Language Access: Effectively Serving Limited- and Non-English Speakers

By Julia Alanen

Does your agency have a legal obligation to provide interpretation or translation services to the people that you serve? Do language barriers prevent your clients from accessing vital information, activities, benefits and services such as the justice and healthcare systems, firefighters or police? Learn how to ensure that your clients’ language-access rights are fulfilled; where to find the laws that entitle limited- and non-English speakers to interpretation and translation and legally obligate agencies to deliver information and services in languages other than English; and how to develop and implement an effective language-access plan at your agency.

What is Language Access?

Language barriers prevent many of the twenty-five million limited- and non-English proficient (LEP and NEP) people living in the United States from accessing critical benefits and services such as police, paramedics, hospital emergency rooms, fire fighters, emergency management services, emergency food and shelter programs, public transportation, child protective services, schools, crisis hotlines, public benefits offices, housing authorities, business and driver’s licenses, courts and legal services providers. LEP and NEP persons include U.S. citizens and non-citizens, refugees and asylees, victims of domestic violence and human trafficking, unaccompanied minor children, and persons with special needs or disabilities. The dependants of LEP and NEP persons suffer, too, when language barriers impede access to critical information, activities, benefits and services. “Language Access” refers to ensuring that persons who are not proficient English speakers are able to meaningfully access and participate in programs and activities at a level equal to proficient English speakers. For agencies that serve primarily immigrants, robust use of interpreters and translators may be a legal and an ethical obligation, and a practical necessity of doing business.

Poverty Impedes Language Access

Poverty can be a particularly daunting obstacle for LEP and NEP persons. In some circumstances, it is not an individual’s lack of English proficiency but rather his or her inability to afford a qualified interpreter (oral language service provider) or translator (written language service provider) that impedes language access.

Certified and professionally-qualified interpreters typically charge anywhere from fifty to two hundred fifty dollars per hour for their services. Interpreters are paid for their time whether they are actually engaged in interpretation or simply waiting for a meeting to begin or for a judge to call a case. For example, in court, where a hearing scheduled for 8:30 a.m. may commence at 3:30 p.m. and then be continued to the next court day, the cost to LEP/NEP litigants can prove prohibitive.

The average cost of expert document translation services ranges anywhere from twenty-six to fifty cents per source-word—the translated version usually contains more words—or seventy-eight to one hundred fifty dollars per 300-word page. Standard languages tend to be less expensive whereas rarely-encountered languages cost more. Complex or technical translations
requiring native acumen or subject-matter expertise are typically more expensive. And, expert translators may charge a project-minimum fee.

An indigent LEP/NEP person is unlikely to be able to afford to hire a qualified interpreter or translator. Even when *pro bono* legal or social services are available, many service providers are unwilling or unable to absorb substantial interpreter or translator costs. Failing to provide LEP/NEP persons with language-assistance services effectively deprives them, and their children and dependants, of meaningful access to your agency’s important activities and services.

**Laws Creating Language Access Rights and Obligations**

The most commonly cited laws forming the basis for federal language-access rights and obligations are Title VI of the Civil Rights Act of 1964 and Executive Order 13166. Other less frequently invoked sources of language-access rights include the Equal Protection Clause at Section One of the Fourteenth Amendment to the U.S. Constitution, the Americans with Disabilities Act (ADA), the Rehabilitation Act (§ 504), and the U.S. Court Interpreter Act. Only a marginal number of state, city and local governments have adopted comprehensive language-access laws (e.g., Hawaii, Maryland, New York City, Oakland, Philadelphia, San Francisco, Washington D.C., and Marion County in Florida).

**Title VI of the Civil Rights Act**

Section 601 of *Title VI of the Civil Rights Act of 1964* (42 U.S.C. 2000d) prohibits intentional discrimination on the basis of race, color, or national origin in federally-funded and federally-assisted programs and activities:

> No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

“Federal financial assistance” includes government grants, in-kind donations of surplus property or use of equipment, training, or any other federal funding or assistance, whether received directly by an agency or as a sub-grantee.

