



UNIVERSITY *of* HAWAI'I®

Ke Kulanui o Hawai'i

LANGUAGE ACCESS PLAN

July 2026-2028

University of Hawai‘i
Plan for Language Access
July 2026-June 2028

I. Introduction

In 2006, the State of Hawai‘i’s Language Access Law¹ was enacted to affirmatively address the language access needs (on account of national origin) of limited English proficient (“LEP”) persons.² The law seeks to address language barriers to:

- accessing important benefits or services,
- understanding and exercising important rights,
- complying with applicable responsibilities,
- or understanding other information provided by state-funded programs and activities.

It was the intent of the legislature that the provision of language accessible services be guided by Executive Order 13166 (2000),³ Title VI of the Civil Rights Act (1964), and succeeding provisions of federal law, regulation, or guidance. [L 2006, c 290, pt of §1] Title VI protects people from discrimination based on race, color, or national origin in programs or activities that receive federal financial assistance. The University of Hawai‘i (hereinafter referred to as “UH” or “University”) receives federal funds and complies with Title VI.

II. Language Access Plan

The Hawai‘i Language Access Law requires State agencies receiving federal financial assistance to file a language access plan by July 1, every two years, with the Office of Language Access (“OLA”), within the State of Hawai‘i, Department of Health. See Haw. Rev. Stat. § 321C-4(c).⁴ The updated UH System Plan for Language Access covers the period of July 2026-June 2028. During this period, the Community College System Director of Compliance, EEO, and Title IX under the Office of the Vice President for Community Colleges will serve as the University’s contact person for consultation with OLA.

¹ Hawai‘i’s Language Access Law was codified as Hawai‘i Revised Statutes (“HRS”) Chapter 371, part II, §§ 371-31 to -37 (2006 Haw. Sess. L. Act 290). It was repealed in 2012 by Act 201, as of July 3, 2012 and recodified as HRS Chapter 321C.

² Limited English Proficient (“LEP”) persons are “individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.” U.S. Dep’t of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 Fed. Reg. 41455, 41459 (June 18, 2002).

³ Executive Order 13166 was revoked by Executive Order 14224 on March 1, 2025, however, the underlying civil rights protections regarding language access remain as provided in Title VI of the Civil Rights Act.

⁴ See also Office of Language Access Memorandum No. 2022-001 which states: “Pursuant to Chapter 321C, Hawai‘i Revised Statutes (HRS), all state agencies receiving state and federal funding are required to establish and file a Language Access Plan (LAP) with the Office of Language Access (OLA) and shall continue to file their plans with OLA every two years.”

III. Four-Factor Analysis Required to Determine the Extent of Language Assistance to be Provided

Hawai‘i’s Language Access Law codified in HRS § 321C-3, set forth a four-factor test to determine if language access services must be provided, and if so, the extent of those services. The four factors are:

1. The number or proportion of persons with LEP that are eligible to be served or likely to be encountered by the program;
2. The frequency with which individuals with LEP come in contact with the services, program, or activities;
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 University and associated costs.

IV. Assessment Regarding Limited English Proficient Populations Eligible to Be Served by the University

The University engages in an individualized analysis in compliance with federal and state law, that balances the above-stated four factors. To obtain data in connection with all four factors and inform the University’s provision of language access services, the University engaged in the following steps to inform this plan and procedures:

1. Utilize a Language Access Request and Tracking Tool (“Tracking Tool”), similar to OLA’s Language Access Reporting Tool, for each of the University’s ten campuses and the University System.⁵ The University uses the Tracking Tool to track the number or proportion of LEP persons served or encountered from the eligible service population, and the frequency with which LEP persons encounter individual campus services, programs, or activities. Each Campus Language Access Coordinator tracks and records for their own campus, the requests for interpretation or translation assistance received either through the University’s webpage forms (discussed in more detail in Section VI), or from in-person requests. The Tracking Tool includes the data from the language assistance requests received for the Plan Year 2024-2026.
2. Conduct a Systemwide Language Access Needs Assessment. The University has periodically surveyed its campuses to assess language access demand, most recently from November 2021 through February 2022. The Community College System Office of Compliance, EEO, and Title IX is now building on that work with a more comprehensive two-phase needs assessment. In Fall 2026, students across all ten campuses will be invited to share their experiences accessing non-academic UH services through an IRB-approved online survey and campus focus groups. In 2027, a second IRB-approved survey will reach out to faculty and staff both to understand their own experiences accessing workplace services and to learn how well-equipped they feel to support LEP students and community members in their day-to-day work. The questions for that survey will be shaped in part by what the student

⁵ The Language Access Request and Tracking Tool is not attached to the University’s Plan, but a copy is made available to the Office of Language Access at <https://drive.google.com/drive/folders/1GSIx2W3axzuzHnEz-rusp8g7bZ8Rszvo>.

survey revealed. Both phases are intended to shed light on language access barriers that do not always show up in existing tracking data; for example, when someone avoids a service altogether rather than asking for help. Findings will be used to strengthen future updates to the Language Access Plan.

