



Final Report to the Executive Committee

Language Access Advisory Board
December 2024 | Research Publication 820



Language Access Advisory Board

Members of the Committee

Voting Members	
Appointed by the House Majority Leader	Appointed by the Senate Majority Leader
Representative Manny Rutinel, Chair	Senator Julie Gonzales, Vice Chair
Representative Mandy Lindsay	Vacant (representing a local government that has implemented a language access plan or advisory entity)
Ms. Ivón Romo (representing Colorado Language Access Coalition)	Ms. Giovanna Carriero-Contreras (working in translation or interpretation services)
Mr. Jose Torres (representing persons with disabilities)	
Appointed by the House Minority Leader	Appointed by the Senate Minority Leader
Representative Mary Bradfield	Senator Janice Rich
Mr. Felix Lopez (with experience in language access in rural communities)	Mr. Rudy Santos (with expertise in language access relating to elections)
Non-Voting Members	
Ms. Natalie Castle Director of Research, Legislative Council Staff	Ms. Christy Chase Deputy Director, Office of Legislative Legal Services

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This report is also available online at:

<https://leg.colorado.gov/committees/language-access-advisory-board/2024-regular-session>

Committee Charge

Pursuant to Section 2-3-2002, C.R.S. ([House Bill 24-1368](#)), the Language Access Advisory Board was created in the Legislative Department for the 2024 interim to study and make recommendations on improving language access to the legislative process for populations with limited English proficiency. The advisory board met four times over the 2024 interim, and it is required to report to the Executive Committee of the Legislative Council by December 15, 2024, on its work and its recommendations.

The purpose of the advisory board is to bring together the appropriate stakeholders, experts, and impacted groups to study and make recommendations on improving meaningful access to the legislative process for populations with limited English proficiency to ensure effective communication and equitable participation. The advisory board was asked to, at a minimum:

- identify current language-related barriers to the legislative process for state residents with limited English proficiency;
- examine the success of current language access measures relating to the legislative process;
- consider the development of a language access plan covering the General Assembly and the legislative process;
- evaluate options for oral interpretation and written translation of legislative activities, including:
 - the interpretation of committee hearings, public testimony, and floor proceedings;
 - the translation of written publications of the General Assembly, including legislative documents and materials, and the General Assembly website;
 - whether interpretation should be simultaneous or consecutive;
 - whether translation and interpretation services should be provided by legislative staff or a third party; and
 - necessary qualifications or other requirements for individuals providing translation or interpretation services; and
- assess language access concerning the ballot information booklet (Blue Book), required pursuant to Section 1-40-124.5, C.R.S. and Section 1 of Article V of the Colorado Constitution, including:
 - solutions to make the Blue Book more accessible to state residents with limited English proficiency;
 - methods for determining the languages into which the Blue Book is translated;
 - methods of distribution to best serve communities of state residents with limited English proficiency;
 - monetary and publication-related constraints; and
 - the impact of federal and state constitutional requirements.

Topics of Study

The board held four meetings during the 2024 interim during which it heard a number of briefings and presentations, including from representatives of community groups, local governments, the Ute Mountain Ute Tribe, board members with specific areas of expertise, and members of the public. The board also heard presentations on a wide range of subjects, including:

- community language access needs;
- state and local government language access programs;
- standards for professional interpreters and translators;
- election materials and the Blue Book; and
- Artificial intelligence (AI) translation and interpreting.

The following sections discuss the committee's activities during the 2024 interim.

Community Language Access Needs

The board invited representatives from the Colorado Statewide Parent Coalition, Community Language Research Group, La Plata Food Equity Coalition, Spring Institute, ARC of Colorado, and the Colorado Cross Disability Coalition to discuss the language access needs of different communities in Colorado. Common themes discussed by the presenters included the importance of plain language for accurate and effective communication, the difference between simultaneous and consecutive interpreting and translation, and the value of language access, notably that it empowers marginalized communities, develops a sense of belonging, increases community representation, and supports civic engagement. The board learned the difference between language and speech: language is the principal method of human communication that consists of words used in a structured and conventional way and conveyed by speech, writing, or gestures; speech is the expression of or the ability to express feelings or thoughts by conveying sounds.

Presenters stressed the importance of everyone having the opportunity to be active participants in a democracy and have their voice be heard by their representatives. They recommended using a combination of technology and human interpreters to provide better language access during the legislative process, and discussed training for interpreters and translators and the need to have a person review materials when their translation relies on technology.