Some U.S. case law interpreting Title VI has treated certain language-assistance denials as proscribed national-origin discrimination. For example, the Supreme Court in *Lau v. Nichols*, 414 U.S. 563 (1974) interpreted the U.S. Department of Health, Education and Welfare’s Title VI implementing regulations to hold that Title VI prohibits conduct that has a disproportionate effect on LEP/NEP persons because such conduct constitutes national-origin discrimination. In the *Lau* case, a San Francisco school district that had a significant number of LEP and NEP students of Chinese origin was required to take reasonable steps to provide them with a meaningful opportunity to participate in federally-funded education programs. In other words, denying an individual access to federally-funded or federally-assisted programs because of his ancestry, or the language that he speaks, constitutes prohibited national-origin discrimination.

Federal agencies’ Title VI language-access obligations are set forth at *28 C.F.R. §§ 42.401 - 42.415*. Every federal agency is required to pass internal Title VI implementing regulations, establish a formal complaint process, and publish Title VI guidelines for recipients of federal funding and federal assistance. Language-assistance services extend to both oral and written communications:
Where a significant number or proportion of the population eligible to be served or likely to be directly affected by a federally assisted program needs service or information in a language other than English in order effectively to be informed of or to participate in the program, the recipient shall take reasonable steps, considering the scope of the program and the size and concentration of such population, to provide information in appropriate languages to such persons. This requirement applies with regard to written material of the type which is ordinarily distributed to the public.

A federally-funded or federally-assisted agency violates Title VI if it fails to adopt policies and procedures to communicate with LEP/NEP program beneficiaries in their primary language and ensure that they can access key information and services at the same level as proficient English-speakers.

Title VI language-access obligations extend beyond the federally-funded and federally-assisted programs of work to a recipient’s entire operation and its sub-recipients’ operations:

[A]ll State agencies, community-based organizations, national voluntary agencies, mutual assistance associations, facilities for unaccompanied alien children and any other organizations receiving [federal] funding, either directly or as sub-recipients, must comply with Title VI.

Agencies are required to robustly comply with the provisions of Title VI even when the federal funding or assistance supports only one discrete program of work, but not the agency’s entire operation. For example, if the U.S. Department of Justice (DOJ) Office on Violence Against Women (OVW) awards a grant to a non-profit organization to fund its Immigration Legal Services Program, all of the operations within the non-profit organization (e.g., its domestic violence shelter, social services component, counseling program, etc.), and not merely its Immigration Legal Services Program, are subject to Title VI language-access requirements.

Sub-recipients of federal funding or assistance must also comply with Title VI. For example, the U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR) awards non-profit Agency X a grant. Agency X uses a portion of its ORR monies to award small flow-through grants to non-profit Agencies A, B and C. Federal funding recipient X and sub-recipients A, B and C are all required to comply with Title VI, or they risk losing their ORR funding.

On April 20, 2009, Deputy Assistant U.S. Attorney General Loretta King informed the Federal Interagency Working Group on Limited English Proficiency that the “Obama Administration supports…Title VI language access work as a high priority [and wants] to make it clear, to recipients [of federal funding and assistance] that language access is not a fly-by-night measure, but an essential component of what it takes to do business and meet civil rights requirements.”

**Language Access in the Justice System**

LEP and NEP persons, particularly non-citizens, can be exceptionally vulnerable to crimes and abuse. Equal access to the justice system is critical to protecting and empowering LEP/NEP persons and their dependants. Under Title VI, state courts and law enforcement agencies that receive federal funding have an affirmative obligation to provide language-
assistance services to LEP/NEP litigants and witnesses. An implicated justice system’s failure to comply with those obligations can give rise to an inference of intentional national-origin discrimination. Many state civil and criminal courts routinely fail to supply competent interpreters and translations; provide court decisions, transcripts and self-help materials in English only; and deny indigent LEP/NEP persons’ applications for interpreter-fee waivers. Denying an indigent litigant or witness language-assistance services effectively deprives him or her, and his or her dependants, of any meaningful day in court.

