



Behind the Scenes

Mapping How State and Local Governments Implement Language Access Measures

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Executive Summary

For many state and local governments, demographic changes have created a pressing practical need to be able to offer their services and information in languages other than English. As of 2023, more than 27 million individuals in the United States had limited proficiency in English, a population speaking hundreds of languages and comprised largely (but not solely) of immigrants. Providing language access—that is, ensuring that those with limited proficiency in English can access public information and services—has long been a civil rights requirement for all state and local government agencies (as well as other entities) that receive federal funds. Recognizing these demographic realities, practical demands, and obligations under federal civil rights law and regulations, a growing number of states, counties, cities, as well as individual agencies within state and local governments have developed more organized approaches to providing language access over the past two decades.

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In order to effectively provide language access, governments must be prepared to deliver information and services in non-English languages through the use of interpreting and/or multilingual staff for verbal communication as well as the translation of written materials and online content. Language assistance needs to be integrated into a variety of contexts and public touchpoints such as emergency situations handled by first responders,

government offices and call centers, public outreach campaigns, as well as complex legal or administrative settings such as court proceedings. Beyond these points of interaction with Limited English Proficient (LEP) individuals, government and agency staff must also plan, coordinate, fund, and monitor language access measures to ensure they are successful and sustainable.

How state and local governments and their component agencies design, implement, and operationalize language access efforts (also called language access programs) remains a relatively underexamined topic. Yet these efforts are critically important to the success of any initiative or policy that is intended to advance language access. State and local language access programs also exhibit significant variety in their scale and approaches, which reflect the different contexts of their agencies and level of government.

Drawing from interviews conducted with staff working on language access issues in state or local governments, this report provides one of the first in-depth examinations of how language access measures are implemented. It offers the following primary findings:

- **Governments and agencies begin their language access initiatives from different starting points, but integrating language assistance into major public touchpoints was a primary focus of all of those examined.** Common strategies for getting language access programs off the ground often centered on developing language access plans, designating individual staff as language access coordinators, identifying points of contact with LEP individuals, and building administrative and

coordinating processes to ensure quality language assistance was available to LEP individuals. These efforts had to reckon with the differing needs, scale, and approaches to delivering services across state and local agencies. Although language access plans and language access coordinators were very commonly utilized, this was not the case universally. Similarly, language access laws and policies were often useful for supporting programs and ensuring compliance, but not every program was developed or supported by such laws or policies.

- ▶ **Effective behind-the-scenes administrative processes were essential for ensuring effective language assistance.** These included developing and embedding vendor contracts (for interpreting and translation) and budgeting to pay for the use of language services contracts and other costs related to language access. Disseminating guidance, tools, and training for frontline staff and agency leadership was also a key component of these efforts, with the aim of making it easier for frontline staff and managers to provide language assistance. Coordinating these efforts across agencies and in individual government programs also generally required staff and/or an office working at a central location on language access. One promising strategy was finding ways to embed language access considerations into regular government processes such as budgeting, communications, and programmatic development, which helped language access become an integrated part of day-to-day functions.
- ▶ **Many governments and agencies explored the centralization of vendor contracts for language services as well as funding or budgets for language access.** In this approach, a single office or entity controlled the pot of funding available for language access (mostly to pay for vendor language services) and/or the contracts for language services vendors. Centralization brought benefits such as increased efficiency and improved monitoring of agency language access efforts, but it could also reduce flexibility and responsiveness. Other governments used more decentralized approaches, which made funding language access and managing vendor contracts the responsibility of individual agencies.
- ▶ **Monitoring the efforts of agencies, individual programs, and their staff was a key component of ensuring compliance with efforts to expand language access.** In interviews, government and agency staff described using a number of relevant tools to monitor and promote accountability, such as formal reporting mechanisms, complaint procedures for the public, and secret shoppers. Yet some language access programs were reportedly hesitant to use these tools due to concerns about the effect strict enforcement measures could have on partner agencies and colleagues, particularly where these programs were in their early stages. The existence of formal monitoring requirements in language access policies, however, could help limit this tension and frame monitoring as a regular part of working on and improving language access.
- ▶ **Intangible factors mattered to governments' and agencies' implementation of language access programs.** Examples included support from government and agency leadership, organizational culture, and the influence of communities and advocates. In addition, longer-standing programs had the benefit of experience, opportunities for learning, and time to socialize ideas with staff and management, all of which helped their implementation efforts. These factors were generally outside

the control of government staff working on language access and could either positively or negatively affect efforts to operationalize and sustain language access programs.

Even with growing recognition of the importance of language access, considerable challenges remain in translating commitments or policies promising greater access to public services for LEP individuals into reality. In particular, complex behind-the-scenes processes are needed to successfully plan, coordinate, and monitor efforts by individual agencies and across governments to provide consistent, timely, and quality language assistance for LEP individuals at points-of-service. In this way, language access in government programs is like an iceberg: although the public may only see the successful delivery of a translated document or provision of an interpreter, a significant amount of effort is generally occurring under the surface to make that assistance happen.

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Ultimately, there is no one-size-fits-all approach for implementing language access. There are, however, abundant lessons that state and local governments and agencies can learn from each other and apply to their own contexts, needs, and capacities.

1 Introduction

The past six decades have seen consistent growth in the size of the immigrant population in the United States, with the foreign-born share of U.S. residents reaching 14.3 percent in 2023—a level nearing the peak of 14.8 percent in 1890.¹ Over this time span, and particularly in the last 30 years, many immigrants, whether they come for work, to reunite with family, as resettled refugees, or due to other factors, have settled in parts of the country previously less touched by immigration. As a result, immigration has become a phenomenon that affects not just traditional immigrant-receiving states such as California, Texas, Florida, and New York but virtually every state in the country.² At the same time, the countries immigrants come from have diversified. Increased numbers of immigrants have arrived from Latin America, Africa, and Asia, bringing with them new cultures, perspectives, and languages to the United States.³

Due to these trends, the integration of immigrants and their children is a critically important policy goal for the country overall as well as for states and localities receiving new residents. For many immigrants, English proficiency is a key component of integration. With more advanced English skills comes a range of benefits, such as higher-wage employment and improved ability to navigate American society. Yet learning English—

1 Migration Policy Institute (MPI) Data Hub, “U.S. Immigrant Population and Share over Time, 1850-Present,” accessed February 24, 2025.

2 MPI Data Hub, “Immigrant Population by State, 1990-Present,” accessed February 24, 2025; Jessica Bolter, “Immigration Has Been a Defining, Often Contentious, Element Throughout U.S. History,” *Migration Information Source*, January 6, 2022.

3 MPI Data Hub, “Regions of Birth for Immigrants in the United States, 1960-Present,” accessed February 3, 2025.

or any language—generally takes years, particularly for working adults who do not have significant free time to devote to formal classes. The availability of adult English courses in the United States is also limited. Federal and state funding for adult English instruction is estimated to meet less than 5 percent of the need for such services nationwide.⁴ Some immigrants, such as those who arrive in the United States at later ages and those with very low levels of formal education in their own languages, may never become fully proficient in English. But English proficiency is also a dial, not a switch. While an individual may speak English well enough to shop at a grocery store, chat with neighbors, or do their jobs, they may not be able to understand formal legal proceedings or communicate about complex health issues with a doctor.

On a practical level, and despite the changes in federal policy, providing language access remains essential for governments to effectively communicate with all members of the communities they serve.

Such language barriers can create challenges to accessing information and public services for the more than 27 million foreign- and U.S.-born individuals in the United States who, as of 2023, were Limited English Proficient (LEP).⁵ Without efforts to increase language access in government programs, an individual's level of English proficiency can become the primary factor affecting their ability to, for example, access health care, understand

emergency warnings, communicate with their children's teachers, or report a crime to law enforcement. Due to the potential harm and discriminatory effect that such situations can have, federal civil rights regulations require that federally funded programs ensure that limited proficiency in English does not create an undue barrier to individuals accessing services or information.⁶ This requirement applies to both recipients of federal funding as well as subrecipients or subgrantees, covering a wide array of state and local agencies as well as private companies and nonprofit organizations that receive federal support.⁷ Although these requirements have not changed, recent policy changes by the Trump administration have brought uncertainty about the extent to which federal agencies will continue providing language access in the programs they themselves deliver as well as the extent to which they will emphasize and monitor requirements for federally funded programs at the state and local levels.⁸

On a practical level, and despite the changes in federal policy, providing language access remains essential for governments to effectively communicate with all members of the communities they serve. In fact, potential retrenchment on language access by the federal government has made state and local efforts even more critical to help ensure that language barriers alone do not block individuals from accessing key government services and information. The need for multilingual communication was amply demonstrated during the COVID-19 pandemic when governments needed to communicate complex, rapidly changing

4 Jacob Hofstetter and Margie McHugh, *Leveraging Data to Ensure Equitable and Effective Adult Skills Programming for Immigrants* (Washington, DC: MPI, 2023), 15.

5 MPI Data Hub, "State Immigration Data Profiles—United States: Language and Education," accessed February 25, 2025. For a discussion of the term Limited English Proficient (LEP) and the rationale behind its usage in this report, see Box 1.

6 Jacob Hofstetter and Margie McHugh, *Expanding Language Access in Federally Supported Programs: Practical Solutions for Persistent Problems* (Washington, DC: MPI, 2024), 5–7; U.S. Department of Justice (DOJ), "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons," *Federal Register* 67, no. 117 (June 18, 2002).

7 Hofstetter and McHugh, *Expanding Language Access*, 5–7.

8 Jacob Hofstetter, "Shifting Priorities: How the Official English Executive Order Could Affect Language Access Efforts" (short read, MPIP, Washington, DC, March 2025).

information related to social distancing, masking, lockdown rules, and vaccine availability to all residents in languages they could understand. Communication with households whose preferred language is not English is also necessary for the success of more routine government operations such as informing individuals and families of available programs and services for which they may be eligible and providing public notice of road closures, public safety alerts, opportunities to participate in public meetings, and more. Particularly for government programs seeking to serve populations that include significant numbers of LEP individuals, providing language access can be an important part of achieving program goals and reaching more eligible individuals with their services.

Recognizing the importance of language access for both individuals and program efficacy, as well as their obligations under federal civil rights regulations, many states and local governments—and their component agencies and programs—have taken steps to help ensure LEP individuals can access the services and information they offer. Many of these efforts have also been formalized through language access laws and policies that set out requirements and standards for steps government agencies and their staff must take to serve LEP individuals, as explored in previous Migration Policy Institute (MPI) research.⁹

Even with an official policy or law in place, providing language access is a complex task. Broadly speaking, governments and their component agencies must be prepared to provide interpreters or multilingual staff during interactions with LEP individuals over the phone, in government offices, and at in-person and virtual public events. Government programs also must be ready to translate written content from English into other languages, including public outreach materials, letters, websites, and other vital documents. In order to ensure that appropriate language assistance is in place, governments and agencies must also plan and budget for language services, analyze data to understand local LEP communities and their needs, coordinate efforts across agencies and their subcomponents, and take steps to monitor these efforts to evaluate if they are effective.

These practical considerations, however, remain underexplored, particularly how state and local governments and agencies can best design language access measures, operationalize and fund them, and evaluate their strengths and weaknesses. Although federal guidance provides advice and best practices for local governments and their agencies, the information available is limited and primarily framed through the lens of civil rights compliance rather than how, in practice, to meet communication needs in the context of complex bureaucracies and public-facing programs. Drawing from a series of interviews conducted by MPI researchers with language access practitioners across the country, this report explores how state and local governments and their agencies implement language access measures (see Box 1 for more details). The study's findings provide an important window into how governments and agencies work to make language access a reality, looking behind the scenes and providing a map to policymakers, government staff, advocates, and other stakeholders seeking to better understand the translation of policy into improved access to public services and information for LEP individuals.