The presenters recommended best practices and considerations to improve language access policies for the legislative process that are inclusive, comprehensive, impactful, technologically smart, cost effective, and with clear implementation and enforcement strategies. These include:

- making accessible website content that includes bills, bill summaries, amendments, committee schedules, and an explanation of the bill process;
- creating an on-site language accessibility office;
- providing a written policy in plain English on procedures and protocols for navigating the legislative process for individuals who are not English proficient;

- mandating training for all legislators and staff on available language services and how to access them;
- building a resource list of available interpreting services for the public to access; and
- improving signage and directions in the Capitol using a universal design model with designated and easily identifiable "hosts" throughout the building.

Language access for people with disabilities. The board heard from several presenters on language access needs for those with physical or developmental disabilities in addition to those with limited English proficiency. Federal and state law mandate that the legislature provide effective communication options and meaningful access to the legislative process for those with disabilities. Meaningful access means providing someone with the ability to effectively communicate in their preferred way. The types of disabilities that may impact effective communication include mobility, sensory, cognitive, mental health-related, or intellectual and developmental (such as autism or cerebral palsy).

The presenters highlighted ongoing access challenges, including that some legislative areas remain physically inaccessible or lack universal design; that certain legislative technology platforms are either inaccessible or have unclear access protocols; and that legislative proceedings may present barriers for individuals with cognitive disabilities, and there are often insufficient or unclear policies on how to request accommodations, receive them, or file complaints if accommodations are denied.

They outlined several recommendations for the legislature to improve language access for people with disabilities in the short-term, which include:

- providing training for all legislators and staff on effective communication and Americans with Disabilities Act (ADA) services, supports, and accommodations;
- providing a link to the legislature's dedicated accessibility support staff that can be accessed on any page of the website; and
- updating the available public testimony options to include remote, prerecorded, and communication alternatives that reflect best practices.

Additional recommended accommodations at the Capitol include providing screen readers, note takers, large print, video and text displays, communications boards, qualified readers, assistance filling out forms, braille materials, and plain language, easy-to-read materials.

Perspectives from the Ute Mountain Ute Tribe. Members of the Ute Mountain Ute tribe spoke to the board about their language access needs and the importance of using simple, plain language when communicating, since many tribe members speak English well but may not be as comfortable with written English. The board heard about the importance of involving tribal elders when discussing language access plans since they generally have a better grasp of the native language, as well as the need to be sensitive to and aware of cultural differences and taboos.

Committee recommendations. The board makes Recommendations 1 and 2 as a result of its discussions. Recommendation 1 explains that the board has identified current language-related barriers to the legislative process, and that it has examined the success of current language access measures relating to the legislative process. Recommendation 2 asks the legislature to conduct a formal needs assessment to further analyze the information studied by the board.

State and Local Government Language Access Programs

Presenters from the City and County of Denver (CCD), City of Boulder, the Oregon State Legislature, and an international language access professional advocate, spoke about language access plans, practices, and legal requirements. The board learned that there are over 350 languages spoken in the United States, and that one in five people in the U.S. speak a language other than English at home. This speaks to the importance of states and localities providing individuals with the ability to communicate effectively, meaningfully, and confidently in their preferred language. Legally, state agencies are required to take “reasonable steps” to ensure that limited English proficient individuals have meaningful access to programs, services, and activities. An agency is considered compliant with legal requirements when language access services (like interpreting or translation) are accurate, timely, effective, and provided at no cost to the individual.

Denver and Boulder language access. [Denver’s Executive Order 150: Citywide Language Access Program](#) (December 2022) applies to all city agencies under the mayor’s purview that provide public-facing services or information. Every individual agency is responsible for developing and implementing its own language access plan, which is reviewed by the CCD Language Access Team. Ms. Alexandra Bare, representing Denver’s Division of Immigrant and Refugee Affairs, told the committee that some Denver agencies have interpreters on staff, but the majority contract out for the service when needed. In Denver, all vital documents must be translated into the top 12 languages spoken in the CCD. The federal government defines vital documents as written material that contains information that is critical for understanding, accessing, applying for, and obtaining information about an agency’s program, service, and/or activity, or is essential to alert the public to critical safety or emergency information. The CCD’s website, including the city’s municipal code, is translated through an embedded translation widget, while Boulder’s website uses [GTranslate.io](#) for translation services. Finally, Spanish interpreting is available for all Denver City Council meetings via Zoom. Other languages are accommodated upon request with at least three business days’ notice.