The DOJ has emphatically reminded federally-assisted state courts of their Title VI obligations. In a February 2009 letter to the Indiana State Courts, Federal Coordination and Compliance Section Chief Merrily A. Friedlander denounced a decision denying LEP litigants free interpreters. The letter set forth that state courts that receive federal funding must provide LEP/NEP parties and witnesses with language-assistance services in all civil and criminal proceedings, and clarified that the language-assistance services must be paid for by the courts, not by the LEP/NEP individuals. Furthermore, the courts must translate vital documents, inform LEP litigants and witnesses of their legal right to an interpreter, ensure that interpreters are competent, adopt and enforce an interpreter code of ethics, train court personnel on when and how to engage interpreters, and ensure that LEP litigants do not suffer disparate delays or other obstacles as a result of their reliance on interpreters and translators. A similar letter authored by Assistant Attorney General Thomas E. Perez of the DOJ’s Civil Rights Division issued on August 16, 2010. For an assessment of specific states’ Title VI language-access compliance, visit the Brennan Center for Justice.

Language access in immigration legal proceedings is critical for LEP/NEP non-citizens. In a recent opinion, the 9th Circuit held that the U.S. Department of Homeland Security (DHS) violated an LEP immigrant’s due process rights by removing him from the country through a stipulated removal process in which he was not adequately advised of his rights in his own language [US v. Ramos, -- F.3d --, 2010 WL 3720208 (Sep. 24, 2010)]. Although the court in Ramos went on to find that, in this particular case, the immigrant’s immigration case was not prejudiced by the language-assistance deprivation, this decision sets a precedent for other cases where Title VI language-access violations do, in fact, prejudice the outcome of the proceeding.

In the adversarial context of any courtroom or detention facility, where individual rights depend on precise, complete and accurate interpretation and translations, interpreters and translators should be independent from the court or facility, and be certified or highly skilled and their qualifications thoroughly verified.

How to File a Formal Language-Access Complaint

An LEP/NEP person who is unlawfully denied meaningful access to a federally-assisted program or service may either report the language-access deprivation directly to the federal funding agency or file a formal administrative complaint with the DOJ’s Federal Coordination and Compliance Section. The Section is actively engaged in outreach efforts to encourage non-governmental organizations (NGOs) serving LEP/NEP populations to file Title VI complaints when language-access deprivations occur. DOJ Complaint Forms are currently available in English, Spanish, and Chinese. The DOJ also receives tips about Title VI violations via phone at (888) 848-5306 (in English and Spanish), (202) 307-2222 (voice), and (202) 307-2678 (TDD).
And, the U.S. Government Accountability Office (GAO) audits and reports to Congress on federal agencies’ language-access compliance.

Executive Order 13166

On August 11, 2000, former U.S. President Bill Clinton signed Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency” into law. The Executive Order (EO-13166) requires all federal agencies and federally-assisted programs to take reasonable steps to comply with Title VI and its implementing legislation:

[Each] Federal agency shall…develop and implement a system by which LEP persons can meaningfully access…services consistent with, and without unduly burdening, the fundamental mission of the agency.

EO-13166 requires that federal agencies draft written guidelines to clarify Title VI obligations for recipients of federal funding or assistance:

Each Federal agency shall also work to ensure that recipients of Federal financial assistance…provide meaningful access to their LEP applicants and beneficiaries…[The] Department of Justice has…issued a general guidance document (LEP Guidance), which sets forth the compliance standards that recipients must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of title VI…[Recipients] must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

EO-13166 explicitly precludes judicial review, “[Executive Order 13166] does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person.”

There are four principal factors that federally-funded and federally-assisted programs must analyze when assessing their federally-mandated language access obligations under Title VI and Executive Order 13166:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the [federally funded/assisted] program or grantee/recipient;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity or service provided by the program to people’s lives; and
4. The resources available to the grantee/recipient and the costs.

Recipient agencies should apply these four factors to the various kinds of contacts they have with the public to assess the eligible population’s language-assistance needs, and then strike a balance that ensures meaningful access without unduly burdening agency resources.

Some potential data sources that an agency can use to assess ethnic and linguistic demographics in its service area or client base (the number or proportion of eligible LEP persons served or likely to be served) include:
• The most current available U.S. Census
• The local public school system
• State and local governments
• Other local community-based organizations and agencies serving LEP/NEP populations
• Local faith-based organizations
• The agency’s internal database, case files, intake records, telephone logs, etc.

Agencies should also consider the needs of LEP parents and guardians whose English-proficient children or dependants might access or encounter the agency’s services.