This study uses the term “language access program” to refer to organized measures, policies, procedures, plans, and staff put in place to assist LEP individuals by either a government, agency, or office at the state

⁹ Jacob Hofstetter, Margie McHugh, and Anna O'Toole, *A Framework for Language Access: Key Features of U.S. State and Local Language Access Laws and Policies* (Washington, DC: MPI, 2021).

or local level. The size and reach of such programs can vary; for example, they may occur in the public-facing offices of a small municipality or across the programs of a large statewide agency that provide a wide range of services in a broad geographic area. Given this range of settings and scope, there is no real one-size-fits-all approach for providing language access. Each setting, each context, and each community is its own, requiring careful consideration on the part of policymakers and government staff seeking to advance language access. There are, however, common and effective practices that can be taken up by governments and agencies of all types and sizes, along with abundant opportunities for innovation.

This report first details the structure and strategies behind the language access programs examined for this research before exploring how governments and agencies operationalize these measures, including through the use of language access plans and coordinators, training modules and guidance documents, interpreting and translation vendors, data analysis, and funding and budgeting approaches. The report then discusses how governments and agencies seek to build accountability and sustainability around language access. The final section explores broader themes that emerged from this analysis and what lessons they can offer policymakers and other stakeholders seeking to improve language access in their communities.

BOX 1

About This Project and Key Terminology

The findings of this report are based in part on analysis of insights shared in 29 interviews the authors conducted in 2022 and 2023. This included 19 interviews with language access specialists (i.e., staff whose positions were mostly or entirely dedicated to coordinating language access across an entire state or local government) as well as 10 interviews with staff working on language access within a specific state or local agency. In some cases, these specialists and staff were from the same jurisdictions. The interviewed experts represent a mix of traditional immigrant-receiving states and localities as well as newer destinations across the country. In order to encourage interviewees to speak openly about their experiences with implementing language access measures, these interviews were conducted on the condition of anonymity.

Key Terminology:

Government and agency. This report uses the term “government” to refer to an entire jurisdiction such as a county, city, or state government. The term “agency” refers to a department within such a government (e.g., a department of human services). The term “agency subcomponent” refers to an office, division, or program within an agency.

Language access program. The report uses this term to describe organized measures, policies, procedures, plans, and staff put in place by either a government, agency, or agency subcomponent at the state or local level to support the provision of language access.

Limited English Proficient. Limited English proficiency is measured through responses to the U.S. Census Bureau’s American Community Survey. Respondents are asked to indicate if they speak a language other than English at home. If they respond yes, the survey prompts them to report their English proficiency. Those who report speaking English less than “very well” out of the options provided (“very well,” “well,” “not well,” or “not at all”) are considered Limited English Proficient (LEP). This report primarily uses the phrase “LEP individuals” or people with “limited proficiency in English.” While other terms such as people “who speak languages other than English” or “who prefer languages other than English” are preferred by some, the authors use LEP given that limited proficiency in English is what triggers civil rights protections under federal regulations. The alternative terms listed above may include some individuals who are both proficient in English and speak another language, who would not be covered by these civil rights protections.

2 The Implementation of Government and Agency Language Access Programs

The successful implementation of language access measures hinges on the effective integration of language assistance into diverse government programs with a variety of public touchpoints. This section details how the governments and agencies examined for this report sought to accomplish key tasks—from using interpreters and translation services to funding and monitoring strategies—while also discussing common trends, approaches, and challenges involved in their efforts. The section is broken into three parts, each of which answers a separate question: first, how and why governments and agencies developed their language access programs; second, how they operationalized those programs; and third, how they sought to monitor and sustain their efforts.

A. *How Governments and Agencies Designed Their Language Access Programs*

Effective design enables language access programs to develop along an organized model, one that coordinates the activities of agencies and agency subcomponents that deliver services and information directly to the public. That said, the structure of a language access program is often developed in an iterative process, with design decisions being made and refined throughout the implementation process rather than entirely at its inception. Often, governments and agencies may begin this process in a more organized manner and then make adjustments as a result of learning what is successful and where changes are needed. At the same time, all of the language access programs examined for this study exhibited features intentionally designed to help organize, steer, and evaluate their efforts. These design elements include a program's origins, staffing models, its relationship with agencies or agency subcomponents, and overall implementation strategies.

The Origins of Language Access Programs

The structure of a language access program often reflects, to some extent, why it was created. The governments and agencies examined for this report developed and implemented their language access programs for several different reasons. These ranged from the consequences of civil rights complaints to a recognition of the practical need to better serve a growing LEP population to community-inspired pushes to improve access to public services and information for all residents. These origins were not mutually exclusive; interviewees often noted that multiple factors led to the development of their language access programs. Beyond providing the initial spark for organized language access efforts, these starting points often influenced the course of language access programs' implementation.

Federal civil rights investigations that showed failures to provide language access were the inciting incidents for the development of language access programs in several of the jurisdictions examined. As discussed in the Introduction, because most state and local agencies receive federal funds, they are obligated to provide meaningful access to LEP individuals and are subject to civil rights investigations by the civil rights offices of federal agencies such as the Department of Health and Human Services and the

Department of Justice.¹⁰ Such investigations are generally triggered by complaints filed by individuals, attorneys, or advocates with the federal agencies administering programs that provide funding to state and local governments. Civil rights investigations related to language access are often settled via agreements in which the recipient or subrecipient of federal funding agrees to take remedial steps such as developing a language access plan, certifying multilingual employees, or providing more extensive guidance to frontline staff.¹¹ In several of the sites examined for this report, the steps taken following such settlement agreements led to the creation of more organized language access efforts, whether this was done to comply with required steps set out in the agreement or to prevent future investigations that could potentially lead to losses of federal funding.

Other language access programs developed from governments and agencies reacting to an increased need to serve LEP individuals in their jurisdictions. On the broadest level, some interviewees described their programs as having been created due to changes in the population of their region, generally from higher rates of immigration and larger numbers of LEP individuals moving to the communities they served and interacting with their offices and programs. In these cases, governments and agencies recognized the practical need to better serve these new residents by providing language assistance tools to staff.

Still other language access programs stemmed from direct advocacy by community members and organizations that called for greater access to services and information for speakers of languages other than English. For instance, one city agency representative noted that their initial work on language access, prior to the development of their city's language access policy, was due to community members expressing greater need for interpreting and translation in their services.¹² The COVID-19 pandemic also pushed many governments and agencies to step up their language access work. Interviewees described the pandemic as amplifying the need for services and information in languages other than English, particularly related to public outreach on shifting health measures and the availability of vaccines. In some jurisdictions, this increased awareness of the importance of language access led to new—and in some cases more focused or enhanced—programs to address the issue. Similarly, increased public attention to equity issues, most notably following the rise of racial equity movements in the summer of 2020, led to the development or acceleration of work on language access in a few jurisdictions.

Although downstream from these various origins, another common starting point for many governments and agencies examined for this report was an official policy, law, or plan related to language access. For some agencies, their language access programs or organized efforts began with steps taken to comply with requirements set out in binding state or local policies, such as a requirement to develop a language access plan.

Even if the path followed from these diverse starting points generally brought governments and agencies to a similar destination in terms of their language access goals and practices, a program's origins nonetheless frequently shaped its organization and implementation. Programs driven by civil rights investigations, for example, might focus more on compliance with federal guidelines such as those related to developing

¹⁰ Hofstetter and McHugh, *Expanding Language Access*.

¹¹ Hofstetter and McHugh, *Expanding Language Access*, 8–9.

¹² Author interview with staff from a local public health department, September 23, 2022.

formal language access plans across agencies. On the other hand, efforts spurred by community advocacy might feature more community feedback measures.

Developing Overall Program Implementation Strategies

The governments and agencies examined for this report shared many common practices and procedures to address language access in their services and subcomponents. Such similarities reflect the reality that the integration of language assistance into government services requires relatively similar steps even if they differ in scale, reach, and frequency. At the same time, staff implementing language access programs described different overall approaches and areas of focus when implementing those steps. These focal points affected the priorities and order of operations for language access programs, even if the ultimate outcome of providing timely, accurate, and quality language services to LEP individuals remained the same. The three primary types of approaches identified were:

- ▶ **Plan-based approaches.** In such approaches, implementation of language access programs centered on the development of language access plans or similar documents for agencies and/or subcomponents of agencies, often as mandated by a state or local law or policy. These plans acted as guides for implementation as well as reminders of obligations and commitments to serve LEP individuals. Detailed, regularly updated language access plans served as tools that prompted agencies and their subcomponents to consider and track data, lay out procedures and standards for staff, and map out language access goals or updates for coming years. For example, San Francisco and New York City, as part of their local ordinance and law, respectively, require agencies to provide regularly updated language access plans and/or compliance reports with extensive information on how they are providing language access in their services.¹³
- ▶ **Point-of-contact approaches.** Some governments and agencies focused more intently on building language access into points of contact with the public or common interactions with LEP individuals and communities. Such approaches sought to embed language access into the regular processes behind serving and informing the public, whether by translating letters, launching outreach campaigns in languages other than English, or ensuring frontline staff were trained on how to access phone interpreting services. For example, one city nutrition assistance program examined for this project recorded the preferred language of each client upon first contact and maintained that note in their file, prompting staff to send out translated materials or arrange multilingual employee assistance or interpreters when communicating with them.¹⁴ This type of approach was generally more decentralized in nature, focusing more intently on where interactions with LEP individuals occur and what interventions or practices would bring greater language assistance into those contexts.
- ▶ **Staff-based approaches.** In this third category, governments and agencies focused on building effective networks of staff working on language access across subcomponents and training staff to serve LEP individuals. Described as developing “implementers” by one interviewee, this set of

13 City of New York, *A Local Law to Amend the New York City Charter and the Administrative Code of the City of New York, in Relation to Improving Access to City Services for Limited English Proficient Individuals*, Local Laws of the City of New York for the Year of 2017, No. 30 (2017); City of San Francisco, *Language Access Ordinance*, Ordinance No. 116-24, *Administrative Code of the City of San Francisco* (2024).

14 Author interview with staff from a city nutritional assistance program, October 14, 2022.

approaches was characterized by a focus on the use of language access coordinators across agencies or offices to work with agency leadership and frontline staff to provide language access.¹⁵ These efforts focused on pushing training, tools, and guidance down through agencies and offices to support language access coordinators, managers, and frontline staff, equipping them with the practices, procedures, and resources they needed to effectively serve LEP clients and communities. Some of the governments and agencies examined focused more intently on training and developing extensive procedures, often standard operating procedures, to outline for staff how to serve LEP individuals.

Although each approach has its own characteristics, they are not mutually exclusive. In fact, governments and agencies could combine elements of each into a language access program, often building on related efforts that already existed. One interviewee noted that “figure it out” was the overarching mandate and strategy they had been given.¹⁶ Similarly, approaches were not set in stone. Newer language access programs often focused intently on plans or staff if only to help get efforts off the ground. Finally, point-of-contact approaches were more common with smaller governments and agencies, likely due to the amount of time and resources needed to develop language access plans as well as less need for planning and coordination compared to larger agencies.

Management and Oversight of Language Access Programs

Language access programs generally require steering or management from an office or staffer. Even in smaller programs, centralized coordination is usually needed to support planning, operationalizing, and monitoring efforts to serve LEP individuals across agencies, offices, and programs. When questions or needs for technical assistance inevitably arise among government staff, centralized staffers or other specialists can also provide guidance on the complex process of integrating language assistance into government programs’ regular operations. As a result, most governments and agencies with language access programs have a dedicated office, team, and/or staff person in a centralized location to assist with these duties.

Insights from interviews indicated that nearly all of these offices and staff shared the goal of coordinating language access efforts across a government or agency. The roles, responsibilities, location, and relationships with agencies or programs providing services, however, varied across jurisdictions.

- ▶ **Location.** The locations of these centralized language access staff fell into four primary categories among the governments examined for this project. The first and most common location was Offices of New Americans (ONAs) or other offices associated with immigrant affairs. For these offices, language access generally overlapped with other duties associated with serving immigrant and refugee residents of their city, county, or state. Recognizing the civil rights requirements associated with language access, other governments housed language access staff within offices of civil rights or offices associated with equity. Still other governments housed language access program staff within offices dedicated to community engagement or communications. Finally, in two governments, such staff were located within commissions—one dedicated to immigrant rights and one dedicated to human rights. Within individual agencies that had a centralized office or staff member focused on

¹⁵ Author interview with a language access specialist from a local government, March 6, 2023.

