

# Establishing, Implementing, and Maintaining a Language Access Program

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*Presented by*

Nancy Rodriguez

Meghan Ballard

*We would like to thank SJC Network participants for sharing their expertise and advice with the research team. As of today, the SJC Network includes locations in the Northeast (Allegheny County, PA; Baltimore City, MD; Camden County, NJ; Cumberland County, ME; Middlesex County, MA; New York, NY; Norfolk County, MA; Philadelphia, PA; State of Connecticut State of Delaware), Southeast (Broward County, FL; Buncombe County, NC; Campbell County, TN; Charleston County, SC; City of Atlanta, GA; Durham County, NC; East Baton Rouge Parish, LA; Gwinnett County, GA; Mecklenburg County, NC; New Orleans, LA; Palm Beach County, FL; Shelby County, TN), Southwest (Bernalillo County, NM; Harris County, TX; Pima County, AZ; San Juan County, NM; Texas Health and Human Services, TX; Tulsa County, OK; West Texas Centers, TX), Midwest (City of St. Louis, MO; Cook County, IL; Dane County, WI; Eau Claire County, WI; Franklin County, OH; Hennepin County, MN; Lake County, IL; Lucas County, OH; Milwaukee County, WI; Minnehaha County, SD; Pennington County, SD; Polk County, IA; Sangamon County, IL; St. Louis County, MO; Summit County, OH), and West (Ada County, ID; Adams County, CO; City of San Francisco, CA; City of Long Beach, CA; Clark County, NV; Deschutes County, OR; Los Angeles County, CA; Missoula County, MT; Multnomah County, OR; Orange County, CA; Santa Clara County, CA; Spokane County, WA; Yakima County, WA).*

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# Introduction

The MacArthur Foundation launched the Safety and Justice Challenge (SJC) in 2015 with the goals of safely reducing jail incarceration and addressing racial and ethnic disparities in the criminal justice system. The SJC Network currently includes fifty-seven sites. The local criminal justice systems in these localities serve racially and ethnically diverse populations comprised of subgroups with different characteristics and needs, including people who are limited English proficient (LEP). As defined by the U.S. Department of Justice (Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 2002), a person is LEP if their primary language is anything other than English and if they have a limited ability to read, write, speak, or understand English. An estimated 25 million people in the United States are LEP (2020 American Community Survey, 5-Year Estimates). The national origin nondiscrimination provisions of Title VI of the Civil Rights Act of 1964 (“Title VI”) require recipients of

federal financial assistance to provide people who are LEP with meaningful access to their programs and activities (e.g., in-language communication, telephonic interpretation, and translation of vital documents).

Many organizations and agencies within local criminal justice systems receive federal financial assistance and are thus legally obligated to provide language services. When law enforcement agencies, court systems, and correctional systems provide adequate language services they strengthen access to justice for people who are LEP - e.g., providing life-saving public safety assistance, supporting victims of crime, and delivering vital medical and behavioral care to people who are incarcerated. While national guidance for improving language accessibility exists, the extent to which language services are available in local justice systems is relatively unknown.

The purpose of this policy brief is to elevate language services in local criminal justice systems alongside criminal justice reform efforts. To achieve this, we first summarize the national landscape of language access guidance, policies, and plans. Second, we present findings from novel survey data on the language services provided by select SJC sites. Finally, we discuss some of the policy implications from this research.

# Methodology

Researchers conducted a content analysis of national language access policies, plans, and guidance published prior to December 2020 by 18 non-governmental organizations and federal agencies that conduct justice-related business and/or advise on justice-related topics. These organizations and agencies include the American Bar Association (ABA), National Center for State Courts (NCSC), Vera Institute of Justice (Vera), U.S. Department of Homeland Security (DHS), U.S. Department of Justice (USDOJ), and various offices and divisions within the USDOJ (e.g., Office of Access to Justice, Civil Division, Civil Rights Division).