An assessment of the frequency with which a federally funded or assisted program has or should have contact with LEP language groups requires taking into account the potential need to conduct outreach to eligible LEP populations that do not currently come into frequent contact with agency because of existing language barriers. If a particular language group has only infrequent and unpredictable contacts with the agency, then it may be reasonable to use a telephonic interpretation service for initial contacts with that group. Whereas, if the agency has daily contact with a particular language group, reasonable steps to provide meaningful access might necessitate hiring, and rigorously training and testing, bilingual staff to interpret in that target language. If the agency’s contacts with LEP persons occur outside of the agency’s traditional work day or if the nature of the program involves emergent contacts with LEP and NEP persons, then a reasonable solution might involve a combination of trained bilingual staff (for contacts during business hours) and a telephonic interpreter service (for emergency or after-hours contacts).

The more important the activity, information, service or program, or the greater the possible consequences of the contact to the LEP individual, the higher is the burden on the agency to offer language assistance services. Where a denial or delay of access to a specific service or information could have serious or even life-threatening implications for the LEP individual or his or her dependent, the burden on the agency to produce language assistance is at its highest. Activities that are compulsory may be presumed to be important enough to trigger language-assistance obligations.

Although smaller agencies with limited resources are not expected to provide the same level of language-assistance services as large, well-resourced agencies, even acute resource limitations will not excuse total noncompliance. An agency’s budgetary limitations may, however, dictate which steps to provide language assistance are “reasonable.” Sharing language-assistance materials and services among agencies, advocacy groups and federal funding agencies can help achieve economies of scale and substantially reduce the costs of compliance. The National Language Access Advocates Network (N-LAAN) was established to facilitate collective advocacy, information-sharing and resource-pooling among advocates that serve low-income and disadvantaged LEP persons.

Agencies located in jurisdictions that have enacted “English-only” laws (declaring English to be the official language) are not excused from complying with language-access laws.

**Developing and Implementing an Effective Language-Access Plan**

The federal funding agencies’ written guidelines set forth federally funded/assisted programs’ Title VI language-access obligations. The U.S. Department of Justice (DOJ) has...

An effective agency language-access plan should be set forth in writing and include, at a minimum, the following elements:

- Identify frequently-encountered language groups
- Describe in detail the language-assistance services that the agency will offer and how staff will render language-assistance services
- Design an outreach mechanism to ensure that eligible LEP/NEP communities understand their language-access rights and the agency’s available language-access services
- Define a process for receiving and documenting language-assistance requests
- Define a procedure for receiving and responding to complaints of language-access deprivations
- Draft a policy instructing staff how to respond to unanticipated language-assistance needs
- Create a mechanism for staff interpreter and translator testing (to ensure that bilingual staff are qualified)
- Create a rigorous mechanism for training staff interpreters and translators (in relevant specialty areas, such as legal or medical)
- Require that all staff be trained how to deliver language-assistance services to LEP/NEP persons, and how to work effectively with interpreters
- Designate a language-access coordinator or committee
- Define how language-access data will be collected by the agency
- Adopt provisions requiring that the agency monitor, evaluate and update its language-access plan on a regular, ongoing basis

Above all, an effective agency language-access plan should clarify how the agency will go about ensuring that its language-assistance service providers, whether on-staff or contracted, are qualified, trained and appropriate. The DOJ recommends that federally-funded and federally-assisted agencies procure certain fundamental language-assistance resources, including:

- Oral interpretation services
- Bilingual staff
- Telephone interpreter lines
- Written language services
- Community volunteers
The agency’s periodic LEP Plan reassessment should, at a minimum, address the following:

- The current LEP/NEP populations encountered annually or likely to be encountered
- Frequency of encounters with each LEP/NEP language group
- Changed ethnic and linguistic demographics in the service area or client base
- The nature and importance of the agency’s current programs and activities to LEP/NEP persons
- Resultant shifts in the need for interpretation and translation services and target languages
- The availability of emerging resources, including technological advances
- Whether previously identified language-assistance resources are still available and viable
- Whether agency staff are aware of the LEP Plan and understand how to implement it
- Complaints, if any received, and steps taken or needed to address them
- Whether existing assistance is effectively meeting the needs of LEP/NEP persons served

The LEP Plan should be reassessed once annually or every alternate year, depending in part on the volume and frequency of the agency’s LEP/NEP contacts and the rate of change in service area demographics.