3. Review and consider the March 2016 Statistical Report entitled “Detailed Languages Spoken at Home in the State of Hawai‘i” published by the Research and Economic Analysis Division (READ) of the Hawai‘i Department of Business, Economic Development & Tourism (HI-DBEDT). The University considered the statistical data of the top languages other than English spoken at home for each County, as well as the size and location of the population, and the level of assistance needed as detailed in the report.
4. Review and consider the 2019 State of Hawai‘i Data Book and the Data Book Individual Tables available from READ, HI-DBEDT, located at <https://dbedt.hawaii.gov/economic/databook/db2019/> and https://dbedt.hawaii.gov/economic/databook/2019-individual/_01/. The University considered the statistical data of the top languages other than English spoken at home for each County for the period in the tables (2014-2018), as well as the size and location of the population, and the level of assistance needed as detailed by HI-DBEDT.
5. Review and consider the 2024 State of Hawai‘i Data Book and the Data Book Individual Tables available from READ, HI-DBEDT, located at https://files.hawaii.gov/dbedt/economic/databook/db2024/DB2024_final.pdf and <https://dbedt.hawaii.gov/economic/language-use-dashboard/>. The University considered the statistical data of the top languages other than English spoken at home for each County for the period in the tables (2020-2024), as well as the size and location of the population, and the level of assistance needed as detailed by HI-DBEDT.
6. Review and consider the October 2018 Report “Serving Hawai‘i’s English Learners” prepared by Hawai‘i P-20 Partnerships for Education with data provided by the Hawai‘i Data eXchange Partnership. Although the report focused on the K-12 population, the University considered the data in relation to the potential population matriculating to higher education.
7. Review and consider the October 2021 publication “Hawai‘i English Learners’ Data Story” prepared by Hawai‘i P-20 in partnership with the Hawai‘i State Department of Education, and Hawai‘i Asian American and Pacific Islander Data Disaggregation Grant with data provided by Hawai‘i Data eXchange Partnership located at <https://www.hawaiidxp.org/data-products/hawaii-english-language-learners-data-story/>. The publication provides information regarding the English Learner (EL) population in Hawai‘i public schools including the most common languages spoken for the school year 2019-2020 for different geographical areas in Hawai‘i, and college enrollment for EL students.
8. Review and consider the November 4, 2021 Office of Language Access Memorandum No. 2021-004 which details the top 14 languages spoken by individuals with limited English proficiency in the State of Hawai‘i.

9. Review and consider the May 1, 2024 Office of Language Access Memorandum No. 2024-002 which details the top 15 languages spoken by individuals with limited English proficiency in the State of Hawai‘i.
10. Review and consider the April 21, 2026 Office of Language Access Memorandum No. 2026-001 which details the top 14 languages spoken by individuals with limited English proficiency in the State of Hawai‘i.
11. Review the English proficiency requirements for undergraduate and graduate students at the University of Hawai‘i.⁶ These requirements hold that applicants for whom English is not their native language must demonstrate a certain level of English proficiency to gain access to UH courses or programs.

The assessment determined that English language fluency is an essential aspect of the majority of the University’s educational programs and activities (e.g., undergraduate or graduate education).⁷ Most of the University’s “clients” or “customers” are students who must have sufficient English language fluency to qualify for higher educational programs.

The assessment process also determined that most nonacademic programs open to the general public involve nonessential services, entertainment, or commercial activities (e.g., sports events, bookstores, food vendors, concerts).⁸ Based on the four prong “Oral and Written Language Services” factors set forth in HRS § 321C-3, multilingual notices are not required for these types of programs.⁹

⁶ *International Admission Requirements*, University of Hawai‘i at Manoa Office of Admissions, <https://manoa.hawaii.edu/admissions/international/> (last visited May 19, 2026); *English Proficiency*, University of Hawai‘i at Manoa Graduate Division, <https://manoa.hawaii.edu/graduate/english-proficiency-exemption-eligibility/> (last visited May 19, 2026).

⁷ The Hawai‘i Language Access Law is modeled after Title VI. “Title VI does not require recipients to remove language barriers when English is an essential aspect of the program,” Exec. Order No. 13166, 3 C.F.R. 13166 (2000), (such as providing civil service examinations in English when the job requires a person to communicate in English, see *Frontera v. Sindell*, 522 F.2d 1215 (6th Cir. 1975)), or when there is another non-pretextual “substantial legitimate justification for the challenged practice” and there is no comparably effective alternative practice with less discriminatory affects. *Elston v. Talladega County Bd. of Educ.*, 997 F.2d 1394, 1407 (11th Cir. 1993); *New York City Environmental Alliance v. Giuliani*, 214 F.3d 65, 72 (2nd Cir. 2000).

⁸ Employment is covered by Title VII of the Civil Rights Act (e.g., nondiscrimination on the basis of national origin) and the Hawai‘i Fair Employment Practices law (nondiscrimination on the basis of ancestry, including language, accent, dialect). Employment does not constitute a “program, service, or activity” under Title VI or the Hawai‘i Language Access Law. However, career and job placement services funded under the Workforce Investment Act (WIA) are “services” covered under Title VI. Community Colleges involved with the WIA and One Stop centers already comply with the language access requirements of Title VI.