Oregon legislature. Two staff members from the Oregon Legislative Policy and Research Office (office) explained how the [Oregon Legislature’s language access program](#) works. The development and implementation of the Language Access Team and program plan began in April 2021 and was finalized in December 2021. As standard practice, the legislature provides simultaneous American Sign Language (ASL) interpreting services for all public committee and task force meetings. It offers the following services by request:

- ASL, Spanish, or other language interpreting for testimony in a public meeting;
- ASL, Spanish, or other simultaneous spoken language interpreting of a public meeting;
- ASL, Spanish, or other language interpreting for a meeting with a legislator;
- translation of written documents and communications for legislators; and
- translation of written testimony for members of the public.

Requests for services can be made by legislators, staff, or any member of the public. The office uses external partners to address partisan requests, help manage high request volume, and accommodate languages that are not spoken by a member of their team. They use [LanguageLine](#), a remote interpreting service, especially for visitor services, and the [ListenWIFI](#)

application is on the capitol internet service so that anyone who is on the capitol Wi-Fi can use the application. All legislators have access to LanguageLine as well.

Other states. Presenters noted several other states that have successfully incorporated language access plans. Hawaii has a state Office of Language Access and a Language Access Advisory Council. New York State mandated through executive orders in 2011 and 2021 that all state agencies develop language access plans. The Washington State Senate has a Language Access and Accessibility Systems Analyst who works with vendors to provide translation or interpretation upon request for a variety of spoken languages for committee proceedings, testimony, and meetings with legislators. Several additional states do not provide services but do use automated or third-party supported website translation tools.

Additional recommended resources. States and local governments can use additional tools when assessing and developing language access plans, including: the U.S. Department of Justice’s [self-assessment and planning tool](#) to determine how to provide “meaningful access” to limited English proficient individuals; the Migration Policy Institute’s [Language Access page](#) that contains a collection of resources, templates, and guides; and a [policy guide](#) from the Refugee Advocacy Lab that shares best practices in language access policy and delivery.

Committee recommendations. The board makes Recommendation 3 as a result of its discussions, instructing the General Assembly to prepare a language access plan and recommending items that the plan should cover.

Standards for Professional Interpreters

The board was charged with evaluating the necessary qualifications for individuals providing translation or interpreting services. Board members and community members provided various examples of poor quality translation and interpreting in support of government services.

Board member Giovanna Carriero-Contreras is a professionally trained interpreter and translator, interpreter trainer, published author, and is involved in developing professional standards for the interpreting industry on the national level, through ASTM International, and on the international level, through the International Organization for Standardization (ISO). She presented to the committee about the importance of establishing a credentialing process for interpreters and translators that takes into account industry certifications and requirements that reflect the industry standards. The existing standards are voluntary and not legally enforceable unless incorporated into contracts. She explained that standards must be paired with enforceable regulations and oversight, as well as dedicated funding for language services.

Ms. Carriero-Contreras noted in her presentation that there are credentials and certifications available for some kinds of interpreting and translating, such as in hospitals and courts, but those would likely not be useful for legislative purposes. She also made clear that bilingualism alone should not be used as a qualification. Board members expressed interest in some kind of vetting for vendors hired to provide legislative interpreting, but Ms. Carriero-Contreras encouraged the General Assembly to assess its needs and establish a purpose before setting any standards specific to the legislative context.

Committee recommendations. As a result of its discussions, the committee makes Recommendation 5, encouraging the General Assembly to pursue legislation to regulate translation and interpreting professions under the Department of Regulatory Agencies.

Election Materials and the Colorado Blue Book

The Legislative Council Staff (LCS) is legally responsible for preparing the ballot information booklet (Blue Book), and the board was charged with assessing language access needs for the Blue Book. LCS presented information about the Blue Book, noting that the full book and supplemental materials are translated into Spanish and [posted online](#). However, bilingual English-Spanish books are only printed and mailed in counties subject to Section 203 of the federal Voting Rights Act (VRA). Those counties are currently Adams, Alamosa, Conejos, Costilla, Denver, and Saguache, and the list will be revised in 2026.

The board also heard from board member Rudy Santos, from the office of the Weld County Clerk and Recorder, and from Hilary Rudy from the Colorado Secretary of State's office. Weld County is not subject to Section 203, but it is subject to [House Bill 21-1011](#), which set state standards for election materials, including requiring additional counties to provide Spanish materials like sample ballots online. HB 21-1011 also required the Secretary of State to set up a multilingual election hotline, and Ms. Rudy provided information about hotline usage, which has been minimal in the 2022, 2023, and 2024 elections.