Findings from the content analysis were used to inform the development of survey questions that assess the availability of language services in SJC implementation sites. We pretested the survey instrument with local law enforcement officers and language access experts, as well as solicited feedback from a working group of selected SJC stakeholders and individuals. The questions were designed to provide a snapshot of SJC partners' language service programs, with the ultimate goal of developing an accurate picture of current policies and practices in criminal justice agencies regarding language accessibility. Specifically, the survey included 39 questions that assessed an organization's or agency's interactions with people who are LEP, language access policies, in-person language services, telephonic interpretation services, written translation services, web platforms and websites, public notice, data collection, and institutional language access barriers. Several types of questions were included to ensure consistency and flexibility in data collection. Most responses were submitted via an online portal, but a few surveys were completed by hand and manually entered by the research team.

All SJC Project Directors of implementation sites were sent a recruitment email in May 2021. The recruitment email included information about the survey and a request for written consent to participate. A total of 13 SJC sites provided consent to participate in the survey. The SJC Project Directors that provided consent were emailed a link to the online survey and were given the option of completing the survey themselves or forwarding the survey to respective employees that could complete it on behalf of individual SJC partners.

We received a total of 15 complete survey responses, one from Los Angeles County (CA) (Los Angeles County Sheriff's Department)<sup>2</sup> and 14 from different SJC partners across eight SJC sites: (1) Allegheny County (PA) (Allegheny County Court of Common Pleas-5th Judicial District); (2) City of Philadelphia (PA) (Philadelphia Department of Prisons; Philadelphia District Attorney's Office; First Judicial District Court of Common Pleas, CP Trial Division, APPD and Pretrial (Philadelphia)); (3) Charleston County (SC) (Charleston County Court Administration); (4) Palm Beach County (FL) (Palm Beach County Criminal Justice Commission); (5) Multnomah County (OR) (Multnomah County Local Public Safety Coordinating Council; Metropolitan Public Defender (Multnomah); Multnomah County Circuit Court; Multnomah County District Attorney; Multnomah County Sheriff's Office); (6) City and County of San Francisco (CA) (San Francisco District Attorney's Office); (7) St. Louis County (MO) (Department of Justice Services, St. Louis County); (8) New Orleans (LA) (New Orleans Police Department).

<sup>2</sup> Los Angeles County responded to the survey as part of their participation in the working group that evaluated and pretested the survey instrument.

# Findings

## I. Language Access Service Content Analysis

Researchers conducted a content analysis of national language access guidance, policies, and plans. Language access guidance provides broad recommendations for how organizations and agencies should provide language services, whereas policies and plans specify how organizations and agencies will provide language services. We constructed a table of the common standards for language accessibility in criminal justice systems by exploiting variation across the sampled documents. We identified ten common standards and categorized them into three team-identified phases of language access planning: establishing, implementing, and maintaining. We refer to these phases collectively as the “language access planning continuum”. Table 1 in the Appendix contains the common standards for language accessibility, language access planning phases, and a summary of related practices.

During the establishing phase, organizations and agencies conduct a needs assessment and develop policies and/or strategies to lay the groundwork for their language access program. During the implementing phase, organizations and agencies develop their language access program by evaluating language service provider qualifications, providing language services training to staff, delivering a variety of language services, and publicizing the availability of these language services. During the maintaining phase, organizations and agencies survey their language access programs by collecting, measuring, and evaluating language services data. Organizations and agencies may discover that policies and practices designed to meet previous standards require adjustments to, for example, meet the changing demands of LEP communities or adapt to new language services technology. Language access planning is an iterative process that necessitates a commitment to providing language services as well as regular evaluation of the language access program.

## II. Language Access Services Online Survey

Researchers administered an online survey to various criminal justice organizations and agencies participating in the SJC. Among the organizations and agencies that responded are county and district courts, corrections agencies, local and county law enforcement agencies, District Attorney’s and Public Defender’s Offices, as well as criminal justice advisory boards and coordinating councils.

Most participating organizations and agencies were sizable, with 66.67 percent reporting that they have 250 or more employees. The remaining, however, reported having fewer than 249 employees with one reporting having 9 or fewer paid employees (for more detailed descriptive statistics of the respondents see Table 3 in the Appendix). The diversity of survey respondents paints a more accurate picture of the varied landscape of language access needs and resources that exist across different criminal justice organizations and agencies.

