State of North Carolina
Department of Information Technology
Language Access Plan
December 2024

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SECTION 1: INTRODUCTION AND BACKGROUND

1.1   N.C. DEPARTMENT OF INFORMATION TECHNOLOGY OVERVIEW

Introduction

North Carolina is home to 1,216,618 individuals who use languages other than English (LOTE) at home. Of those, 451,823 individuals are limited English proficient (LEP), and 867,946 are foreign-born.[1] Given the state's growing cultural and linguistic diversity, language access and digital equity are the cornerstones of building a cohesive, safe, resilient, and vibrant community that allows individuals using languages other than English[2] to contribute their talents and skills.

Governor Roy Cooper is committed to advancing language access and digital equity to ensure equitable access and opportunities for all North Carolinians using languages other than English. As such, this Language Access Plan (LAP) has been developed by the N.C. Department of Information Technology (NCDIT), in compliance with the State of North Carolina Proposed Language Access Policy, to ensure that all North Carolinians have access to language assistance services and can meaningfully participate in NCDIT's programs, activities, and services.

This Language Access Plan outlines NCDIT's five-year plan for language access implementation, a timeline selected to achieve greater alignment with the department's Digital Equity Plan. Section 1 of the Language Access Plan sets the stage for the plan by providing an overview of NCDIT and establishing the purpose, goals, and guiding principles that anchor the Language Access Plan. The sections that follow, Sections 2 to 7, address specific areas of language access implementation. Each area of implementation is addressed in four distinct parts which include:
1. **Overview of Standard** (or Implementation Area): A brief description of the standard based on federal guidance and North Carolina's Proposed Language Access Policy
2. **Current NCDIT Systems and Practices**: A description of NCDIT's current practices, existing infrastructure, and/or progress to date in relation to the standard

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[1] *Please see Appendix 1: Factor 1 American Community Survey Demographic Data for a more detailed overview of the data collected on individuals who use languages other than English (LOTE) and individuals who are limited English proficient (LEP) from the 2022 American Community Survey's 5-Year Estimates.*

[2] *Languages Other than English (LOTE) is an alternative term to Limited English Proficient (LEP), the legal term denoting any person age 5 and older who self-reports as speaking English less than "very well" in the US Census Bureau American Community Survey (ACS). Because LEP is a deficit-based term, LOTE is used instead throughout this report as functionally equivalent to LEP, except when referring to ACS data in which case these two terms refer to distinct data sets, LOTEH refers to individuals who speak a language other than English at home, and LEP refers to a subset of this population which speaks English less than "very well."*

3. **Implementation Goals**: provides an overview of the overarching goals NCDIT will pursue to meet compliance objectives
4. **5-Year Action Plan**: a list of detailed time-bound action items to be completed by NCDIT in three phases over an implementation period of five years:
   a. Phase I (Year 1)
   b. Phase II (Years 2 and 3)
   c. Phase III (Years 4 and 5)
      i. The timeframe for a phase is subject to be modified by NCDIT.

N.C. Department of Information Technology's Role

NCDIT's mission is to "use information technology to make government more efficient, effective, and user-friendly for the public."[3] NCDIT is responsible for overseeing information technology services for all state agencies in addition to local governments and educational institutions across North Carolina.The department provides access to the state-wide employee platform, NC ID; hosts websites for other state agencies; provides telecommunications services and desktop computing; oversees and maintains state employee email communication; and provides system service support. NCDIT also hosts websites for other state agencies that provide services to the public and implements broadband and digital equity programs, grants, and services aiming to increase the public's adoption and access to high-speed internet.

The N.C. Department of Information Technology website is: https://it.nc.gov/

NCDIT's Divisions, Offices, and Programs include:
● **Broadband and Digital Equity:**
  The Division of Broadband and Digital Equity manages broadband projects across the state to improve access to the internet for North Carolina residents and digital equity projects to tackle the digital divide and ensure all North Carolinians have access to technology. These projects include:
    ○ Building a sustainable team to deliver digital equity to North Carolina,
    ○ Enabling more North Carolinians to afford high-speed internet,
    ○ Increasing digital literacy among all North Carolinians,
    ○ Expanding broadband access across the state, and
    ○ Leveraging data to identify and understand community needs
      ■ Website: https://www.ncbroadband.gov/
● **Communications:**
  The Communications team strategically communicates with external and internal audiences about the department's mission, priorities and activities through the sharing of public information directly to the public and through media outlets.
● **Enterprise Data Office:**
  The Enterprise Data Office transforms existing data assets into information

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[3] *Please see, "Commitment to Customers," N.C. Department of Information Technology https://it.nc.gov/about/commitment-customers*

through data sharing and integration initiatives for the state's policy and operational leaders to use in making program investment decisions, managing resources, and improving results.

- **Digital Solutions:**
The Digital Solutions team develops, maintains, and secures the Digital Commons web publishing platform. Digital Commons, built on a customized distribution of Drupal, provides over 90 state agencies a robust toolset to create accessible and user-friendly websites that work on any device. The team also manages Cloudflare's web security service and provides tools for monitoring website quality and accessibility.
- **Enterprise Solutions:**
The Division of Enterprise Solutions manages and maintains the department's infrastructure, and provides IT services and enterprise applications.
- **Human Resources:**
The Division of Human Resources manages and guides critical organizational support functions involving recruitment and selection, classification and compensation, employee relations, workforce development, diversity and inclusion, performance management, benefits administration, safety and health, and HRIS administration.
- **NC 911 Board:**
The NC 911 Board is responsible for creating an enhanced 911 calling system for both wireless and landline callers throughout North Carolina. The aim is to integrate the calling systems and connect it to voice communication technologies.
  - Website: https://it.nc.gov/about/boards-commissions/nc-911-board
- **Agency Chief Information Officers**
The Department's Chief Information Officers (CIOs) oversee the direction, delivery and support for all technology used across North Carolina's agencies. These agencies include:
  - Department of Administration
  - Department of Environmental Quality
  - Department of Military Veteran Affairs
  - Department of Natural and Cultural Resources
  - Department Public Safety and Department of Adult Correction
  - Department of Transportation
  - Office of State Budget Management
  - Office of State of Human Resources

Additional NCDIT divisions, offices, and programs include: Internal Audit, Enterprise Privacy, Enterprise Security and Risk Management, Finance, Legal, Legislative Affairs, State IT Procurement, and Workplace Services

N.C. Department of Information Technology's Language Access Efforts

NCDIT has taken the following steps over recent years to engage North Carolinians using languages other than English, build its language access and digital equity infrastructure, and advance digital equity and language access for the state:

- NCDIT and the Office of the Governor jointly applied for the North Carolina Equity for Digital Language Access Initiative Grant which was awarded and used to hire Language Equity and Access Partners LLC (LEAP), a language access consulting firm, to assess the current state of language access within the state. This project produced the [State of North Carolina Language Access and Digital Equity Needs Assessment Report](#), the [State of North Carolina Proposed Language Access Policy and Coordination Plan](#), and the [State of North Carolina Language Access Toolkit](#) which included a Language Access Plan template that NCDIT and numerous other departments are using to develop their Language Access Plan.
- In 2023, NCDIT's Division of Broadband and Digital Equity conducted a Digital Equity Survey, using guidance from the National Digital Inclusion Alliance, to understand the digital language barrier and overall needs of people in North Carolina likely to experience barriers to digital access. The survey was made available in nine languages and was available online, in print, and via phone. Approximately 7,447 survey responses were gathered, among which several were in Spanish, Korean, Mandarin, Arabic, Vietnamese, and French. Additionally, the department hosted 23 listening sessions, seven of which were held with communities who speak languages other than English.
- The Division of Broadband and Digital Equity, crafted the [2024 Digital Equity Plan](#) that created guidelines and implementation goals for improving digital equity. This includes efforts to improve digital equity and accessibility to individuals who use languages other than English.
- NCDIT joined and contributed to statewide efforts to establish an Interagency Working Group for New Americans which conducted six statewide multilingual listening sessions from December 2022 to December 2023.

1.2   LANGUAGE ACCESS PLAN LEGAL BASIS AND PURPOSE

Purpose and Goals

This Language Access Plan aims to provide guidance to NCDIT staff and establish a roadmap to support meaningful access to the department's services, programs, and opportunities for individuals using languages other than English. The Language Access Plan also seeks to align the department's efforts with the standards outlined in the [State of North Carolina Proposed Language Access Policy](#) and bring NCDIT into compliance with Title VI of the Civil Rights Act of 1964, the Digital Equity Act of 2021, North Carolina's Digital Equity Plan, and other applicable federal and state standards and guidelines.

Authority

As a recipient of federal financial assistance, North Carolina is bound by Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d-2000d-7, and its implementing regulations, 45 C.F.R. Part 80, which prohibits discrimination based on race, color, or national origin (which includes Limited English Proficiency). North Carolina is committed to advancing the goals of Title VI of the Civil Rights Act of 1964 and Executive Order 13166 in alignment with the State of North Carolina's Digital Equity Plan.

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d) (Title VI), prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. As a recipient of federal financial assistance, the [Department/Agency] is bound by Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d-2000d-7, and its implementing regulation, 45 C.F.R. Part 80, which prohibits discrimination based on race, color, or national origin (which includes Limited English Proficiency).

Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (Aug. 16, 2000), requires federal agencies to take reasonable steps to provide meaningful access to their programs and activities for individuals with limited English proficiency. This includes providing individuals with limited English proficiency language services, such as interpretation and translation, to meaningfully access and engage in federally conducted programs and activities. EO 13166 requires all federal agencies to develop and implement a Language Access Plan to "improve access to federally conducted programs and activities by eligible LEP persons" (p. 50121).[4]

The Memorandum for Heads of Federal Agencies, Heads of Civil Rights Offices, and General Counsels, from the Office of the Attorney General, reaffirms the federal government's commitment to language access obligations under EO 13166 and the Justice Department's commitment to addressing linguistic barriers in government services. The memorandum seeks to assess whether federal agencies have updated their language access policies and plans; have evaluated and improved federal resources, programs, and services to effectively reach individuals with limited English proficiency; whether agencies have considered modification to guidance on Title VI requirements; and whether agencies have adapted digital communication efforts for individuals with limited English proficiency.[5]

The Digital Equity Act of 2021 requires states that wish to be eligible for grant funding on digital equity, to develop and implement a statewide digital equity plan that identifies

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[4] *See Executive Order No. 13166, 3 C.F.R. 50121 (2000).*
https://www.govinfo.gov/content/pkg/FR-2000-08-16/pdf/00-20938.pdf
[5] *See Memorandum for Heads of Federal Agencies, Heads of Civil Rights Offices, and General Counsels (Nov. 21, 2022). https://www.justice.gov/ag/file/1554086/dl?inline=*

barriers to digital equity amongst covered populations, identifies clear objectives to meet goals in addressing digital equity, and collaborates with key stakeholders in the state to address those gaps.

North Carolina's Digital Equity Plan responds to the digital inclusion and equity needs of defined populations, including individuals facing language barriers, limited English proficiency persons, and those who have low levels of literacy. The plan outlines implementation strategies to address the needs and barriers of defined populations to advance digital equity. These strategies include increasing access to affordable and high-speed internet; promoting standards to support online accessibility and inclusivity of public resources and services; promoting education efforts and support to increase digital literacy; promoting best practices and tools to ensure online privacy and cybersecurity; and increasing access to affordable and public digital devices.

The State of North Carolina Proposed Language Access Policy aims to clarify standards and provide guidance for North Carolina cabinet agencies, executive offices, and departments working to ensure meaningful access to state government services, programs, and opportunities for individuals who use languages other than English. Per this proposed policy, "any North Carolina agency, executive office, or department that provides direct or indirect services, resources, programs, information, data, policies, instructions, or activities to the public, funded entities, and staff" is a Covered Entity. The proposed policy further categorizes Covered Entities according to a two-tier system based on the size, capacity, and level of public contact of the Covered Entity. As a department whose primary responsibility consists of providing direct services to and interacting with the public, NCDIT is recommended to be a Tier I Covered Entity.

