



U.S. General Services Administration (GSA)

GSA Order: Language Services Policy

OCR 2335.1B

Office of Civil Rights

civilrights@gsa.gov

Purpose:

This order establishes the U.S. General Services Administration's ("GSA" or "Agency") Language Services Policy (LSP) for providing language services for individuals who are Deaf or Hard of Hearing (D/HOH) or who are limited English proficient (LEP). This LSP formally rescinds and supersedes GSA's May 3, 2024, Language Access Plan (LAP), which was based on Executive Order (EO) 13166. EO 13166 has been revoked by [EO 14224, *Designating English as the Official Language of the United States*](#). The LSP reflects GSA's obligations under EO 14224, guidance from the U.S. Department of Justice ("DOJ")¹, and GSA's continuing legal obligations under Sections 504 and 508 of the Rehabilitation Act of 1973 (the "Rehabilitation Act").

Background:

GSA provides language services consistent with EO 14224. EO 14224 establishes English as the official language of the United States and directs agencies to phase out unnecessary multilingual services. GSA will continue to provide services required by law, particularly for individuals who are D/HOH under Sections 504 and 508 of the Rehabilitation Act, while limiting services for individuals who are LEP to mission-critical circumstances (e.g., signage, public notices, program information, emergency and safety information.)

Applicability:

This order applies to all GSA employees with the following exception:

The Office of Inspector General, due to its independence under the Inspector General Reform Act of 2008 (Title 5 United States Code Sections 401-424).

¹ DOJ Memorandum for All Federal Agencies: [Implementation of Executive Order No. 14224: Designating English as the Official Language of the United States of America \(July 14, 2025\)](#); DOJ, [Memorandum for All Federal Agencies: Guidance for Recipients of Federal Funding Regarding Unlawful Discrimination \(July 29, 2025\)](#).

Cancellation:

This order cancels and supersedes both GSA Order OCR 2335.1A and GSA's May 3, 2024 LAP developed under EO 13166. The LAP is rescinded and is no longer in effect.

Summary of Changes:

This LSP:

- Rescinds the prior LAP under EO 13166.
- Clarifies that Title VI of the Civil Rights Act of 1964 (Title VI) does not require GSA to provide a broad range of language access services in its federally conducted programs for individuals who are LEP.
- Clarifies that Title VI applies to recipients of federal financial assistance through GSA.
- Confirms obligations to provide services for individuals who are D/HOH under Sections 504 and 508 of the Rehabilitation Act remain mandatory.
- Limits language access services for LEP individuals to mission-critical circumstances (e.g., signage [no loitering, emergency exit, no smoking signs] in GSA-controlled facilities, and certain press releases and transactions).

Roles and Responsibilities:

The Office of Civil Rights (OCR) is responsible for planning, developing, coordinating, and administering GSA's nationwide civil rights programs, including language services.

1. OCR is responsible for:
 - a. Leading the development and implementation of the LSP.
 - b. Providing guidance to internal stakeholders and recipients of Federal financial assistance (FFA) through GSA.
 - c. Establishing policies and procedures to ensure compliance with EO 14224, DOJ Implementation Guidance and GSA's operational direction.
2. OCR's External Programs Branch (EPB) is responsible for ensuring that GSA's financially assisted programs, services, and activities comply with applicable federal civil rights laws. EPB also leads the implementation of the Agency's LSP by:
 - a. Developing internal resources and training on language services.
 - b. Overseeing contracted language services.
 - c. Supporting GSA's offices in meeting language services needs.
 - d. Coordinating with DOJ and other federal agencies on language services matters.
 - e. Serving as the Agency's Language Services Coordinator.

3. All GSA employees and organizations that receive FFA through GSA are required to comply with this order.

Signature:

/S/ _____
Aluanda R. Drain
Associate Administrator
Office of Civil Rights

September 17, 2025
Date

GSA Language Services Policy

Table of Contents

1. General Language Services Policy	5
1.1 Generally Applicable Statutes	5
1.1.1 The Rehabilitation Act Section 504:	5
1.1.2 The Rehabilitation Act Section 508:	5
1.1.3 Title VI	6
1.2 GSA's Regulations and Guidance	6
1.2.1 Title 41 Code of Federal Regulations (C.F.R.) Subpart 101-6.2	6
1.2.2 Title 41 C.F.R. Subpart 101-8.3	6
1.2.3 GSA Guidance for Recipients of FFA	6
1.3 Scope of Policy	6
1.4 Definitions	7
2. Language Services Implementation Strategy	7
2.1. General	7
2.2 Agency-wide and Interagency Cooperation	7
2.3 Language Services for D/HOH Individuals	7
2.3.1 Communication Methods	7
2.3.1.1 Sign Language Interpreters	8
2.3.1.2 Assistive Technology	8
2.3.1.3 Assisted Listening Systems	8
2.3.1.4 Communication Devices	8
2.3.1.5 Screen Readers and Accessible Software	9
2.3.1.6 Speech-to-Text Tools and Augmentative and Alternative Communication	9
2.3.1.7 Accessibility in Electronic and Digital Content (Sec. 508 Focus)	9
2.3.2 Guidelines and Best Practices for Providing Accessible Communication	9
2.4. Permissible Language Services for LEP Individuals	10
2.4.1. Interpretation	10
2.4.2 Translation of Vital Documents	11
2.5 Procedures for Requesting and Providing D/HOH and LEP Services	11
2.6 Technology Considerations and Tools for Language Translation and Interpretation	11
2.6.1 D/HOH Services	11
2.6.2 LEP Services	11
2.7 Quality Assurance	11
2.8 Training	12
2.8.1 General Training	12
2.8.2 Targeted Training for High-Impact Roles	12
2.8.3. Training Materials and Updates	12
3. Contacting OCR for Language Services and Assistance	12
Appendix	13

1. General Language Services Policy

It is GSA's policy to provide individuals who are Deaf or Hard of Hearing (D/HOH)² with the auxiliary aids and services necessary to ensure effective communication in federally conducted programs, services, and activities, as required by Sections 504 and 508 of the Rehabilitation Act.

By contrast, language services for individuals who are limited English proficient (LEP) are not mandatory in federally conducted programs. GSA may provide such services only when they are mission-critical to Agency operations or legally necessary, consistent with Executive Order (EO) 14224, [Designating English as the Official Language of the United States](#).

Recipients of Federal Financial Assistance (FFA) through GSA (hereinafter "Recipients," as defined in the Appendix) remain subject to Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on national origin. These obligations are addressed in Section 1.1.3 of this directive.

Because these obligations arise under different statutes, this LSP treats them separately. Services for individuals who are D/HOH are mandatory under Sections 504 and 508 of the Rehabilitation Act, while services for individuals who are LEP are limited and discretionary under EO 14224. For implementation details, see Section 2.3 (D/HOH) and Section 2.4 (LEP).

1.1 Generally Applicable Statutes

The following statutes establish GSA's obligations to provide language services and ensure effective communication in its programs and activities, as well as to ensure compliance by Recipients.

1.1.1 [The Rehabilitation Act Section 504](#):

Section 504 prohibits discrimination based on disability in GSA programs and activities and in programs or activities receiving FFA. It requires GSA to provide auxiliary aids and services where necessary to ensure effective communication with individuals who are D/HOH. It also requires Recipients to provide individuals with disabilities equal access to their programs, services, and activities, including reasonable accommodations when necessary.

1.1.2 [The Rehabilitation Act Section 508](#):

Section 508 requires federal agencies, including GSA, to ensure that individuals with disabilities, including those who are D/HOH, have comparable access to information and communication technology (ICT) used in programs and activities. This includes websites, electronic documents, and software applications developed, procured, maintained, or used by GSA.

² National Association of the Deaf, [Community and Culture – Frequently Asked Questions -What is the difference between a person who is "deaf," "Deaf," or "hard of hearing"?](#)

Section 508 applies directly to federal agencies, not to Recipients. However, GSA may require Recipients to meet accessibility standards in ICT that provided by or funded through GSA programs.

1.1.3 [Title VI](#)

Title VI prohibits discrimination based on race, color, or national origin in programs and activities receiving FFA. Recipients of GSA-administered FFA programs, such as the Federal Surplus Personal Property Donation Program and the Public Benefit Conveyance Program, must comply with Title VI.

Consistent with the U.S. Department of Justice's (DOJ) implementation Guidance for EO 14224, Title VI does not impose a broad or generalized obligation on Recipients to provide multilingual services. Recipients may offer LEP assistance, but prior guidance premised on EO 13166 has been withdrawn.

1.2 GSA's Regulations and Guidance

GSA implements federal requirements on language access through its own regulations and internal guidance. These authorities ensure that GSA's programs and activities comply with applicable civil rights laws and executive directives.

