



U.S. General Services Administration

Professional Services and Human Capital Categories (PSHC)

Translation and Interpretation Services SIN 541930 Ordering Guide

Prepared by Members of the Language Services
Procurement Committee

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1. Introduction

Approximately 29.6 million individuals in the United States are considered Limited English Proficient (LEP) and the population of LEP individuals continues to grow.¹ An individual with limited English proficiency is a person whose primary language for communication is not English and who has a limited ability to read, write, speak, or understand English. Language access services, including, but not limited to, oral interpretation and written translation, are essential to ensuring accurate and effective communication between LEP persons and non-LEP persons. Most agencies utilize the General Services Administration (GSA) Language Services Schedule to procure the services needed to overcome language barriers.

2. Audience

This ordering guide is intended to: (1) assist agencies, program staff, and their procurement officers in using the existing GSA Language Services Schedule to purchase language services and, (2) offer tips and best practices for procuring high quality language assistance services. Please note that while the Language Services Schedule includes services for the deaf and hard of hearing, the scope of this ordering guide is limited to foreign language services such as translations and interpretations. The guide presumes the Ordering Contract Officer (OCO) is familiar with [GSAR Subpart 538.71 \(GSA Class Deviation RFO-2025-FSS-GSAR 538 and RFO-2025-08\) Federal Supply Schedule Ordering Procedures](#), of which contains procedures for ordering on MAS.

Contact us at professionalservices@gsa.gov to share your feedback on how to improve this guide, as well as to request GSA assistance with your agency procurement requirements.

3. Legal Requirements and Guiding Policy

Before purchasing language services, agencies should be aware of their legal obligations, internal policy directives, and regulations aimed at serving LEP members of the public. This section outlines some of these requirements.

Title VI of the Civil Rights Act of 1964 – Applicable to all federal agencies that provide federal financial assistance.

Title VI, [42 U.S.C. § 2000d](#) et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. As President John F. Kennedy said in his 1963 Civil Rights Address:

Simple justice requires that public funds, to which all taxpayers of all races [colors, and national origins] contribute, not be spent in any fashion which encourages, entrenches, subsidizes or results in racial [color or national origin] discrimination.

The Supreme Court decided, in *Lau v. Nichols*, over three decades ago that a federal fund recipient's denial of education to a group of non-English speaking students violated Title VI and its implementing regulations². Since the Supreme Court's decision in *Lau*, other courts have

¹ U.S. Census Bureau. 2023 American Community Survey (ACS).

² *Lau v. Nichols*, 414 U.S. 563, 569 (1974).

found that the failure by a recipient to provide meaningful access to LEP persons constitutes national origin discrimination ³

If a recipient of federal assistance is found to have discriminated and voluntary compliance cannot be achieved, the federal agency providing the assistance should either initiate fund termination proceedings or refer the matter to the Department of Justice for appropriate legal action. Aggrieved individuals may file administrative complaints with the federal agency that provides funds to a recipient, or the individuals may file suit for appropriate relief in federal court. Title VI itself prohibits intentional discrimination, however, most funding agencies have regulations implementing Title VI that prohibit recipient practices that have the effect of discrimination on the basis of race, color, or national origin.⁴

Executive Order 14224

The Order officially establishes English as the national language to promote unity, cultivate a shared American culture, and ensure consistency in government operations. Despite the designation of English as the official language and the revocation of EO 13166, the Order states that it does not require or direct any change in services provided by any agency. Agency Heads have the authority to make decisions they deem necessary to fulfill their respective missions and efficiently provide Government services.

Note: Agencies are not required to stop producing documents, products, or other services prepared or offered in languages other than English. Agency heads shall make decisions as they deem necessary to fulfill their agencies' mission and efficiently provide government services

Other Statutory and Regulatory Requirements

Agencies should be aware that certain program statutes and executive orders, and their implementing regulations, reinforce or supplement the language access requirements of Title VI.. Below are a few examples of other statutory and regulatory language access requirements. See Table 1. for a summary of these requirements.