¹⁶ Author interview with a language access specialist from a local government, February 22, 2023.

language access, these were located within similar entities such as teams, programs, or initiatives dedicated to immigrants, equity, or community engagement.

- ▶ **Staffing.** All of the governments examined for this project had centralized staff dedicated to managing their language access programs, but the number of staff members and the number of hours they spent on this work varied. Some governments and agencies, particularly larger ones with more established programs, had a staff person or, in more limited cases, multiple staffers dedicated entirely to managing their language access programs. Others only reserved parts of staffers' time for managing language access, including those responsibilities as part of a broader portfolio of work with other duties depending on the office or team within which a staffer was located. In addition, many agencies used language access coordinators or liaisons to manage efforts to provide access to LEP individuals, as is explored in more depth in Section 2.B.
- ▶ **Roles and responsibilities.** Those managing language access programs often provided technical assistance for agencies and offices serving the public, described as "consultation, guidance, and technical support" by one interviewee.¹⁷ This assistance aimed to address challenges associated with implementing language access measures and answering common questions, such as how frontline staff could access interpreting and translation services or how managers and directors should develop language access plans. This included both answering individual questions for agencies and staff as well as serving as a "hub," as one interviewee termed it, for resources such as written templates, trainings, and step-by-step instructions.¹⁸ A related role involved dealing with contracts between a government or agency and vendors that provided interpreting and translation services. This included a range of tasks, all the way from actively overseeing contracts and troubleshooting common problems with vendors to reminding agencies or offices about using qualified or approved vendors for their language services. Coordination-related responsibilities included regular meetings, update emails, and one-on-one check-ins intended to help those working to implement language access measures share experiences, issues, and updates and jointly problem solve. Beyond these more official roles, the offices or staff managing language access programs often acted as unofficial advocates for the issue within their government or agency, whether reminding frontline staff and managers of obligations to serve LEP individuals or raising language access issues to the attention of leadership.

In many jurisdictions, these considerations were determined by enacted language access laws or policies. State and local language access policies often appointed an oversight office as well as dedicated staff, including requiring agencies and/or their subcomponents to appoint language access coordinators.¹⁹

B. How Governments and Agencies Operationalized Their Language Access Programs

Developing an effective design for language access programs is an important step in establishing an infrastructure and overall framework to support their success. Where the rubber hits the road, however,

¹⁷ Author interview with a language access specialist from a local government, August 26, 2022.

¹⁸ Author interview with a language access specialist from a local government, February 16, 2023.

¹⁹ Hofstetter, McHugh, and O'Toole, *A Framework for Language Access*.

is upon the integration of language access measures into government services. Through this process of operationalization, governments and agencies identify and address the practical elements of providing language assistance and serving LEP individuals, such as establishing vendor contracts for interpreting and translation services, training staff on how to use such tools effectively, and budgeting for contracted language services.²⁰

Using Language Access Plans and Coordinators

As discussed in the previous section, language access plans (LAPs) and language access coordinators (LACs) were important and common features across the state, county, and city language access programs examined for this report. LAPs and LACs generally served key roles in program implementation, with LAPs providing written goals, requirements, and standards to agency managers and staff and LACs ensuring language access efforts were appropriately supported.

The governments and agencies using LAPs were all at different stages of implementation. In some, language access planning had been occurring for years, while in others, LAP development was relatively new.²¹ Several interviewees noted that LAPs were useful in capturing and sustaining departments' commitments to serving LEP individuals. By acting as a written record of such commitments, LAPs allowed LACs, agency staff, communities, and advocates to push for greater language access within the covered agencies. Another interviewee described a major benefit of LAPs as their ability to allow language access to better "seep into government processes" by raising awareness of obligations, standards, and required practices for serving LEP individuals.²²

In the agencies that had LACs (who were sometimes referred to as language access liaisons), these staff members served as nodes for the implementation of language access programs. Acting as the point of contact for all things language access, LACs served in a variety of roles, including as ambassadors and advocates for the issue, implementers of policies and plans, as well as troubleshooters and go-to experts whose primary responsibility was to "stay on top of things" related to language access in their agencies.²³

At the agency level, being an LAC was generally not a full-time position. Instead, LACs usually took on their responsibilities in addition to the duties of another position, whether by volunteering or being assigned. In terms of specific responsibilities, LACs often managed vendor contracts, which included holding the access codes for interpreting and translation services and approving agency staff's requests for their use. As mentioned above, LACs also assisted with developing and overseeing LAPs, and at times

Acting as the point of contact for all things language access, LACs served in a variety of roles, including as ambassadors and advocates for the issue, implementers of policies and plans, as well as troubleshooters and go-to experts.

20 It is important to note that these measures could also precede the development of a language access program at the government or agency level. Whether due to factors such as practical concerns or civil rights investigations, individual staff, managers, agency subcomponents, and agencies themselves may have already taken steps such as these to serve LEP individuals prior to the creation of a more official, centralized language access program.

21 Author interview with a language access specialist from a state government, January 24, 2023.

22 Author interview with a language access specialist from a state government, January 24, 2023.

23 Author interview with staff from a state agency, June 7, 2022.

they created procedures for agency staff based on the LACs' familiarity with the programs and services agencies managed. LACs also often provided reminders or updates around language access. For example, one specialist from a city government described how they notified agency LACs to email agency staff and managers about how to provide translated materials alerting residents of an impending severe weather event.²⁴

Interviewees noted that LACs frequently faced challenges in their roles. In some cases, LACs struggled to gain the influence or support from leadership needed to effectively change practices around language access in their agencies, limiting their impact. The reality that for most, being an LAC was not a full-time role, and thus the time they had to devote to language access was limited, was another commonly reported challenge. In addition, turnover was cited as a point of difficulty, since the departure of LACs often sapped expertise and momentum from agencies' language access work.

Raising Agency Staff Awareness and Capacity to Provide Language Access

Language access is one of many pressing issues that government and agency leadership and staff must account for while planning and delivering services to the public. Awareness of the considerations and practical steps involved in providing access to LEP individuals may also be low among government and agency staff as well as leadership. To provide language access, government and agency staff working in public-facing roles need a range of practical information, such as how to access multilingual colleagues' assistance along with interpreting and translation services and how to effectively use those tools in a culturally appropriate manner. Staff and managers may need information and assistance with including content in languages other than English in public outreach materials or setting aside funding for the use of language services in projects or regular operations. The governments and agencies examined for this report primarily used two strategies to tackle these related challenges: training staff on language access issues and providing staff with written resources or guidance.

Training Staff on Language Access

Many of the governments and agencies examined provided some form of training on language access to directors, managers, and/or staff. These trainings differed significantly in content, format, and audience, but they all shared the overarching goal of making managers and staff aware of language access issues, the obligation to serve LEP individuals, and the procedures or tools to do so.

In terms of what was covered, these trainings usually shared certain core of content, although the level of detail and range of topics differed between governments and agencies. Many trainings included a basic orientation to language access both as a civil rights issue as well as its importance for the effectiveness and reach of government programs. Several interviewees said their cities or agencies more explicitly tied trainings to cultural competency and the issue's intersection with language barriers.²⁵ Trainings also regularly focused on how to serve LEP individuals when staff encountered them. For example, many trainings covered how to access a contracted phone interpretation service or how to liaise with an LAC

²⁴ Author interview with a language access specialist from a local government, September 29, 2022.

²⁵ Author interview with a language access specialist from a local government, September 26, 2022; author interview with a language access specialist from a local government, September 29, 2022; author interview with staff from a local public health department, September 23, 2022.

to have a document translated for a client. In some cases, governments and agencies also used trainings to address more specialized issues, such as how to effectively work with in-person interpreters or provide updates on pressing issues (e.g., the arrival of large numbers of Afghan evacuees or COVID-19 measures). In jurisdictions with language access laws and policies, trainings also often provided details on how managers and staff should engage with required annual processes and procedures set out in those laws and policies.²⁶

Timing ranged from having one-off sessions to more regular trainings on a variety of topics related to serving LEP individuals.

The format and timing of trainings varied between jurisdictions. Timing ranged from having one-off sessions to more regular trainings on a variety of topics related to serving LEP individuals. For example, one interviewee reported their local government having a series of virtual brown bags

for staff on topics related to language access.²⁷ Other governments and agencies embedded language access issues into other trainings or professional development opportunities they offered to staff. Several interviewees noted that language access had become part of the onboarding process for new staff. One local government included language access in its diversity, equity, and inclusion (DEI) trainings, while another embedded the topic in its sessions on communication and community engagement.²⁸

The audience for training on language access also varied from site to site. In some cases, training was intended for the entire staff of a government or agency. However, in other cases, training was specifically for agency leadership and designed to develop more support for language access among those leaders and directors. For example, one city mostly delivered their training on language access to agency directors, their chiefs of staff, and their corresponding language access liaisons.²⁹ In other cases, centralized staff delivered more specialized trainings for LACs in agencies across their jurisdictions.

Providing Staff with Written Resources and Guidance

Government and agency staff as well as managers often need written resources that they can access to obtain information related to language access. Such resources also serve as an accessible record of key information such as the contact information for LACs, LAP templates, and access codes for language services vendors. These tools equip managers and staff to address various practical challenges related to language access that come up in their regular duties. The governments and agencies examined for this report used both formal guidance and instructions, such as standard operating procedures, and more informal collections of resources, usually centralized in an online hub or shared online folder.

- ▶ **Step-by-step guidance for staff.** Several governments and agencies examined for this project developed guidance, step-by-step instructions, and basic procedures for how their staff should provide services and information to LEP individuals, whether directly or when conducting broader community outreach. Such “handy guides,” as one human services agency staffer described them, contained different levels of detail but often set basic standards for how staff should serve LEP

²⁶ Hofstetter, McHugh, and O’Toole, *A Framework for Language Access*, 17–18.

²⁷ Author interview with a language access specialist from a local government, September 29, 2022.

²⁸ Author interview with a language access specialist from a local government, March 6, 2023; author interview with a language access specialist from a local government, September 26, 2022.

²⁹ Author interview with language access specialists from a local government, November 5, 2022.

individuals, such as not using Google Translate for translation needs.³⁰ Another city government provided staff with more explicit instructions in their procedures on how they should work with interpreters and translators.³¹

- ▶ **Standard operating procedures.** The most formal type of guidance was standard operating procedures for providing language access, which only a few interviewees reported their government or agency either having or being in the process of developing. These procedures were generally more prescriptive and carried greater weight for staff, given they were sent out by leadership or other offices to an entire agency or local government—an approach one interviewee described as an “institutionalization of procedures.”³² The level of detail in such documents could be high, with one interviewee describing their local government as having a 30-page, vetted set of standard operating procedures that detailed the “responsibilities of every person within the agency” around providing language access.³³ In terms of placement, one city reportedly included language access in its plain language toolkit and another as part of a formal equitable engagement toolkit.³⁴
- ▶ **Online resource hubs.** Many of the examined governments and agencies also had centralized collections of resources for staff related to language access, generally via shared online folders on a web-based collaborative platform such as SharePoint. In these online one-stop shops, staff could access all of the guidance, tools, and other resources they would need to effectively serve LEP individuals—as one interviewee described it, both “the basics and every tool you would need to serve someone who is LEP.”³⁵ Another interviewee described their city’s centralized resource hub as containing “best practices, requirements, model procedures, language access tools like multilingual signage and I Speak Cards.”³⁶ These tools were generally mentioned in trainings on language access and shared by LACs with their agencies and/or teams.

Challenges associated with staff awareness and action can persist despite trainings, resources, and guidance. Many interviewees noted that, even when resources were well-publicized and regular trainings provided, awareness of language access across agencies, programs, services, and staff could remain frustratingly low. As one interviewee commented, language access was usually “not on the forefront of people’s minds,” even those wishing to be “proactive” on the issue.³⁷

Using Language Services Vendors

For most governments and agencies, it is not possible to adequately serve LEP individuals through the use of multilingual employees alone. Though such employees can be invaluable and convenient sources of language assistance, the number of LEP individuals and the time needed to produce many translated

30 Author interview with a language access specialist from a county human services agency, November 4, 2022.

31 Author interview with a language access specialist from a local government, March 6, 2023.

32 Author interview with a language access specialist from a local government, March 6, 2023.

33 Author interview with a language access specialist from a local government, January 25, 2023.

34 Author interview with a language access specialist from a local government, September 26, 2022.

35 Author interview with a language access specialist from a local government, August 26, 2022.

36 Author interview with a language access specialist from a local government, February 16, 2023. I Speak Cards provide a list of languages that LEP individual can use to easily identify which one(s) they speak from a translated phrase. See, for example, U.S. Department of Agriculture, “[I Speak Statements Cards](#),” updated July 8, 2024; King County, “[King County ‘I Speak’ Cards](#),” accessed April 22, 2025; LEP.gov, “[Translation—Language Identification and I Speak Cards](#),” accessed 24, 2025.