Guiding Principles

In accordance with federal and state requirements, this Language Access Plan provides a framework for ensuring NCDIT can provide timely and meaningful language assistance services to NCDIT's constituents who use languages other than English. NCDIT is committed to language access, digital equity, and to ensuring that all individuals using languages other than English have access to critical government services, programs, and opportunities. NCDIT will operationalize this commitment to language access and digital equity by:
- Serving all individuals who use languages other than English and providing free, timely, culturally competent, and high-quality language access services;
- Examining current practices and communication strategies to identify opportunities for eliminating barriers, and for engaging culturally and linguistically diverse audiences more effectively;
- Expanding NCDIT's ability and expertise in supporting multilingual digital content, and in increasing access for individuals using languages other than English to resources, programs, and services made available digitally;

- Closely monitoring progress across its divisions, programs, and grantees and supporting department-wide efforts to meet compliance standards;
- Proactively building the skills and knowledge of all staff, including multilingual staff - to ensure they are equipped to communicate with and serve individuals who speak languages other than English; and
- Embedding in the department's culture an understanding that language access, digital equity, and culturally and linguistically responsive service delivery are essential to the department's ability to fulfill its mission.

Definitions

- **Covered Entity**: any North Carolina cabinet agency, executive office, or department that provides direct or indirect services, resources, programs, information, data, policies, instructions, or activities to the public, funded entities, and staff.
- **Tier I Covered Entity:** Covered Entities that are large in size and capacity as defined by the Office of the Governor, and whose primary responsibility consists of providing direct or indirect services and information to the public, funded entities, and staff.
- **Tier II Covered Entity:** Covered Entities that are small in size and capacity as defined by the Office of the Governor, and whose primary responsibility consists of providing direct or indirect services and information to the public, funded entities, and staff.
- **Coordinating Entity**: the Language Access Program, housed in the Office of Public Engagement within the Office of the Governor, is the entity assigned to coordinate the efforts of North Carolina's Covered Entities to provide meaningful language access to individuals with limited English proficiency in accordance with federal requirements.
- **Funded Entity:** any contractors, grantees, and recipients that receive financial assistance from the Covered Entity for the purpose of delivering programs, activities, research, information, or services to the public.
- **Individuals who use Languages Other than English (LOTE):** individuals who read, speak, write, or understand a language other than English. Please see Individuals with LEP below.
- **Limited English Proficiency (LEP)**: the inability or difficulty to understand or to effectively express oneself in spoken or written English as a result of one's national origin and the individual has not developed fluency in the English language.
- **Individuals with Limited English Proficiency (LEP):** individuals who self-identify as speaking English less than "very well" according to the U.S. Census American Community Survey.
- **Language of Lesser Diffusion:** any language used within a distinct geographic area, such as a city, county, or state, where the population of speakers is relatively small.
- **Language Access:** the process of ensuring that individuals who use languages other than English have access to vital documents and services in a language they can understand, either through interpretation or translation services. Please see meaningful language access below.

- **Meaningful Language Access**: the ability to receive information in one's spoken or used language and to participate in and benefit from public services offered by a Covered Entity.
- **Digital Language Access**: the utilization of technology to guarantee that individuals who use languages other than English can understand and engage with digital content in their preferred language. This includes the use of tools such as translation applications, multilingual websites, and various digital resources, all of which aim to enhance information accessibility for people, regardless of language disparities.
- **Language Access Plan (LAP)**: a management document and roadmap that outlines the tasks and priorities to be implemented to ensure the Covered Entity will meet compliance standards set forth in the proposed policy.
- **Internal Three-Person Peer Review Translation Process**: the three-person process which involves multilingual staff who are trained to review and translate text from English to another language. One person translating the text, another ensuring accuracy and clarity through review, and a third finalizing the edited version for delivery.
- **Statewide Director of the Language Access Program:** staff of the Coordinating Entity tasked with coordinating and overseeing all language access implementation statewide and across all covered and funded entities and overseeing the Language Access Coordinators.
- **Language Access Coordinator (LAC):** staff of a <u>Covered Entity</u> tasked with coordinating and overseeing the entity's language access implementation activities and coordinates and oversees the Language Access Liaisons to ensure that language access information is shared across all state agency programs and divisions.
- **Language Access Liaison (LAL):** staff of a d<u>ivision, program, or funded entity</u> tasked with coordinating and overseeing the entity's language access implementation activities
- **Interpretation**: the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. See also oral language services.
- **Oral Language Services**: includes various methods to provide verbal information and interpretation, such as staff interpreters, multilingual staff, telephone interpreter programs, tele-video interpretation services, and private interpreter programs. See also interpretation.
- **Multilingual Staff:** staff member who has demonstrated proficiency in one or more languages other than English and is formally assigned and fairly compensated to either provide language assistance services such as interpretation and/or translation to individuals with LEP, or serve in a policy, resource, or advisory role to provide their cultural and linguistic expertise.
- **Contractor/Vendor:** a vetted language service provider contracted to perform language assistance services, such as interpretation and/or translation, for individuals with LEP.
- **Four-Factor Analysis**: a framework intended to aid recipients of federal financial assistance with conducting an individualized assessment of their programs and activities to help them prioritize language access services.

- **Translation**: the replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- **Plain Language:** a style of communication that aims to make written or spoken information easy to understand for a broad audience. The Plain Language Act (2010) defines plain language as "clear, concise, well organized, and follows other best practices appropriate to the subject or field and intended audience."[6] Language intended for public consumption avoids non-essential information and complex phrasing; highlights essential information; avoids the use of technical terms and industry jargon; and simplifies complex information.
- **Vital Documents**: public-facing written materials in any format, created, issued, or made available on any platform, including websites, by a Covered Entity to inform and communicate with the public; allow the public to apply for benefits, services, or program participant; notify an individual about their eligibility, participation, benefits, or applications; advertise and inform the public about programs, services, resources, rules, rights, requirements, and events; provide instruction or guidance; or provide the public a concern submission process.

SECTION 2: NEEDS ASSESSMENT

North Carolina is home to a population that is increasingly culturally and linguistically diverse. To support NCDIT in determining and prioritizing language assistance services, the Language Access Plan includes a Needs Assessment that identifies the languages spoken by individuals with languages other than English served or likely to be served by NCDIT.

A four-factor analysis is used in this section as a framework to determine the language services NCDIT needs to prioritize to meet the needs of individuals with limited English proficiency. The four-factor analysis is a tool designed to help recipients of federal financial assistance conduct an individualized assessment that considers the following four factors:[7]
1. Factor 1: Data collection and analysis of population with limited English proficiency
2. Factor 2: Data collection and analysis of languages encountered
3. Factor 3: Services Provided to General Public and/or Prospective Limited English Proficient Users
4. Factor 4: Budget and Available Resources

Data provided in this section illustrates the number of individuals with limited English proficiency and who use languages other than English who may need language services, as well as the types of services NCDIT provides that the general public and potential individuals who use languages other than English would access.

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[6] *See Public Law 111-274. 124 Stat. 2861*
https://www.gpo.gov/fdsys/pkg/PLAW-111publ274/pdf/PLAW-111publ274.pdf.
[7] *See Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (67 FR 41455) (2002).*
https://www.federalregister.gov/documents/2002/06/18/02-15207/guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against-national

2.1   FOUR-FACTOR ANALYSIS

Overview of Standard

Factor 1, *Limited English Proficient Population Data Collection and Analysis*, assesses the number or proportion of individuals with limited English proficiency that could be served by or could encounter NCDIT's services.

The Proposed Language Access Policy recommends Covered Entities compile and analyze data on the number and percentage of individuals with limited English proficiency in the State and by region as well as the top languages spoken by individuals with limited English proficiency. NCDIT will monitor language assistance needs and demographic data annually to ensure that language services are provided to individuals with languages other than English for services that would be used significantly by the general public. The purpose of this analysis is to ensure that NCDIT is positioned to adequately identify underserved communities with limited English proficiency and languages other than English who are experiencing barriers to accessing critical services.

Current NCDIT Systems and Practices

NCDIT generally works with the State Demographer housed in the Office of Budget Management to conduct a demographic analysis using the American Community Survey from the US Census Bureau.

In 2024, NCDIT is using the following findings from a demographic analysis conducted by the N.C. Office of the Governor on the State's individuals with limited English proficiency and individuals who use languages other than English:

- As of 2022, an estimated 12.3%, or 1,216,618 individuals five years and older, speak a language other than English at home in North Carolina. Of those who speak a language other than English, an estimated 37.14%, or 451,823 individuals, are limited English proficient. The limited English-proficient population represents 4.47% of the total population of North Carolina.[8]

- Of the 451,823 state residents with limited English proficiency, the top ten most common languages or language groups spoken by residents with limited English proficiency are[9]:
    - Spanish

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[8]*U.S. Census Bureau, ACS, 2022 5-Year Estimates (Table B16001)*
[9]*Please see Appendix 1: Factor 1 American Community Survey Demographic Data for a more detailed overview of the data collected on individuals who use languages other than English and individuals who are limited English proficient.*

- Chinese (including Mandarin and Cantonese)
- Vietnamese
- Arabic
- French (Including Cajun)
- Korean
- Other Asian languages
- Nepali, Marathi, or Other Indic Languages
- Russian
- Gujarati

Implementation Goals

NCDIT will compile and analyze the data on the number and percentage of individuals within the state/region, as well as the top languages spoken by individuals with limited English proficiency using the U.S. Census, American Community Survey, and information provided by statewide or local community organizations serving individuals with limited English proficiency and who use languages other than English.

NCDIT will:
- Identify the size, demographic characteristics, and geographic distribution of persons with limited English proficiency within the service population.
- Determine countries of origin and languages spoken by persons with limited English proficiency.
- Track demographic changes and an influx of emerging communities with limited English proficiency that may result in new language needs.
- Prioritize the most prevalent languages in each service area spoken by persons with limited English proficiency based on an analysis of data triangulated from the US Census, local offices, and the community.

NCDIT will consult with the State Demographer housed in the Office of Budget Management on gathering this information and request the data yearly.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Factor 1 implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items

I	Language Access Coordinator will identify the necessary data to track and analyze language needs.
II	Language Access Coordinator will request demographic data on individuals with limited English proficiency and the languages they speak from the State Demographer, housed in the Office of State and Budget Management yearly.
II	Language Access Coordinator will compile data on the number and percentage of individuals with limited English proficiency statewide and by region and the languages spoken by individuals with limited English proficiency statewide and by region.
II	Language Access Coordinator will include the data compiled in the report and provide it to the Coordinating Entity every two years.
II	Language Access Coordinator will administer changes to the Language Access Plan based on changes in the data collected.

Overview of Standard

Factor 2, *Language Encounters Data Collection and Analysis*, assesses the frequency with which individuals with limited English proficiency and languages other than English come into contact with NCDIT.

The Proposed Language Access Policy recommends that Covered Entities compile and analyze internal language usage data. NCDIT will track and analyze the various ways in which individuals who use languages other than English come into contact with NCDIT and the frequency of such contact with the department on an annual basis. The purpose of this analysis is to ensure that NCDIT is positioned to adequately identify underserved communities with limited English proficiency.

In order to ensure that all NCDIT encounters with individuals who use languages other than English across programs and services are collected in a comprehensive and ongoing manner, NCDIT will:
- Collect data on encounters with individuals who use languages other than English that take place in person, as well as virtually via telephone, email, or through online mediums;
- Track the various languages and types of language assistance services requested and/or needed during those encounters; and
- Assess the high volume languages and language assistance services that are most frequently requested and needed.