⁹ The University issues notices that it does not discriminate on the basis of race, sex, age, color, national origin, religion, or disability in its programs and activities and provides equal access. The Community Colleges’ websites have non-discrimination notices in thirteen (13) languages, (soon to be fourteen (14) languages), and specifically state that with respect to Career and Technical Education (CTE) courses, that lack of English skills will not be a barrier to participation in CTE programs. See <https://uhcc.hawaii.edu/ovpcc/nondiscrimination/>

Additionally, the Language Access Request and Tracking Tool indicates a low frequency of encounters or services requested by LEP persons on every one of the University’s campuses. For the past plan period of July 2024-June 2026, each campus had few service inquiries (ranging from 0 to 32), with the majority of those requests insufficiently specific to provide assistance or support with respect to a university program or activity. The exception is the University’s College of Tropical Agriculture and Human Resources (CTAHR) Cooperative Extension Program, an outreach program that has secured federal funding for the specific purpose of providing support to agricultural LEP clients. Moreover, previous surveys conducted by the University have not demonstrated a large demand for language access services on any campus, or in any programs/services, across the board.

Factors 1 and 2 of the four-factor analysis also require that the University review the number or proportion of LEP requests received in light of the eligible service population served by the University, i.e., comparing the actual number of LEP requests received, to the total size of the eligible service population. The relevant guidance does not provide further information about what the definition of the “eligible service population” would be for the University. For the purposes of this analysis the University took the most cautious, language access-focused approach and compared the number of actual LEP requests received to the smallest reasonable definition of “eligible service population” for the University. This eligible service population would be the total number of students enrolled plus the total number of individuals employed at the University over a given period of time. This analysis showed that the University encountered a very limited number of LEP individuals within the eligible service population, well under 1%.

The University tracks LEP requests in a Tracking Tool. During the period July 1, 2024 to June 17, 2026 the University received 232 inquiries for assistance across all 10 campuses and the System offices (excluding the requests received by CTAHR which has a unique eligible service population that is determined by federal grants CTAHR received). Out of the 232 inquiries, the actual LEP requests for assistance which concerned a UH program or service, including those who responded affirmatively to indicate a need for interpreter assistance, numbered 192.¹⁰

During that period of time, the total student enrollment at the University averaged 49,534¹¹, and the total number of employees averaged 9,445.¹² This results in an average minimum eligible service population during this time of 58,979.

¹⁰ When counting requests for assistance concerning UH programs or services, the University is counting such requests as concerning UH programs or services if the request appears that it *may* concern UH programs or services, even if the request language is somewhat vague or unclear.

¹¹ *Enrollment Report*, University of Hawai‘i Institutional Research, Analysis & Planning Office, <https://data.hawaii.edu/student/enrollment?semester=2026-1&campus=SYS&studentType=A> (last updated May 1, 2026) (last visited June 10, 2026).

¹² *Number of Personnel and FTE: All Funds (By Classification and Rank) - University of Hawai‘i System (For Fall 2025)*, University of Hawai‘i Institutional Research, Analysis & Planning Office, <https://data.hawaii.edu/#/reports/FAC00> (last visited June 10, 2026).

Given the number of LEP requests concerning a UH program or service received during that time of 192, this results in a proportion of individuals requesting LEP assistance as compared to the eligible service population of thirty-three-one-hundredths of one percent, or .33%.

Finally, if the eligible service population is expanded to include state, national, and international potential students who submitted applications during that same time period (an average of 32,933¹³), the average eligible service population would increase to 91,912. This would result in an even smaller proportion of individuals requesting LEP assistance of twenty-one hundredths of one percent, or .21%. While LEP requests remain relatively small in proportion to the University’s eligible service population, the University observed an increase in requests during this plan period and will continue to monitor trends in language access needs across its campuses and offices.

Based on this data, with regard to factors 1 and 2 of the four-factor analysis, the University’s obligation to provide language access services is infrequently triggered when viewed solely through the lens of population size and frequency of contact. The University however, understands that the totality of circumstances are considered when determining oral language services to be provided. With the analysis discussed above in mind, the University recognizes in considering factor 3, that there are programs or services of such a nature and importance, that they weigh in favor of providing language assistance, even if there has not been frequent prior interaction with LEP individuals. The University considers those services to be in the areas of health or safety, or those services that have the potential to greatly affect students in terms of their academic journey, such as financial aid, admission services, or counseling. The University is also aware that an individual may not be LEP in all situations, and in general may be able to interact with their existing level of English skills, and participate in University programs, but due to trauma, or the complexity of some formal University processes, may not be able to navigate certain University systems or meaningfully participate in administrative proceedings with the same level of English skills. Because of this, language for individuals who are LEP can be a barrier to accessing certain University benefits or services, understanding and exercising important rights, or complying with University procedures (e.g., judicial processes).

Therefore, the University has identified certain offices and services whose functions and services are directly related to safety, health, equity, and rights where language access services will be provided to the extent possible. Currently the University has not identified any limitations due to resource concerns which would prohibit providing language support in these areas. The offices identified systemwide in which LEP support is prioritized are included in **Attachment A** and encompass the following:

- **Security/Campus Safety:**

Campus Security Units (such as the Department of Public Safety at Manoa and Campus Security at the Community Colleges, West Oahu, and Hilo) that actively works towards providing a safe and secure environment for students, employees, and guests. Security’s charge includes in part responding to incidents that disrupt or endanger the health and welfare of the University community, assisting in addressing safety concerns, and providing emergency alerts and prevention training.