37 Author interview with a language access specialist from a state government, January 24, 2023.

written materials can make it virtually impossible to rely solely on multilingual staff to meet language assistance needs. Similarly, although agencies may be able to provide assistance in certain common languages (such as Spanish) primarily with multilingual staff, it is unlikely they will have staff members proficient in all the languages they will encounter, particularly those less common in their regions.

To address this challenge, most governments and agencies turn to vendors that offer contracted interpreters, either remotely or in person, as well as translation for written and web materials. These vendors may be nationwide for-profit companies or local organizations, though the services they provide are generally similar. As interviews indicated, coordinating language services contracts and embedding these services into government programs and processes are prominent tasks for many language access programs. Interviewees reported several key considerations for the use of such vendors, including who holds responsibility for the contracts, how to provide oversight, what the trade-offs are of local versus nationwide vendors, and how contracted interpreting and translation services are integrated into staff interactions with the public and, by extension, LEP individuals.

Establishing Responsibility for Language Services Contracts

Language access programs examined for this project generally either gave responsibility for language services to a centralized office or team, which this report terms a centralized approach, or to agencies themselves, which this report terms a decentralized approach. Comprising a range of levels of centralization, each approach carried its own features, advantages, and limitations.

Centralized Language Services Contracts. In programs with centralized language services contracts, these were usually managed by the office or team responsible for the overall language access program. Such contracts were often developed in partnership with contracting, general services, or other administrative offices in order to comply with government rules and regulations around establishing vendor contracts. The use of centralized contracts generally took one of three forms:

- ▶ **A blanket contract.** In this model, a language access program developed a single contract that covered all agencies and offices in the program, all services related to interpreting and translation, and that could be accessed by staff across an entire jurisdiction. This scope generally required a contract with a large language services company able to provide forms of assistance such as 24/7 phone interpreting for emergency services and call centers, which smaller vendors were generally not able to offer. In many cases, governments and agencies recorded their offices' or programs' level of usage of the contracted services and then charged them accordingly. In a few cases, language access programs covered the cost of contracts through funds provided by their jurisdiction, meaning offices and staff could use the contracted services as much as they needed rather than limiting their use based on their own budgets (see the discussion of funding at the end of Section 2.B. for more detail).
- ▶ **Preapproved vendors.** In this model, a centralized office or team managing a language access program developed contracts with a number of language services vendors and then allowed agencies, offices, and programs to choose whichever was most relevant to their needs. For example, one interviewee reported that their local government had a list of 12 approved language services

vendors that agencies could choose from.³⁸ This approach allowed for the setting of standard rates and assurance of quality while also preserving some flexibility for staff to choose which vendor was the best fit for their language assistance needs.

- ▶ **Centralized contracts for specialized services.** This model combines elements of the prior two, with centralized contracts with language services vendors that have certain specializations along with, in many cases, a list of preapproved vendors for other forms of language assistance. For example, some of the governments and agencies examined for this report had centralized contracts for American Sign Language (ASL) interpreting or for on-demand, phone interpreting for 311, 911, and other emergency services functions, while leaving broader decisions about language services contracts to individual agencies or offices.

Interviewees noted several benefits of using centralized contracts. First, and perhaps most importantly, centralized contracts allowed governments and agencies to negotiate lower rates and thus to save money and stretch their funding for interpreting and translation. These cost savings were achieved by aggregating demand into a single contract, thus ensuring vendors would receive greater numbers of requests for their services and making them willing to charge less than they would if individual agencies or offices sought their own contracts. As one interviewee put it, centralized contracts allowed their city “to create better deals and strictly define services.”³⁹ This approach also created cost savings by reducing the amount of staff time needed to develop additional contracts for each agency.

Centralized contracts often also made quality control and data collection easier for language access programs. For many programs with centralized contracts, either staff or agency LACs had to approve requests for the use of interpreting or translation services, which provided an opportunity to monitor the extent to which agencies and staff were using these services as well as the amount of funding being expended for them. This oversight could also allow for quality assurance measures, enabling LACs to ensure that managers and staff were requesting the right types of language services.

Centralized contracts allowed governments and agencies to negotiate lower rates and thus to save money and stretch their funding for interpreting and translation.

Despite these benefits, interviewees also reported drawbacks related to using centralized contracts. Centralized contracts, particularly blanket contracts, could promote a one-sized-fits-all version of language services that could create barriers for agencies and burdens for staff whose needs do not neatly align with those contracts. Agencies delivering widely different services, ranging from emergency services to public assistance programs, may have considerably different language services needs. Some government programs might require primarily translation of public notices and online content in a limited set of languages other than English, while others (such as a fire department) could require on-demand interpreting in a number of languages, with the exact mix difficult to predict. In these situations, centralized contracts that were insufficiently nimble and flexible could create challenges. For language access program staff, approving

³⁸ Author interview with a language access specialist from a local government, October 4, 2022.

³⁹ Author interview with a language access specialist from a state government, September 26, 2022.

usage requests or overseeing contracts for a large number of agencies and programs could also take considerable amounts of time.

Similar to the blanket contract described above, a few interviewees from local governments and agencies noted that they were able to use centralized statewide contracts for all of their translating and interpreting needs. Available in only a limited number of states, such contracts allow local governments across an entire state to tap into a state-managed contract and pay per use with a negotiated, lower cost. Such contracts were described as extremely useful for smaller local governments and agencies without citywide contracts. In one case, a county government staffer also reported being able to use a nearby city's centralized contract for their language assistance needs, enjoying cost savings and avoiding needing to go through their own intensive vendor approval process.⁴⁰

Decentralized Language Services Contracts. In a decentralized approach, individual agencies were responsible for developing and maintaining their own language services contracts. This approach was more common among newer or less extensive language access programs, though some governments had also returned to this approach after using centralized contracts.

Decentralized contracts presented their own advantages and disadvantages. Decentralization provided more flexibility to agencies to develop vendor contracts that made sense for their services and sectors. This approach also required less administration from the office or team managing language access across an entire jurisdiction. However, decentralized contracts were less efficient, requiring agencies or even their subcomponents to develop and negotiate their own contracts, often at a higher rate than could be set in a centralized contract. Similarly, decentralized contracting was harder for the staff or office overseeing and coordinating language access to monitor.

Some of the governments examined used a hybrid approach, providing smaller agencies with access to a centralized contract while requiring larger ones to develop their own contracts due to the size of their programs and extent of their interpreting and translation needs. For example, interviewees from several cities and counties reported that their human services agencies, which were responsible for large public assistance programs such as the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF), often had their own interpreting and translation contracts.

Using Local versus Larger Vendors for Language Services Contracts

Governments' and agencies' language access programs contracted with different types of language services vendors. In many cases, they prioritized the use of local vendors—that is, language services providers located in the same city, county, or state as the language access program. These local vendors could include for-profit companies, nonprofit organizations, or individual interpreters or translators.

Local vendors brought benefits as well as some limitations, according to those interviewed. Because they were located in the same area as the language access program, such vendors often brought a level of understanding of the local context that large national vendors could not. For example, one interviewee noted that a local vendor was particularly helpful in translating terms related to snow emergencies

⁴⁰ Author interview with a language access specialist from a local government, November 6, 2022.

and winter weather used by local speakers of a particular language due to their connections to that community.⁴¹ Local vendors, especially individually contracted interpreters and translators, were also essential in providing interpreting and translation in languages that were prevalent in particular cities or counties but less common nationally. One interviewee noted that a local Somali translator was able to provide effective services by understanding that many in the local community did not use the written form of their language to the same extent as might be expected by outside vendors.⁴² Similarly, several interviewees noted that local vendors could help immigrants navigate and understand specific features of their new homes due to their own experience living in the community for longer periods. For example, one interviewee described how local Afghan interpreters were able to not only interpret for newly arrived refugees but also provide greater detail on how certain government programs functioned in their communities.⁴³

The primary drawback of local vendors also corresponds to the main strength of large nationwide vendors, as reported by interviewees. Local vendors generally did not have the capacity to meet all of the needs of larger agencies nor to provide on-demand, remote interpreting. As a result, larger nationwide vendors were useful for providing language services on an on-call basis and in rare languages. Larger vendors were also often able to offer apps or other technology that could be used to request interpreting or translation. For example, one agency was able to install an interpretation app from a large nationwide company on the tablets employees used in the community, providing rapid access to interpreting as needed.⁴⁴

Using Data to Track Need and Progress

The use of data is key to governments' and agencies' ability to anticipate the need for language services from the communities they serve and to track the level and quality of service they are providing to LEP individuals. Government and agency staff interviewed for this project detailed a number of sources of relevant data and approaches to taking data into consideration during the implementation and monitoring of their language access programs. These strategies fell into three primary categories: using existing population data to anticipate local communities' need for language services; collecting data on the use of language services and other performance indicators; and soliciting feedback from community members and organizations on the reach and effectiveness of language access measures.

Using Population Data

Governments and agencies examined for this report used several sources of population data to determine the extent of the need for language services in their jurisdictions. These data sources provided both an estimate on how many LEP individuals were present in a service area as well as what languages were most commonly spoken by LEP individuals. These types of data were mostly used to determine what materials should be translated and into what languages as well as to consider how many multilingual staff should be available. Governments and agencies also used the data to better understand which areas or neighborhoods in their jurisdictions were most in need of language services.

41 Author interview with a language access specialist from a local government, January 9, 2023.

42 Author interview with staff from a city nutritional assistance program, October 14, 2022.

43 Author interview with a language access specialist from a local government, September 29, 2022.

44 Author interview with staff from a city office, October 21, 2022.

The primary sources for population data used by governments and agencies examined for this project were datasets from the U.S. Census Bureau, school district data, and more observational or anecdotal information collected from a variety of sources. Each of these sources brought with it advantages as well as disadvantages:

- ▶ **Census Bureau data.** In addition to the decennial census, many of the governments and agencies studied used data from the U.S. Census Bureau's annual American Community Survey (ACS) to estimate the size of their LEP populations and the languages they speak. This strategy matches previous federal guidance for recipients of federal funding on providing language access and aligns with the requirements of many state and local language access laws and policies.⁴⁵ Such datasets were described as particularly useful because they are of high quality, publicly available, and contain information on respondents' LEP status and non-English languages spoken. Common challenges were also described, however. Census data take time to collect and publish, creating a lag in the availability of up-to-date data, and based on data quality or privacy considerations, datasets may only use broad descriptors such as "Indo-European languages" that are of little use to language access planning.⁴⁶
- ▶ **School district data.** Several governments and agencies reported using data collected from their local K-12 systems to estimate the size of different language groups in their jurisdictions or service areas. These data, usually collected by school districts for administrative purposes, included parents' preferred home languages, and governments and agencies used those with non-English home languages as a proxy for LEP households. Such datasets were useful in that they were generally more specific than ACS data at the local level and updated more quickly. At the same time, the data only corresponded to households with school-age children, and school district boundaries did not always neatly align with the jurisdiction or service area for governments and agencies.⁴⁷
- ▶ **Observational data.** Governments and agencies also reported using a range of anecdotal or observational data on what language groups were present and in need of language services. In some cases, this was simply agencies or government programs reporting what groups staff most commonly encountered when serving the public. For example, one language access specialist from a small city noted that their parks department had highlighted a need to translate signage into Chinese in several parks due to the large number of Chinese-speaking residents using the facilities.⁴⁸ Similarly, representatives of several governments and agencies described how the arrival of refugees, asylum seekers, and parolees from Afghanistan and Ukraine increased the need for assistance in the languages spoken in those countries. A few language access programs also worked with refugee resettlement providers in their areas to better understand resettlement patterns and what languages they could expect to encounter among refugee newcomers. Though, by definition, anecdotal sources

45 DOJ, "Guidance to Federal Financial Assistance Recipients," 41460; Hofstetter, McHugh, and O'Toole, *A Framework for Language Access*, 25.