Current NCDIT Systems and Practices

Currently, NCDIT tracks and collects data on the number of individuals who use languages other than English and languages spoken by individuals who use languages other than English who come in contact with NCDIT through the following ways:

- The Digital Solutions team uses Google Analytics to track language preferences and total user count for all websites on Digital Commons.
- Language data was collected via the Digital Equity Survey which collected information on the languages requested by individuals who spoke languages other than English. This information was used in congregations to show the need and help formulate strategies to address that barrier to internet adoption.

Implementation Goals

To track and compile comprehensive data that can allow for better monitoring of language needs, NCDIT will:

- Identify the language assistance services requested by individuals who use languages other than English.
- Identify and track language assistance needs of individuals who use languages other than English tracked in the data and Information Management Systems.
- Review language assistance service requests and usage reports submitted by contractors/vendors.
- Review language assistance services requests from other agencies who partner with NCDIT to provide services.
- Review and track the total user count for all agency websites on Digital Commons via Google Analytics.
- Analyze multilingual content accessed by individuals who use languages other than English on digital platforms for future planning, budget projections, and outreach which highlights a need for further engagement.
- Identify the languages spoken by individuals who use languages other than English served by multilingual staff and the frequency of such interactions.
- Identify languages spoken by individuals who use languages other than English served by contractors/vendors and the frequency of such interactions.
- Review data reported by public-facing funded entities on individuals who use languages other than English they've served or encountered.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Factor 2 implementation goals over three phases spanning five years:

- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items

I	Language Access Coordinator will identify the necessary data to track and analyze language needs.
I	Language Access Coordinator will request monthly reports on language services used or requested from contractors/vendors performing language access services.
I	Refugee Coordinator within the Department of Health and Human Services will send collected information and data on interactions with individuals who use languages other than English to NCDIT and other Language Access Coordinators every six months.
II	Language Access Coordinator will create a form and process for documenting the participation of individuals who use languages other than English in public events and meetings.
II	Language Access Coordinator will request language access-specific data from other Cabinet Agencies and Executive Offices yearly.
II	Language Access Liaisons will collect information and data on the use of language services and engagement with individuals who use languages other than English across their divisions, programs, and funded entities and submit the data to the Language Access Coordinator.
II	In collaboration with Digital Solutions, Language Access Coordinator will collect and analyze data on the language preferences and the frequency of use for multilingual content using Google Analytics.
II	Language Access Coordinator will compile data to track and analyze language needs.
II	Language Access Coordinator will include the data compiled in the report and provide it to the Coordinating Entity every two years.
III	Language Access Coordinator will administer changes to the Language Access Plan based on changes in the data collected.
III	Language Access Coordinator will continue to collect information and data on the use of language services and engagement with individuals who use languages other than English across divisions, programs, and funded entities collected by Language Access Liaisons.

Overview of Standard

Factor 3, *Services Provided to General Public and/or Prospective Limited English Proficient Users*, assesses the nature and importance of the programs, activities, or services provided by NCDIT.

The Proposed Language Access Policy recommends Covered Entities identify the nature and importance of the program, activity, or service provided by the Covered Entity. This is intended to ensure Covered Entities prioritize language access and digital equity initiatives for programs and services that are most essential to the safety and well-being of individuals who use languages other than English. To ensure meaningful access to critical and urgent information and services, NCDIT will outline procedures for prioritizing language assistance for critical and urgent information and activities. NCDIT will review all services and information and will prioritize language assistance for programs, activities, services, or information that if not understood by individuals using languages other than English could have immediate and/or severe impacts.

Current NCDIT Systems and Practices

Services Provided to the General Public

NCDIT interacts directly with the public through public communication and announcements, hosting public engagement opportunities, public meetings, providing grants, providing 24/7 IT support services, maintaining the state employee platforms, maintaining agency and state websites, Digital Commons, and maintaining NC ID.

Services provided by NCDIT include:
- Public Engagement
  - Providing grants to internet service providers, local government, schools, higher education institutions, and nonprofits.
  - Providing information to key stakeholders throughout the state about broadband deployment programs.
- Communication and Information Sharing
  - Producing website content, social media content, emails, press releases, and newsletters.
  - Communicating directly through news media, website content, local town hall meetings, listening sessions and indirectly through communications sent through other state agencies (E.g., mailers/emails from DOT or videos displayed on DMV office monitors).
  - Providing employment information to customers and recruiting potential talent.
- Management of Digital Commons and Websites
  - Managing Digital Commons which serves 10.2 million constituents by providing access to most of the State's products, services, and information.
  - Managing the NC ID program, which provides a state account for identification and authorization for all users.
  - Developing and managing website content.

NCDIT's prioritized services for individuals using languages other than English include:

NCDIT's Digital Commons features Google Translate which enables users to choose their preferred language for website content.

Information for public engagement sessions for digital equity has been provided in multiple languages. The Digital Equity Survey was provided in nine of North Carolina's top languages. Additionally, press releases and the Digital Equity Plan Executive Summary were provided in Spanish.

The listening sessions for the Interagency Working Group for New Americans included interpretation service in Spanish and the offer of other languages if requested. One listening session was held in Spanish with English and Ukrainian interpretation provided.

Implementation Goals

NCDIT will ensure that vital documents and online materials related to the direct services offered by the Department will be translated by a vendor/contractor or multilingual staff in accordance with Section 3 of the Language Access Plan.

NCDIT will ensure all public engagement events, such as public meetings, listening sessions, requests for meetings and in-person and over-the-phone interactions have access to interpretation services offered by a contractor/vendor or multilingual staff in accordance with Section 3 of the Language Access Plan.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Factor 3 implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator will identify direct services provided by NCDIT and its divisions and programs where individuals who use languages other than English may be encountered.
I	Language Access Coordinator will identify the specific programs, activities, or services to prioritize language assistance services.
II	Language Access Coordinator will compile data on the quality and quantity of language assistance services provided by NCDIT.

II	Language Access Coordinator will include the data compiled in the report and provide it to the Coordinating Entity every two years.
III	Language Access Coordinator will administer changes to the Language Access Plan based on changes in the data collected.

Overview of Standard

Factor 4, *Budget and Available Resources*, assess the resources available to NCDIT currently, as well as the cost associated with providing the language assistance.

The Proposed Language Access Policy recommends Covered Entities fund language access services and the implementation of the Language Access Plan. The budget for language access services based on programmatic needs and the top languages prioritized for services. NCDIT will outline the costs associated with current language assistance services, as well as assess the level of resources, costs, and capacity to implement and support additional language services over time. Based on the assessment of resources, NCDIT will identify efforts to support cost-savings and cost-sharing when/if needed. Such efforts may include sharing resources with other departments and agencies and/or using technology to support the delivery of language assistance services.

Current NCDIT Systems and Practices

At this time, NCDIT does not have a practice for assessing or monitoring the ongoing cost of language assistance.

At this time, NCDIT does not have an agency-wide budget allocation for language assistance services. The Digital Solutions team has a budget for digital equity services which includes funding for quality assurance and accessibility monitoring on all state websites, regardless of whether they are hosting on the Digital Commons platform.

Implementation Goals

NCDIT will review and revise the budget allocation for language access annually in accordance with their internal approval protocols and technical assistance provided by the Coordinating Entity to ensure that budget allocations remain effective and responsive to the needs of staff and individuals who use languages other than English served, or likely to be served, by NCDIT.

NCDIT's annual line items should include:

- **Staffing:** to cover the salaries and benefits of program staff, which may include at least two permanent full-time Language Access Coordinator and Language Access Liaisons for each division, program, and funded entity.
- **Language Access Services:** to cover the costs associated with providing language services to individuals who use languages other than English, including interpretation services, translation services, and other language assistance services. The services may be provided via a contract with a Language Service Provider.
- **Signage:** to cover the costs associated with the development and dissemination of multilingual signage and other visual notices to assist individuals who use languages other than English.
- **Training:** to cover the costs associated with providing language access training to state staff including language access policy training, cultural awareness training, plain language training, and other relevant training.
- **Multilingual Staff Evaluation and Premium Pay:** to cover the costs associated with formalizing the role of multilingual employees as determined by NCDIT's Multilingual Staff Management Policy requirements.
- **Technology:** to cover the costs associated with procuring and maintaining technology solutions to facilitate language access services, including over-the-phone interpreting, video remote interpreting, digital platforms, and online programs and services.
- **Compliance Monitoring and Evaluation:** to cover the costs associated with monitoring compliance with language access policies and procedures, including conducting language access audits, focus groups, and survey assessment processes.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Factor 4 implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
I	NCDIT will allocate an agency-wide budget for language access including line items for language access services, staffing, signage, training, multilingual staff evaluation, multilingual staff pay, technology, outreach, and compliance monitoring and evaluation.
I	NCDIT will prioritize the use of technology solutions for facilitating language access services when allocating an agency-wide budget.
I	NCDIT will prioritize language access staffing when allocating an agency-wide budget.

II	NCDIT will allocate a language access budget per division and program including line items for language access services, staffing, signage, training, technology, outreach, technical assistance resources, and compliance monitoring and evaluation.
II	NCDIT and the Language Access Coordinator will review and adjust the budgets annually based on the needs of the Department and individuals who use languages other than English encountered by the Department and its divisions, programs, and funded entities.

SECTION 3: LANGUAGE ASSISTANCE SERVICES

NCDIT is committed to taking reasonable steps to ensure meaningful communication and access to information for NCDIT's users who use languages other than English. The Language Assistance Services section outlines the types of language assistance NCDIT currently provides, as well the services NCDIT plans to provide to support meaningful communication and participation for individuals who use languages other than English and who are limited English proficient. The language assistance services outlined in the Language Access Plan include oral interpretation services, virtual interpretation services, in-language assistance with multilingual staff, print and online translation services, and the development of other multilingual media content.

This section outlines the roles and responsibilities of NCDIT's language access staff, including Language Access Coordinators and Language Access Liaisons who are responsible for monitoring and ensuring the implementation of the language assistance services according to the Language Access Plan across the agency.

3.1   LANGUAGE ASSISTANCE SERVICES PLAN

Overview of Standards

The Proposed Language Access Policy recommends Covered Entities ensure adequate staffing to support the development, management, and oversight of the language access activities to ensure all NCDIT staff are equipped to serve individuals who use languages other than English. To facilitate this, NCDIT will establish the following roles: a Language Access Coordinator and a Language Access Liaison.

The Proposed Language Access Policy recommends that Covered Entities require Funded Entities to comply with the Proposed Language Access Policy and provide language assistance services to individuals with limited English proficiency and who use languages other than English. NCDIT conducts programs and services in partnership with a wide network of grantees and funded entities. Therefore, NCDIT will take steps to

ensure grantees and Funded Entities comply with language access compliance requirements.

Language Access Coordinator and Liaisons

Implementation Goals

As outlined in the Proposed Policy, as a Tier I Covered Entity, NCDIT will designate and employ a minimum of two full-time Language Access Coordinators to ensure that language services are delivered in accordance with the Language Access Plan.

The Secretary and State Chief Information Office (SCIO) will designate a Language Access Coordinator to coordinate NCDIT's language access implementation and will determine the division in which to house the Language Access Coordinator. It is recommended that the Language Access Coordinator be housed in the SCIO or another division with equal agency-wide authority.

If the responsibility of a Language Access Coordinator is added to the role and responsibilities of an existing position, it is recommended that the Language Access Coordinator be fairly compensated.

The name and contact information for the Language Access Coordinators for NCDIT will be provided here once identified.