AG Bondi Memo: Implementation of Executive Order No. 14224:

In accordance with EO 14224 and the Attorney General's July 14, 2025 memorandum, English is established as the official language for Federal operations unless legally or mission-critically required otherwise. Ordering officials are encouraged to review [guidance based on the EO](#), consider english-only services where appropriate, use technology to save costs, include disclaimers that english is the official language (on non-english materials), and redirect funds toward english education as applicable.

ACA Sec. 1557

³ See, e.g., *Sandoval v. Hagan*, 197 F.3d 484, 510-11 (11th Cir. 1999) (holding that English-only policy for driver's license applications constituted national origin discrimination under Title VI), *rev'd on other grounds*, 532 U.S. 275 (2001); *Almendares v. Palmer*, 284 F. Supp. 2d 799, 808 (N.D. Ohio 2003) (holding that allegations of failure to ensure bilingual services in a food stamp program could constitute a violation of Title VI).

⁴ The Federal Coordination and Compliance Section maintains an up-to-date [list of agency Title VI Regulations](#).

The Patient Protection and Affordable Care Act, or ACA, overhauls the U.S. health care system. Section 1557 is the nondiscrimination provision of the ACA, and it prohibits discrimination on the basis of race, color, national origin, sex, age, or disability in certain health programs or activities. The [regulations implementing Section 1557](#) include a provision effectuating Section 1557's prohibition of national origin discrimination in the context of health programs and activities.⁵ Under these regulations, covered entities must provide information about communication assistance, and post taglines informing the LEP public of the availability of language services in the top 15 languages spoken by LEP individuals in the relevant state or states.

Like Title VI, Section 1557 provides that covered entities must take reasonable steps to provide meaningful access to individuals with limited English proficiency. The regulations specify that language services must be provided accurately, in a timely manner, and be free of charge. Accordingly, interpreters must be qualified as defined in the regulation. Unqualified individuals, like children or friends, are restricted from interpreting for covered entities. The 1557 regulation builds on the longstanding civil rights principles under Title VI. To learn more about the final rule implementing Section 1557, please contact the [Office for Civil Rights at HHS](#).⁶

Executive Order 12250

In 1980, President Carter signed Executive Order 12250, which provided for the consistent and effective implementation of various laws prohibiting discriminatory practices on the basis of race, color, national origin, sex, disability, or religion in programs and activities receiving federal financial assistance. The 12250 implementing regulation, or [Coordination Regulation](#), enacts additional Title VI language access requirements that apply to all federal agencies.

Specifically, the Coordination Regulation requires that federal agencies coordinate their Title VI enforcement efforts under the guidance of the Department of Justice Civil Rights Division Federal Coordination and Compliance Section.⁷ This includes, but is not limited to collecting data on the participation of LEP communities in federally assisted programs and activities, and asking both agencies and their recipients to provide in-language outreach and the translation of vital documents.

The Stafford Act

Specific to disaster relief and assistance, the [Stafford Act nondiscrimination provisions](#) require that the Administrator of the Federal Emergency Management Agency (FEMA) lead efforts to prevent discrimination against LEP individuals in emergency management and assistance. The statute directs the Administrator to identify and take into account population groups with limited English proficiency in planning for an emergency or major disaster, ensure that information made available to individuals affected by a major disaster or emergency is made available in formats that can be understood by LEP individuals, and develop and maintain an informational clearinghouse of model language assistance programs and best practices for State and local governments in providing services related to a major disaster or emergency.⁸

Table 1. Summary of Different Legal Requirements for Language Access

⁵ See 45 C.F.R. 92.201

⁶ See 45 C.F.R. 92.