In discussing election materials, the board returned frequently to the importance of publicizing the availability of Spanish language materials to ensure meaningful access as required by law. Board members suggested that the limited impact of the state hotline was largely because voters were unaware of it. Mr. Santos told the board that the county election office places bilingual poll workers at Weld County voter service and polling centers and has bilingual employees working in the office and for the elections phone bank. Mr. Santos demonstrated a radio advertisement that Weld County ran in Spanish on Spanish language stations, which his office understood to drive additional traffic to their Spanish election materials.

Board members generally expressed support for the current method of distributing printed bilingual Blue Books to only the VRA counties, though several thought LCS could make it easier for those in other counties to find Spanish materials online and to request printed Spanish Blue Books.

Committee recommendations. As a result of its discussions, the board makes Recommendation 4, concerning the Blue Book. The recommendation is to continue printing and mailing bilingual English-Spanish Blue Books to VRA counties, and to facilitate providing Spanish Blue Books upon request in other counties.

AI Translation and Interpreting

The board heard several presentations about the use of AI for translation and interpreting.

Website translation. The board heard from various presenters about the use of AI website translation tools in Las Animas, Boulder, and Denver counties. The website translation tools allow for the translation of website content into multiple languages. Boulder County discussed

its preference for software that allows for AI translations to be edited on the back end as necessary.

Ethical considerations. The board invited representatives from the [Interpreting SAFE-AI Task Force](#) to discuss its research on emerging AI technology being used for interpreting and translation services. Representatives highlighted a number of concerns when employing AI for this purpose, such as:

- ensuring that AI systems handle sensitive data securely;
- addressing and mitigating biases in AI outputs;
- evaluating the risks of AI use in high-stakes environments;
- understanding which language pairs AI handles well and where human oversight is still necessary;
- ensuring AI decision-making processes are understandable and can be audited;
- establishing clear protocols for human supervision of AI systems and defining responsibility for AI-assisted decisions and actions.

SAFE-AI representatives also highlighted the need to train AI tools for the specific context, such as legislative terminology.

They also provided examples of nuanced conversation and context that AI can struggle with, including:

- cultural context, such as inferences and differences;
- linguistic context, such as dialect, regionalism, colloquialism, slang, mixed languages, and idiomatic expressions;
- interaction context, such as visual cues, intent, and emotion;
- tonal context, such as humor, sarcasm, innuendo, and cynicism;
- speech challenges, such as speech impediments, accents, unusual cadence, and children's talk;
- language impairments or imperfections, such as incorrect grammar, trailing off, and mispronunciations; and
- situational barriers, like noisy backgrounds, multiple speakers, and physical space from microphones.

Representatives concluded that while AI and machine translation and interpreting can be useful tools, they should be implemented carefully. These tools are best for low-risk, non-technical, and non-urgent communication. Human interpreters and translators should be used in all other cases. They also noted that AI interpreting cannot be edited by a human translator before publishing, as AI translation can be.

Product demonstration. A representative from [Wordly.ai](#) presented its live translation captioning tool that uses AI to interpret speakers into over 60 different languages. The tool is accessible through a QR code or website that allows participants the ability to choose their preferred language during the session.

Summary of Recommendations

The Language Access Advisory Board makes the following recommendations to the Executive Committee.

Recommendation One: Regarding this Report

The board recommends that this final report reflect the valuable input received from grassroots organizations over recent meetings, documenting their identified language-related barriers and accessibility needs.

Recommendation Two: Conduct a Needs Assessment

The board recommends an assessment of language access needs in the legislative process in a manner determined by the Executive Committee. This assessment should prioritize feedback from Limited English Proficiency (LEP) communities, stakeholders, language access experts, and data analytics. This assessment should identify high-impact areas for accessibility improvements, explore cost-effective options like automation and translation tools, and incorporate a phased, scalable approach to allow growth as resources expand. This assessment should include analysis of practices shared by other states, detailing available services and indicating whether Colorado currently provides comparable support. This assessment should include public engagement—through focus groups, town halls, and multilingual surveys—to gather community insights. This approach will provide a robust structure for continuous improvement in language access across Colorado’s legislative processes.