46 While Census datasets often provide population counts for speakers of individual non-English languages, smaller linguistic groups are sometimes grouped together. In some Census datasets, particularly for smaller geographies, languages may be grouped into even more general categories (the simplest categorization sorts non-English languages into four groups: Spanish, other Indo-European languages, Asian and Pacific Island languages, and other languages). See U.S. Census Bureau, "About Language Use in the U.S. Population," updated December 16, 2021.

47 Christy Hoff and Erica Gardner, "An Innovative Model for Generating Limited English Proficient Population Estimates," MPI, accessed February 3, 2025.

48 Author interview with a language access specialist from a local government, September 29, 2022.

of information could not provide exact numbers of speakers of a language, they were nonetheless useful in that they could shed light on smaller language groups, such as those within refugee communities, that may not have showed up in other, more formal data sources.

Given that all of these data sources had their own uses and limitations, many governments and agencies reported using them in combination with each other in order to gather the most complete picture of language needs and the LEP population in their areas. With this approach, language access programs sought to ensure that one data source's gaps could be filled with complementary sources. For example, observational data might be instrumental in anticipating emerging language needs, while ACS data could be used to better understand the size of existing language groups and which languages government programs were most likely to encounter in their work.

Tracking Language Service Usage and Performance

While data on the size and makeup of an area's LEP population were generally used for planning purposes, governments and agencies also collected and used data on the usage of language services as well as the performance of their language access programs. These types of data enabled governments and agencies to better understand where and how many LEP individuals were interacting with public services and to monitor the extent to which language access measures were being implemented by agencies, offices, and staff.

In order to track usage of language services, governments and agencies generally relied on vendors or the staff within their language access programs. Most contracted language services vendors were able to provide an array of data, such as the number of documents they translated, the number of times their remote or in-person interpreters interacted with LEP individuals, and what languages these interactions corresponded to. For some staff of language access programs, tracking such information required combining numbers and reports from a variety of vendors. In more centralized language access programs, staff or LACs who approved vendor requests could also track their usage themselves. Similarly, some governments and agencies tracked funding used for language services by program or office, generally through the use of funding codes or via vendor expense reports. Besides providing useful data on the implementation of language access measures, usage data could illuminate language assistance needs that did not appear as prominent in population data. For example, one interviewee noted that language services in Swahili were the third most used by their agency even though ACS data did not identify Swahili as a top non-English language spoken in the local area.⁴⁹

Several interviewees also mentioned tracking the usage of translated online materials in order to better understand what language groups were interacting with their web content most frequently. For example, a representative of one city agency described its use of paid ads on social media and how that allowed their office to see more information on who was interacting with their posts and in what languages.⁵⁰ Another interviewee said their local agency was able to track the number of times the translation function was used on their website and into what languages.⁵¹

49 Author interview with a language access specialist from a local government, September 29, 2022.

50 Author interview with staff from a city nutritional assistance program, October 14, 2022.

51 Author interview with staff from a city human services agency, March 27, 2023.

BOX 2**Philadelphia's Language Services Usage Dashboard**

Language Access Philly is Philadelphia's citywide language access program, managed by the Office of Immigrant Affairs (OIA). The program is responsible for overseeing language access policies and plans, including interpretation and translation services, to help ensure everyone can equitably access city services in their preferred language. In December 2022, Philadelphia's OIA announced the launch of an interactive Language Services Usage dashboard that publicly displays data on the city's language access efforts and requested services. The dashboard is maintained through the Philadelphia Office of Innovation and Technology and is part of a larger city initiative, the Open Data Program, to make government data more accessible to the public. At the end of each fiscal year, OIA compiles language access data provided by citywide language services vendors into a master file before updating the dashboard. Dashboard users can view data on translation and interpretation usage, the variety of languages requested, and the services provided across different departments.

The Language Services Usage dashboard also serves as a tracking system for the city, demonstrating the potential utility and extent to which the government and its agencies are implementing language access measures across multiple programs. The dashboard provides greater transparency about who is being served and how, aiming to inform the public about language access initiatives, encourage individuals to seek out city services, and promote research that improves ongoing citywide language access efforts.

Sources: Philadelphia Office of Immigrant Affairs, Language Access Philly, "[Philadelphia Language Services Usage](#)," updated June 2023; City of Philadelphia, "[City Releases an Interactive Language Services Usage Dashboard](#)" (press release, December 12, 2022).

Overall, these data sources provided governments and agencies with up-to-date numbers on how LEP individuals were using public services or accessing information, in ways that went beyond a portrait of their local community's demographics (see Box 2). As one interviewee commented, data "helps [governments] see what is existing, what is deviating, and how [they should] invest and make changes for the future."⁵² Another interviewee noted that data on the usage of language services both "provided answers and raised questions" on how language access measures were playing out in their area. For example, the interviewee described how examining such data alerted their local government to a decline in the use of telephonic interpretation, an issue that the language access program was prompted to look into and would not have otherwise been aware of.⁵³

At the same time, those interviewed usually described the collection of data on language services usage as a work in progress. In many cases, some but not all agencies or programs were systemically tracking or reporting their usage of language services, limiting understanding of the effectiveness or implementation of language access measures across an entire government or agency. Another challenge was that, although multilingual staff were the primary means through which many agencies, offices, and individual programs served LEP individuals, this form of language assistance was often more difficult to track than vendor services.

Those interviewed usually described the collection of data on language services usage as a work in progress.

⁵² Author interview with language access specialists from a local government, November 5, 2022.

⁵³ Author interview with a language access specialist from a local government, February 16, 2023.

Leveraging Community Feedback

Some governments and agencies also sought feedback from communities and organizations serving them as a source of data on the effectiveness of their language access programs. The most formal version of this involved tracking complaints related to language access filed by LEP individuals with a government or agency. As a source of data, complaints allowed language access program staff or LACs to identify persistent challenges, whether with a particular program, agency, location, or office—a process one interviewee described as “monitoring for patterns.”⁵⁴

Similarly, several governments and agencies held regular feedback sessions with formal groups of community members or organizations serving those communities. These advisory councils were more common at the government rather than the agency level, and they allowed community groups to raise language access issues at regularly scheduled meetings. These efforts often piggybacked off existing engagement with immigrant communities via offices of new Americans or immigrant affairs. In one case, a staffer from a city agency reported holding a town hall with local organizations serving LEP individuals in order to invite them to raise issues and build trust.⁵⁵

BOX 3

Leveraging Community Feedback to Inform Language Access Measures in Greensboro

Greensboro, North Carolina’s International Advisory Committee (IAC) is a promising example of how community feedback can be leveraged to inform and improve language access measures. The IAC was established via a resolution passed by the Greensboro City Council in 2008. Housed within Greensboro’s Human Rights Commission, the IAC is comprised of elected immigrant community leaders who represent the city’s diverse international community. Members are responsible for voicing problems, identifying needs within the local immigrant community, and suggesting solutions. The IAC is overseen by five leadership figures, including a chair, two vice chairs, a secretary, and one executive member. All committee members are elected to serve two-year terms.

Through its relationship with the IAC, the City of Greensboro has improved its ability to provide language access resources that are in tune with the needs of its immigrant communities. Much of this work has been a direct result of Greensboro’s Language Access Program working alongside the IAC to receive feedback and guidance on language access resources for different communities. Throughout the COVID-19 pandemic, the IAC hosted weekly meetings with community leaders to discuss how the city could improve its connection to local communities. These discussions amplified the need for the city to provide information in plain language, to create videos narrated by native speakers of various languages (to address concerns about limited literacy in some communities), and to establish emergency communications practices in advance of critical events to ensure timely language services. More importantly, this mechanism has also helped the city government of Greensboro establish a direct line to community concerns that provides crucial insight on which language access measures or practices will best address the needs of the local community.

Source: Author interview with staff from the City of Greensboro, NC, September 2022.

⁵⁴ Author interview with staff from a city human services agency, March 27, 2023.

⁵⁵ Author interview with staff from a city office, October 21, 2022.

Funding and Budgeting for Language Access Measures

Effective funding and budgeting for language access programs was a critical step for their successful and sustainable operationalization. In addition to paying for the use of vendor contracts for interpretation and translation services, funding was needed to cover staff time spent on a range of activities such as developing LAPs and resources, implementing new language access policies, serving as LACs, driving community outreach efforts, and organizing trainings. Language access programs had to strategically use available funding and resources to ensure sufficient support for their implementation, given they were often only one of many initiatives seeking funding from state and local budgets.⁵⁶

This section examines different budgetary and funding strategies used by governments and agencies to support the implementation of language access programs. These processes typically vary based on the size, scope, and needs of language access programs and the services they oversee. This section examines three primary themes that emerged in interviews: different strategies for allocating funding, approaches to managing budgets for language access, and experiences operating within resource-constrained environments.

Allocating Funds for Language Access

At a basic level, governments and agencies must determine the source of funding for their language access measures. Interviewees described the allocation of funds for language access programs as a complex process that varied by program, agency, and department. This variation is largely tied to governments' and agencies' specific needs, contexts, and capacity for serving LEP individuals. Although their exact approaches differed, the governments and agencies examined mostly relied on one of three common strategies for allocating funds to support language access efforts: drawing from a general fund, utilizing a specific language access fund, or accessing supplemental sources of funding.

- ▶ **General fund.** Several governments and agencies were described as drawing from the general fund of their jurisdiction to finance language access services. In this approach, funding to pay for vendor language services was pulled directly from a general fund, most commonly via budget line items or baseline funding allocated to all departments and offices from their annual budget requests. Language access was usually budgeted under umbrella categories such as operations or administration funding. As a result, instead of having a set amount of funding allocated specifically for language access, general funding had to be shared with various other functions. For example, one interviewee described how switching to a general fund resulted in programs competing with one another to receive funding for their various priorities from that single pot of funding.⁵⁷ In such systems, agencies and their subcomponents had to be cautious about not allowing contracted language

⁵⁶ Although civil rights regulations require that federally funded programs, including those managed by state and local governments, provide language access, additional or supplemental funds are not generally provided for the development and continuation of language access programs. Instead, federal funding recipients are generally expected to either use the funds they have already been granted to serve LEP individuals or to find additional funding. Thus, state and local governments and agencies are primarily responsible for funding their own language access programs, whether through existing federal grants or their own budgets.

⁵⁷ Author interview with language access specialists from a local government, November 5, 2022.

services to take up too much of the general funding granted to them for administrative purposes, lest they not have enough money left for other priorities the funding was intended to also cover.

- ▶ **Language access fund.** Some governments and agencies examined for this report chose to create a dedicated fund to support language access services. At the state or local government level, this fund was sometimes overseen by a centralized office, as is discussed more in Section 2.C. To determine the size of language access funds, this centralized office or individual agencies generally relied on data on the use of language services contracts in previous years and on other language access expenses, when available. Setting aside funds specifically for language access had the benefit of providing clear resources for this work and avoiding competition with other initiatives, but this approach also required extensive planning and reliable data and carried some risks. For example, in order for this approach to be effective, the government, agency, and/or its subcomponents had to have sound estimates of the amount of funding they would need to provide language access or else risk running out. For example, one interviewee described how departments in their jurisdiction had to approximate future language access costs, request funds through a purchasing code, and receive city council approval during every budget cycle before accessing the city's language access fund, all steps that took significant staff time. Should the requests exceed what was budgeted for language access, agencies would have to be prepared to balance this out with funds from their own budget.⁵⁸ Despite this risk, few interviewees had direct experience with running out of funding—with the exception of the additional interpreting and translation services required to respond to the COVID-19 pandemic, which were usually paid for with federal relief funds distributed to states and localities during the health crisis. To mitigate this risk, some agency staff and LACs worked with their agency's finance departments to make accurate language access cost estimates and budget requests.
- ▶ **Supplemental sources of funding.** Many governments and agencies examined for this report used temporary, supplemental sources of funding to support language access. These could be funds from state or federal entities—and theoretically from philanthropic sources, though no such examples were noted in interviews—and were usually used for discrete projects related to language access, such as translating a certain set of materials. For example, one interviewee shared that they had a special temporary fund with their state's government to assist with funding language access programs.⁵⁹ Similarly, another interviewee explained that their state leadership granted a \$20 million one-time investment to develop a consolidated vendor contract and mini translation hub to support language access within a larger human services agency.⁶⁰ Federal COVID-19 relief funds, authorized under the *American Rescue Plan Act of 2021*, played a crucial role in promoting and expanding language access programs across the sites examined. For many of the states and localities interviewed, COVID-19 relief funds helped support new language access infrastructure and cover large cost increases throughout the pandemic. However, while supplemental funding can be invaluable in providing initial support for language access programs, expanding services in moments of high demand, and funding special projects, it ultimately is not a sustainable source of support given its temporary nature.

