Office of the County Internal Auditor

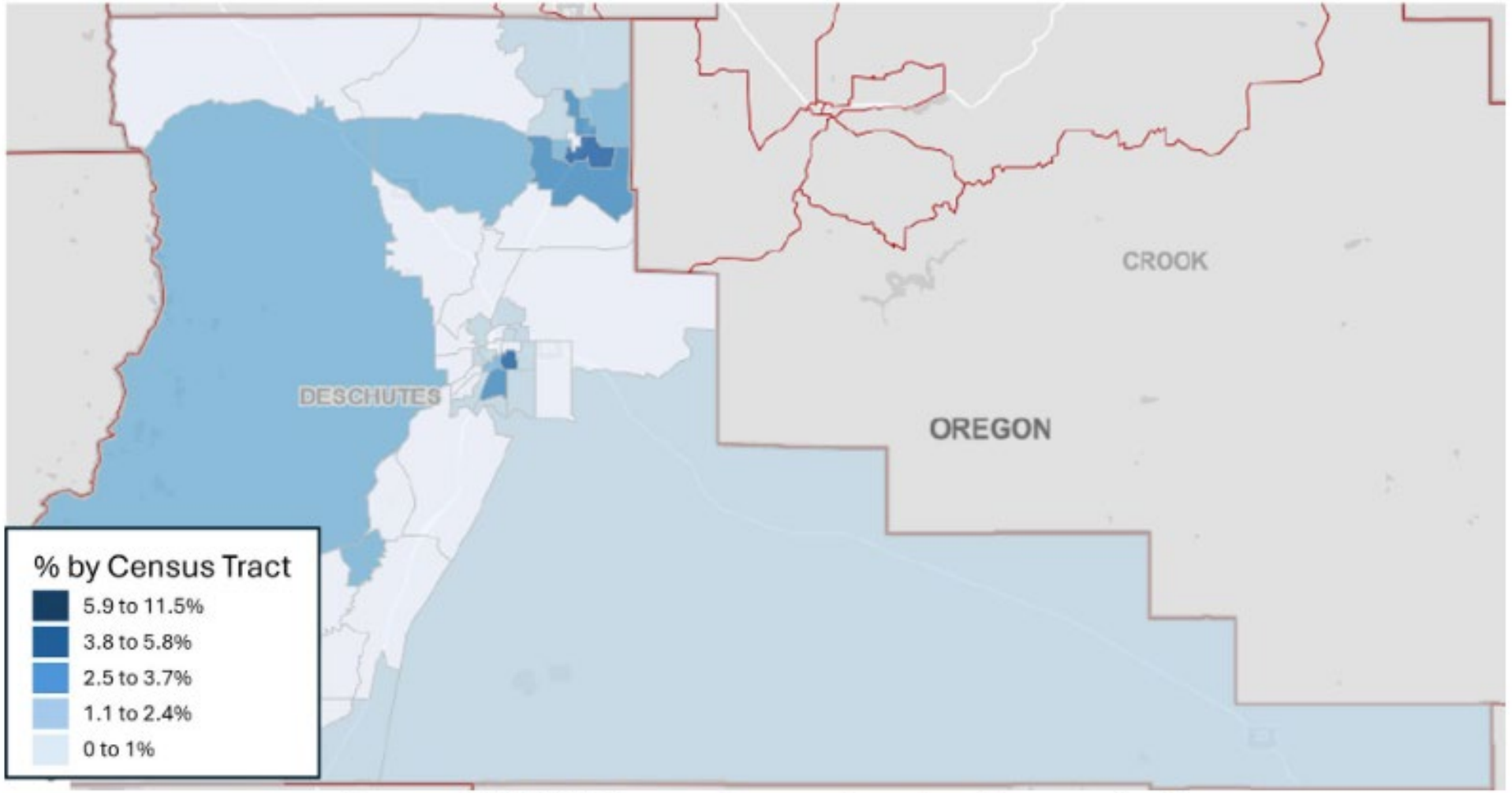
Language Access Program

Low compliance risk, but better coordination and guidance needed

February 14, 2025

Background

People needing language access



Source: 2022 U.S. Census Bureau American Community Survey

3,243 people speak Spanish while also speaking English less than well

Rules and Best Practices

Title VI of 1964 Civil Rights Act

- Prohibits national origin discrimination when information is provided only in English

US Department of Justice

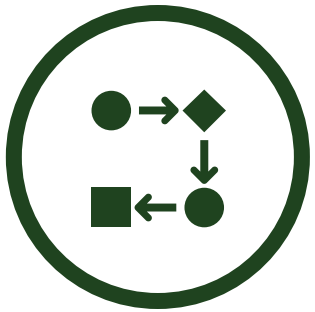
- Language Access and Assessment Planning Tool

Audit Objective

Determine whether the County complies with rules related to translation and interpretation services and whether services are effectively and efficiently provided.

Fieldwork

Processes



Expenses
Vendors
Staff

Compare to Criteria

Civil Rights Act Title VI
US Dept of Justice—Language Access Assessment and Planning Tool
www.lep.gov/sites/lep/files/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf

Findings and Recommendations

Some risk of noncompliance with federal rules

Meaningful Access Standards

- Size of population
- Frequency of contact
- Importance of service
- Available resources

1. Recommendation

The County Administrator should assign responsibility for the language access program to a specific person.

Agree

Policy did not provide clear guidance

County Civil Rights Act policy, GA-16

- ✕ Authority not specific to language access
- ✕ Definitions incomplete
- ✕ Accountability for “programs” instead of staff

2. Recommendation

Administration should update the Civil Rights Act policy to provide clearer guidance and include best practices.