¹³ *Applications Processed University of Hawai‘i*, University of Hawai‘i Institutional Research, Analysis & Planning Office, https://data.hawaii.edu/#/reports/ADM_TOC and <https://data.hawaii.edu/student/applications-processed> (last visited May 27, 2026).

- **Title IX, EEO, and Other Compliance-Related Offices:**
Campus compliance offices that are responsible for addressing policy violations, preventing discriminatory or harassing conduct, providing accommodations, ensuring diversity and equity, and adjudicating violations.
- **Disability Services:**
Employee and Student Campus offices that assist individuals with disabilities in obtaining accommodations to support full participation in programs and activities, or the performance of job duties and functions.
- **Academic Advising and Admission Counseling:**
Offices that support students with identifying and planning individual educational goals and objectives, including registration assistance, course and program selection, as well as future career and educational plans.
- **Admission Outreach and Recruitment:**
Offices and services that conduct outreach and pre-admission activities, including resource networking and recruiting of prospective students.
- **Student Judicial Affairs:**
Offices responsible for establishing the guidelines governing the ways in which students interact with each other within the University community, and adjudicating the Student Conduct Code and other related student policies.
- **Health Services (including Mental Health Services):**
Offices responsible for the physical and mental well-being of university community members. These offices include those that provide medical services, pharmacy services, and/or mental health counseling.
- **Financial Aid:**
Offices that are dedicated to assisting and processing student financial aid.

Each individual campus may prioritize additional services/programs for the provision of LEP services.

V. University Structure for Language Access Support

Language Access Coordinators (“LAC”) have been designated for each of the ten University of Hawai‘i campuses as well as the University system. These individuals are responsible for developing, updating, and coordinating the overall implementation of the University’s Language Access Plan and their respective campus procedures. Responsibilities of the campus LAC also include:

- Serving as a primary contact for LEP individuals who are requesting language assistance services on their campus
- Responding as appropriate to inquiries regarding the University’s Language Access Plan and requests for language assistance
- Providing support to campus offices with respect to the language access issues

- Coordinating with System offices and the University’s Language Access Committee on language access issues
- Assisting in the compilation and coordination of internal and external language resources
- Collecting information necessary to enable the University to provide language access to LEP individuals as appropriate

A listing of the current Language Access Coordinators for each campus can be found on this website:

<https://www.hawaii.edu/offices/eoo/language-access/>

In addition to Language Access Coordinators, the President’s Office has convened a Language Access Committee (“Committee”) which meets regularly and recommends appropriate steps for the University to comply with the language access laws and meet the needs of LEP individuals where appropriate and possible. The Committee consists of the Language Access Coordinators for each campus and system, as well as representatives from the University Community College System Office of Compliance, EEO, and Title IX; the EEO Office for UH Mānoa and UH System; and Hawai‘i P-20.¹⁴ The Committee works with and receives information and guidance from the Office of the University General Counsel, and others, as needed. Members of the Committee are listed on the University’s Language Access Committee website: <https://www.hawaii.edu/offices/eoo/language-access/>

The University has a part time Language Access Specialist who serves as systemwide support for the Language Access Coordinators and the Language Access working group. The Language Access Specialist assists in the implementation of the University’s Language Access Plan, and provides policy, program, and administrative support. This position ensures there is a consistent and standard approach to handling and assessing language access needs, ensures compliance with state and federal language access laws, and works to advance language access programs and education within the University. In this capacity, the Language Access Specialist coordinates language access efforts across campuses and supports internal monitoring. The Specialist develops and delivers training for front-line workers and bilingual employees to increase accessibility and consistency of instruction and conducts research to keep population data current and reflective of community needs. The position advances initiatives in emerging areas to continuously strengthen the University’s language access infrastructure.

The Committee also seeks to maintain and expand collaborative relationships with campus partners whose work brings them into regular contact with multilingual students. These connections strengthen the University’s language access efforts by leveraging campus expertise and helping identify the needs of LEP individuals beyond formal reporting channels. The English for Speakers of Other Languages (ESOL) Working Group is one example of a campus resource whose members are often well positioned to recognize when multilingual students face barriers accessing University services.

¹⁴ Hawai‘i P-20 has adopted the duties that were previously assigned to the Office of the State Director for Career and Technical Education. Hawai‘i P-20 is currently the administrative office managing the federal Perkins V grant and serves as civil rights oversight for the state Career and Technical Education (CTE) office per the Title VI Guidelines for Vocational Education.

VI. Protocol for Providing Language Services

The University has in place general procedures for the intake of requests for language access assistance from LEP persons, and for the assessment and provision of services. These procedural steps are set forth below and apply to all ten University campuses. Each campus may also develop protocols for responding to language access requests for specific units or departments in addition to these general procedures, based on demand, the unit function, and need.

A. Notice of Language Service Availability¹⁵

The University notifies LEP individuals that they may request language assistance from the University, and that free language assistance may be provided when English proficiency is not required for participation.