Agencies should also translate key written documents and signage, such as vital forms, applications and notices, including notice of the right to a free interpreter or translator, and the agency’s complaint forms, into the identified frequently-encountered languages. Agencies serving exceptionally diverse LEP/NEP communities may find it difficult to define precisely which populations constitute frequently-encountered language groups for purposes of Title VI compliance. Section 405.7 of the New York State Department of Health Regulations requires that vital documents be translated for any language group that constitutes more than 1% of the eligible population served or likely to be served. The D.C. Language Access Act of 2004 defines as frequently-encountered any language group constituting “3% or 500 individuals, whichever is less, of the population served or encountered, or likely to be served or encountered” by an agency. And, the DOJ’s Guidance defines as frequently-encountered any LEP/NEP language group constituting 5% or 1,000 individuals, whichever is less, of the agency’s eligible population. These are referred to as ‘safe harbor’ provisions – proof that an agency’s written translations satisfy these guidelines is strong evidence of agency compliance with written-translation obligations. Translation is typically a one-time expense – the upfront costs of translation are amortized over the likely lifespan of the translated sign or document.

**Selecting and Working with Qualified Interpreters**

Many people mistakenly believe that simply being bilingual is sufficient qualification for purposes of interpreting and translating. Expert, accurate interpretation and translation involves more than mere word substitution; it requires contextually appropriate vocabulary (e.g., legal, or medical) in both languages, and a nuanced understanding of the impact of culture, non-verbal cues, dialect and colloquialism on communication. Using untrained or inappropriate interpreters can drastically change the outcome of a communication, petition or proceeding and negatively impact the LEP/NEP person’s perceived credibility.

Because accuracy is critical, the federal Court Interpreters Act (28 U.S.C. 1827) mandates that the federal courts use certified interpreters whenever reasonably available. However, no formal interpreter certification is available for most languages and, of
approximately three thousand certified interpreters in the U.S., only five hundred interpret in a language other than Spanish.

State interpreter certification examinations are available in a select few widely-spoken languages, Spanish being the most common. Each state sets its own interpreter standards and some states have adopted the rigorous federal court interpreter examination. In some states, where no formal certification process is available in a particular language, a freelance interpreter may “register” him- or herself with the state simply by self-certifying fluency in English and the target language. Agencies should not assume that registered interpreters are qualified experts.

Relying on non-interpreters—such as well-intentioned but untrained bilingual staff or volunteers—instead of hiring a professional interpreter, is generally a risky practice. The interpreter is the nexus among all of the parties to a communication, so if the interpreter is not competent, everyone involved is rendered incompetent. Language Line Services has developed the following graph to illustrate the risks and benefits associated with utilizing trained interpreters versus bilingual staff or volunteers, and on-site versus telephonic interpreter services:

While the use of telephonic interpretation can reduce the costs of language-assistance, nuances in language and non-verbal communication may be undetectable over the phone. Video-teleconferencing (even via free services like Skype where resource limitations are a factor) can be more effective than telephonic interpreting.

The use of LEP and NEP persons’ family or friends as interpreters can violate the intended beneficiary’s rights to dignity, privacy, impartiality, confidentiality and informed consent. And, the use of children as interpreters is a nearly universally condemned practice. According to comments and recommendations submitted by the New York Immigration Coalition to the Department of Health and Human Services:

Not only do minors not have the knowledge of English and/or medical terminology required to interpret, the use of minors can upset familial relationships that are deeply rooted in the LEP person’s culture, and is particularly problematic in the areas of oncology, gynecology, reproductive health, sexually transmitted diseases, injuries from
domestic violence and other sensitive crimes, and mental health treatment. We strongly urge [the Office of Civil Rights] to amend the guidance to prohibit the use of minors as interpreters regardless of the beneficiary’s request, unless it is an emergency medical situation with no alternative means of providing language assistance.