Agree

Don’t know what’s needed

- ✕ Need based on Census
- ✕ No financial information
- ✕ No accountability
- ✕ No training for staff
- ✕ No notice to community
- ✕ No plan to monitor or evaluate

3. Recommendation

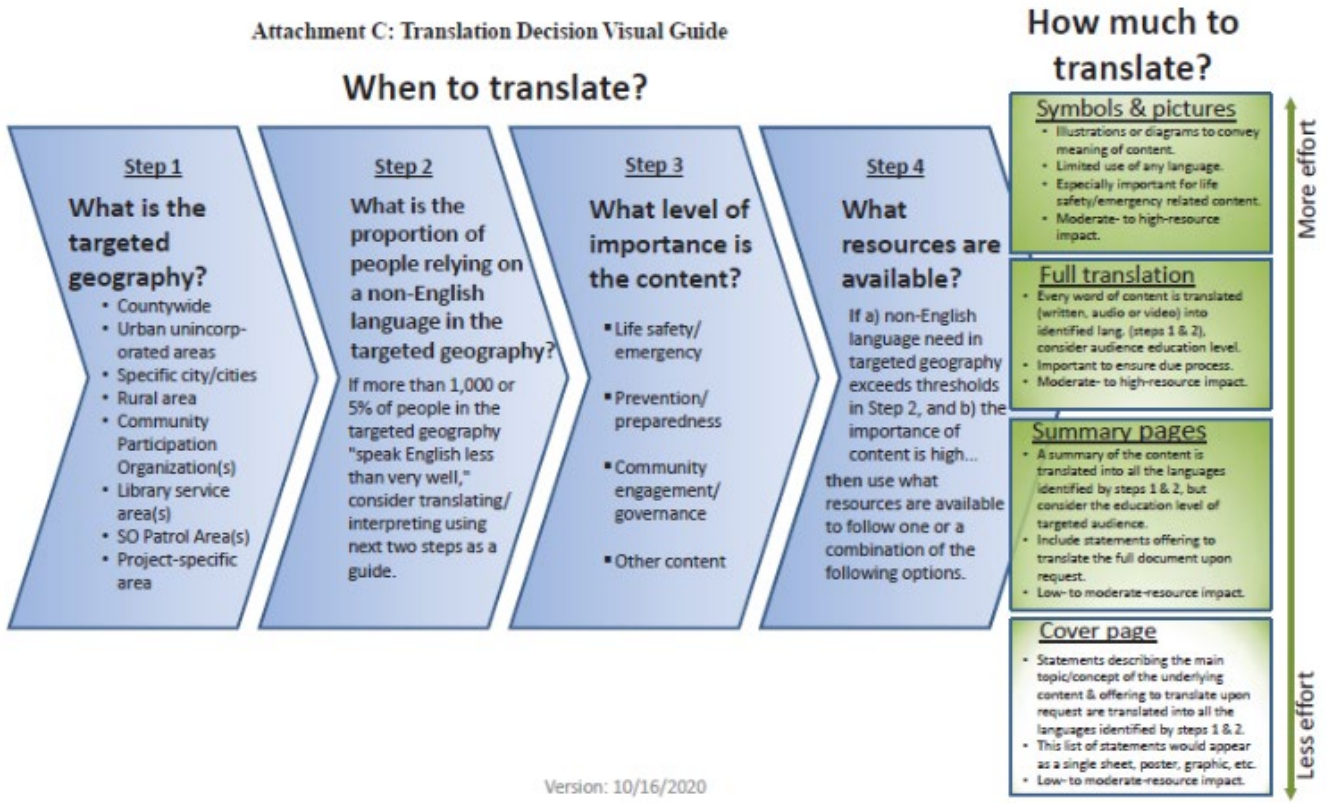
Administration should create a language access plan based on the Language Access Assessment and Planning tool.

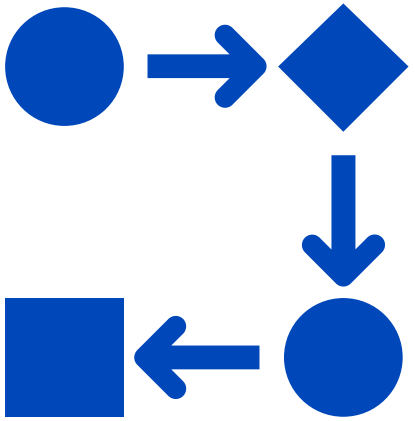
Agree

Documents not available

Contracts underused

Figure 3: Washington County Translation Decision Guide





No Countywide Procedures

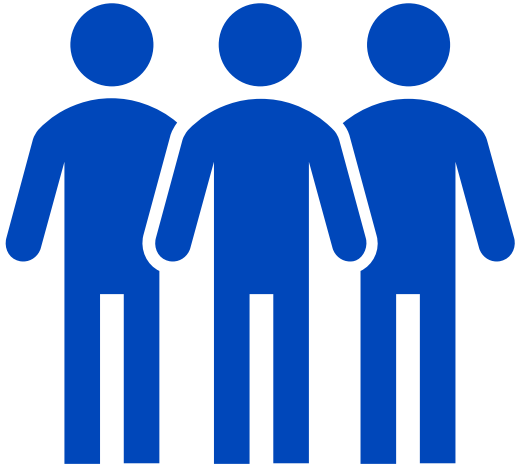
4. Recommendation

Administration should add mandatory county-wide procedures to the language access policy.

Accept Risk

Bilingual Employees Bore Burden

Assist other agencies
Extra workload based on need
Colleagues request help instead of using contractors
One considering declining the stipend
Stipends not consistently tied to skill or need



6. Recommendation

Create a policy for the bilingual program that clarifies selection/hiring, testing, expectations, and compensation.

Agree

Questions and Comments?

Complete the Survey!