⁷ See 28 C.F.R. § 42.401 Subpart F

⁸ See 42 U.S.C. § 5196f

Statutory and Regulatory Language Access Requirements:	Specific Language to Language Access:
Title VI	Prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Failure by a recipient to provide meaningful access to LEP persons can constitute national origin discrimination. <i>See Lau v. Nichols.</i>
Executive Order 14224	Officially establishes English as the national language. States the Order does not require or direct any change in existing services, and agencies are not required to stop providing documents or services in languages other than English, allowing Agency Heads to make mission-based decisions.
AG Memorandum on implementation of EO 14224.	Provides guidance on implementing President Trump's EO 14224.
Affordable Care Act Section 1557	Covered entities must provide information about communication assistance. Entities must post taglines informing the LEP public of the availability of language services in the top 15 languages spoken by LEP individuals in the relevant state or states.
Executive Order 12250	Requires that federal agencies coordinate their Title VI enforcement efforts under the guidance of the Federal Coordination and Compliance Section of the Department of Justice Civil Rights Division.
The Stafford Act	Requires the Administrator of FEMA to lead efforts to prevent discrimination against LEP individuals in emergency management and assistance.

4. SIN 541930 Definitions

To assist agencies in better understanding some of the terminology used in the language services industry, this section provides definitions for some of the most commonly used terms.

a. 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 meaning.

- In-person Interpretation: Where a qualified interpreter, who is present, listens to communication in one language and orally converts it into another language (either

consecutively or simultaneously) while retaining the meaning.

- Telephonic Interpretation: Where a qualified interpreter, who is on the phone, listens to communication in one language and orally converts it into another language (either consecutively or simultaneously) while retaining the meaning.
- Video Remote Interpreting: Where a qualified interpreter, connected in video by remote technology, listens to communication in one language and orally converts it into another language (either consecutively or simultaneously) while retaining the meaning.
- Consecutive interpretation: Where a qualified interpreter performs the interpretation in the pauses after an utterance and does not speak while others are talking. The interpreter will usually signal for speakers to start or stop, in order to ensure that all parties to the interpretation understand. Consecutive interpretation requires approximately double the amount of time as a conversation without interpreters, and time should be budgeted accordingly.
- Simultaneous interpretation: Where a qualified interpreter performs the interpretation contemporaneously with the speaker whose words are being interpreted. A simultaneous interpretation occurs without any pauses since the interpreter and speaker are talking at virtually the same time. Simultaneous interpretation may require the use of special equipment, such as headsets or interpreter booths.
- Escort interpretation: Where a qualified interpreter accompanies a person or delegation on a visit, tour, meeting, or interview. Escort interpreting is usually performed through simultaneous or consecutive interpreting.
- Community interpretation: A type of interpreting service more often used to facilitate social service access in language minority communities. Community interpreting is a broad and flexible field that can encompass work in education, health, housing, social security and other service areas.
- Voiceover interpreting: A type of interpretation technique that records the voice of an interpreter over the original audio track. This method of interpreting is often used in audiovisual materials such as new reports and movies in languages where subtitling is not the norm.

b. LEP individuals: Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still LEP for other purposes (e.g., reading or writing).

c. Meaningful access: Language assistance that results in accurate, timely, and effective communication with the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

d. Qualified Interpreter for an individual with limited English proficiency means an interpreter who via a remote interpreting service or an on-site appearance:

- Adheres to generally accepted interpreter ethics principles, including client Confidentiality;
- Has demonstrated proficiency in speaking and understanding both spoken English and

at least one other spoken language; and

- Is able to interpret effectively, accurately, and impartially, both receptively and expressly, to and from such language(s) and English, using any necessary specialized vocabulary, terminology and phraseology.

e. Qualified Translator means a translator who:

- Adheres to generally accepted translator ethics principles, including client confidentiality;
- Has demonstrated proficiency in writing and understanding both written English and at least one other written non-English language; and
- Is able to translate effectively, accurately, and impartially to and from such language(s) and English, using any necessary specialized vocabulary, terminology and phraseology.

f. Transcription: Rendering of spoken word, audio, or video from a source language into a written transcript in either the original source language or a new target language (translation-transcription).

g. Translation: The replacement of written text from one source language into an equivalent written text in the target language.