58 Author interview with a language access specialist from a local government, August 26, 2022.

59 Author interview with staff of an immigrant-serving contractor of a state human services agency, December 5, 2022.

60 Author interview with staff of a state operations office, June 13, 2023.

Managing Language Access Budgets

A key consideration for governments and agencies seeking to effectively fund their language access efforts is designating which entity or entities will be responsible for overseeing budgets and the usage of funding (most commonly for language services from vendors). Many of the governments examined for this report allowed their agencies or agency subcomponents to manage this process entirely or mostly on their own, though some placed this responsibility with the office or team overseeing language access. The choice of a decentralized or centralized model could depend on many factors, including the overall structure, size, and needs of the agency along with how its language access program developed. As with using centralized or decentralized vendor contracts, each approach carried its own benefits and limitations.

Decentralized Funding Approaches. Under a decentralized approach, agencies and their subcomponents are responsible for incorporating and covering costs related to language access in their own budgets and funding streams. Depending on the services provided or the funds agencies and their subcomponents have access to, these costs could be drawn from a variety of sources, generally aligned with one or more of the three approaches to funding allocation outlined above. For example, one interviewee reported that their local government used fixed local budget allocations to fund certain language access services while relying on state and federal sources to fund others.⁶¹ Since agencies were responsible for paying for their language access costs, some also sought to limit those costs. As one interviewee explained, agencies in their jurisdiction relied more heavily on multilingual staff to serve LEP individuals (since the only expense in such cases was staff time) or to use only federal funding for language access.⁶²

Providing departments and offices with the ability to manage their own language access budgets carried certain benefits. As interviewees explained, a decentralized approach was useful because it empowered agencies, who understand firsthand their services, needs, and scale, to request the appropriate level of funding to support language access measures.⁶³ Decentralization also provided flexibility, which was helpful given agencies' varied sizes, capacity, and service sectors. For example, larger, more public-facing departments often required more funding to adequately meet their obligations and could draw from larger federal grants to do so, while smaller departments with less public contact might be able to effectively provide language access with only small expenses related to a few translation projects. Similarly, a decentralized approach enabled agencies and their subcomponents to braid together funding from federal grant programs and supplemental state and local funding. For example, one interviewee described how their city's finance departments supported language access in their SNAP program by identifying in which cases the program's federal, state, or local funding should be used to support a particular project or action related to serving LEP individuals.⁶⁴ Similarly, another interviewee shared that their local government's decentralized approach allowed departments to choose if they wanted to implement a centralized plan for the whole department or allow programs within each department to manage their own language access budgets.⁶⁵

61 Author interview with a language access specialist from a local government, September 26, 2022.

62 Author interview with a language access specialist from a local government, November 6, 2022.

63 Author interview with a language access specialist from a local government, March 1, 2023.

64 Author interview with staff from a city human services agency, March 27, 2023.

65 Author interview with a language access specialist from a local government, October 4, 2022.

Providing agencies with the autonomy and responsibility to use their own funding led them to feel that they had “skin in the game,” as one interviewee put it.

In addition, interviewees noted that decentralized contracts often prompted agencies to take more ownership over their language access programs and services. Providing agencies with the autonomy and responsibility to use their own funding led them to feel that they had “skin in the game,” as one interviewee put it.⁶⁶ This sense of responsibility and

accountability motivated agencies and their subcomponents to play a greater role in adhering to language access guidelines since their funding was being dedicated to the issue.

Despite these benefits, decentralized approaches also had limitations. First, such approaches could create fragmentation and unevenness across different agencies. Some agencies might commit dedicated resources from a single source while others might use a complex mix of funding sources to support their work, resulting in different levels of available resources and, in some cases, sufficiency in serving LEP individuals. In such systems, centralized staff or LACs could also find it difficult to monitor or evaluate the extent to which agencies or their subcomponents were effectively funding language access in their services. One interviewee noted that grant managers across different agencies could be managing up to 15 or 20 grants each, making understanding where funds for language access were coming from challenging.⁶⁷ Decentralization could also lead to greater competition between departments for language access funding. For example, one interviewee disclosed that agencies had to actively advocate for their own language access funds during each budget cycle, competing with other agencies’ priorities—including those also related to language access.⁶⁸ This could make planning for and anticipating language access funds difficult, especially in resource-constrained environments where allocations could fluctuate from year to year. Similarly, decentralized funding approaches could put smaller agencies at a disadvantage, since some have limited flexible funding to support language access measures. For example, one interview noted that smaller departments within their local government struggled with funding language access services; in some cases, their limited budget and capacity could result in them going so far as to exclude language access funding from their budgets entirely.⁶⁹

Centralized Funding Approaches. Several sites examined for this report used centralized approaches for budgeting and funding related to language access. In centralized approaches, all language access funding was managed by one office or entity that oversees the distribution of those funds. Agencies and their subcomponents seeking support for the use of language vendors or specific projects related to language access could request and draw funds from the same pot of funding, with the approval or notification of that centralized entity. In practice, this usually meant an agency staff member or, more often, LAC requesting services from a language services vendor and then either using a funding code for that expense to draw from the centralized fund or using an access code for the vendor that automatically billed the centralized entity overseeing the fund. In nearly all of the sites examined that used a centralized model, the entity that oversaw this funding was the same one that oversaw the language access program more broadly.

⁶⁶ Author interview with a language access specialist from a local government, January 9, 2023.

⁶⁷ Author interview with language access specialists from a local government, March 7, 2023.

⁶⁸ Author interview with a language access specialist from a local government, March 1, 2023.

⁶⁹ Author interview with a language access specialist from a local government, August 26, 2022.

Centralized funding approaches carried several benefits for language access programs that, as might be expected, were largely the inverse of the benefits and limitations of decentralized approaches. As interviewees explained, centralization helped make the process for approving and distributing language access funds more efficient. Instead of having multiple approaches to budgeting and funding that required separate efforts within individual agencies, centralized approaches reduced administrative costs by consolidating those processes with one staffer, team, or office. In addition to increasing efficiency, a centralized approach could also incentivize departments to use language services vendors more frequently since they could do so without having to allocate money from their own budgets.

Using a centralized funding approach also helped improve oversight across agencies and their subcomponents. Having a system in which one central entity pays for all language access services in a jurisdiction provided that entity and its staff with the opportunity to rigorously track all funding usage to gauge the extent to which agencies and their subcomponents were addressing language barriers, whether by using language services contracts or other measures.⁷⁰ For example, one

In addition to increasing efficiency, a centralized approach could also incentivize departments to use language services vendors more frequently since they could do so without having to allocate money from their own budgets.

interviewee credited their local government's centralized budget with creating important expenditure records that supported their office's understanding of the extent of the need for language services in their government and agency.⁷¹ These practices ultimately helped produce more accurate budget requests and report summaries that could help better determine a program's funding allocations for language access. Centralized funding models could also be used to bring about better compliance with language access requirements. For example, one site examined for this report required agencies and their subcomponents to complete an LAP and undergo training before they could access centralized funding.⁷²

Although centralized funding approaches could help build more efficient and straightforward processes, some governments and agencies reported challenges related to their implementation and long-term use. For one, centralized approaches to budgeting and funding led to reduced flexibility for agencies and their subcomponents. Ensuring the equitable distribution of funding among agencies or agency subcomponents was also difficult, and in some cases virtually impossible, given that some (such as large human services agencies) had language service needs so extensive that they could use virtually all of the funding dedicated to language access themselves and leave smaller agencies with little to no resources. And despite the promise of better monitoring of funding use in such systems, the entities managing centralized language access funds generally could not hold agencies or their subcomponents accountable for failing to use funding, rendering some of this promise moot. For example, one interviewee acknowledged that their agency had no enforcement mechanism associated with their centralized funding system, meaning that they could not oblige agencies and their subcomponents to draw and use funds for language access.⁷³

⁷⁰ Author interview with language access specialists from a local government, November 5, 2022.

⁷¹ Author interview with a language access specialist from a local government, February 16, 2023.

⁷² Author interview with staff from a local public health department, September 23, 2022.

⁷³ Author interview with a language access specialist from a local government, March 6, 2023.

Navigating Limited Language Access Funding and Resources

Regardless of the approach governments and agencies use to fund language access, all interviewees reported challenges with administering language access services in resource-constrained environments. Interviewees noted that laws and policies related to language access were sometimes viewed as “unfunded mandates” due to agencies and their subcomponents having to fund their own language access initiatives to comply with new requirements around serving LEP individuals, an observation consistent with the findings of other MPI research.⁷⁴ This is not to say that such spending was seen as unimportant, however. Many interviewees described including and prioritizing language access in budget requests as a helpful—and indeed vital—step toward ensuring at least some level of sufficiency in terms of funding for providing access to LEP individuals, while also noting that more funding would improve the delivery of language access services and allow governments and agencies to proactively address their communities’ needs and concerns.⁷⁵ In the meantime, competing priorities for limited state and local funding and the end of federal pandemic relief funding will likely continue to constrain the amount of public resources available to support language access measures.

C. *How Governments and Agencies Monitored, Evaluated, and Sustained Their Language Access Programs*

Building effective accountability and evaluation mechanisms as well as sustainable operations and funding are essential for language access programs, particularly after the initial stages of their implementation. This section explores these distinct yet related topics, first discussing the monitoring and accountability measures of the sites examined for this report before delving into interviewees’ perspectives on the connections between organizational culture and the sustainability of language access initiatives.

Monitoring Language Access Measures to Create Accountability and Evaluate Effectiveness

Even with well-designed and thoroughly implemented measures related to vendor contracts, budgeting, data tracking, staff guidance, and regular trainings, governments and agencies must be able to monitor and evaluate the success and effectiveness of their language access programs. Through monitoring, governments and agencies work to ensure that staff are implementing language access measures and that programs are complying with LAPs and related policies. Unlike tracking data (e.g., on language services usage or agency interactions with LEP individuals), monitoring measures focus on accountability and may involve taking additional steps to bring staff, managers, and offices into compliance. Despite their importance, the governments and agencies examined generally did not have robust monitoring mechanisms, a limitation discussed more in the final segment of this section. At the same time, several governments and agencies had either initial or established monitoring measures, as detailed below.

74 Author interview with a language access specialist from a local government, February 16, 2023; Jacob Hofstetter and Margie McHugh, *Language Access in Colorado State Agencies: Existing Efforts and Opportunities for Expansion* (Washington, DC: MPI, 2024).

75 Author interview with a language access specialist from a local government, January 9, 2023.

Using Reporting Mechanisms and Audits

One of the more common monitoring mechanisms among the governments and agencies examined involved the use of reporting requirements. Generally mandated as part of official policies or laws, these measures required agencies to combine information into formal reports delivered regularly (often annually) to a centralized office or staff person overseeing a language access program and, in some cases, to an executive or legislative body such as a city council or mayor's office.⁷⁶ Information generally required for these reports included data on both the jurisdiction's overall population and the number of LEP individuals served, a description of steps taken to improve language access during the previous year, and plans for the next year. In perhaps the most robust example, San Francisco's ordinance requires agencies to submit yearly reports that are compiled into a language access compliance summary report by the city's Office of Civic Engagement and Immigrant Affairs.⁷⁷

A few cities and counties also used more formal audits to evaluate language access in their jurisdictions, generally producing one-off reports. In these instances, an office such as a city auditor or office of the inspector general provided a more formal evaluation of the extent and effectiveness of language access measures in agencies across a jurisdiction. For example, one interviewee noted that their city's language access program was originally launched due to the findings of a formal audit of agencies' language access practices.⁷⁸ Another county reportedly organized an informal audit prior to implementing a language access program, interviewing all 20 agencies to determine what practices they had related to language access and what was needed to better serve LEP individuals.⁷⁹

Establishing Complaint Procedures

Creating opportunities for LEP individuals to file complaints when they do not receive adequate language assistance from an agency, office, or staff person was another common accountability mechanism. Generally available via a paper form, phone line, or web portal, complaint processes allowed community members to provide direct and immediate information on where language access measures were falling short. This information helped staff overseeing language access programs understand what kinds of action were needed to address those challenges.