1.2.1 [Title 41 Code of Federal Regulations \(C.F.R.\) Subpart 101-6.2](#)

Implements GSA's policy prohibiting discrimination based on race, color, or national origin in programs that receive FFA through GSA and effectuates Title VI.

1.2.2 [Title 41 C.F.R. Subpart 101-8.3](#)

Implements Section 504 by prohibiting discrimination based on disability in programs and activities that receive FFA through GSA.

1.2.3 [GSA Guidance for Recipients of FFA](#)

GSA issued guidance on July 23, 2003, clarifying Recipient responsibilities under federal civil rights laws. GSA is reviewing this guidance to align with DOJ's implementation Guidance for EO 14224. To the extent earlier materials relied on EO 13166 or suggested broad LEP translation duties, those provisions are rescinded. Updated Recipient guidance will be issued after DOJ finalizes its government-wide updates and implementation guidance.

1.3 Scope of Policy

This LSP establishes GSA's policy on language services. It guides Agency staff in meeting obligations under federal civil rights laws and provides direction to Recipients.

The LSP is intended for internal Agency management and guidance only. It does not create rights or benefits enforceable at law or in equity by any party against the

United States, its agencies, officers, employees, or other persons. Accordingly, the contents of this LSP shall not be cited in any judicial or administrative proceeding. The directive applies to GSA's federally conducted programs and activities and provides guidance for Recipients; it does not govern workplace language services for GSA employees.

1.4 Definitions

Definitions for terms used in this LSP are provided in the [Appendix](#). For clarity, the term "Language Services" is used in this LSP means:

- Mandatory services for D/HOH under Sections 504 and 508 of the Rehabilitation Act, and
- Services for individuals who are LEP needed for Agency mission-critical responsibilities consistent with EO 14224.

2. Language Services Implementation Strategy

2.1. General

The Office of Civil Rights (OCR) serves as the agency's resource for language services, providing guidance and support to program offices that interact with external stakeholders requiring language assistance. Employees should contact OCR for questions regarding interpretation, translation, or D/HOH accommodations.

2.2 Agency-wide and Interagency Cooperation

GSA may collaborate with other federal agencies to improve efficiency in providing services in the following ways:

- For D/HOH services, an interagency agreement may be used to ensure coverage and quality
- For LEP services, collaboration will be considered only where mission-critical needs align with EO 14224

2.3 Language Services for D/HOH Individuals

The following requirements apply to both GSA and Recipients, unless otherwise specified.

2.3.1 Communication Methods

GSA and Recipients must ensure effective communication with individuals who are D/HOH by providing appropriate auxiliary aids and services. The following are aids and services that can be provided, as appropriate and effective in a particular situation:

2.3.1.1 Sign Language Interpreters

Sign language interpreters ensure effective communication between individuals who use sign language and those who do not. Interpreters may be provided in person or remotely, depending on the setting and the need.

- **On-site Interpreters:** For in-person events, public meetings, or individual appointments
- **Video Remote Interpreting (VRI):** For virtual or hybrid meetings and emergencies when in-person interpreters are not feasible
- **Qualified Interpreters:** Must be certified and able to interpret effectively, accurately, and impartially

2.3.1.2 Assistive Technology

Assistive technology provides alternative methods to access spoken communication, including captioning and transcription services. These options support full participation in meetings, events and video programming.

- **Closed Captioning:** Required for all prerecorded and live video produced or sponsored by GSA; Recipients must ensure comparable access in materials they produce
- **Open Captioning:** Used when closed captioning is not feasible or would not provide comparable access (e.g., public events, presentations, or large display screens)
- **Real Time Transcription (Communication Access Realtime Translation (CART) or equivalent):** For live events, meetings, or training sessions
- **Written Transcripts:** Required for audio-only media and available upon request for video programming

2.3.1.3 Assisted Listening Systems

Assisted listening systems ensure effective communication for D/HOH individuals in public spaces and meeting rooms. Acceptable systems include:

- [Infrared systems](#),
- [Frequency Modulation Systems](#),
- [Hearing loops](#)

These systems help amplify sound and reduce background noise, allowing individuals with hearing loss to fully participate in programs, services, and activities.

2.3.1.4 Communication Devices

Communication devices are essential for ensuring that D/HOH individuals can effectively communicate with GSA staff and participate in programs and services. Examples include:

- **TTY/TDD Devices:** Text telephone for individuals with hearing or speech impairments
- **Videophones:** For users of sign language
- **Relay Services:** Telephone relay service (TRS) or video relay service (VRS) to connect callers through an interpreter

These devices expand communication access by providing alternatives to traditional voice telephones.