- Editing/Double-Checking: A double check is where a second qualified translator reviews the source document and the original translation to verify the accuracy, completeness and readability of the final documents. In order to ensure the accuracy of any translation at least two qualified translators should review it.
- Sight Translation: An oral rendering of written text into spoken language by a qualified linguist, without changing the meaning, based on a visual review of the original text or document.
- Localization: The process of translating and redesigning software products, websites, marketing communications, or e-learning systems to appear as native in language products.
- Summarization: The process of reducing a document from a source language into an abstract or outline while retaining the most important points of the original document in the target language.

h. Vital Documents: A document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits, or is required by law. Vital documents include, for example: applications; consent and complaint forms; notices of rights; notices of disciplinary action; notices advising LEP persons of the availability of free language assistance; prison rulebooks, commissary request forms, grievance forms, and health request forms; written tests that do not assess English language competency, but rather competency for a particular license, job, or skill for which English competency is not required, and letters or notices that require a response from the beneficiary or client. For instance, if a complaint form is necessary in order to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services. Advertisements of federal agency tours and copies of testimony presented to Congress that are available for information purposes would be considered non-vital information

*** Note about Cultural Nuance:** Successful translation and interpretation services achieve meaning and ease of understanding for the target audience and avoid literal conversions from English to other languages. As such, it is important that language service providers understand the cultural nuances of the target language community. These can include cultural awareness of speech and behavior differences; hierarchy of power and communication barriers to highlight similarities and differences between the target and home culture; the ability to promote meaningful dialogue regarding cultural challenges in the workplace; discuss factors that may affect family, personal, and business relationships; and run interactive simulations that reflect a realistic situation in the business setting.

5. SIN 541930 Description

a. Translation Services – MAS SIN 541930

Services included under this SIN include the translation of written, electronic, and multi-media material to and from English and native foreign languages. Materials include, but are not limited to:

- Business
- Legal
- Medical
- Technical
- Documents
- Software
- Website localization for Internet and Intranet
- Video subtitling
- Captioning
- Transcriptions for Title III Monitoring

Client consultation and Project management services include:

- Translation formatting
- Proofreading
- Text adaptation
- Editing
- Graphic design
- Desktop publishing

b. Interpretation Services— MAS SIN 541930

Interpretation Services include the interpretation of oral communication to and from English and native foreign languages. Interpretation includes, but is not limited to:

- Simultaneous
- Consecutive
- Escort
- Community
- Telephonic
- Voiceovers

Interpreter forums may include:

- Meetings
- Conferences

- Seminars
- Litigation
- Briefings
- Trainings

Client consultation and project management services provide for scheduling, assignment, and logistical coordination of linguist support.

c. Interpretation Services— MAS SIN 541930

Transcription services for Title III Monitoring are included in this SIN. Note: this does not include medical transcription, which is included in MAS SIN 561410 Editorial, Publishing, and Library Media Services.

d. Summarization Services – MAS SIN 541930

Written summarization services including gisting fit under SIN 541930. Please contact a GSA contracting officer if more information is needed based on the scope of work and fitting under the proper SIN. ⁹

6. Assessing Your Agency's Language Needs

Agencies should conduct a survey or assessment of its language needs before procuring language assistance services. The purpose of this assessment is to gather information on the number and frequency of interactions that federal employees have with LEP individuals, particularly when those interactions involve the receipt of a vital program or activity.

An assessment can help an agency determine if it communicates effectively with LEP individuals and can inform its language access program planning including identification of an agency's funding and procurement needs.

7. Choosing a Provider

When choosing a language services provider, the purchasing authority should use certain factors to rank and evaluate providers. Some of these factors are commonplace in procurement (e.g., past performance), but other factors are more specific to the language services industry (e.g., depth and pool of linguists). Depending on your requirements, some of these factors may have varying or equal weight.

a. Qualifications:

One purpose of this factor is to establish minimum standards for contract linguists and contract program staff supporting your requirement. Years of experience, education, training (ongoing), and certifications fall under this factor. Another purpose of this factor is to determine if a provider possesses the ability to respond effectively to your requirement. The availability (how many linguists do they have & how fast can they assist?) and depth (do they even support the language & can they recruit?) of the linguist pool are critical to assess.

