LANGUAGE ACCESS PROGRAM

DISTRICT OF COLUMBIA OFFICE OF HUMAN RIGHTS

Language access data collection

Legal requirements

Under the Language Access Act of 2004, covered entities must **collect, report, and analyze data** on the demand for their services in languages other than English. This demand relates to the limited or non-English proficient (LEP/NEP) population that is "served or encountered, or likely to be served or encountered, by the covered entity" (4 DCMR § 1205.3). **All contractors and grantees that provide public services must also report this data.**

The Act further requires covered entities to **update existing databases, applications, and tracking systems** so that these tools capture both public demand and language needs. Each entity's Language Access Point of Contact (LAPOC) or Language Access Coordinator (LAC) is responsible for reporting this data to the Language Access Program (LAP).

Data components

The Language Access Program requests that covered entities include the following components in their data collection reports:

- Languages encountered;
- Number of encounters per language; and
- Whether interpretation was provided via telephone interpreter, in-person interpreter, or bilingual staff.

Encounters consist of both customers and individual interactions, depending on how the covered entity operates. For those entities that sustain relationships with customers over time, one customer may generate multiple interactions. Whenever possible, covered entities should count each interaction as an encounter, because every interaction uses agency resources.

Most covered entities have several points of contact with the public. A comprehensive data collection system will gather information from every one of these points of contact, including hotlines, walk-in facilities, mobile units, community events, and online applications for services.

Data collection systems

There are two considerations that go into creating a language access data collection system: how to capture information from the real world and how to communicate this information to the LAPOC/LAC. Ideally, data collection systems dovetail with a covered entity's established operations, utilizing existing tools for language access purposes. For this reason, covered entities will use different mechanisms to create a data collection system. Below are some examples of data collection mechanisms. (Note that this list is not exhaustive.)

Customer records management (CRM) system

Many covered entities use software and/or databases to store information about members of the public who are applying for or receiving services. By law, these CRM systems must capture language access information. For capturing information on the languages encountered, the LAP recommends using a prompt that asks for "language needed" rather than "preferred language," since language access is about necessity rather than preference. The LAP additionally recommends that prepopulated responses (e.g., dropdown menus) include the top 20 most common languages in DC: Amharic, Arabic, Bengali, Cantonese, Farsi, French, Haitian Creole, Hindi, Indonesian, Japanese, Korean, Mandarin, Pashto, Portuguese, Russian, Spanish, Thai, Tigrinya, Turkish, and Vietnamese. (Note that Mandarin and Cantonese are both dialects of Chinese, but are counted separately.) Prepopulated responses should allow for an "other" option to capture languages outside of the top 20.

CRM systems should have the capability to generate reports based on recorded language need. The LAPOC/LAC must have access to these reports to be able to pass the information on to the LAP.

Multilingual staff tally

Multilingual staff should keep track of how often they provide interpretation for members of the public. One way of doing so is for multilingual staff to fill out a log or maintain a tracking sheet as interpretations occur. Multilingual staff should submit these tallies to the LAPOC/LAC on a regular basis. The LAP recommends a monthly submission schedule.

Sign-in sheets

Sign-in sheets are a common feature at reception areas as well as at outreach events such as trainings, workshops, meetings, or presentations. The LAP recommends that covered entities implement multi-lingual sign-in sheets that allow members of the public to self-identify as LEP/NEP. Keep in mind that sign-in sheets should refer to language in terms of need rather than preference, and should be submitted to the LAPOC/LAC on a regular basis. The LAP recommends a weekly submission schedule.

The text below provides possible headers for a multilingual sign-in sheet that captures language need. It includes DC's top six non-English languages.

English	**Date**	**Time**	**Full Name (please print)**	**DC Resident? Yes/No**	**What language do you speak?**	**Other**
Spanish	**Fecha**	**Hora**	**Nombre completo (por favor, escriba en letra de molde)**	**¿Reside en el Distrito de Columbia? Sí/No**	**¿Qué idioma habla usted?**	**Otro**
Amharic	ቀን	ሰዓት	ሙሉ ስም (እባክዎ በቁም ጽህፈት ይጻፉ)	የዲሲ ነዋሪ ነዎት? አዎ/የለም	የሚናገሩት ቋንቋ ምንድን ነው?	ሌላ
French	**Date**	**Heure**	**Nom et prénom (en lettres d'imprimerie)**	**Résident de DC ? Oui/Non**	**Quelle langue parlez-vous ?**	**Autre**
Chinese	日期	时间	全名 （请用大写字母清楚拼写）	哥伦比亚特区居民? 是/否	请问你说哪一种语言？	其他
Vietnamese	**Ngày**	**Giờ**	**Tên (viết hoa)**	**Cư dân Hoa Thịnh Đốn? Đúng/Không đúng**	**Quí vị nói tiếng gì?**	**Khác**
Korean	날짜	시간	이름 (정자체로 써주십시오.)	거주민? 네/아니오	어떤 언어를 사용하세요?	기타

LanguageLine Solutions reports

All covered entities are required by law to maintain an active account with a provider of multilingual telephonic interpretation. DC's vetted provider, LanguageLine Solutions (LLS), provides online reports that break down LLS usage by number of requests per language. These reports are available at https://my.languageline.com. They include current information up to the previous day and historical information for the six months leading up to the date that the report is generated. The LAPOC/LAC should have access to the online account and generate reports for each quarter of the fiscal year.

Vendor reports

For billing purposes, vendors of in-person interpretation keep accurate records of their services. The LAPOC/LAC should receive reports from vendors on a quarterly basis. Alternatively, the LAPOC/LAC may work with the procurement officer of a covered entity to generate reports on in-person interpretations. These reports should include the language(s) requested, the number of interpreters provided, and the number of constituents served (when possible).

Data collection worksheet

Questions for consideration

- How do members of the public interact with the covered entity? What are the covered entity's points of public contact?

- Does the covered entity already collect data from customers in the form of applications, registrations, reports, etc.? How can these processes incorporate language need?

- For points of public contact that do not already involve data collection, what is the most efficient way to capture the desired data?

- Once captured, how will the LAPOC/LAC access the data?

Outline

Use the table below to outline the data collection system at your agency. If a division has multiple points of public contact, enter each one on a separate line.

Division	Points of public contact	Mechanism for capturing data	Mechanism for communicating data
e.g., Customer Service Center	*Hotline*	*LLS Reports, bilingual staff tally*	*LAPOC receives LLS reports, contacts bilingual staff monthly for tally sheets*
e.g., Customer Service Center	*Walk-ins*	*Sign-in sheet*	*Supervisor delivers to LAPOC weekly*
e.g., Licensing Center	*Application appointments*	*Customer database*	*LAPOC generates reports quarterly*

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