2.3.1.5 Screen Readers and Accessible Software

Screen readers and accessibility-focused software ensure that individuals with vision impairments or other disabilities can fully access digital materials. GSA programs and services, as well as materials produced by Recipients, must be designed to work effectively with these tools.

- **Digital Content Compatibility:** Digital materials (e.g., PDFs, web pages, software) must be compatible with screen readers
- **Accessibility Practices:** Content must incorporate features such as descriptive alt text, proper heading structure, and keyboard navigation

2.3.1.6 Speech-to-Text Tools and Augmentative and Alternative Communication

Speech-to-text tools and augmentative and alternative communication (ACC) technologies provide alternative methods of communication for individuals who may have difficulty with spoken or written language. These tools ensure effective participation in GSA programs and services, as well as those offered by Recipients.

- **Speech-to-Text Tools:** Convert spoken language into written text to support communication in real time.
- **ACC Devices and Applications:** Include a range of technologies (e.g., text-to-speech devices, communication boards, and mobile applications) that supplement or replace speech for nonverbal individuals.

2.3.1.7 Accessibility in Electronic and Digital Content (Sec. 508 Focus)

- All digital and electronic content, such as websites, e-learning modules, and electronic documents) produced by GSA must comply with Section 508 standards. The [Web Content Accessibility Guidelines](#).
- ICT must support alternative input methods and be navigable without a mouse.
- Forms must be accessible, with labeled fields and error messaging readable by assistive technology.

2.3.2 Guidelines and Best Practices for Providing Accessible Communication

Guidelines:

Services and aids for D/HOH individuals must be:

- **Equal in Access** - Must be as effective for D/HOH individuals as for hearing individuals
- **Individualized** – Based on the preferred communication method of the individual (not one-size-fits-all)
- **Timely** – Provided promptly to avoid delays in participation
- **Free of Charge** – No cost to the individual

Best Practices:

- **Real-time Captioning (CART):** Prioritize providing accurate real-time captioning for live events to ensure effective communication with D/HOH persons
- **Closed Captions:** Ensure all video content includes synchronized, high-quality closed captions covering all spoken content
- **Written Supplements:** Supplement oral communication with written notes or summaries
- **Plain Language & Accessible Formatting:** Use plain language with accessible formatting (e.g., large fonts and high contrast) in written materials.
- **Additional Best Practices:** For additional best practices, including information on assistive listening systems and Video Remote Interpreting (VRI) standards.

2.4. Permissible Language Services for Individuals Who are LEP

EO 14224 rescinded EO 13166. As a result, GSA is no longer obligated to provide a broad range of language access services for individuals who are LEP. Services may be provided only in limited, mission-critical circumstances, such as:

- Public signage at GSA-controlled facilities where English-only signage would pose safety or access barriers.
- Press releases or advisories necessary for public health, safety or access to GSA services.
- Transactions with non-English speaking property owners (e.g., easements or acquisitions).

Any translated documents must be translated accurately and state that English is the official language of the United States and that the English version is the authoritative version of all federal information.

2.4.1. Interpretation

OCR may coordinate spoken language interpretation when necessary to carry out mission-critical activities.

2.4.2 Translation of Vital Documents

SSOs should contact OCR for the translation of written documents that are essential to GSA's mission or operations. All translated documents will carry the required English-language disclaimer.³

2.5 Procedures for Requesting and Providing D/HOH and LEP Services

Services and Staff Offices (SSOs) should direct all requests for D/HOH or LEP services to OCR at civilrights@gsa.gov. OCR will coordinate with approved vendors. Information on available services and resources is available on the OCR Civil Rights Program web page.

2.6 Technology Considerations and Tools for Language Translation and Interpretation

Technology may improve efficiency but must be applied responsibly. To maximize cost efficiency, GSA will leverage technology applications, including:

- Artificial Intelligence and machine translation tools for computer-generated translation, subject to human validation to ensure accuracy.
- Computer-aided translation tools that capture human-certified translations to improve machine-generated translation accuracy.
- Virtual (video) and remote (audio/text) interpretation, enabling qualified interpreters to provide services efficiently from remote locations.
- CART (See Sec. 2.3.2, above).