In the subsections that follow, we present a summary of survey responses along the language access planning continuum. Next, we discuss detailed findings that pertain to each of the language access planning phases. We conclude with a presentation of findings related to the reported institutional challenges in providing language services.

### a. Survey Responses Along the Language Access Planning Continuum in Summary

According to the findings of our content analysis, language access programs are ideally developed by completing all aspects of each language access planning phase in the following order: establishing → implementing → maintaining. However, in practice, organizations and agencies meet standards at different points in the development of their language access program. Though most respondents report having language access resources and practices, Figure 1 demonstrates that there are significant gaps in the provision of translated content and public announcements, as well as a lack of knowledge about whether their organization or agency addresses language access complaints or collects data on language services.

**Figure 1. Matrix of Survey Responses by Respondent**

	Language Access Plan	Language Access Policies	Language Access Coordinator	Certified Bilingual/Multilingual Staff	Telephonic Interpretation	Translated Forms or Materials	Translated Website Content	Translated Social Media Content	Translated Public Notices	Holistically Addresses Complaints	Tracks Use of Language Services
Respondent A	◆	◆	◆	◆	◆	◆			◆	◆	
Respondent B	◆	◆		◆	◆	◆	◆	◆	UNK	UNK	
Respondent C	◆	◆	UNK	◆	◆	◆		UNK	Other		
Respondent D	◆	◆	◆	◆	◆	◆		◆	◆	◆	
Respondent E				◆	◆	◆		◆	◆		
Respondent F											
Respondent G				◆	UNK			◆	Other		
Respondent H	◆	◆		◆	◆	◆		◆		UNK	
Respondent I	◆	◆	◆	◆	◆	◆		UNK	◆	◆	
Respondent J											
Respondent K	◆	◆	◆		◆	◆		◆		UNK	
Respondent L	◆	◆	◆		◆	◆			◆	◆	
Respondent M	◆		◆	◆	◆	◆	◆	◆	UNK	◆	
Respondent N	◆	◆	◆	◆	◆	◆	◆	UNK	◆	◆	
Respondent O				◆						UNK	

Sources: Authors' analysis using results from the online survey described above (n=15).

Notes: Blanks indicate "No" and UNKs indicate "Unknown". No differs from Unknown as an Unknown response implies the site may in fact offer that service or resource but this information was unknown to the survey taker. For the question about "Holistically Addressing Complaints", an "Other" option allowed respondents to offer a narrative descriptive beyond the yes/no binary (e.g., "Depends on the complaint/issue").

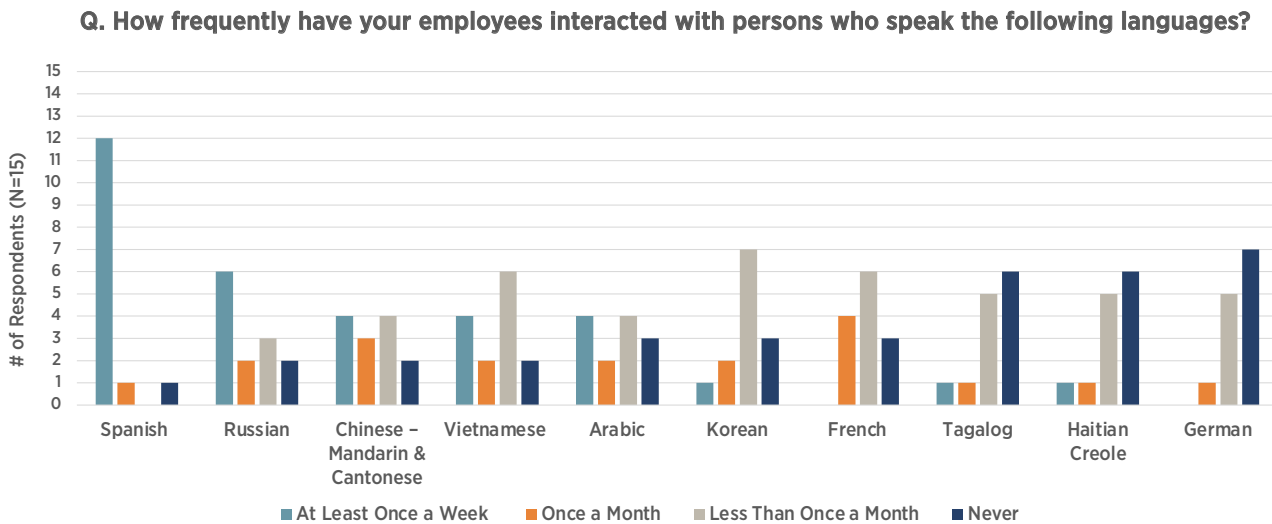
### b. Establishing a Language Access Program: Assessments, Plans, and Policies