Website Notices and Request for Services Forms. Website notices in fifteen major languages notify LEP individuals that free interpretation services may be provided, except in programs or areas where English proficiency is required. A language access bar located either on the top or bottom of the University System webpages and each campus webpage lists fifteen languages, and links to a language request form LEP individuals may complete to request language assistance. The fifteen languages reflect those identified by OLA as spoken by at least 5% of the state population or 1,000 people, as detailed in OLA Memorandum No. 2026-001 (April 21, 2026), with the addition of Thai. Although Thai falls marginally below the current OLA threshold based on 2020-2024 ACS PUMS data,¹⁶ the University has elected to retain Thai in recognition of the community’s prior eligibility and the negligible difference from the threshold. The University will continue to monitor OLA language data and update its language bar as warranted by future threshold determinations. The fifteen languages are:

1. Ilokano
2. Japanese
3. Tagalog
4. Korean
5. Spanish
6. Cantonese
7. Vietnamese
8. Chuukese
9. Mandarin
10. Marshallese

¹⁵ If there are fewer than fifty (50) persons in a limited English proficient group that reaches the 5% threshold, the agency must provide written notice in the primary language to the limited English proficient language group of the right to receive competent oral interpretation of vital documents, free of cost. See Haw. Rev. Stat. § 321C-3(4)(c)(2). As stated above in Section IV, the University is currently unaware of any obligation to provide free language access assistance in the majority of its programs and services; however, the University has determined there is a benefit to the University population in including these notices for those services in Attachment A. The University will continually monitor the data to see if the demand and need changes over time.

¹⁶ According to the DBEDT Language Use Dashboard (<https://dbedt.hawaii.gov/economic/language-use-dashboard/>), the estimated number of Thai speakers with limited English proficiency in the State of Hawai‘i is 961, i.e., just below the 1,000-person threshold established under HRS § 321C-3(4)(c).

11. Hawaiian
12. Samoan
13. Cebuano
14. Tongan
15. Thai

The University’s language access bar as well as the request forms LEP individuals may complete for assistance, are found on the following website pages:

<https://www.hawaii.edu/>
<https://uhcc.hawaii.edu>
<https://manoa.hawaii.edu/>
<https://hilo.hawaii.edu/>
<https://westoahu.hawaii.edu/>
<https://www.hawaii.hawaii.edu/>
<https://www.honolulu.hawaii.edu/>
<https://www.kapiolani.hawaii.edu/>
<https://www.kauai.hawaii.edu/>
<https://www.leeward.hawaii.edu/>
<https://www.maui.hawaii.edu/>
<https://windward.hawaii.edu/>

Signage. The University has multilingual signs and/or pamphlets at those offices identified by the University as priority services for language access support in **Attachment A**. (Please see **Attachment B**, Notice of Language Assistance Posters). These signs are a functional and effective method to inform LEP individuals of where and how to request language assistance. Signage is, and will continue to be made available to staff at specified University support service locations identified as primary points of public contact.

Language ID Cards. Following a plan of action similar to the "I speak..." language assistance request cards used by agencies in Hawai‘i as well as across the country, multilingual language assistance cards will be made available in the offices/units associated with the priority services identified in **Attachment A**. (Please see **Attachment C**, Language ID Cards). The LAC for each campus may also place language ID cards in additional key locations on their campus based on demand and need. The cards are printed in English and 14 non-English languages. LEP individuals can request an interpreter by showing the appropriate Language ID Card to staff, or writing in the name of their language.

B. Language Services Support Assessment

Completed online request forms for language access assistance are routed to a general language access email account uhlac@hawaii.edu that is monitored by a Committee Outreach Coordinator.¹⁷ The Committee Outreach Coordinator will forward the language access assistance request to the appropriate campus/system LAC and work with the LAC to ensure the request is assessed and responded to appropriately. Depending on the request and the service/program involved, other University

¹⁷ The LAC Outreach Coordinator may be rotating and consists of individuals in the Community College System of Compliance, EEO, and Title IX, as well as members of the Language Access Committee.

administrators may also be notified of the request. The LAC will appropriately identify the issues and the services requested based on information included in the submitted form.

For individuals who request language assistance in person based on the notices and posters included in campus offices, the office will inform and consult with the campus LAC of the request, if support is needed. For these in-person requests, the LAC will help to appropriately identify the issues and the services requested using the resources discussed in Section VI. C. below.

C. Provision of Interpretation/Translation Services

Based on the campus assessment, if the campus LAC determines support is warranted, they will identify appropriate resources, both internal and external, in order to provide language access services free of charge to eligible LEP individuals, including:

- competent, timely oral language services (such as on-site, video remote, or phone interpreting)
- written translations of vital documents/information

The University is aware that it must provide interpretation or translation from appropriate and competent individuals and may not rely on or ask students, friends, family, or untrained school staff to translate and/or interpret. Each campus LAC is trained that use of family members or friends as interpreters is highly discouraged.