The specific responsibilities of the Language Access Coordinator(s) include:
- Reporting directly to NCDIT's leadership and the Statewide Director of the Language Access Program.
- Leading the development of NCDIT's Language Access Plan and ensuring the Language Access Plan is submitted to the Coordinating Entity every two years.
- Coordinating and overseeing the implementation of the Language Access Plan to ensure NCDIT fulfills the responsibilities outlined in the proposed policy.
- Participating in language access training, professional development, and skill-building opportunities provided by the Coordinating Entity.
- Utilizing support and technical assistance provided by the Coordinating Entity.
- Monitoring and addressing the quality of language assistance services provided by NCDIT as outlined in Section 3 of the Language Access Plan.
- Monitoring and developing the implementation of notifying individuals who use languages other than English of the availability of language assistance services as outlined in Section 4 of the Language Access Plan.
- Monitoring and developing division-specific language access training with Language Access Liaisons for all staff to use as needed within the different programs, divisions, and roles as outlined in Section 5 of the Language Access Plan.

- Monitoring and addressing language assistance concerns as outlined in Section 6 of the Language Access Plan.
- Serving as a liaison to the Coordinating Entity and fulfilling reporting responsibilities as outlined in Section 7 of the Language Access Plan.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Language Access Coordinator implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
I	NCDIT will determine the division the Language Access Coordinator position will be housed in.
I	NCDIT will determine the leadership position a Language Access Coordinator will report to.
I	In consultation with the Coordinating Entity, NCDIT will develop a job description for a Language Access Coordinator.
I	NCDIT will designate and employ a minimum of one full-time Language Access Coordinator.
I	Language Access Coordinator will receive training on the Proposed Language Access Policy compliance requirements and training on their duties and responsibilities in regard to language access implementation from the Coordinating Entity.
II	Language Access Coordinator will send agency-wide communication introducing themselves and informing all staff about their role and function.
II	NCDIT will designate and employ a second full-time Language Access Coordinator.
II	The second Language Access Coordinator will receive training on the Proposed Language Access Policy compliance requirements and training on their duties and responsibilities in regard to language access implementation from the Coordinating Entity.
III	The second Language Access Coordinator will send agency-wide communication introducing themselves and informing all staff about their role and function.

Implementation Goals

NCDIT will designate Language Access Liaisons who will ensure language access services are delivered in accordance with the Language Access Plan at the division, program, and funded entity levels

The name and contact information for the Language Access Liaisons for each entity within NCDIT will be provided here once identified.

The specific responsibilities of the Language Access Liaisons include:
- Reporting directly to the Language Access Coordinator(s) and the Statewide Director of the Language Access Program.
- Leading the development of NCDIT's Language Access Plan and supporting the Language Access Coordinators in ensuring the Language Access Plan is submitted to the Coordinating Entity every two years.
- Coordinating and overseeing the implementation of the Language Access Plan to ensure the division or program fulfills the responsibilities outlined in the proposed policy.
- Participating in language access training, professional development, and skill-building opportunities provided by the Coordinating Entity.
- Utilizing support and technical assistance provided by the Language Access Coordinators.
- Monitoring and addressing the quality of language assistance services provided by their program or division as outlined in Section 3 of the Language Access Plan.
- Monitoring and developing the implementation of notifying individuals who use languages other than English of the availability of language assistance services as outlined in Section 4 of the Language Access Plan.
- Supporting Language Access Coordinators in developing agency-specific language access training with s for all staff to use as needed within the different programs, divisions, and roles as outlined in Section 5 of the Language Access Plan.
- Monitoring and addressing language assistance concerns as outlined in Section 6 of the Language Access Plan.
- Serving as a liaison to the Coordinating Entity and fulfilling reporting responsibilities as outlined in Section 7 of the Language Access Plan.

NCDIT will ensure each of their public-facing Funded Entities provide meaningful access to individuals who use languages other than English in compliance with the NCDIT Language Access Plan and the Proposed Language Access Policy. This includes:
- Ensuring Funded Entities have a certified language access plan in place.
- Providing annual training for contractors, subcontractors, grantees, subgrantees, recipients, and sub-recipients.

- Including an "Assurance of Nondiscrimination" Clause in all contracts and agreements with Funded Entities as outlined in Section 2.2 of the Proposed Language Access Policy.
- Monitoring language access implementation and compliance as outlined in Section 7 of the NCDIT Language Access Plan.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Language Access Liaison implementation goals over three phases spanning five years:

- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator and NCDIT will identify the divisions, offices, and programs that require a Language Access Liaison.
I	In consultation with the Coordinating Entity, NCDIT will develop a job description for a Language Access Liaison.
I	NCDIT will identify Language Access Liaisons per each division and program.
I	NCDIT will designate and onboard Language Access Liaisons per each division and program.
I	NCDIT will review current contracts and agreements with Funded Entities and include an "Assurance of Nondiscrimination" Clause as outlined in the Proposed Language Access Policy. NCDIT will also ensure the Clause will be incorporated into future contracts and agreements.
II	In collaboration with the Statewide Director of the Language Access Program, Language Access Coordinator will train Language Access Liaisons on the Proposed Language Access Policy and Language Access Plan compliance requirements and on their duties and responsibilities in regard to language access implementation, ensuring they are fully equipped to fulfill their duties and report data and implementation updates to Language Access Coordinators.
II	Language Access Coordinator will introduce newly-appointed Language Access Liaisons to all agency staff by sending a notification that describes their role and function of Language Access Liaisons.
II	Language Access Liaisons, in collaboration with the Language Access Coordinator, will provide language access training to funded entities annually.

III	Language Access Coordinator and NCDIT will identify the Funded Entities to prioritize in establishing Language Access Liaison positions.
III	NCDIT will designate and employ Language Access Liaisons for Funded Entities if prioritized.

Language Access Services

1. **Language Need Identification**

   ● **Overview of Standard**

   The Proposed Language Access Plan recommends Covered Entities utilize language-need identification materials, such as printed multilingual I-Speak resource cards, to assist with the identification of the languages requested by individuals who use languages other than English. These materials allow individuals with languages other than English to select and specify their language needs.

   ● **Current NCDIT Systems and Practices**

   Currently, NCDIT's website is available in 16 languages via Google Translate. To translate, constituents must use the "Select Language" button that is in English and at the top right-hand corner. Google Translate supports 243 languages. Currently, the most prominent languages spoken are enabled as the default, but agencies can request additional languages based on customer needs.

   ● **Implementation Goals**

   NCDIT will utilize printed multilingual I-Speak resource cards to assist with the identification of language needs during public events, if needed. The I-Speak cards will be made available in, at minimum, the top 28 languages spoken by individuals who use languages other than English, following translation standards as outlined in Section 2.7 of the Proposed Language Access Policy and the Translation Management Guidance, so that individuals who use languages other than English in need of direct language assistance services can identify the language(s) they speak.

   NCDIT will review and update languages listed on I-Speak cards and the languages available for Google Translate in accordance with data collected on the number and percentage of individuals who use languages other than English

in the State or region and the top languages spoken every two years, in accordance with Section 7 of the Language Access Plan.

NCDIT will also ensure that individuals who use languages other than English accessing digital content or the department's website will be notified of the availability of translated content and prompted to make their language selection by clicking on their language. It is a best practice for the "Select Language" button to translate the website and the drop-down list of languages to be large and easily visible, not in the corner of the page. It is a best practice that the button to translate material not be in English and needs to appear in at least the top 5 languages prioritized for translation.

- **Five-Year Action Plan**

    NCDIT will address the action items outlined in the table below to achieve the Language Need Identification implementation goals over three phases spanning five years:
    - Phase I (Year 1)
    - Phase II (Years 2 and 3)
    - Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator will review and identify website locations and online content that require multilingual prompts informing readers of the availability of content in languages other than English.
I	Language Access Coordinator will ensure the website is available in the languages prioritized and the link to translate is visible and made available in languages other than English.
II	Language Access Coordinator will review the list of languages available to translate the website every two years.
III	Language Access Coordinator will develop I-Speak cards to use for public events in accordance with the Proposed Language Access Policy and the Translation Management Guidance.

2. **Hiring/Contracting Qualified Interpreters for In-Person Communication**

- **Overview of Standard**

The Proposed Language Access Policy recommends Covered Entities ensure individuals who use languages other than English have quality interpretation services when interacting with staff, programs, and services. Covered Entities are recommended to use qualified and trained in-person interpreters via vetted contractors/vendors, define when staff need to provide in-person interpretation services, and prioritize encounters where in-person interpretation is required.

- **Current NCDIT Systems and Practices**

Currently, NCDIT provides minimal interpretation services for in-person interaction with individuals who use languages other than English, because there is minimal in-person engagement or contact with the public. For example, NCDIT recently took part in the Interagency Working Group for New Americans' listening sessions in which one session was fully held in Spanish with English and Ukrainian interpretation provided. All other sessions were in English with Spanish interpretation and participants were offered the use of interpretation in any other language (coordinated via registration). The Department of Health and Human Services provided the funding for local interpreters (including Cezontle).

NCDIT has access to the Statewide Term Contract 961C - Translation and Interpretation Services with the Department of Administration, but does not often use them because they are unreliable. The Statewide Term Contract contractors/vendors and their contact information include:
- United Language Group
  - Karla Solis: (612) 400-6630
  - Annie Sligh: (612) 400-6520
- Acolad (Amplexor)
  - Kathryn Santora: (585) 370-5747
- Language Line Services, Inc.
  - Kelly Mistry: (831) 238-5433
- Lionbridge Global Solutions II, Inc.
  - John Drugan: (978) 964-9550
- Masterword Services, Inc.
  - Ludmila Golovine: (281) 589-0810

The contact information for the Statewide Term Contract Manager is:
- Austin Kiziah:
  - austin.kiziah@doa.nc.gov
  - 984-236-0237

- **Implementation Goals**

NCDIT will utilize qualified and trained in-person interpreters for public events, public meetings, listening sessions, and public announcements.

NCDIT will hire or contract qualified and trained in-person interpreters via vetted contractors/vendors or utilize previously evaluated multilingual staff trained to perform interpretation services for in-person communication with staff or the delivery of in-person services to individuals who use languages other than English.

NCDIT will ensure that contracts with contractors/vendors who perform in-person interpretation services include stringent quality assurance requirements.

NCDIT will ensure that frontline staff who interact with individuals who use languages other than English in person will have access to tools and technology, including dual headsets, necessary instructions, and other devices (an iPad for example) that support interpretation or translation software. Frontline staff should also have access to interpretation software that uses artificial intelligence (AI) to communicate with individuals who use languages other than English.

Individuals who use languages other than English and wish to use an interpreter other than one that is offered to them by NCDIT may do so but must sign an interpretation waiver form following the guidelines set in the Proposed Language Access Policy and Interpretation Waiver Form Guidance document.

NCDIT will formalize the role of multilingual staff in the delivery of interpretation services. In order to serve as an interpreter, multilingual staff need to be formally evaluated, their language proficiency and interpretation skills need to be assessed, and they need to receive interpretation training. Additionally, multilingual employees should be compensated for their role in delivering interpretation services, and interpretation duties assigned to them need to be formally stated in their job description and work plan.

- **Five-Year Action Plan**

  NCDIT will address the action items outlined in the table below to achieve theIn-Person Interpretation implementation goals over three phases spanning five years:
  - Phase I (Year 1)
  - Phase II (Years 2 and 3)
  - Phase III (Years 4 and 5)

Phase	Action Items

I	Language Access Coordinator will ensure NCDIT has a contract with a vetted contractor/vendor that provides in-person interpretation services and is selected based on the quality and reliability of its services.
II	Language Access Coordinator will ensure all necessary staff have access to qualified and trained in-person interpreters via a vetted contractor/vendor or multilingual staff for public events, public meetings, listening sessions, and public announcements.
II	Language Access Coordinator will provide translated interpretation waiver forms to all staff who may interact with individuals who use languages other than English
II	Language Access Coordinator will train staff on how to access in-person interpreters, how to use and access interpretation waiver forms, and the role and appropriate use of multilingual staff for providing interpretation services.
II-III	Language Access Coordinator will administer a quality review process to monitor and evaluate provided interpretation services.