⁹ Please note that "gisting" is not an appropriate substitute for interpretation, and may result in significant additional, potentially detrimental, communication barriers.

b. Company History and Past Performance:

Although a standard evaluation factor in procurement, the language services industry is somewhat unique in that much of the work is completed through freelance linguists. This creates overlap between providers. OCO's should be thorough in checking subcontractors, the [Contractor Performance Assessment Reporting System \(CPARs\)](#), OIG reports, and current contract/program managers when reviewing this factor. CPARs are especially useful for checking a provider's past performance.

c. Industry Involvement:

The purpose of this factor is to determine if a provider is language centric. This refers to a provider that is dedicated to providing language services, as opposed to a provider that picked this up as something on the side for extra revenue. Purchasing authorities are better positioned to select providers who are dedicated to the language services industry. Providers who are language centric are closely attuned with the language community and local LEP populations. This proximity enables them to leverage technology, monitor trends, and engage key stakeholders.

d. Testing:

The purpose of this factor is to leverage the industry's ability to determine a linguist's skill set when the government does not have internal resources to do so. A good provider should test all skill sets and determine level of proficiency. A great provider will do periodic retests to ensure those skills remain up to speed.

e. Questions to Ask When Selecting a Provider:

Common concerns cited with language services and contracting revolve around three areas: (1) quality, (2) delivery, and (3) administration. One way to alleviate these concerns is to ask the provider specific questions. [Sample questions are available here.](#)

8. Scope of Services

Develop a Performance Work Statement (PWS), Statement of Objectives (SOO), or a Statement of Work (SOW). A SOW details *how* the contractor must work, increasing government risk. A PWS focuses on desired results, granting the contractor execution freedom. A highly flexible SOO provides high-level goals, requiring the contractor to propose the detailed PWS. Outcome-based PWS and SOO foster competition, innovation, and efficiency, aligning with [FAR Subpart 37.1 \(GSA Class Deviation RFO-2025-37\)](#), which mandates maximizing performance-based acquisition methods.

9. Monitoring Performance

When choosing a language services provider, the purchasing authority should inquire about the provider's quality assurance practices and quality control standards. Performance monitoring practices and measures should also be clearly articulated in the contract.

a. Quality Assurance

A language service provider should be willing to guarantee the quality of the foreign language services it delivers. This will require the language service provider to share their process for training linguists and providing services. Agencies should be mindful that language services often fail when translations and interpretations are accurate word for word, but do not properly convey the true meaning of the communication.

Like any other contract-based relationship, agencies should assign liability and specify a dispute resolution process in the contract.

b. Quality Control Standards

Additionally, providers should be able to describe their internal quality control procedures, such as screening of potential interpreters or translators, frequency and types of training programs offered after hire, and quality control/monitoring process. These quality control measures should be detailed in the contract to ensure that the services are completed in accordance with acceptable principles of internal control, and meet specified, acceptable levels of quality. An example of an acceptable Quality Control Plan may contain:

- ✓ A plan to ensure translation accuracy by using multiple translators to check each project for accuracy (e.g., every translation has been viewed and approved by at least two qualified translators before being returned to the Government);
- ✓ A plan to use and maintain the Government's glossary, word bank, or index of commonly used terms;
- ✓ A method of identifying all translators who independently approve of each translation.
- ✓ A method of addressing poor language assistance services including, but not limited to: inaccurate translation, untimely service, misplacing or mishandling Government documents; and,
- ✓ A plan to handle unintelligible information.

10. Special Topics

a. Service Contract Act (SCA)

The GSA MAS contract incorporates confirmed wage determinations for Foreign Language Translators (Wage Determination 1987-0989 to 20222-0036) specific to language services on Schedule. Per the applicable contract clauses, contractors must comply with the base rate and fringe benefit rate requirements of the prevailing rate SCA Wage Determination Revision Number currently incorporated into the GSA Schedule contract. No prevailing rate wage determination may be incorporated into a task order as the order then may conflict with the Schedule terms and conditions. If you have questions regarding the applicability of the Service Contract Act, please contact the GSA Contracting Officer assigned to your task order contractor.

