.

**LEP Contact Listing.** All RRB employees have been surveyed to identify bilingual personnel who are willing and able to serve as interpreters. A list of these individuals, categorized by language, has been provided to the field offices for use as a resource tool when dealing with an LEP individual. The contact listing will be published on the RRB's intranet to allow for easy access by both field and headquarters personnel. Field representatives should rely primarily on the services of an RRB headquarters employee for interpreter services if no field representative is available; a small number of offices utilizes bilingual staff in other government agencies or security staff for the building. RRB employees performing interpreter services should interpret using a conversational style, at the same time remaining cognizant that they are interpreting, not conversing with the LEP individuals. Caution must be taken not to overburden bilingual RRB employees whose job responsibilities do not require providing interpreting services.

**Spanish Publications.** The Spanish documents published by the RRB are revised on a regular basis to incorporate changes made to the corresponding English version of the form. Any future revisions to forms should be incorporated in both the English and Spanish versions.

**Links to Additional Resources.** The LEP working group will explore adding links to the agency's "Publicaciones en Español" page for appropriate sites with documents in Spanish, as well as other languages, that provide complementary or useful information for the RRB's LEP customers. An example of this is the Centers for Medicare & Medicaid Services page that provides Medicare-related information in Spanish and some other languages. In addition, the working group will investigate providing added

visibility for these resources, including the possibility of adding a link on the agency's home page.

### **Areas of Consideration**

The LEP working group will attempt to identify ways to improve the RRB's service to LEP individuals by reviewing and updating this plan on an annual basis without adversely impacting the agency's ability to accomplish its mission.

### **Conclusion**

In general, the RRB's contact with individuals who are LEP is limited in volume and in locale. Approximately 25 percent of the RRB's field offices report no contact with LEP individuals and only about 10 percent of field offices has more than 100 LEP contacts per year. The offices reporting the most LEP contacts all have access to bilingual RRB employees to assist LEP individuals. Through the use of bilingual employees, the assistance of family members and friends of LEP individuals, and the willingness to provide excellent customer service despite any impediments to effective communication, RRB field personnel believe they are usually able to fully satisfy the needs of the LEP population served by the RRB.