3. **Hiring/Contracting Qualified Interpreters for Virtual Communication (Over-the-Phone or Video)**

   ● **Overview of Standard**
   The Proposed Language Access Policy recommends Covered Entities ensure individuals who use languages other than English have quality interpretation services when interacting with staff, programs, and services. Covered Entities are recommended to ensure frontline and outreach staff have access to virtual interpretation at any time staff are trained on using virtual interpretation and language identification, define when staff need to provide in-person interpretation services and prioritize encounters where virtual interpretation is required.

   ● **Current NCDIT Systems and Practices**

   NCDIT provides 24/7 IT Support Services which includes a Help Desk where constituents and staff can seek over-the-phone assistance at any time. NCDIT also offers Chat Live which allows individuals to seek IT support from the NCDIT Service Desk Specialists on Monday through Friday, 8 a.m. to 5 p.m.

   NCDIT rarely provides interpretation services for virtual communication with individuals who use languages other than English because there is not much need.

NCDIT also has access to contractors/vendors through the [Statewide Term Contract 961C](#) who perform virtual interpretation. However, NCDIT does not often use them because they are unreliable.

- **Implementation Goals**

  NCDIT will hire or contract qualified and trained virtual interpreters via vetted contractors/vendors or utilize previously evaluated multilingual staff trained to perform interpretation services for over-the-phone or video communication with individuals who use languages other than English.

  NCDIT will ensure that callers who use a language other than English who are accessing NCDIT's 24/7 help desk can hear multilingual automated prompts in, at least, the top five languages prioritized in the Proposed Language Access Policy which include, but are not limited to, Spanish, Chinese (Mandarin and/or Cantonese), Vietnamese, Arabic, and French.

  Under the coordination of the Language Access Coordinator(s), NCDIT will set up an account with an on-demand over-the-phone and video communication interpretation service contractor/vendor so monolingual and multilingual frontline and outreach staff have access to an interpreter virtually at any time. Staff will have access to dual handset phones, instructions for virtual interpretation, and language identification instructions.

  NCDIT will formalize the role of multilingual staff in the delivery of interpretation services. To serve as an interpreter, multilingual staff need to be formally evaluated, their language proficiency and interpretation skills need to be assessed, and they need to receive interpretation training. Additionally, multilingual employees should be compensated for their role in delivering interpretation services, and interpretation duties assigned to them need to be formally stated in their job description and work plan.

  Individuals who have limited English proficiency and wish to use an interpreter other than one that is offered to them by NCDIT may do so, but must sign an interpretation waiver form following the guidelines set in the Proposed Language Access Policy and Interpretation Waiver Form Guidance document.

- **Five-Year Action Plan**

  NCDIT will address the action items outlined in the table below to achieve the Virtual Communication Interpretation implementation goals over three phases spanning five years:
  - Phase I (Year 1)
  - Phase II (Years 2 and 3)

○ Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator will identify activities that require the need for over-the-phone or video interpretation.
I	Language Access Coordinator will ensure NCDIT has an account with an on-demand over-the-phone or video interpretation service provider.
I	Language Access Coordinator will identify multilingual staff who are trained to perform virtual interpretation and have it included in their job description.
I-II	Language Access Coordinator will work with contractors/vendors to ensure that callers who use a language other than English who are accessing NCDIT's 24/7 help desk can hear multilingual automated prompts in, at least, the top 5 languages in accordance with the Proposed Language Access Policy.
II	Language Access Coordinator will ensure all necessary staff have access to qualified and trained over-the-phone or online interpreters via a vetted contractor/vendor or multilingual staff.
II	Language Access Coordinator will provide translated interpretation waiver forms to all staff who may interact with individuals who use languages other than English.
II	Language Access Coordinator will train staff on how to access over-the-phone or virtual interpreters, how to use and access interpretation waiver forms, and the role and appropriate use of multilingual staff for providing interpretation services.
II	Language Access Coordinator will administer a quality review process to monitor and evaluate provided interpretation services.

4. **Employing/ Utilizing Multilingual Staff**

● **Overview of Standard**

The Proposed Language Access Policy recommends Covered Entities develop a Multilingual Staff Management Policy and hire multilingual staff in both public contact positions to communicate with the public and advisory/resources positions to provide cultural and linguistic expertise.

● **Current NCDIT Systems and Practices**

Currently, NCDIT has staff who use languages other than English that have no official role as multilingual staff, however, the agency has had multilingual staff in the past. At this time NCDIT has not employed a process to identify, train, certify, or deploy multilingual state employees.

The Division of Data utilizes staff members who use languages other than English to translate materials into Spanish.

- **Implementation Goals**

NCDIT will employ trained multilingual staff who speak English and languages other than English at proficient levels in public contact positions to provide direct services and communicate with the public, particularly positions that require numerous encounters with individuals who use languages other than English. NCDIT will ensure staff members at reception, the NCDIT Help Desk, and phone and email operators include multilingual staff or have access to all interpretation and translation contractors/vendors, as well as the necessary tools.

NCDIT will utilize existing multilingual staff or incoming trained multilingual staff who speak English and languages other than English at proficient levels in resource positions and advisory roles to support communication levels including:
  - Participating or advising outreach and engagement programs,
  - Advising efforts to improve accessibility for individuals who use languages other than English,
  - Participating or providing cultural awareness training,
  - Performing quality assurance checks on translated materials,
  - Reviewing translation services and interpretation services of contractor(s)/vendor(s),
  - Creating content and resources in languages other than English,
  - Reviewing and creating policies and procedures related to providing language access services,
  - Conducting research and collecting evidence around best practices for providing language access services,
  - Collecting data, and
  - Advising human resources practices around the hiring of additional multilingual staff and training of monolingual staff.

NCDIT will set clear benchmarks for hiring multilingual staff in public contact positions. NCDIT will prioritize the five languages most widely spoken by individuals who use languages other than English encountered or likely to be encountered by the department when recruiting multilingual staff.

NCDIT will evaluate the language proficiency of existing staff who use languages other than English and multilingual staff during the hiring process to determine

multilingual status, their ability to perform language access services (if necessary), and to determine compensation for differential pay.

NCDIT will ensure the responsibilities of multilingual and monolingual staff who provide language access services are clear and formally stated in their job description.

Multilingual and monolingual staff will receive ongoing translation and interpretation training.

The roles and responsibilities of multilingual staff adhere to the Multilingual Staff Management Policy and Section 2.3 of the Proposed Language Access Policy

The name and contact information for multilingual staff and the languages they are proficient in will be provided here once identified.

- **Five-Year Action Plan**

  NCDIT will address the action items outlined in the table below to achieve the Multilingual Staff implementation goals over three phases spanning five years:
  - Phase I (Year 1)
  - Phase II (Years 2 and 3)
  - Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator will create benchmarks for hiring multilingual staff in public contact positions and advisory/resource roles.
I	Language Access Coordinator will identify public contact positions that require multilingual staff to provide services.
II	Language Access Coordinator will implement benchmarks for hiring and designating multilingual staff in public contact positions and advisory/resource roles.
II	In collaboration with the Office of State Human Resources, Language Access Coordinator will evaluate the language proficiency of existing staff who use languages other than English and set guidance on evaluating the language proficiency of multilingual staff during the hiring process.
II	Language Access Coordinator will identify advisory or resource positions that require the use of multilingual staff.

II	Language Access Coordinator will fill positions that require multilingual staff with multilingual staff, prioritizing those top languages spoken by individuals who use languages other than English.
II	Language Access Coordinator will ensure the roles and responsibilities of multilingual staff are included in their job description.
II	Language Access Coordinator will train monolingual and multilingual staff on the roles and responsibilities of multilingual staff, their positions, and when it is appropriate to utilize them to provide language assistance services.
II	Language Access Coordinator will ensure multilingual staff will continue to receive ongoing translation and interpretation training.

5. Translation of Vital Documents and Online Content

● **Overview of Standard**

The Proposed Language Access Plan recommends Covered Entities clearly define and identify vital documents prioritized for translation, translate all vital documents and online content developed by the Covered Entity into, at least the top five languages most widely spoken, and ensure vital documents are translated accurately, completely, and in a timely manner by qualified translators.

● **Current NCDIT Systems and Practices**

Translation of Physical Documents and Public Outreach Materials

NCDIT has translated public information materials for the Affordable Connectivity Program into Spanish; the Digital Equity Survey into Spanish, Arabic, Korean, Simplified Chinese, Traditional Chinese, Vietnamese, and French; the North Carolina Broadband Survey into Spanish; and the North Carolina Digital Equity Plan Executive Summary into Spanish. Documents were disseminated by print, but were made available on NCDIT's website and social media. The Health Information Exchange Authority has translated materials into Spanish. NCDIT has also provided translated materials for North Carolina Emergency Management in response to Hurricane Helene.

NCDIT's Data team has used multilingual staff to translate materials into Spanish. NCDIT also has access to the contractors/vendors in Statewide Term Contract 961C, to perform translation services, but does not often use them.

Translation of Websites and Online Content

Currently, all state-supported websites are available for translation via Google Translate by using the "Select Language" button. All state websites and the Digital Commons are managed by the Digital Solutions team. NCDIT's website is available in 16 languages. However, Google Translate supports 243 languages. Currently, the most prominent languages spoken are enabled as the default, but agencies can request additional languages based on customer needs.

- **Implementation Goals**

    NCDIT will translate vital documents and online content in accordance with federal compliance standards. NCDIT will employ processes and protocols for identifying vital documents and content and will create a plan for prioritizing document translation.

    NCDIT will translate all vital documents into the five statewide or regional languages most widely spoken by individuals who use languages other than English in accordance with Section 2.1 of the Language Access Plan, following translation guidelines outlined in the Proposed Statewide Language Access Policy and the Translation Management Guidance.

    NCDIT will apply "Safe Harbor" standards when determining translation efforts, which includes providing written translations of vital documents for each eligible limited English proficient language group constituting five percent or 1,000 people, whichever is less, of the population of individuals eligible to be served or likely to be affected or encountered.

    The top five languages to prioritize for translation include, but are not limited to Spanish, Simplified Chinese, Vietnamese, Arabic, and French. The top five languages to prioritize for translation will be reviewed and updated every two years. In accordance with Section 2.1, the top languages prioritized will be based on data collected on the top languages spoken by individuals who are limited English proficient and languages spoken by individuals who use languages other than English encountered by NCDIT.

    NCDIT will identify vital documents and online content to prioritize for translation.
    - Vital documents include public-facing written materials in any format, created, issued, or made available on any platform, including websites and digital resources, by NCDIT to inform and communicate with the public, allow the public to apply for benefits, services, program participation, notify or correspond with an individual about their eligibility, participation, benefits, or outcomes of an application, advertise and inform the public about programs, services, resources, rules, requirements,

public meetings, and events, provide instructions and guidance, provide the public a feedback submission process.

In collaboration with the Coordinating Entity and the Language Access Coordinators of other state agencies, NCDIT will house the translation of all state agency websites on Digital Commons through Google Translate as agency websites are considered vital documents[10]. NCDIT will ensure individuals who use languages other than English are able to translate their website and that the process is easily accessible. It is a best practice for the "Select Language" button to translate the website and the drop-down list of languages to be large and easily visible, not in the corner of the page. It is a best practice that the button to translate material not be in English and needs to appear in at least the top five languages prioritized for translation.