Establishing a language access program requires conducting an initial needs assessment, developing a language access plan, instituting language access policies, and appointing a language access coordinator. A needs assessment can, among other things, aid in determining which populations require language services. Nearly all

survey respondents reported that their organization or agency has at least some interactions with people who are LEP, and the majority indicated that they have daily interactions with Spanish speakers. Figure 2 shows that several respondents also have frequent encounters with people who speak languages other than Spanish such as Russian, Chinese (Mandarin and Cantonese), Vietnamese, Arabic, and others.

# Findings

**Figure 2. Prevalence of Interactions with Commonly Encountered Languages (n=15)**



Knowledge about who needs language assistance can inform how best to administer language services. Developing language access plans and/or policies and appointing a Language Access Coordinator to monitor compliance with these plans and/or policies can be an effective two-pronged approach to the initial implementation of a language access program. However, only about half of all respondents reported having internal language access plans and/or policies and less than half reported having a Language Access Coordinator (see Table 3 in Appendix).

### c. Implementing a Language Access Program: Services and Public Notice

Implementing a language access program entails being able to provide language access services and informing the public of their availability. We asked respondents to report on which of the common language services their employees have used for the top ten most common foreign languages spoken in American homes (i.e., Spanish, Chinese - Mandarin & Cantonese, Tagalog, Vietnamese, Arabic, French, Korean, Russian, German, and Haitian Creole) (2020 American

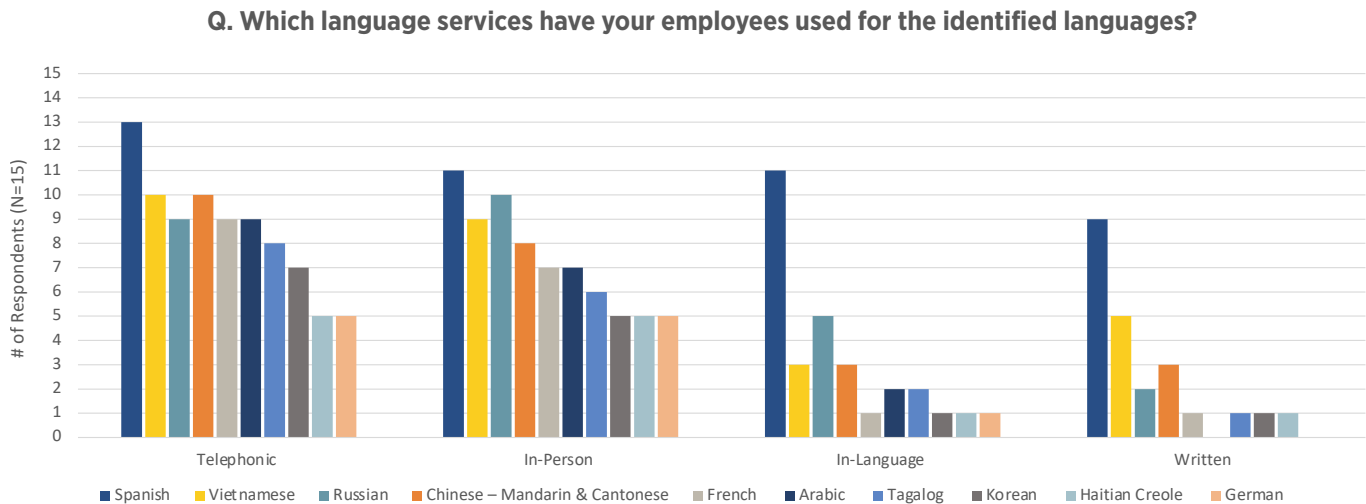
Community Survey, 5-Year Estimates). The four common language services include:

- in-language communication (e.g. Spanish-speaker converses in Spanish with a Spanish-speaking person),
- in-person interpretation (e.g. Spanish-speaker interprets for a Spanish-speaking person),
- telephonic interpretation (e.g. a telephonic interpreter service is used to interpret for a Spanish-speaking person)
- written translation (e.g. Spanish-speaking person is provided a Spanish translated form)

Respondents reported that telephonic and in-person interpretation were the most common methods of providing language assistance. As shown in Figure 3, however, there exists a notable lack of in-language communication and written translation services for almost all languages other than Spanish. A robust language program would ideally have all four of these language services available for the common languages spoken in their area.



**Figure 3. Language Services by Frequently Encountered Languages (n=15)**



### *i. Interpretation*

Approximately 94 percent of respondents reported that they have bilingual and/or multilingual employees. Respondents also reported that less than half of their bilingual and/or multilingual employees are certified, and less than half offer pay differentials to employees who use their language skills on the job. Furthermore, pay differentials range widely, from a flat rate of \$60 more per paycheck to a 3-5 percent pay increase per paycheck. When bilingual and/or multilingual employees are unavailable, telephonic interpretation can be a practical solution. Approximately 87 percent of our survey respondents reported having telephonic interpretation contracts in place, and more than half of all respondents reported having a non-emergency phoneline or hotline that can assist callers in languages other than English (e.g., Spanish, Chinese, and Vietnamese).

### *ii. Translation*

Despite more than half of all respondents reporting that they have translated materials, as shown in Figure 3, there are some languages for which no written translation is provided by any of the respondents. One of the most serious institutional hurdles to providing meaningful language access, according to respondents, is a paucity of translated resources. Even though translation extends to digital spaces, less than half of respondents said their official website contains translated content. Furthermore, while 61 percent of respondents reported that they have a social media account, only 25 percent have a social media profile that includes translated content.

### *iii. Public Notice*

Almost all respondents reported having posted notices in public places. However, as Figure 1 shows, less than half reported that those notices are translated into a language other than English. Moreover, all respondents who reported having translated public notices said the notices were only translated into Spanish.

# Findings

## d. Maintaining a Language Access Program: Gather, Measure and Analyze Data

Maintaining a language access program entails gathering, measuring, and analyzing language services data. This phase is perhaps the most important and least emphasized aspect of language access planning. Data on who is being served and how they are being served is vital information for aiding in the maintenance of an effective language access program. Data collection includes keeping abreast of all the information related to the establishing and implementing phases of the language access planning continuum. As described in the Table of Language Service Standards (see Table 1 in the Appendix), the latter can be assessed by documenting how frequently language services are being provided and by tracking and addressing language

access complaints. Less than half of respondents reported collecting data on how frequently language services are utilized, and about half reported making efforts to address language access complaints beyond a case-by-case basis (e.g., regular reviews of complaints and outreach to specific language minority groups).

## e. Institutional Challenges to Providing Language Services: Budget, Resources, and Training

According to respondents, the most severe institutional barriers to providing language services are budget, resources, and training. Of note, however, the top ranked barriers in Table 2 indicate that institutional barriers vary widely by organizations and agencies.

**Table 2. Institutional Language Access Barriers, Ranked by Severity (n=15)**

<b>Institutional Barriers</b>	<b>Mean</b>	<b>SD</b>	<b>Min</b>	<b>Max</b>
<i>Severely (1), Extremely (2), Moderately (3), Mildly (4), Not at All (5)</i>				
Limited Budget	3.54	1.51	1	5
Work not conducive to telephonic interpretation	3.58	1.56	1	5
Lack of translated materials	3.69	1.11	2	5
Insufficient number of bilingual/multilingual officers	3.77	1.24	2	5
Insufficient number of bilingual/multilingual employees	3.77	1.10	2	5
Lack of training resources	3.77	1.24	1	5
Lack of knowledge about language access tools	3.93	1.00	2	5
Lack of knowledge about the LEP population	4.07	.92	3	5
Difficulty identifying communication needs	4.17	1.03	2	5
No pay perks for bilingual/multilingual employees	4.36	1.29	1	5
Uneasiness with language technology	4.39	.96	2	5
Lack of community partners	4.39	.96	2	5
Increasing presence of rare languages	4.39	.65	3	5
Lack of Language Access Plan and/or Language Access Coordinator	4.43	.94	2	5
Union contract restrictions	4.67	.65	3	5

Sources: Authors' analysis using results from the online survey described above (n=15).