2.6.1 D/HOH Services

- D/HOH Services: Tools such as real-time captioning, video relay, and screen readers may be appropriate.

2.6.2 LEP Services

- LEP Services: Remote interpretation, translation memory, or machine translation may be used when mission-critical and accompanied by qualified human review.

OCR will evaluate new technologies for accuracy, privacy, security, and compliance.

2.7 Quality Assurance

OCR will periodically review language services for compliance with legal requirements and effectiveness. SSOs should avoid relying on unqualified individuals (such as family members or coworkers) to provide interpretation or translation.

³ See July 14, 2025, DOJ Memorandum Implementation of E.O. 14224, above.

2.8 Training

Training is essential to ensure that GSA employees understand their responsibilities for providing language services. Upon request, OCR will coordinate training opportunities and resources for staff, with an emphasis on ensuring effectiveness, consistency, compliance, and efficiency.

2.8.1 General Training

All staff will receive periodic training on:

- Requirements for D/HOH services
- Scope of permissible LEP services
- Procedures for requesting services through OCR.
- Use of technology, including the requirement for human oversight

2.8.2 Targeted Training for High-Impact Roles

Staff in high-impact roles (e.g., public-facing positions, contracting officers, program managers) may receive additional training focused on:

- Identifying when language services are legally required and/or mission-critical
- Ensuring communication is accurate, timely, and accessible
- Avoiding reliance on unqualified individuals

2.8.3. Training Materials and Updates

OCR will maintain training materials, job aids, and guidance documents. Updates will reflect changes in the law, technology, or Agency practice.

3. Contacting OCR for Language Services and Assistance

OCR is the primary point of contact for questions or assistance regarding the Agency's LSP.

- Email: civilrights@gsa.gov
- Phone: (202) 501-0767

Complaints and Feedback

Complaints and feedback about language services in GSA's programs, services, and activities may be submitted in any language to OCR. For more information about filing a complaint, email civilrights@gsa.gov.

Appendix

Definitions

Below are terms used in the LSP and other helpful terms commonly used in the provision of language services.

American Sign Language (ASL): A complete, natural language that uses hand shapes, facial expressions, body movements, and gestures, primarily used by individuals who are D/HOH in the United States and parts of Canada.

Augmentative and Alternative Communication (AAC): Devices or methods that supplement or replace speech (e.g., text-to-speech devices, communication boards, mobile apps.)

Communication Access Realtime Translation (CART): Near-real-time captioning of spoken language.

Deaf/Hard of Hearing (D/HOH):

- Deaf individuals have profound hearing loss, often use sign language, and may have limited English proficiency. They may not be proficient in ASL or any other recognized sign language.
- Hard of hearing individuals have mild to severe hearing loss and usually communicate through spoken language, often with hearing aids or captioning.

Direct “In-Language” Communication: Monolingual communication in a language other than English between a multilingual staff and individuals who are LEP (e.g., Korean-to-Korean).

External Stakeholder: A member of the public or organization seeking access to GSA’s programs, services, or activities.

Federal Financial Assistance: Includes grants, loans, donations of property, detail of federal personnel, below-market leases, or other federal agreements intended to provide assistance. See Title 28 C.F.R. Sec. 42.102(c).

Interpretation: Oral rendering of speech from one language (the source) into another (the target language).

Language Services: For purposes of this LSP, “Language Services” means

(a) mandatory services for D/HOH under Sections 504 and 508 of the Rehabilitation Act; and

(b) services for individuals who are LEP needed for Agency mission-critical responsibilities consistent with EO 14224.

Limited English Proficient or Proficiency (LEP): An individual whose primary language is not English and who has limited ability to read, write, speak, or understand English in

a manner that permits effective communication.

Primary Language: The language in which an individual communicates most effectively.

Qualified Interpreter: A bilingual/multilingual person with appropriate training and experience to render spoken, written, or signed messages accurately and impartially. Children and family members should not serve as interpreters, except in emergencies when a qualified interpreter is unavailable. Unqualified employees may not serve as interpreters.

Recipient: Any State, political subdivision, public or private agency, institution, organization, or other entity, or any person, to whom GSA extends FFA. See Title 28 C.F.R. Sec. 42.102(f).

Service and Staff Offices (SSOs): GSA organizational units responsible for executing programs, services, or activities described in this LSP.

Sight Translation: Oral or signed rendering of written text into spoken or signed language by an interpreter without change in meaning.

Translation: Converting written text in one language into another.

Resources

[OCR Library](#)