b. Web and Computer-Based Translation Tools

There are many new and emerging web- and computer-based tools that can be used to help

with the translation process. When used appropriately, these programs can help reduce costs and decrease the amount of time needed to complete a translation; however, agencies should be mindful of the purpose and limitations of each.

i. Machine Translations

Machine translations are software or online applications that automatically translate written material from one language to another without the involvement of a human translator or reviewer. Machine translations can be a helpful tool; the translations produced, however, are often less accurate and reliable than the translations provided by qualified human translators. Since machine translations often translate word for word, they may fail to account for slang, nuance, colloquialisms and terms of art. Additionally, because languages may differ in vocabulary, alphabet, and writing style, machine translation often fails to capture not only the meaning of the content, but also the form. It is not recommended and may be a breach of an agency's language access plan to use machine translation to translate vital documents, without the review and double check of a qualified translator. To learn more about the advantages and disadvantages of machine translations, please read this [DigitalGov blog post](#).

ii. Computer-Aided Translation

Computer-Aided Translation (also known as Computer-Assisted Translation or CAT) is also a software based translation tool; however, it serves a different purpose than machine translation. CAT tools assist the translator by providing translations for phrases and sentences that the linguist has previously translated. This method allows the linguist to increase productivity while maintaining accuracy throughout the document.

iii. Translation Memory

Translation memory (TM) is another tool that can help enable higher translation productivity for human translators. TM is a database that captures a human translator's previous translation and applies it for future use. When used properly, TM can help reduce costs, provide greater translation consistency, and help human translators complete translation projects in a shorter amount of time.

c. Word Banks and Glossaries

Some agencies have developed in-house word banks and glossaries as a tool for creating consistent translations for key terms. A word bank or glossary is a list of approved, standardized terms in the source language that are relevant to your agency. These tools allow agencies to maintain ownership over translated terms that have been validated for quality and can be used on a consistent basis. Word banks and glossaries are also useful for agencies to include with their translation request to providers to save time and money. Agencies can also work with providers to develop word banks and glossaries for the agency. Developing these tools helps speed up the translation process, therefore reducing the time and costs associated with the review and validation cycles.

d. Utilizing Multilingual Staff

Many federal agencies employ staff members who are able to speak, read, write and understand non-English language(s). Before utilizing these staff to fulfill certain language service needs, there are a number of factors to take into consideration. How does a federal agency ensure that its staff member is fluent in a non-English language? Does a multilingual employee obtain any benefits (such as pay differential) for using his or her language skill on the job? Are workload adjustments necessary if a federal employee's language skill is in high

demand? At a minimum, federal agencies should be wary to accept at face value an employee's self-identification of fluency in a non-English language. Third party assessment of a multilingual employee's linguistic skill, preferably by a professional linguist, is one acceptable method for assessing the fluency of multilingual workers. Vendors can be useful for providing assessments of multilingual employee language skill if the federal agency does not have the in-house capacity and expertise to do so. Agencies should also consider quality standards, pay differentials, and workload adjustments in determining the impact of utilizing multilingual employees to fulfill the agency's language service needs.

c. Community Partnerships

Organizations that have significant contact with LEP persons, such as schools, religious organizations, community groups, and groups working with new immigrants can be very helpful in linking LEP persons to an agency's programs and its language assistance services. Community based organizations provide important input into the language access planning process and can often assist in identifying populations for whom outreach is needed and who would benefit from the agency's programs and activities where language services to be provided. Community based organizations may also be useful in recommending which outreach materials the agency should translate. As documents are translated, community-based organizations may be able to help consider whether the documents are written at an appropriate level for the audience. Community-based organizations may also provide valuable feedback to the agency to help the agency determine whether its language assistance services are effective in overcoming language barriers for LEP persons.

It is not recommended, however, to rely on a community-based organization to provide your agency with interpreting or translation assistance. The receipt of community-provided interpreting or translation services without a compensation agreement or MOU may constitute a "gift" and trigger an ethical violation. If you are unsure about how your agency should manage community partnerships in this context, please speak with your ethics officer.