The LAC will work with relevant campus administrators to respond to language access requests and will utilize the below resources and procedures in providing appropriate language services and support:

1. Resources

- a. Internal Resources - Dual and Multilingual Employees.¹⁸ To fulfill language service requests, the University compiles, and updates, a list of potential internal dual and multilingual employees who may assist in providing translation or interpreting services. Bilingual staff who are willing, on an as-needed basis, to assist the University by facilitating informal oral or written communication with LEP individuals are self-identified through a survey and by campus leadership. (Please see **Attachment D**, Volunteer Language Service Provider Form). These dual and multilingual volunteers may be available to work with the LAC and campus staff to meet the language needs of the LEP populations. Each campus LAC has access to the list of identified dual and multilingual employees and has the discretion to assess the circumstances to determine whether use of such internal resources is appropriate.¹⁹ Campus LAC and other personnel will also use the four-factors (refer to Section III in this document) to identify the appropriate interpreter skill level for the particular situation, and when a qualified interpreter

¹⁸ If the program or campus determines a need for additional bilingual personnel, they should include the relevant language skills as a desirable qualification when filling vacant state funded public contact positions. See Haw. Rev. Stat. § 321C-3(4)d.

¹⁹ The University’s list of internal dual and multilingual employees who may be called upon to provide interpretation services is not attached to the University’s plan but is available to the Office of Language Access at <https://drive.google.com/drive/folders/1GSIx2W3axzuzHnEz-rusp8g7bZ8Rszvo>.

is recommended or necessary. LAC members understand that use of internal University resources may not always be appropriate if the matter requires extensive language access support, in cases where translation may be technical, and in cases that are subject to a more formal process and/or are judicial in nature.

- b. External Resources - National and State Agencies Providing Language Access Services. The University provides to the campuses a resource list that contains national and Hawai‘i-based providers whose services may be utilized for oral interpretation and written translations. (Please see **Attachment E**, External Language Assistance Services). The University previously participated in a contract for telephonic and video interpretation services as a member of WSCA-NASPO, through the Hawai‘i State Procurement Office (SPO). The Hawaii State Procurement Office (SPO) has entered into an SPO price contract effective as of June 1, 2026 with the following service providers that are available to all state agencies, including the University: (1) Bromberg & Associates, L.L.C.; (2) Effectiff LLC; (3) Hanna Interpreting Services LLC; (4) Visual Language Professionals LLC. University campuses may also utilize Hawai‘i-based service providers in addition to the national vendors under the SPO Contract to provide language services.

2. Providing Oral Interpretation Services

The University understands that the availability of oral interpreter services may be critical for LEP individuals in order to communicate with University staff and apply for and receive services from the University. As appropriate, the University provides oral interpretation services to LEP individuals both telephonically, via video, and face-to-face.

a. Use of Family and Friends as Interpreters

Although an agency has flexibility in determining the appropriate mix of language assistance services to provide, the University highly discourages the use of family and friends as interpreters.

The University understands, however, that an LEP individual may choose to use a family member or friend to assist with language access, even in situations where other language service options are available.

If an individual chooses to use a family member or friend to assist with language access, the appropriate campus LAC shall take reasonable steps to determine if the individual providing the interpretation is competent to provide this service by engaging in the following steps:

- Determine whether conflict of interest, confidentiality, or other concerns make the use of the family member or friend inappropriate.
- Use caution if the LEP individual asks to have a minor provide interpretation.
- Determine whether the campus shall provide interpreter services in place of or, if appropriate, in addition to, the person selected by the LEP individual.

b. Telephonic Interpretation Services

Telephone interpretation is useful in brief-encounters or urgent situations where immediate assistance is needed. It is more economical and provides quick access for LEP persons.

To ensure immediate language access to all LEP individuals, each University campus has immediate access to telephone interpreter services in more than 100 languages, 24 hours per day, 7 days per week through contracts with national vendors and also through Hawai‘i-based providers as described below.

Under a prior national contract, in which the University was a participant addendum along with another 14 states for telephonic interpreter services as a member of WSCA-NASPO, through the Hawai‘i State Procurement Office (SPO), University campuses primarily utilized national vendor Corporate Translation Services, LLC dba Language Link for telephonic interpretation services. The Hawaii State Procurement Office (SPO) has entered into an SPO price contract, effective June 1, 2026, with the following service providers that are available to all state agencies, including the University: (1) Bromberg & Associates, L.L.C.; (2) Effectiff LLC; (3) Hanna Interpreting Services LLC; (4) Visual Language Professionals LLC. All University campuses are notified of the option to utilize these four authorized national vendors to provide telephonic interpretation services via a distributed document entitled “External Language Assistance Services.”

The University also informs campuses of the options to utilize Hawai‘i-based service providers in addition to the national vendors under the SPO Contract. Campuses are provided information regarding the various options available via the resource listed in the External Language Assistance Services document. (Please see **Attachment E**).

c. On-Site Interpretation Services

On-site interpreting generally requires advanced booking. After consultation with the campus LAC, a department or unit can utilize an internal University staff interpreter if appropriate, or contact an external interpreter directly. (Please see **Attachment E**).

The following are the specific steps the campus LAC and the department/unit may take to respond to an on-site request for language services

- (1). Determine whether there is a need for an interpreter.
 - Ask the LEP individual directly which language they speak.
 - Use visual aids that list languages, such as Notice of Language Assistance Posters and I-Speak cards, so the LEP individual may point to the language they speak. (Please see **Attachments B and C**).