In the sites examined for this report, complaints were settled in either a formal or informal manner. More formal processes often involved complaints going through local civil rights offices (not those of federal agencies), which would investigate them much in the same way as other nondiscrimination investigations. Following an established process, these complaints generally concluded with a more

Complaint processes allowed community members to provide direct and immediate information on where language access measures were falling short.

76 Hofstetter, McHugh, and O'Toole, *A Framework for Language Access*, 23–25.

77 For examples of compliance reports from San Francisco, see City of San Francisco, "Language Access and Rights," accessed February 24, 2025.

78 Author interview with a language access specialist from a local government, August 26, 2022.

79 Author interview with a language access specialist from a local government, March 6, 2023.

formal resolution or statement of findings. In other processes, complaints were handled more informally by language access program staff, working with the named office or agency of concern. The usual outcome was for the LEP individual to receive the service they needed, such as a translated document. For example, one interview described complaints as an opportunity to have a conversation about language access requirements with the staff person, program, or office identified in the complaint and to provide them with technical assistance to avoid future issues.⁸⁰ Still, several interviewees noted that there was often sensitivity around language access complaints related to concerns that they could lead to civil rights lawsuits or other legal challenges, even if such lawsuits are generally difficult to bring.⁸¹

Using Secret Shoppers

One of the more innovative monitoring measures involved governments and agencies using secret shoppers. Through this approach, language access program staff or LACs brought in multilingual individuals to attempt to receive services in their languages from a particular office or program and then report back on their experience.

One city used contracted interpreters to test compliance with their language access policy, having them call offices or service locations in a language other than English to see if they would be connected to an interpreter.⁸² Another city used multilingual interns as secret shoppers, sending them to offices to see if they could receive services in their languages.⁸³ In one of the more formal secret shopper programs, a city worked with community-based organizations to send staff or community members themselves to offices and service locations to see how well they were served (see Box 4). Although seemingly an effective measure for monitoring compliance with language access requirements, only a few governments and agencies interviewed for this project reported using secret shoppers.

80 Author interview with a language access specialist from a local government, September 29, 2022.

81 In the 2001 case *Alexander v. Sandoval*, the Supreme Court ruled that individuals and their advocates cannot bring claims of discrimination based on being LEP and not receiving language access if they cannot prove they were intentionally discriminated against by the recipient or subrecipient of federal funds. For more details, see: memorandum from Ralph F. Boyd, Jr., Assistant Attorney General, DOJ Civil Rights Division, to heads of departments and agencies, general counsels, and civil rights directors, *Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency*, October 26, 2001.

82 Author interview with a language access specialist from a local government, August 26, 2022.

83 Author interview with a language access specialist from a local government, February 16, 2023.

BOX 4**Using Spot Checks to Monitor Language Accessibility in San Francisco**

San Francisco's Language Access Ordinance, one of the most robust local language laws in the country, is overseen by the city's Office of Civic Engagement and Immigrant Affairs (OCEIA). To ensure LEP residents are being equitably served across the city's departments, OCEIA has developed infrastructure to monitor departments' compliance with language access requirements. These monitoring mechanisms include a webpage where residents can file a complaint and an annual public compliance report that outlines trends in language interactions, resources, and staffing.

In addition to this advanced infrastructure to monitor compliance, San Francisco's OCEIA carries out spot checks, a type of secret shopper program, to evaluate departments' interactions with LEP individuals and to see to what extent departments are complying with the city's ordinance. To conduct a spot check, OCEIA works with local community-based organizations, which then contact a department and request a service in a language other than English. These experiences and interactions are tracked on a form and logged in a system for OCEIA to review. Spot checks help shed light on the quality and accessibility of language access services administered by government entities, data that inform recommendations in compliance reports. In cases where failings are identified, spot checks can also lead to formal complaints, triggering an internal complaint investigation and resolution process.

Spot checks can also shed light on larger data trends. Aggregate data from these spot checks help inform OCEIA of priority areas and needs across departments, programs, and services. For example, telephonic spot checks found barriers in remote communication across several departments. In response, OCEIA advised departments' language access liaisons about developing multilingual phone trees and mailboxes and shared written guidance with them on the subject. OCEIA also publishes spot check results in their annual public compliance reports. Similar monitoring practices can help provide governments with immediate and concrete feedback on the extent to which LEP members of the public can access services and information in languages other than English and better understand where gaps exist.

Sources: Author interview with OCEIA staff from the City and County of San Francisco, March 2023; San Francisco OCEIA, *Bridging Voices for a More Inclusive San Francisco: San Francisco Language Access Compliance Summary Report 2024* (San Francisco: OCEIA, 2024), 37–45.

Monitoring Grantees and Contractors

In many cases, the governments and agencies examined for this report did not deliver all of their services to the public but instead contracted with local nonprofit organizations or other entities to do so. This arrangement could create challenges for language access requirements, given that governments and agencies were not delivering the services themselves. As a result, a few governments and agencies had measures to monitor language access among grantees and contractors, which is also required under federal civil rights regulations.⁸⁴ Representatives of several agencies mentioned using metrics (such as grantee reports describing their plans to serve LEP individuals or the number of multilingual employees in a contracted organization) to track compliance. One interviewee described their city's uniquely strong system in which all city subcontractors were required to provide reports on their language access measures, a process that was officially incorporated into the city government's policies and provisions for all public-facing subcontractors.⁸⁵

⁸⁴ DOJ Civil Rights Division, *Title VI Legal Manual* (Washington, DC: DOJ, n.d.), 14.

⁸⁵ Author interview with a language access specialist from a local government, September 26, 2022.

Understanding Limitations in Monitoring and Accountability Measures

Despite the importance of measuring the faithful implementation and effectiveness of language access measures, many governments and agencies interviewed for this report indicated serious limitations in their attempts to develop and sustain monitoring mechanisms. On one hand, many governments and agencies had relatively new language access programs and had plans to increase monitoring further into the implementation. In these cases, interviewees often described a desire to have technical assistance, training, and other supportive mechanisms in place prior to attempting to hold agencies and their staff accountable for compliance with language access requirements. Similarly, other interviewees noted that without effective and well-established data collection measures, it was difficult to evaluate the performance of agencies and programs in serving LEP individuals.⁸⁶

Interviewees often described a desire to have technical assistance, training, and other supportive mechanisms in place prior to attempting to hold agencies and their staff accountable for compliance with language access requirements.

In several cases, however, governments and agencies indicated that much of the hesitancy around monitoring was related to needing to maintain effective relationships with agencies and their leadership. For relatively new language access programs, this meant minimizing feelings of frustration or being overwhelmed among LACs, agency staff, and leadership—both because they needed to be on board to implement language access measures and out of a desire to avoid

antagonizing them by publicly shaming them for failures. One interviewee described this as a tension between making language access a requirement and maintaining a welcoming and supportive posture toward leadership and staff.⁸⁷ Formal reporting and accountability requirements laid out in language access laws and policies helped limit this tension somewhat, since data collection and similar activities on the part of language access program staff were obligatory rather than discretionary. Similarly, one interviewee noted that LAPs were useful in giving them a clear benchmark against which they could compare agencies' performance.⁸⁸

Finally, although a federal civil rights requirement for recipients of federal funding, governments and agencies reported mixed levels of monitoring from their states and the federal government. Interviewees, with a few exceptions, generally had not experienced any checks from federal agencies or their regional offices related to language access. Staff of larger human services agencies, however, did report more regular and detailed checks that asked about their agencies' plans and practices for serving LEP individuals. At the same time, civil rights investigations by the federal government did loom large in many language access programs' origins, as was described in Section 2.A. Several interviewees noted that being able to tell managers, directors, and other leadership that language access requirements were a federal civil rights requirement aided in gaining support for their efforts.

⁸⁶ Author interview with a state refugee coordinator, January 31, 2023; author interview with staff from a local public health department, September 23, 2022.

⁸⁷ Author interview with a language access specialist from a local government, August 26, 2022.

⁸⁸ Author interview with a language access specialist from a local government, August 26, 2022.

Sustaining Language Access Efforts

Beyond the processes, policies, budgets, contracts, and other practical concerns related to establishing effective language access programs, many interviewees stressed the importance of another, less tangible factor that shapes the sustainability of language access efforts: a government or agency's organizational culture. Interviewees described culture as the conditions, context, norms, and expectations around language access that existed across their government or agency. A positive culture related to language access referred to conditions in which staff, managers, and leadership were conscious of the need to serve LEP individuals and committed to doing so. A more challenging cultural environment often occurred when leadership or staff resisted implementing language access measures or were unmotivated to serve LEP individuals or improve practices to do so. Despite it being difficult to measure or define, adjusting organizational cultural attitudes toward language access was seen as important, alongside the development of more traditional language access tools such as LAPs and budgets for contracted language services. It is important to note that cultural divides often exist within governments and agencies. In such cases, some agencies, offices, and staff were enthusiastic about implementing language access measures while others within the same jurisdiction or agency were not. As one interviewee commented, "willingness is not always evenly distributed."⁸⁹

Staff working on language access in governments and agencies described several strategies and factors that contributed to positive cultures around language access. One involved associating language access with broader initiatives, which could foster greater responsiveness to the issue from leadership and staff. Most notable were movements or policies to create greater equity in government services into which language access was embedded and considered part of a larger, overarching area of work for a government or agency. Similarly, language access could feature as part of larger conversations in a field or sector. For example, one interviewee noted that the Centers for Disease Control and Prevention (CDC) discussing language access more prominently during the pandemic helped their local public health department's efforts to get staff onboard with their efforts.⁹⁰ A personal connection to the issue could also help, with some interviewees noting that having staff and leaders from immigrant or multilingual backgrounds often brought greater dedication to the implementation of language access measures.

Many interviewees described attempting to bring government and agency leadership onboard as a first step in their efforts to create more responsiveness to language access. In this thinking, greater commitment to language access from leadership would signal to managers and staff the importance of the issue and instill a greater level of urgency in efforts to serve LEP individuals. As a result, agency leaders or prominent offices were sometimes the initial target for trainings around language access. For example, a specialist with one city's language access program described conducting a training with the mayor's office first because "If the mayor's office does [language access], every department

Many interviewees described attempting to bring government and agency leadership onboard as a first step in their efforts to create more responsiveness to language access.

⁸⁹ Author interview with a language access specialist from a local government, November 6, 2022.

⁹⁰ Author interview with staff from a local public health department, September 23, 2022.

needs to, and it will trickle down.”⁹¹ Building greater connections between agency LACs and leadership was another common strategy for bringing more responsiveness and attention to language access.

Several of those interviewed also highlighted the benefits of making “language access easy” for building a more positive culture around and commitment to language access among leadership and staff.⁹² When staff were easily able to use and access tools and guidance related to language access, interviewees reported they were generally more enthusiastic or at least less resistant to new language access practices. In this way, training and technical assistance materials (such as resource hubs) in addition to clear procedures could serve to not only assist staff but also to increase their willingness to serve LEP individuals. As one interviewee noted, the “ball is dropped when it isn’t easy for staff.”⁹³

At the same time, many interviewees described cultural challenges that persisted despite their best efforts. Some interviewees noted how language access programs were giving more work and additional responsibilities to already overloaded staff and managers, and that tasks such as LAP development were expected to be completed in addition to staff members’ regular duties. Similarly, LACs were often “voluntold,” as one interviewee described it, to serve in that position on top of their regular duties.⁹⁴ Consequently, providing language access was not always a priority for staff and could even become a nuisance, decreasing their enthusiasm or willingness to properly implement language access measures. Staff turnover, which interviewees noted was increasing, was also a challenge since it could result in a loss of momentum and each new staff person, director, or LAC needed to be trained.