Recommendation Three: Create Language Access Plan

The board recommends that the General Assembly develop a comprehensive Language Access Plan (LAP) based on the needs assessment and any other relevant information or analyses. The LAP should include a plan for implementation, which may establish a centralized Language Access office or identify responsible staff to coordinate services across legislative agencies, allowing each to tailor plans to their specific roles and needs. Key plan components should include identifying widely spoken languages in Colorado, prioritizing translation of essential legislative documents, and ensuring compliance with ADA and Title VI by providing interpreting and translation services, including sign language, for public and legislative sessions. Additionally, the LAP should be scalable, expanding services based on community demand and available resources, and should include regular assessments of language needs using census and other demographic data. This plan will create a more inclusive and accessible legislative process for all Coloradans.

Recommendation Four: Regarding the Blue Book

The Language Access Advisory Board recommends that the Blue Book be made more accessible to residents with limited English proficiency by expanding both distribution and translation options. First, the legislature should continue automatic distribution of bilingual (English-Spanish) blue books to all Voting Rights Act (VRA) counties. For other counties, access

to bilingual blue books should be available upon request through accessible options like a QR code, a request postcard within the English-only blue book, a hotline, or an online form. The legislature should consider a robust online option to access translated versions of the Blue Book on demand, which could supplement print distribution and help manage costs. This strategy will ensure that vital voter information reaches all communities equitably while allowing for flexible, cost-effective solutions.

Recommendation Five: Regarding Interpreting and Translation Professions

To ensure compliance with federal civil rights laws and improve language access across Colorado, it is essential to regulate translation and interpreting professions to maintain service quality, protect public safety, and uphold equitable access for communities. Unlike translation, which allows for accuracy through review processes, interpreting requires real-time delivery of accurate, culturally appropriate messages, relying on practitioners' expertise and professionalism. Federal regulations mandate qualified individuals for these roles, yet the absence of state regulation risks violations of federal laws, reliance on unqualified individuals or machine translation, and ethical breaches. The board recommends a bill be drafted to establish interpreter credentialing frameworks, leveraging existing certifications, professional training, and industry standards like those from ASTM International and the International Organization for Standardization (ISO). The board further recommends creating a committee of experts and stakeholders to guide this legislation. Thoughtful regulation will elevate professional standards, optimize resources, and ensure equitable access to essential services for individuals with limited English proficiency.

Additional Board Discussion of Recommendations

The board encourages the General Assembly, in continuing the board's work and preparing a language access plan, to take into consideration a number of additional discussions where the board did not reach consensus. Some board members thought a single point-person or language access office at the legislature would help consolidate services and make it easier for members of the public to know where to find those services, though others were concerned about the cost of adding dedicated staff. Some board members noted the need to broadcast audio in Spanish for certain key committee hearings, which is not currently available. Enthusiasm for AI interpreting was mixed among board members, but some thought as AI tools continue to improve, they may be able to complement human interpreting and translation, particularly in lower stakes situations when the cost savings and increased access can offset other concerns.

The board encourages the General Assembly to better publicize all language access services, prominently locating information on the website in Spanish, providing wayfinding information throughout the Capitol building, and letting communities know that they can request translation without charge. The board also noted from many presenters the importance of plain language in written and spoken communication. Plain language is more consistent and simpler, and as a result, it is easier to translate accurately. Plain language also benefits English speakers, many of whom are still intimidated by the legislative process even when it is in their native language. Finally, the board encourages robust data collection to accompany any language access services, so the General Assembly can evaluate demand for the services and their success.

Resource Materials

Meeting summaries are prepared for each meeting of the committee and contain all handouts provided to the committee. The summaries of meetings and attachments are available at the Division of Archives, 1313 Sherman Street, Denver (303-866-2055). The listing below contains the dates of committee meetings and the topics discussed at those meetings. Meeting summaries are also available on our website at:

<https://leg.colorado.gov/committees/language-access-advisory-board/2024-regular-session>

Meetings and Topics Discussed

July 31, 2024

- Opening Remarks and Overview of Committee Charge
- Board Member Introductions
- Community Perspectives on Language Access Needs
- Ute Mountain Ute Tribe Perspectives on Language Access
- Local Government Language Access

September 19, 2024

- State and Local Language Access Initiatives
- Oregon Legislature Language Access Program
- Legislative Accessibility and Effective Communication
- Standards for Translators and Interpreters
- Committee Discussion

October 22, 2024

- Language Access in the Colorado Blue Book
- Language Access for Election Materials in Colorado
- Public Testimony
- The Role of AI in Translation and Interpretation
- Committee Discussion

November 12, 2024

- Language Access for Elections in Colorado
- AI in Translation and Interpretation
- Product Demonstration: wordly.ai
- Key Features of U.S. State and Local Language Access Laws and Policies
- Consideration of Recommendations