- Seek assistance from dual or multilingual staff, or family and/or friends, if the LEP individual is unable to say which language they speak.
 - If the department/unit is still unable to identify the language needed, the department/unit can call a telephone interpreting service to help determine the specific language spoken by the individual with LEP. (Please see **Attachment E**).
- (2). In connection with the campus LAC, determine if it is appropriate to offer interpreter services at no cost to the individual. Interpreter services may be appropriate if:
- The request is not in connection with a service where English proficiency is required.
 - The request is in connection with an important or priority program/service as listed in **Attachment A**.
 - The request is necessary with respect to allowing meaningful access to education or essential services.
- (3). When oral interpreters are needed, departments/units must explore all effective and timely options.
- Consider the feasibility of having the interpretation by phone, video, or face-to face, as appropriate.
 - Utilize competent and qualified volunteer staff when appropriate. The use of internal volunteer interpreters may not be appropriate if the matter requires extensive language access support, is technical, or concerns a process that is more formal and/or judicial in nature.
 - If volunteer staff is not appropriate or not available, utilize external language service providers as identified in **Attachment E**.

d. Video Remote Interpretation Services

Video remote interpretation (VRI) services involve real-time, full-motion video service provided via Zoom or other video conference platforms. Depending on the circumstances, VRI may fulfill the requirements of telephonic or face-to-face interpretation services as appropriate.

The majority of the external resources in **Attachment E** provide VRI services.

3. Translation of Vital Documents/Information

Written translations of vital documents²⁰ are required for LEP groups that constitute 5% or 1000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. See Haw. Rev. Stat. § 321C-3(4)(c)(1). Under the Safe Harbor Provision, for an LEP person who is seeking translation services, but speaks a language that does not meet the threshold, the University will provide written notice in the LEP Person’s primary language of the right to receive oral interpretation of written materials, free of cost.

As stated above, based on the data, and low demand for language access services received by all campuses across the board, the University has determined that LEP persons constitute less than 5% or 1000 of the population of persons eligible to be served or likely to be affected or encountered. Accordingly, the University has not identified vital documents related to priority or essential services that are currently required to be translated

However, the University recognizes that translation services may be helpful in certain areas, and campus LACs will work with departments and units to identify information or situations where translation may be desirable.

Steps to Identify Documents/Information for Translation

a. Identify documents for translation priority.

Departments and units may prioritize documents that are critical for obtaining services and/or benefits, or are required by law, and which may directly impact the mission of the University. Such documents may include, for example, applications, consent forms, complaint forms, outreach materials, and notices of rights.

b. Categorize and prioritize documents for translation.

Consider the frequency the document may come in contact with an LEP individual, i.e., forms, information brochures, and periodic or seasonal communications.

c. Make documents language access ready.

Documents should be user-friendly and translatable. To the extent possible, documents should be written and designed in plain language so that documents are clear, logical, concise, and easy to read. Plain language means the author needs to analyze and decide what information is needed by the individual to make informed decisions, before words, sentences, or paragraphs are considered. Plain language documents use words economically and at a level that the client can understand. The sentence structure should be tight; the tone welcoming and direct, and the design visually appealing.

²⁰ Vital Documents are defined as printed documents that provide important information necessary to access or participate in services, programs, or activities of a state agency or covered entity, including, but are not limited to, applications, outreach materials, and written notices of rights, denials, losses or decreases in benefits or services. See Haw. Rev. Stat. § 321C-2.

- d. Identify the targeted languages using language data collection. All vital documents must be translated for languages that meet the threshold above. Non-vital documents that are identified as priority documents (see paragraph 1 above), should be translated in the languages most useful as identified by University data (e.g., the Tracking Tool, survey), and other reliable sources such as agency data (e.g., April 21 Office of Language Access Memorandum No. 2026-001 which details the top 14 languages spoken by individuals with limited English proficiency in the State of Hawai‘i).
 - e. Assess translation options. Please use the internal volunteer list and the external language services resource list; Attachment E
4. Ensuring Quality of Language Access Services

To ensure the quality of interpreter services, the current authorized vendors from the State contracts were selected through a Request for Proposal (RFP) evaluation process that took into consideration the interpreter quality assurance, such as the screening process for interpreters, the general minimum requirements for experience, education, language proficiency, and certification to ensure quality of interpreters.

To ensure translated materials are accurate, consistent, reliable, readable, culturally appropriate, and free of errors, the University only retains translators from external resources that have been authorized or qualified by the American Translators Association (ATA) and/or other approved translator programs.

To ensure the quality of interpretation for internal resources, the University requires volunteer interpreters to adhere to the interpreter code of ethics. The University does this by requiring all internal volunteer interpreters to read and sign the Interpreter Code of Ethics contained in **Attachment D** prior to assisting with any language request.

The University recommends that volunteer interpreters engage in language access training and testing opportunities, including free training offered by OLA, interpreter workshops sponsored by other state agencies, such as the State Judiciary, and language skills testing that has historically been coordinated by the University of Hawai‘i at Manoa’s Hawai‘i Language Roadmap Initiative.

Bilingual employees who volunteer to provide language assistance are also encouraged to attend the 90-minute training workshop developed by the Community College System Office of Compliance, EEO, and Title IX, described in Section V, which covers key principles of interpretation and translation, ethical decision-making, and the boundaries of the volunteer role in low-risk LEP encounters.