Notes: Respondents were asked to what degree are the identified issues barriers to providing language services, with 1 being "Severely" and 5 being "Not at All". As such, the lower the mean the more severe the institutional barrier.

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# Findings

Respondents were also asked, in the form of an open-ended question, to describe in greater detail their most severe barriers to providing language services. Responses that differed from the identified issues included, for example, difficulties recruiting bilingual/multilingual staff due to inability to offer competitive salaries, difficulties collecting data on translation and transcription services from multiple vendors and tracking language-related payments, and the need for increased WiFi access in facilities to ensure consistent access to virtual language services.

# Policy Recommendations

**Work smarter not harder.** Although most respondents reported regularly interacting with people who are LEP, fewer than half reported tracking the frequency with which language services are used. Regular needs assessments help organizations and agencies stay abreast of population changes and maximize the effectiveness of language access programs. When data on language services are collected on a regular and systematic basis, needs assessments are more reliable. Identifying and analyzing differences in identified needs (via needs assessments) and utilization of existing services (via outcome monitoring) can help organizations and agencies target the types of interventions and solutions to better serve their LEP population.

**Every ship needs an anchor.** Although 67 percent of respondents reported having internal language access policies and/or a language access plan, less than half have a Language Access Coordinator. The best way to provide consistent and effective language services is to monitor compliance with language access policies and/or plans on a regular basis. Hiring or appointing a coordinator to monitor compliance internally will help reduce the likelihood of an external compliance review.

**Be resourceful.** Financial constraints were cited as the most serious institutional impediment to providing language services. Organizations and agencies can lower the cost of language services by leveraging internal human capital. Job postings, for example, should highly encourage applications from bilingual and multilingual candidates. Ensure, however, that bilingual and multilingual employees' language abilities are professionally evaluated by a third party. Pay differentials and/or other non-monetary incentives can help organizations and agencies retain current qualified bilingual and multilingual staff. Collaborate with other organizations and agencies to exchange resources, standardize terminology, and gather input on the quality of mass-distribution translations.

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# Future Directions

This study provides valuable insight into how specific SJC partners interpret language access policies and guidance, as well as what language access services they provide. We hope to expand the survey to a broader range of organizations and agencies in the future to assess the generalizability of our findings. In the following study, researchers will work with community members who serve the justice-involved LEP population to interview and learn how language access services are administered and how people who are LEP use such services. We hope that the findings of these studies will provide a more comprehensive understanding of the efforts and challenges of effectively providing language access services in a criminal justice setting.

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**Table 1. Table of Language Service Standards, Language Access Planning Phases, and Summarized Practices**