Additional vital documents could include:
- Public Information and Notices on Programs and Services (Communications)
- High-Speed Internet Information (Broadband and Digital Equity)
- Digital Equity Grant Programs(Broadband and Digital Equity)
- Cybersecurity Information (Communications)
- Privacy Information (Communications)
- User Instructions for Provisioning NCDIT Services (Enterprise Operations)
- User Instructions for Technical Support (Enterprise Operations)
- Opt-Out Form (Data)
- Patient Education Brochure (Data)
- Employment Opportunity Advertisements (Human Resources)
- [A list of additional vital documents will be provided here once identified]

In addition to utilizing Google Translate for the translation of Digital Commons websites, NCDIT will hire or contract qualified and trained translators via vetted contractors/vendors or utilize previously evaluated multilingual staff trained to perform translation services.
- It is considered a best practice to use one or more contractor(s)/vendor(s) to provide translation services. However, when utilizing multilingual staff for the translation of vital documents, it is recommended that NCDIT utilize a three-person peer-review translation process where one person translates the material, another reviews the document for accuracy and clarity, and a third finalizes the translation for distribution as outlined in the Proposed Statewide Language Access Policy.

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[10]*Please note that all content available on Digital Commons websites is created and owned by their respective agencies. NCDIT is not responsible for their content creation.*

NCDIT will ensure that contracts with contractors/vendors who perform translation services include stringent quality assurance requirements.

NCDIT will ensure staff have access to Google Translate to perform fast translation when necessary. Please note, that it is a best practice for translation to be conducted by either a contractor/vendor who uses human translation or by certified multilingual staff whose job description includes translation. All machine translation, including that performed by Google Translate, must undergo a quality review process to ensure accuracy.

- **Five-Year Action Plan**

  NCDIT will address the action items outlined in the table below to achieve the Translation of Vital Documents and Online Content implementation goals over three phases spanning five years:
  - Phase I (Year 1)
  - Phase II (Years 2 and 3)
  - Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator will identify all vital documents used by NCDIT to communicate essential information to the public; specify the target audience for each document; identify vital documents already translated into non-English languages and the languages in which they have already been made available.
I	Language Access Coordinator will clarify and prioritize the top five languages for translation of vital documents.
I	In collaboration with NCDIT, Language Access Coordinator will clarify and prioritize the languages for translation of online content provided on the website.
I	Language Access Coordinator will identify contractors/vendors available to NCDIT for translation and the number of multilingual staff available to translate materials.
II	Language Access Coordinator will utilize a contractor/vendor or multilingual staff to translate the following vital documents into the top five languages most widely spoken by individuals who use languages other than English: ● Signage in visible locations or NCDIT websites informing individuals who use languages other than English of their rights to language access and steps to request language assistance, ● Instructions on NCDIT websites on how to request further information in languages other than English,

	• Application forms, notices, and informational documents individuals who use languages other than English need to access services and programs, and • Summary of services, benefits, and programs offered by NCDIT and key contact information.
I	In collaboration with NCDIT, Language Access Coordinator will ensure the website is available in the languages prioritized and the link to translate is visible and made available in languages other than English.
II	Language Access Coordinator will prioritize which additional vital documents will be translated within the upcoming Phase 2-Phase 3 planning period.
II	Language Access Coordinator will utilize a contractor/vendor or multilingual staff to translate prioritized vital documents following standards outlined in the Translation Management Guidance.
II	Language Access Coordinator will identify English-only documents and vital documents that have yet to be translated in which to add multilingual taglines.
II	Language Access Coordinator will create a dedicated phone number or email address to be shared with the public as part of the tagline. Taglines will include an identification number that individuals who use languages other than English can refer to and inform staff when calling or emailing NCDIT. to receive information in their language.
II	Language Access Coordinator will utilize a contractor/vendor or multilingual staff to translate multilingual inserts and include them on English-only documents and vital documents that have yet to be translated in which to add multilingual taglines.
II	Language Access Coordinator will provide necessary staff access to machine translation technology or a contractor/vendor who provides quick machine translation for providing quick translation.
II	Language Access Coordinator will administer a quality review process to monitor and evaluate provided translated materials.
III	Language Access Coordinator will continue to have vital documents translated.

6. **Development and Distribution of Multilingual Content in Other Formats (Public Service Announcements, Radio Messaging, Social Media Information)**

   ● **Overview of Standard**

      The Proposed Language Access Policy recommends Covered Entities to create multilingual digital content in languages other than English in formats that can

more effectively reach communities who use languages other than English. These include audio public service announcements and messages, short online videos, and social media content. Multilingual content should be translated in accordance with the Translation Management Guidance.

- **Current NCDIT Systems and Practices**

  Currently, NCDIT develops multilingual content in other formats in the following ways:
  - NCDIT translates information and media via social media platforms including Facebook, X (formerly Twitter), and LinkedIn, but only in Spanish. NCDIT utilizes other agencies to develop and release the information.
  - NCDIT includes images, videos, and PDF documents in their online content. However, Google Translate is unable to translate these materials.

- **Implementation Goals**

  NCDIT will develop and distribute translated and multilingual content in other communication formats used to provide public information and to notify constituents of services, critical information, or updates. Such messaging, which may include public service announcements, radio messaging, graphics, videos, and/or social media content will be translated and recorded in languages other than English to support meaningful access for limited English proficient constituents.

  NCDIT will hire or contract qualified and trained translators via vetted contractors/vendors or utilize previously evaluated multilingual staff trained to perform translation services to translate multilingual content in other communication formats.

- **Five-Year Action Plan**

  NCDIT will address the action items outlined in the table below to achieve the Development and Distribution of Multilingual Content in Other Formats implementation goals over three phases spanning five years:
  - Phase I (Year 1)
  - Phase II (Years 2 and 3)
  - Phase III (Years 4 and 5)

Phase	Action Items

I	Language Access Coordinator will develop multilingual content and announcements in English using plain language standards.
I	Language Access Coordinator will prioritize existing and developed content to translate.
II	Language Access Coordinator will utilize a contractor/vendor or multilingual staff to translate multilingual announcements, prioritizing the top five languages most widely spoken by individuals who use languages other than English.
III	Language Access Coordinator will distribute multilingual materials and announcements.
III	Language Access Coordinator will continue to translate multilingual content in other formats.
III	Language Access Coordinator will administer a quality review process to monitor and evaluate provided translated materials.

SECTION 4: NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES

In addition to providing language assistance services, The Notification of Language Assistance Services section will outline how NCDIT can notify the public of language assistance services and provide information on how language assistance services can be requested. Such communication will assist individuals who use languages other than English in understanding the services provided by NCDIT, which can increase public trust and confidence.

4.1 NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES PLAN

Overview of Standards

The Proposed Language Access Policy recommends Covered Entities ensure that the general public and individuals who use languages other than English know of the language assistance services available and have information on how to request them. Covered Entities are recommended to provide multilingual notification of services in various formats that are shared digitally and in physical locations. NCDIT will notify the public of language assistance services and provide information on how language assistance services can be requested. Such notifications will be integrated into various formats to ensure widespread public knowledge.

Current NCDIT Systems and Practices

At this time, NCDIT does not provide notice of the language assistance services made available to individuals who use languages other than English.

Implementation Goals

As outlined in the Proposed Language Access Policy, NCDIT will notify the public of the availability of language assistance services and provide information on how they can be requested.

NCDIT will notify the general public and constituents who use languages other than English of its commitment to language access and of available language assistance services through the following methods:
- Multilingual communication online of the development of the Language Access Plan;
- Multilingual communication online of language assistance services available;
- Multilingual communication online of the processes to request language assistance services, including through the use of online forms;
- Multilingual brochures, flyers, and infographics to be shared with community partners to notify individuals who use languages other than English of language assistance services;
- Use of multilingual taglines on English-only materials crafted by NCDIT to inform limited English proficient litigants of available services.
- Providing multilingual information about language assistance services at community events with information-sharing; and
- Including multilingual information about language assistance services in public service messaging (social media, radio, etc.)

NCDIT will follow the Proposed Language Access Policy on the use of multilingual notification:
- Multilingual notices will be clear, legible, and include clear steps.
- Multilingual content will be translated into the top five statewide or regional languages spoken by limited English proficient users in accordance with translation guidelines outlined in the Proposed Language Access Policy and the Translation Management Guidance.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Notification of Language Access Services implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator will identify physical and online locations that require the notification of language access services and a Language Access Plan.
I	Language Access Coordinator will develop multilingual materials and online content utilizing plain language standards.
I	Language Access Coordinator will prioritize the languages to translate notification materials and multilingual content into the top five prioritized languages in accordance with the Proposed Language Access Policy and the Translation Management Guidance.
I	Language Access Coordinator will utilize a contractor/vendor or multilingual staff to develop and translate the multilingual content in accordance with the Translation Management Guidance (per quality assurance standards).
II	Language Access Coordinator will distribute multilingual content to all identified locations.

SECTION 5: LANGUAGE ACCESS TRAINING

NCDIT is committed to providing language access training opportunities to all staff who come into contact with or may come into contact with individuals who use languages other than English. This section outlines the type of language access training to provide all NCDIT, as well as specific training responsibilities for prioritized staff members. This section also identifies when and how training shall be implemented across the agency and its divisions.

5.1 LANGUAGE ACCESS TRAINING PLAN

Overview of Standards

The Proposed Language Access Policy recommends Covered Entities develop a language access training plan and deliver language access training to all staff including specialized training for staff who may come in contact with individuals who use languages other than English . NCDIT will develop and conduct ongoing training opportunities for staff related to the Language Access Plan, its policies and procedures, and how to effectively deliver language assistance services in accordance with this Language Access Plan. Training opportunities will include initial training, as well as ongoing refresher training sessions for all identified staff.

Current NCDIT Systems and Practices

At this time, NCDIT staff have not received language access training.

Members of the Interagency Working Group for New Americans received language access training which included:
- [Department of Justice I-Speak Card Training](#)
- [Title VI State Agency Training](#)
- [Urban Institute Findings Training](#)

Implementation Goals

NCDIT will develop and conduct language access training to be delivered to all staff who come into contact with or may come into contact with individuals who use languages other than English. Training components to be covered include:
- Review of federal, state, and local rules and policies related to language access,
- Review of digital equity standards and practices related to language access,
- Overview of the value of language access and the impact it plays on individuals who use languages other than English,
- Overview of Language Access Plan,
- Overview of language identification processes,
- Overview of language assistance services and how to locate, contract, and deliver services from a vendor/contractor,
- Overview of the role of the interpreter and best practices for working with interpreters,
- Overview of the roles and responsibilities of multilingual staff and when to contact them,
- Review of accessing language access resources and tools developed by the Language Access Coordinator(s) and other language access staff,
- Review of evaluation processes, and
- Review of concern resolution process.

When training becomes available to NCDIT staff, the department will continue to provide refresher training for all staff on a periodic basis. Training will include online and in-person formats or a combination of both.