In the event that an LEP person insists on supplying his or her own interpreter (typically a friend or family member), it may be prudent for the agency to still rely on its own, independent interpreter, particularly in circumstances where accurate communication is critical. Some agencies have developed interpreter waiver forms in target languages for LEP persons who insist on declining the agency’s interpreter. Great care should be taken to ensure that any such waiver is voluntary and informed, and that the LEP understands that a qualified interpreter is available through the agency free of charge.

In certain circumstances, the interpreter’s gender—relative to the LEP/NEP person’s gender—can profoundly impact a communication. In cases involving intensely personal or potentially embarrassing facts, or where the LEP/NEP hails from a culture with strictly defined gender roles, agencies should take care to assess whether the LEP/NEP person has a strong preference that the interpreter be of a particular gender.

When an agency hires or trains an interpreter, certain considerations are vital. A qualified, effective interpreter will:

- Understand and observe a specified code of ethics and standards of practice
- Strictly honor the confidentiality and privacy rights of the NEP/LEP person
- Interpret accurately and completely
- Maintain impartiality (e.g., not interject his or her personal opinions or biases)
- Identify and immediately disclose any potential conflicts of interest
- Observe professional courtesy at all times
- Undertake ongoing professional development activities
- Possess and practice cultural awareness and sensitivity

Bilingual staff that interpret for LEP individuals must understand and adhere to their role as interpreter and not deviate into their customary roles (e.g., as legal advisor, intake screener, case manager or counselor).

When working with an interpreter to communicate with an LEP or NEP person, agency employees should:

- Allow the interpreter to explain his/her role in facilitating the communication
- Look at and speak directly to the LEP/NEP person, not the interpreter
- Speak in short sentences, pausing long enough to allow the interpreter to keep pace
- Ensure that the interpreter is permitted to take breaks during lengthy communications
- Expect language stretch (some sentences will take more words in the foreign language than in English)
- If possible, give the interpreter adequate opportunity to review any documents requiring sight translation (the act of translating a written text out loud) prior to the discussion
- Work with the interpreter to ensure that your client truly understands the issues and information that you wish to communicate
Some agencies have created helpful “I speak…” cards (see, for example, the U.S. Census Bureau and Mass Legal Services) to assist LEP/NEP persons to indicate their primary languages. Images of national flags might be used to assist preliterate LEP/NEP persons to indicate their languages (though some countries have multiple language groups). The agency’s telephonic voice menus should also be available in multiple target languages. And, agencies should be prepared to meet the needs of LEP/NEP persons who are minor children, sight or hearing impaired, or preliterate.

Finally, in order to be meaningfully effective, interpretation and translation should be provided in a timely manner. Language-assistance services should be made available at a time and place that avoids the effective denial of the service, information, activity, benefit or right at issue or the imposition of an undue burden on or delay in important rights, benefits or services to the LEP person. Where access to a service, activity, information, benefit or right is not effectively precluded by a reasonable delay, language assistance can likely be delayed for a reasonable period. However, delays should never be significantly greater for LEP persons than for English-proficient persons.

The Bottom Line

Every federally-funded or federally-assisted agency is legally obligated to take reasonable steps to assess the language needs of the population eligible for its services, develop a language-assistance plan that ensures a meaningful response to those identified needs, and train its staff to implement the plan. Agencies that fail to comply with their Title VI obligations risk losing their federal funding or assistance. Finally, innumerable resources and strategies are available to help agencies move toward Title VI language-access compliance without unduly burdening agency resources.

Language-Access Resources

District of Columbia stakeholders have developed a replicable language-access model, the D.C. Language Access Coalition, to facilitate cooperation, collaboration and resource-sharing among stakeholders. And, the Washington D.C.-based non-profit organization, Ayuda, has developed a Community Legal Interpreter Bank that can serve as a model for other non-profit organizations. Catholic Charities’ Translation & Interpretation Network (TIN) provides professional interpretation and translation services in more than 70 languages. And, Language Line Services’ team of 8,000 interpreters offers telephonic, video-telephonic and on-site interpretation in more than 170 languages. Other interpretation and translation resources, and federal agencies’ Title VI language-access guidance and language-access plans are posted at the Limited English Proficiency Federal Interagency Website. For additional language-access resources, visit the Language Access and Linguistic Integration (“LALI”) Initiative, and join the National Language Access Advocates Network (N-LAAN) listserv.