A few interviewees, however, called into question the role of organizational culture in developing effective language access programs. One noted that cultural change was part of any large project in government, commenting that “centralizing anything in a large bureaucracy is very challenging and requires a culture

BOX 5 **Prioritizing Language Access Across Boston’s City Leadership**

The Office of Language and Communication Access oversees the City of Boston’s language access programs and services that aim to ensure LEP individuals have equitable access to all city services. Securing support from city leadership has been a key strategy for expanding and promoting language access initiatives across the city. To advance this goal, the City of Boston assigns responsibility for coordinating language access to senior-level department staff, duties that are usually undertaken by more junior staff in other jurisdictions. In these roles, senior staff members help embed language access into their respective departments and prioritize these issues in department-wide discussions and processes. These senior staff members also receive administrative support through meeting with language access specialists every month throughout the implementation phase of their department’s language access program and biannually or quarterly during their compliance period. Ensuring leadership buy-in helps signal the importance of language access while also supporting the development of an organizational culture that values and advances access for LEP individuals.

Sources: Author interview with staff from the City of Boston, Office of Language and Communication Access, November 2022; City of Boston, “[Establishing Language and Communications Access for City Services](#),” *City of Boston Municipal Code*, Chapter 6–10.1 (March 2016).

⁹¹ Author interview with language access specialists from a local government, November 5, 2022.

⁹² Author interview with a language access specialist from a local government, August 26, 2022.

⁹³ Author interview with a language access specialist from a local government, August 26, 2022.

⁹⁴ Author interview with a language access specialist from a local government, February 22, 2023.

shift.”⁹⁵ Another questioned the utility of focusing on cultural elements and whether laws or policies came first or if culture did, expressing the view that if organizational culture ultimately comes down to the attitudes and actions of individual employees, it was wiser for larger organizations and agencies to focus on developing uniform policies and procedures that would compel staff and managers to act on the issue.⁹⁶

3 Key Lessons for Language Access Implementation

As the experiences described in this report illustrate, providing language access in governments’ and agencies’ services is an incredibly complex task. These experiences also shed light on promising practices as well as important lessons, detailed in this section, for government staff, policymakers, community organizations, advocates, and other stakeholders seeking to ensure the successful implementation of language access programs.

A. *Promising Practices and Key Considerations*

While this report has explored *common* approaches and practices in the implementation of language access programs, many stakeholders focused on this issue no doubt are equally, if not more, interested in the *best* approaches and practices related to language access. Yet evaluating governments’ and agencies’ efforts around language access is difficult. Identifying the best measures would require high-quality data as well as established metrics to determine if LEP individuals are being served and if language access programs are equitably reaching different communities. The quality of language services, whether translated documents or interactions with an interpreter or multilingual employee, may be even more difficult to quantify, particularly at a cross-agency or cross-jurisdictional scale. Despite these limitations, however, the research conducted for this report does suggest certain approaches have considerable promise and may potentially be more effective than others, while also pointing to important lessons and considerations for governments and agencies engaged in work around language access.

Embedding Language Access into Government Processes

As many interviewees noted, efforts to expand and improve language access were often most effective when woven into other, standardized processes already underway in governments and agencies rather than standing alone as independent initiatives. In such arrangements, considerations related to language access became regular aspects of communications, budgeting, and policymaking. For example, finance offices might be prompted to regularly check with all agencies and offices on how much was being budgeted for interpreting and translation of written materials in annual budget requests or funding for new projects. A representative of one local agency interviewed for this project noted that their programs were asked to present budgets for language access with every annual budget cycle.⁹⁷ Similarly, communications and public outreach campaigns in such systems, before issuing any new social media post, letter, pamphlet, advertisement, or webpage, automatically consider whether the content should be made available in languages other than English. In the policy space, every proposal, programmatic change, or strategy would

⁹⁵ Author interview with a language access specialist from a local government, November 14, 2022.

⁹⁶ Author interview with a state refugee coordinator, January 31, 2023.

⁹⁷ Author interview with staff from a city nutritional assistance program, October 14, 2022.

also consider how it affects LEP communities and how language services could be incorporated into its design or delivery. Robust data are needed to support this decision-making, meaning relevant metrics would need to be tracked via data systems; for example, case management software or other tools tracking public interactions could add a prompt asking what language an encountered member of the public prefers or what language a service was provided in.

Taken together, embedding language access in existing processes allows consideration of how best to serve LEP individuals to “seep into government processes,” as one interviewee described it.⁹⁸ Embedding language access in this way requires close cooperation between those with expertise on the issue, such as language access coordinators, as well as those with more specialized knowledge related to the standard practices of governments and agencies. In most of the governments and agencies in this project, staff with specialized knowledge in language access often collaborated with finance, policy, and communications teams to help ensure that language access measures were being properly integrated into those processes and mechanisms.

Making Serving LEP Individuals Easier for Government Staff

Another effective strategy raised on numerous occasions by those interviewed for this project was the goal of making language access easy. This goal may seem contradictory, given how complex the implementation of language access measures can be. This mantra, however, refers not to how easy the task of realizing language access actually is but rather to managers’ and frontline staff members’ experiences with serving LEP individuals and using tools such as language services vendors to do so.

To make such tasks easy, staff from language access programs and language access coordinators sought to arrange easy-to-use tools, training, and technical assistance resources for staff. Examples included clear, concise guidance and training materials tailored to staff and managers’ daily tasks, responsibilities, and types of public interactions. Similarly, convenient resources such as I Speak Cards, easy-to-find funding and access codes for language services, and clear procedures on how to serve LEP individuals played important roles in making language access easier for staff and managers. The benefit of this approach was not only more effective and efficient services for LEP individuals but also greater willingness and enthusiasm to work to provide language access.

Using Data to Track Progress

Several interviewees noted the usefulness of data tracking systems they had developed related to language access. Such systems generally recorded the use of language services such as interpreting and translations, including the number of interactions, the amount of funding spent, and the languages in which assistance was requested. These types of data provided up-to-date information on the implementation of language access measures and the population being served. Many interviewees used vendors’ reports to collect such data, and some also leveraged centralized language contracts and/or funding to track the implementation of language access programs.

98 Author interview with a language access specialist from a state government, January 24, 2023.

These data also served monitoring purposes, with staff from language access programs more readily able to identify agencies or agency subcomponents that were not using language services to the extent they would be expected to. Though such tracking had its limitations, such as only being able to record use of contracted language services and not multilingual staff members' interactions with the public, it provided key metrics of success that were often otherwise unavailable to language access programs.

Building Sustainable Support for Language Access

Language access measures are only as effective as the consistency of their implementation. Without robust, ongoing engagement and support, language access measures may lose steam, becoming check-the-box exercises rather than fully realized and consistently followed policies. Numerous interviewees described cultivating this kind of support as a critical element of building and sustaining the momentum of their language access programs.

The most common approaches to doing so involved enlisting key leadership, whether mayors, city council members, or powerful community advocates, to support language access and put their weight behind implementation efforts. Such support could be the issuance of actual requirements around language access, such as policies mandating the creation of language access plans; stable commitments of funding to language access efforts; or vocal support from actors that agencies' leadership would respond to. Although separate from more concrete practices such as contracting language services vendors and training staff, building durable support for language access that extended beyond the tenure of any individual staff member or elected official was also a critical part of ensuring successful implementation in the long term.

Weighing the Level of Centralization of Language Access Programs

The extent to which the management of language access measures is centralized was an important consideration for many governments and agencies examined for this report. Several governments opted to use centralized vendor contracts and services as well as funding for language access, an approach that could bring greater efficiencies and allow for the collection of better data on the extent to which language access measures were being implemented. At the same time, centralization could also impose inflexible requirements on agencies, particularly large ones with high levels of demand for language services, and lessen the amount of ownership agencies feel over the issue of language access, potentially undercutting the ability to effectively embed it into government processes. Decentralization carried the inverse set of pros and cons, allowing for more innovation and ownership by individual agencies, yet creating inefficiencies and uneven language access efforts across agencies.

Taken together, this suggests that there are real benefits to some level of centralization, particularly around the establishment and oversight of language services contracts. Centralization of funding also appears to be an effective tool for assisting agencies that may have relatively lower levels of need for language services. For example, one interviewee noted that their county's mortuary benefited greatly from not having to develop or budget for language services when it only needed to use them on a few occasions each year.⁹⁹ However, for language access programs that cover larger entities with considerable interaction with the public, such as a county human services agency, a centralized approach to funding could create challenges,

⁹⁹ Author interview with a language access specialist from a local government, March 6, 2023.

given that agency may have far greater needs for language services than other, smaller agencies meant to also draw support from that same pot of funding.

Monitoring as a Critical Component for Success

Monitoring the quality and use of language access measures frequently emerged as an essential component of successful language access programs. At the same time, many government and agency representatives expressed trepidation about fully implementing monitoring systems due to concerns about alienating agency partners and prematurely judging emerging efforts. Although giving agencies and programs some time to develop before evaluating their work is understandable, refraining from robust and effective monitoring measures will likely undercut the success of language access programs over time. Holding staff and agencies accountable, or at least indicating where shortcomings exist, is incredibly important both for continuous improvement but also for emphasizing the seriousness of language access.

Three strategies emerged in interviews as promising ways to ameliorate some of this tension. One is establishing strong support from leadership or executive and legislative partners, such as a mayor's office or city council, that can help build greater acceptance of monitoring mechanisms. The second is including monitoring measures within official policies, plans, or laws, making them a required part of working on language access rather than something imposed by language access program staff. The final strategy is framing monitoring as creating opportunities for learning or improvement, using complaint processes, audits, secret shopping, and similar measures as tools to strengthen language access efforts rather than to expose and shame agencies and their staff.

The Impact of Time

A key factor in the success and effectiveness of language access programs also appeared to be the amount of time they have been in existence. Language access measures that had been in place longer, especially if supported by an official law or policy, were often associated with greater staff awareness and understanding of the issue and related requirements, built up through socialization efforts in earlier phases of implementation. Time often also brought opportunities for innovation and eased the implementation of more sensitive pieces such as monitoring requirements. Of course, language access coordinators and other government staff cannot control how long their particular language access programs have been in place, but this finding suggests the importance of designing multi-year, phased processes for implementation that allow for the building of support and momentum as well as for internal learning prior to having a full-fledged program.

B. Conclusion

The goal of expanding and improving language access in state and local government programs has taken root in many governments and agencies, as well as attracting the attention of communities and advocates. But even with growing recognition of the importance of language access and a desire to better serve LEP individuals, implementing and sustaining these measures remain a challenge. In the implementation stage, language access policies, requirements, and goals collide with the intricate machinery of bureaucracies and the competing demands of diverse local contexts.

For those seeking to improve language access at the state and local levels, there is much to learn from the efforts of other governments and agencies. The insights and experiences highlighted in this report offer a starting point for considering how to develop, improve, or expand language access programs in states, localities, or individual agencies. Given policy changes at the federal level and associated uncertainty about the future of language access in federal programs, these state and local efforts are now more critical than ever for endeavoring to ensure that government staff and the country's increasingly linguistically diverse public are able to communicate with each other, and that individuals are not denied access to services and information for which they are eligible due to language barriers.

Perhaps most importantly, this analysis clearly indicates that there is no one correct way to implement a program or series of measures to provide language access across a government or agency. Instead of a one-size-fits-all approach, this research points to certain common needs, goals, and necessary actions across settings that can be successfully addressed using various promising strategies and practices. Efforts to provide greater language access should be tailored to their individual contexts, refined iteratively, and promote an ecosystem that encourages continuous learning. These efforts should also be anchored in a shared vision that recognizes the benefits—for individuals, for communities, and for program impact—of ensuring everyone can enjoy full access to public programs and information, regardless of their preferred languages or proficiency in English.

For those seeking to improve language access at the state and local levels, there is much to learn from the efforts of other governments and agencies.

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