NCDIT will evaluate training efforts on an ongoing basis and determine if additional or new training components should be added based on changes in language access needs, emerging languages, or changes in policies or protocols.
- Provide refresher training to all existing staff who work with individuals who use languages other than English or who may come into contact with individuals who use languages other than English at minimum, every two years,
- Ensure that all new staff receive training on language access policies, protocols, and service delivery upon hire,

- Ensure that all new staff receive training on digital equity standards, policies, and protocols upon hire,
- Provide cultural and linguistic competency training periodically,
- Review the tracking list of training participation to ensure compliance for all staff and those who may come into contact with individuals who use languages other than English,
- Provide training on the difference between the data for individuals who use languages other than English and individuals with limited English proficiency, and the importance of creating resources and information based on the limited English proficient data and needs, and
- Report progress on the implementation of the language access training plan every two years.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Language Access Training implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
I	Language Access Coordinator, in collaboration with the Statewide Director of the Language Access Program, will organize and develop training guides, instructional guides, templates, resources, and tools to coordinate language access implementation in accordance with the Proposed Statewide Language Access Policy and the toolkit items. Language Access Coordinator should prioritize the following: • Data Collection tool for tracking encounters with individuals who use languages other than English, • Template and guidance for identifying vital documents, • Template and guidance for translation, • Multilingual taglines, • Interpretation waivers, and • Concern forms for reporting quality issues.
I	Language Access Coordinator, in collaboration with the Statewide Director of the Language Access Program, will develop comprehensive training modules designed to train all staff and grantees.
I	Language Access Coordinator, in collaboration with the Statewide Director of the Language Access Program, will develop comprehensive training modules for staff who frequently come in contact with individuals who use languages other than English, multilingual staff, and staff responsible for conducting language access services or

	collecting data on language access implementation and individuals who use languages other than English.
II	Language Access Coordinator will conduct training for all staff on all training components.
II	Language Access Coordinator will conduct additional training for specialized staff.
III	Language Access Coordinator will evaluate training efforts and review the tracking list of training participation to ensure compliance for all staff and those who may come into contact with individuals who use languages other than English.
III	Language Access Coordinator will report on the progress of their language access training plan every two years to the Statewide Director of the Language Access Program.

SECTION 6: CONCERN RESOLUTION PROCESS

The Concern Resolution Process Section of the Language Access Plan highlights the need for allowing public feedback on the quality and effectiveness of language assistance services to address any concerns that arise. This section outlines how NCDIT will develop a concern resolution form. collect concerns made by individuals who use languages other than English and members of the general public, and promptly address concerns.

6.1   CONCERN RESOLUTION PROCESS

Overview of Standards

The Proposed Language Access Policy recommends Covered Entities develop and make publicly available a concern process and to promptly address language access concerns made by the general public and individuals who use languages other than English. NCDIT will share a concern form for members of the public to use to report and pursue a remedy for instances of noncompliance and issues with access to language assistance services. The section will also include the process for translating the concern resolution process and concern forms in the top languages identified through Section 2 of this plan.

Current NCDIT Systems and Practices

Currently, NCDIT has a general feedback form and an option to report accessibility issues on the website. Digital Solutions actively monitors constituent feedback and responds to all accessibility issues directly, but all responses are in English. The Division of Human Resources responds promptly to concerns that they receive through email, Microsoft Teams

messaging, and phone calls. The division also responds to incidents from the NCDIT Help Desk.

Implementation Goals

NCDIT will develop and make publicly available a concern form and instructions regarding a process for members of the public to use to report and pursue a remedy for instances of noncompliance with the Language Access Plan and Proposed Statewide Language Access Policy, issues with accessing language assistance services, and issues with translated content and/or quality of language assistance services

NCDIT will make publicly available a concern process, including instructions for submitting concerns online. NCDIT, in collaboration with the Office of the Governor, will create an email address for individuals who use languages other than English to report their concerns. These concerns will go to the email address which is monitored by the Coordinating Entity and Language Access Coordinators.

NCDIT will translate the language access concern form, instructions, and description of the concern process into, at minimum, the top five statewide or regional languages spoken by individuals who use languages other than English in accordance with Section 3.1 of the Language Access Plan.

NCDIT will visibly display the multilingual versions of the concern form, instructions, and process on its website and will share it widely with community partners and stakeholders who work with or serve individuals who use languages other than English.

NCDIT shall promptly address language access concerns and concerns shared by individuals who use languages other than English, members of the general public, or other stakeholders.

Language Access Coordinator(s) shall track, address, and report all language access concerns filed against NCDIT and be responsible for:
- Taking proactive steps to work with relevant staff of NCDIT to address concerns associated with language access concerns and respond to concerns within 15 business days.
- Track all received concerns and report the concerns and updates on their resolution to the Coordinating Entity and relevant members of NCDIT's leadership team.

NCDIT will translate the concern resolution process and associated forms in accordance with Sections 2 and 3 of the Language Access Plan and translation guidelines in accordance with the Translation Management Guidance.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Concern Resolution Process implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
II	In collaboration with the Statewide Director of the Language Access Program, Language Access Coordinator will develop a concern resolution process form that is culturally appropriate and follows plain language standards.
II	Language Access Coordinator will translate the concern resolution process form into the top 5 languages spoken by individuals who use languages other than English.
II	In collaboration with the Office of the Governor, NCDIT will develop an email address for individuals who use languages other than English to report their concerns.
II	Language Access Coordinator will distribute the concern resolution process form and email address on NCDIT's website and to community organizations and service providers who serve individuals who use languages other than English.
II	Language Access Coordinator will track, address, and report all language access concerns.

SECTION 7: MONITORING, EVALUATION, AND REPORTING

The Monitoring, Evaluation, and Reporting section of the Language Access Plan outlines the implementation and procedures NCDIT will take to monitor and evaluate the effectiveness of this Language Access Plan and its action items. This section will outline current practices and procedures for monitoring and collecting language access data, analyzing language use and language assistance needs, procedures for collecting and participating in community engagement/community feedback sessions to gather input on improvements to the Language Access Plan and language assistance service, and evaluating the quality of language assistance services offered by NCDIT.

7.1 MONITORING, EVALUATION, AND REPORTING PLAN

Overview of Standard

The Proposed Language Access Policy recommends Covered Entities update a Language Access Plan every two years to ensure the Language Access Plan remains updated and to monitor the progress on the implementation of the Language Access Plan. NCDIT will develop and implement a process to evaluate language use and assistance needs on an ongoing basis. The monitoring and evaluation plan will include the ongoing review of statewide and local limited English proficiency data, as well as population changes and information on new or emerging language needs. The monitoring and evaluation plan will also include progress on the implementation of Language Access Plan goals, the review of costs for language assistance services, and any estimates for changes in costs that may necessitate budgetary changes or alternate methods of service delivery for language assistance services. Data will be collected and reviewed in the following manners:

Current NCDIT Systems and Practices

At this time, NCDIT:
- Does not have a data collection method for the cost of services provided
- Does not have an existing system or procedure to track language access compliance efforts.

Please see all the language access data collected in Section 2.1 of this Language Access Plan.

Implementation Goals

NCDIT will develop a report to the Coordinating Entity every two years which will contain the following information:
- An update on NCDIT's progress with the implementation of goals and action steps outlined in the Language Access Plan,
- The number and language of individuals with limited English proficiency and who use languages other than English served by NCDIT within the reporting period,
- An assessment of any changes in languages spoken by individuals who use languages other than English,
- An assessment of any gaps in NCDIT's capacity to implement the Language Access Plan or meet the needs of individuals who use languages other than English,
- An assessment of multilingual staff in public contact positions determined by the need for each language to provide meaningful language access for the population of individuals who use languages other than English encountered by NCDIT,
- The number and language of multilingual staff in public contact positions and those in limited public contact positions serving in a resource or advisory capacity,
- Progress on implementation of the language access training plan, and
- Progress in meeting the following translation implementation goals:

- ○ Translating the description of NCDIT's function and information;
- ○ Displaying multilingual signage on the availability of language services;
- ○ Identifying translation completed for vital documents, websites, and digital content, prioritized by the importance of service/program and frequency of public use;
- ○ Identifying languages in which vital documents have been translated to date;
- ○ Identifying vital documents, websites, and digital resources, to be translated in the upcoming two-year Language Access Plan period and/or fiscal year and languages into which the vital document(s) and other resources will be translated; and
- ○ Identifying documents containing multilingual inserts/contact information and documents that will be updated in the upcoming two-year Language Access Plan period and/or fiscal year.

NCDIT will review and revise the budget allocation for language access annually in accordance with their internal approval protocols and technical assistance provided by the Coordinating Entity to ensure that budget allocations remain effective and responsive to the needs of staff and individuals who use languages other than English served or likely to be served by NCDIT.

To assist with the evaluation of the effectiveness of the Language Access Plan and language assistance services delivered, NCDIT will also conduct the following evaluation processes every two years.

- ● Surveys and focus groups to gather staff and customer feedback and satisfaction.
- ● Surveys to evaluate staff understanding of the Language Access Plan and its protocols.
- ● Engagement with community partners servicing individuals who use languages other than English to gather areas for further improvement.
- ● Ongoing review of concerns received (annually or another timeframe.

To ensure that language assistance services continue to meet the needs of individuals who use languages other than English , NCDIT will track, analyze, and report on the demand for services by limited English-proficient individuals every two years. The ongoing process of tracking and analyzing demand will include the identification of services in which linguistically accessible services are in high demand, as well as the identification of the types of language assistance services that will meet such demands (i.e., interpretation, translation, etc.).

NCDIT will also continue to monitor statewide and local/regional data to assist with identifying the potential need for language assistance services in new or emerging languages and/or to assist with identifying the need for additional language services to be delivered in high-demand languages.

Five-Year Action Plan

NCDIT will address the action items outlined in the table below to achieve the Monitoring, Evaluation, and Reporting implementation goals over three phases spanning five years:
- Phase I (Year 1)
- Phase II (Years 2 and 3)
- Phase III (Years 4 and 5)

Phase	Action Items
II	In collaboration with the Statewide Director of the Language Access Program, Language Access Coordinator will develop data collection methods and a reporting tool to report on the progress of implementing the Language Access Plan.
II	Language Access Coordinator will implement data collection methods and a reporting tool to monitor the progress of implementing the Language Access Plan.
II	Language Access Coordinator will monitor and evaluate the quality of language assistance services provided by NCDIT.
II	Language Access Coordinator will review data collected on concerns made and their resolutions.
II	Language Access Coordinator will implement data collection methods and a reporting tool to craft the report and submit the report to the Coordinating Entity every two years.
III	Language Access Coordinator will continue to monitor collected data and report on changes or issues that arise.

SECTION 8: RESOURCES

- State of North Carolina Proposed Language Access Policy and Coordination Plan
- State of North Carolina Language Access Toolkit
- 2024 Digital Equity Plan

SECTION 9: APPENDIX

9.1 APPENDIX 1: FACTOR 1 AMERICAN COMMUNITY SURVEY DEMOGRAPHIC DATA

As of 2022, North Carolina has an estimated population of 10,470,214 people.
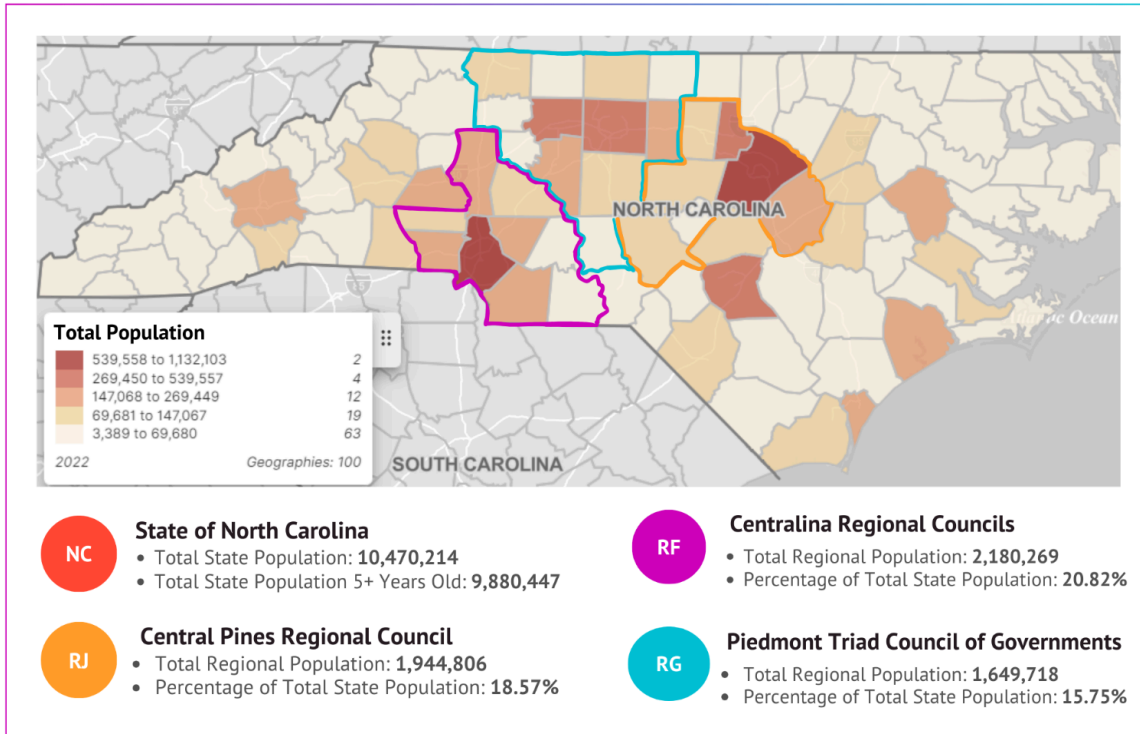
As of 2022, an estimated 12.3%, or 1,216,618 individuals five years and older, speak a language other than English at home in North Carolina.[11] Of those who speak a language other than English , an estimated 37.14%, or 451,823 individuals, are Limited English Proficient. The limited English-proficient population represents 4.47% of the total population of North Carolina.