Standards	Language Access Planning Phase	Summarized Practices
Conduct a Needs Assessment	Establishing	An initial needs assessment helps determine which populations require language services, which language services may be required, and the extent to which language services must be provided (i.e., four factor analysis).
Establish Language Access Policies and/or Plans	Establishing	Language access policies and/or plans – a.k.a., implementation plans, action plans, and so on – outline how best to administer language services. Many guidance documents underscore the importance of establishing a Language Access Coordinator and/or a Language Access Committee/Workgroup. A Coordinator assists in enforcing language access policies and/or plans, whereas a Committee/Workgroup assists in determining the relevance of policies and/or plans.
Assess Interpreter and Translator Qualifications	Implementing	Qualified interpreters and translators are individuals who have been professionally evaluated by a third party in terms of language proficiency and accuracy (in English and target language), ability to engage in cognitive tasks concurrently, and knowledge of setting-specific language (e.g., legal, medical).
Provide Staff Training on Language Services	Implementing	Language services staff training should occur during new staff orientations and ongoing staff training sessions. Staff should be trained on their legal obligation to provide language services, as well as language access policies, plans, and procedures.
Provide In-Person Language Services	Implementing	In-person language services are administered by qualified bilingual staff, staff interpreters, contract interpreters, and/or family members, friends, and community members in exigent circumstances. Many plans and policies state that only qualified interpreters may provide official language assistance on behalf of an organization or agency.
Provide Telephonic Language Services	Implementing	Telephonic interpretation has several advantages, including on-demand assistance in identifying non-English languages and quick interpretation in a variety of languages. However, limitations include work that is not conducive to telephonic interpretation and issues related to nonverbal communication.
Provide Written Language Services	Implementing	Written translations of “vital documents” should be precise and free-of-cost. Vital documents are those that have serious consequences if the information they contain is not provided accurately or in a timely manner. Machine or automatic translations are strongly discouraged.
Translate Web Platforms, Websites, and E-Documents	Implementing	Web platforms can be used to disseminate critical information and to publicize the availability of language services. As a result, vital information on webpages and e-documents should be accessible and navigable in languages other than English.
Issue Public Notice and Engage in Public Outreach	Implementing	The availability of language services should be publicized in languages other than English. Working with community organizations, posting newspaper notices, announcing notices on non-English radio and television stations are common.
Gather, Measure, and Analyze Language Services Data	Maintaining	Data is essential for monitoring, improving, and eventually maintaining language access programs. Data collected frequently includes information about encounters with LEP individuals, as well as the use and rate of interpreter services. Data collection is essential not only for budgeting and planning, but also for engaging community members and demonstrating accountability and transparency.

# Appendix

**Table 3. Summary Statistics from the Language Access Survey (n=15)**

Demographics	Percent
<b><i>Estimated Annual Budget</i></b>	
More than \$1 billion	7.1%
\$100 million-\$249 million	21.4%
\$1 million-\$99 million	71.4%
<b><i>Number of Paid Employees</i></b>	
1,000 or more	26.7%
500-999	20.0%
250-499	20.0%
100-249	13.3%
50-99	6.7%
10-24	6.7%
9 or less	6.7%
Language Accessibility Measure	Percent
<b><i>LEP Population &amp; Current Practices</i></b>	
Has contact with LEP communities?	86.7%
See Languages Encountered Table (see Figure 2)	
See Types of Language Services Table (see Figure 3)	
<b><i>Policy</i></b>	
Has a Language Access Coordinator?	46.7%
Has internal policies on language access?	60.0%
Has a “Language Access Plan”?	66.7%
<b><i>In-Person Language Services</i></b>	
Has Bilingual/Multilingual Employees?	93.3%
>10%	69.2%
11-20%	15.4%
21-30%	15.4%
Bilingual/Multilingual Employees Certified?	46.7%
Bilingual/Multilingual Employees Pay Differential?	46.7%
... ranges from flat rate (e.g., \$60/paycheck) to percent increase (3-5%).	
<b><i>Telephonic Interpretation Services</i></b>	
Has non-emergency phone line or hotline?	73.3%
Callers can be assisted in languages other than English?	81.8%
Has telephonic interpretation contract?	86.7%
... more than half spend more than \$10,000 annually.	



Language Accessibility Measure	Percent
No employee restrictions to use telephonic service?	84.6%
Employee training required to use telephonic service?	61.5%
... approximately 80% require training once in a career or as needed.	
<b><i>Written Translation Services</i></b>	
Has translated forms or materials?	66.7%
Uses in-house resources to translate?	46.7%
Has a contract with a third-party for translations?	40.0%
<b><i>Web Platforms and Websites</i></b>	
Has a public website?	100.0%
At least a portion is translated?	46.2%
Has a social media account?	61.5%
At least a portion is translated?	25.0%
<b><i>Public Notice</i></b>	
Has posted notices in public areas?	93.3%
Notices are translated?	42.9%
... of those who reported having translated notices, all indicated Spanish.	
<b><i>Data Collection</i></b>	
Holistically addresses language-related complaints?	50.0%
Tracks how frequently language services are used?	40.0%