As an added measure of control, the University also uses feedback and comments from users, community-based organizations, the Language Access Committee, State Language Administrative entities such as OLA, and other stakeholders to assess the quality of interpreters and translators.

D. Data Collection and Reporting System

Each campus LAC documents requests for language access services. As described above in Section IV.1. the LAC uses a Tracking Tool modeled after the Language Access Encounter Tool (revised 9/6/22) created by the Office of Language Access to collect and report data regarding language services pursuant to Chapter 321C, Hawai‘i Revised Statutes. (Please see **Attachment F**, Language Access Request and Tracking Tool). The campus LAC also assists other administrators on their campus with using the Language Access Request and Tracking Tool to obtain accurate data regarding language services provided. The data collected by each department/unit is provided to the campus LAC on, at minimum, a yearly basis, and the Tracking Tool for each campus is maintained by that campus LAC.

If a LEP related incident is reported to the University, the LAC may direct a complainant to the University System Compliance offices – The System Office for Equity Assurance, or the Community College System Office of Compliance, EEO, and Title IX. The Compliance offices will assess the complaint and appropriately address complaints in accordance with university policies and procedures, including the policies and procedures addressing discrimination if applicable (University Executive Policy EP 1.202 and Administrative Procedure AP 1.202). Each campus LAC will log complaints received in a central Language Access Complaint Log. (Please see **Attachment G** for a sample). The LAC may also direct individuals to the Office of the Language Access website at <https://health.hawaii.gov/ola/filing-a-complaint/> to file a complaint with an entity outside of the University.

V. **Training**

The Language Access Plan is utilized as the University’s official Language Access Policy and Procedures and is accessible to all employees on the University’s language access webpage: <https://www.hawaii.edu/offices/eo/language-access/>

The campus LAC will ensure that priority offices in **Attachment A** are familiar with the Language Access Plan, the procedures for interpretation and translation services, as well as the internal and external resources for language services. The LAC will work with the campus to provide notice to employees of the identity of the campus LAC and their contact information.

The campus LAC conducts annual training to ensure that departments and units in **Attachment A**, and other identified administrators who have public contact positions are properly trained and understand the proper use and purpose of the Language Access Request and Tracking Tool (**Attachment F**), so that accurate data regarding language services requests can be obtained.

To expand the reach of language access training across the University system, the Community College System Office of Compliance, EEO, and Title IX has developed a comprehensive 90-minute online training course available to faculty, staff, and administrators through the University's Learning Management System, *Lamakū*. The course covers the University's language access obligations, practical guidance for recognizing and responding to LEP encounters in person and by phone, and procedures for reporting language access requests. Campus LACs will work with priority units and their supervisors to identify employees who should enroll, and participation will be tracked through *Lamakū*. The course

will be available beginning Summer 2026 and complements existing face-to-face training, which will be maintained for supervisors and campus LACs.

LACs and members of the Committee attend the OLA quarterly Language Access Coordinator meetings, and will consult with OLA regarding training, and utilize OLA’s assistance in conducting training for the University, as appropriate.

In addition, the University's Community College System Office of Compliance, EEO, and Title IX is developing a 90-minute training workshop for bilingual employees who volunteer to provide language assistance under the University's Language Access Plan. The workshop will cover the volunteer's role within the Plan, key principles of interpretation and translation, and ethical decision-making with particular attention to understanding the boundaries of the volunteer role and recognizing when a situation requires referral to a qualified professional interpreter. The training is designed to support bilingual volunteers in serving LEP individuals effectively and confidently in low-risk encounters.

VII. Sub-Recipients and Sub-Contractors

Sub-Recipients are responsible for complying with civil rights, and other Federal and State laws and assurances, including and not limited to, informing individuals of any rights to free interpreter service, auxiliary aids as qualified, and the right to file a discrimination complaint when they feel their civil rights have been violated or an interpreter has not been provided.

Contractors and Sub-Contractors are responsible for providing reasonable, meaningful access to their services and for posting required notices, including assurances.²¹

²¹ The University includes in its Contracts Policy the obligation for work-based learning agreements to have non-discrimination assurances with employers under the contract. Specifically, agreements will include the language: “No Unlawful Discrimination. In the performance of this Agreement, the Agency and the School shall comply with all Applicable Laws prohibiting unlawful discrimination including but not limited to race, sex, gender identity and expression, age, religion, color, national origin, ancestry, citizenship, disability, genetic information, marital status, breastfeeding, income assignment for child support, arrest and court record (except as permissible under State law), sexual orientation, national guard absence, or status as a covered veteran. The students under this Agreement will not be subject to discrimination including but not limited to their acceptance or selection, assignment to jobs or work tasks, recruitment, hiring, placement, hours of employment, levels of responsibility, and in pay.”

VIII. Updating and Revising the Plan

To ensure continual improvement in ensuring access to education and essential services, in a manner that is culturally and linguistically appropriate, the University’s Language Access Committee and LACs will monitor the provisions of language access services for LEP individuals, and update the Language Access Plan as appropriate. The next update to the Language Access Plan is due to OLA by July 1, 2028. See Haw. Rev. Stat. § 321C4(b).

Approved:



Wendy Hensel
President
University of Hawai‘i