Of the 1,216,618 state residents who speak a language other than English at home, the top ten most common languages spoken by residents who speak languages other than English are displayed below:

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[11] U.S. Census Bureau, ACS, 2022 5-Year Estimates (Table B16001)

Language	Population	Percentage of State LOTE Population	Percentage of State Population
Spanish	774,886	63.69%	7.84%
Chinese*	38,296	3.15%	0.39%
French**	32,019	2.63%	0.32%
Arabic	30,931	2.54%	0.31%
Vietnamese	24,822	2.04%	0.25%
German	21,901	1.80%	0.22%
Hindi	21,244	1.75%	0.22%
Telugu	19,921	1.64%	0.20%
Korean	16,130	1.33%	0.16%
Tagalog***	15,442	1.27%	0.16%

Total State LOTE Population (1,216,618)

Percentage of State LOTE Population

*Chinese (Including Mandarin & Cantonese) **French (Including Cajun) ***Tagalog (Including Filipino)
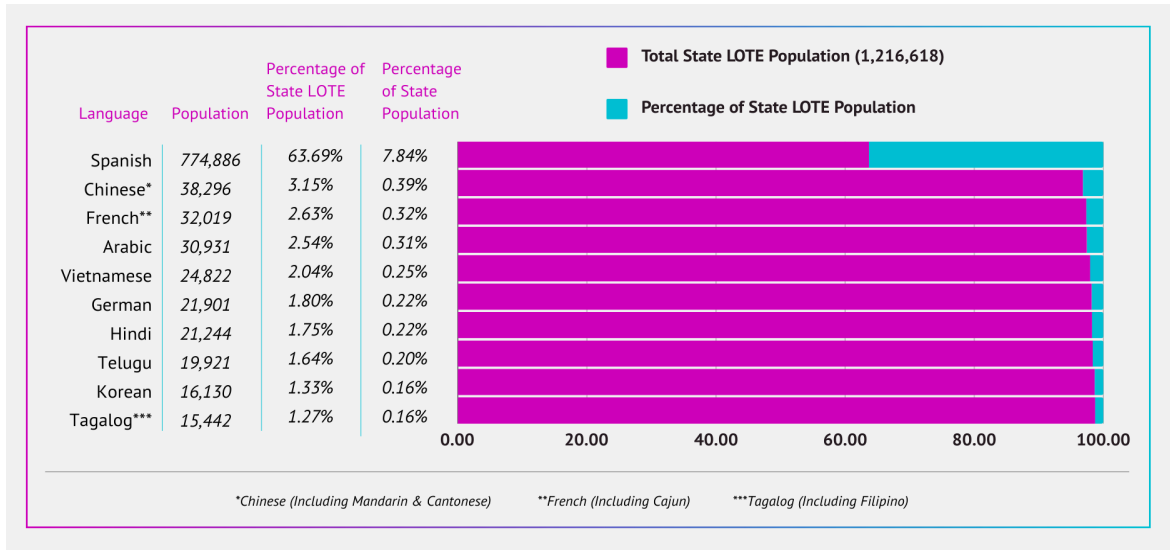
Source: U.S. Census Bureau, ACS, 2022 5-Year Estimates (Table B16001)

Of the 451,823 state residents with limited English proficiency, the top ten most common languages spoken by residents with limited English proficiency are displayed below:

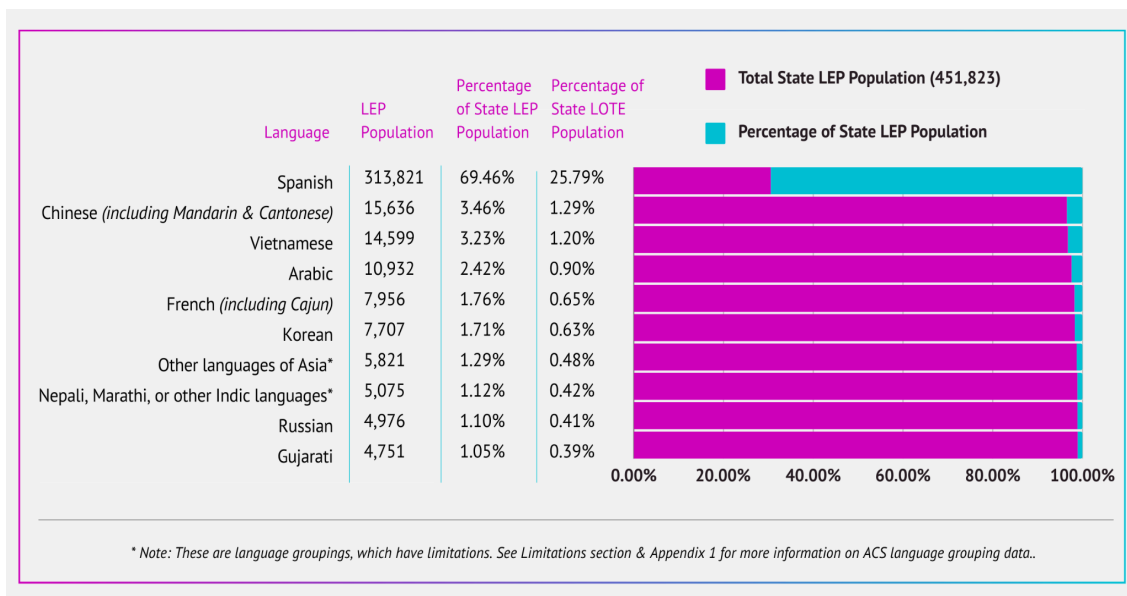| Language	LEP Population	Percentage of State LEP Population	Percentage of State LOTE Population
Spanish	313,821	69.46%	25.79%
Chinese *(including Mandarin & Cantonese)*	15,636	3.46%	1.29%
Vietnamese	14,599	3.23%	1.20%
Arabic	10,932	2.42%	0.90%
French *(including Cajun)*	7,956	1.76%	0.65%
Korean	7,707	1.71%	0.63%
Other languages of Asia*	5,821	1.29%	0.48%
Nepali, Marathi, or other Indic languages*	5,075	1.12%	0.42%
Russian	4,976	1.10%	0.41%
Gujarati	4,751	1.05%	0.39%

Total State LEP Population (451,823)

Percentage of State LEP Population

* Note: These are language groupings, which have limitations. See Limitations section & Appendix 1 for more information on ACS language grouping data..

Source: U.S. Census Bureau, ACS, 2022 5-Year Estimates (Table B16001)

The visual provides an analysis of regional demographic data for North Carolina by illustrating the top languages spoken by individuals with limited English proficiency in each Council of Government Region.

Spanish is the top language spoken by individuals with limited English proficiency across all Council of Government Regions.

Language	Council of Government Regions (COGRs)																Avg. Rank
	A	B	C	D	E	F	G	J	K	L	M	N	O	P	Q	R	
Spanish	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1.00
Other Asian and Pacific Island languages	4	4	2	7	2	3	3	4	2	5	3	7	3	2	2	4	3.56
Other Indo-European languages	2	3	5	4	3	2	2	2	6	4	7	11	2	8	3	5	4.31
Vietnamese	3	8	7	3	5	4	4	5	12	2	6	3	12	7	9	2	5.75
Chinese (incl. Mandarin, Cantonese)	5	5	6	8	6	5	6	3	10	10	10	5	4	6	5	3	6.06
French, Haitian, or Cajun	8	7	9	12	10	6	8	9	8	9	5	2	6	3	8	10	7.50
Arabic	10	6	11	10	11	9	5	6	3	3	4	10	7	11	6	8	7.50
Russian, Polish, or other Slavic languages	9	2	4	6	7	7	9	10	7	12	12	8	9	10	7	11	8.13
Korean	12	12	12	12	12	10	10	8	5	6	2	12	5	4	4	7	8.31
German or other West Germanic languages	6	10	8	2	9	11	12	12	4	8	11	6	8	12	11	6	8.50
Other and unspecified languages	7	9	10	11	4	8	7	7	9	7	9	9	11	9	10	9	8.50
Tagalog (incl. Filipino)	11	11	3	9	8	12	11	11	11	11	8	4	10	5	12	12	9.31

*As noted in fn. 10, the U.S. Census Bureau has over 1,333 language codes that are collapsed into a set number of language group classifications. According to the U.S. Census Bureau, "The determination of whether to show an individual language or collapse it into an aggregated category depends chiefly on the size of the population in the United States speaking that language at home. In tabulations, smaller languages are aggregated with other languages in a way that meets a certain population threshold, but has some utility for translators or researchers." (https://www.census.gov/topics/population/language-use/about.html). Based on the U.S. Census Bureau's group classifications with examples, the language categories reflected in this table, which reflects the language categories represented in the U.S. Census Bureau, ACS, 2022 5-Year Estimates (Table C16001), *may* include the following examples: **Spanish** (Spanish, Ladino, etc.), **Other Indo-European languages** (Italian, Portuguese, Greek, Armenian, Persian, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali or other Indic languages, Albanian, Lithuanian, Pashto, Romanian, Swedish, Telugu, Tamil, Malayalam or other Dravidian languages, etc.), **Chinese** (Mandarin Chinese, Min Nan Chinese (incl. Taiwanese), Yue Chinese (Cantonese), etc.), **Other Asian and Pacific Island languages** (Japanese, Hmong, Khmer, Thai or other Tai-Kadai languages, Burmese, Karen, Turkish, Uzbek, Illocano or other Austronesian languages, etc.), **German or other West Germanic languages** (German, Luxembourgish, Yiddish, Dutch, etc.), **Other and unspecified languages** (Navajo, Other Native languages of North America, Hebrew, Amharic, Somali, or other Afro-Asiatic languages, Yoruba, Twi, Igbo, Other languages of Western Africa, Swahili, Ganda, Kinyarwanda, Lingala, Hungarian, Jamaican Creole English, Unspecified, etc.), **Arabic** (Arabic languages, etc.), **Russian, Polish, or other Slavic languages** (Russian, Polish, Bosnian, Croatian, Serbian, Bulgarian, Czech, Ukrainian, etc.), **French, Haitian, or Cajun** (French, Haitian, Cajun, etc.), **Korean** (Korean, etc.), **Vietnamese** (Vietnamese, etc.), and **Tagalog** (Tagalog, Filipino, etc.).

Source: U.S. Census Bureau, ACS, 2022 5-Year Estimates (Table C16001)