



United States Commission on Civil Rights  
1331 Pennsylvania Ave NW, Suite 1150  
Washington, D.C. 20425

April 8, 2025

Delivered via email

**RE: Support for Strengthening Federal Language Access Protections**

Dear Commissioners,

On behalf of the Certification Commission for Healthcare Interpreters (CCHI), I submit this testimony to the United States Commission on Civil Rights to underscore the urgent need to protect the civil rights of individuals with limited English proficiency (LEP) through stronger federal language access protections. CCHI is the only certification body for healthcare interpreters accredited by the National Commission for Certifying Agencies (NCCA), setting the national standard for competency in healthcare interpreting. Since 2009, we have worked to ensure that professional interpreters have the skills and qualifications necessary to support clinicians, clinics, hospitals, insurance carriers and public health departments in delivering high-quality, efficient, and effective care.<sup>1</sup>

**Access to health care is a civil right.**

When patients are denied the ability to communicate with their providers due to language barriers, they are effectively denied equal access to care. Title VI of the Civil Rights Act of 1964 guarantees that no person in the United States shall be subjected to discrimination on the grounds of race, color, or national origin under any program receiving federal financial assistance. This includes discrimination based on language ability. Yet, despite this federal mandate, compliance is inconsistent and too often unenforced.

**Clear communication is the cornerstone of quality health care.**

Healthcare professionals and first responders rely on professional interpreters to ensure accurate diagnoses, informed consent, and effective treatment plans. Without qualified language access services, miscommunication can lead to unnecessary tests, incorrect treatments, increased liability, and costly inefficiencies within the health care system<sup>2</sup>. By strengthening delivery of language services, we enable healthcare professionals to do their jobs better, improving patient outcomes, streamlining operations, and mitigating the financial and human costs of medical errors. A comprehensive national study estimated that reducing communication barriers could prevent an estimated 671,440 adverse event

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<sup>1</sup> Certification Commission for Healthcare Interpreters. (2025). CCHI Timeline  
<https://cchicertification.org/about-us/cchi-timeline/>

<sup>2</sup> National Health Law Program. (2013, July 23). The High Costs of Language Barriers in Medical Malpractice <https://healthlaw.org/resource/the-high-costs-of-language-barriers-in-medical-malpractice/>

cases annually, translating to a potential cost savings of \$6.8 billion.<sup>3</sup> But beyond the cost savings, the stakes are higher: when language access is denied, lives are at risk and civil rights are violated.

### **Language access is critical for advancing health equity and improving population health.**

When patients can communicate effectively with their healthcare providers, they are more likely to follow treatment plans, adhere to medication regimens, and seek preventive care - reducing emergency room visits and long-term healthcare costs.<sup>4</sup> Effective communication fosters trust in the health system, leading to better patient engagement and stronger relationships between providers and the communities they serve.<sup>5</sup> This, in turn, improves overall public health outcomes and reduces disparities that strain healthcare resources. Ultimately, effective communication helps dismantle systemic disparities and promotes fair treatment regardless of national origin or linguistic background.

### **Investing in language access also promotes economic justice.**

The language services industry supports tens of thousands of jobs across the country<sup>6</sup>, including for highly skilled professionals, small business owners, and entrepreneurs who operate language service agencies. Many interpreters work as independent contractors or within small businesses, contributing to local economies, tax revenues and the broader goal of equity in healthcare delivery. Investing in language access means investing in American jobs, strengthening workforce development, and ensuring that healthcare systems operate as efficiently as possible.

To achieve these critical goals, we urge the United States Commission on Civil Rights to advocate for the following strategies:

1. Expand funding and incentives for hospitals, health systems, and federally funded programs to hire qualified, including nationally certified, interpreters, prioritizing local professionals to strengthen community-based language access infrastructure.
2. Encourage workforce development initiatives that create pathways for bi/multilingual individuals to enter the language services profession and obtain national certification, supporting job creation and economic growth.
3. Incorporate language access requirements into health equity and population health initiatives, recognizing communication access as a foundational element of justice and inclusion.

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<sup>3</sup> Hurtig, R. R., Alper, R. M., & Berkowitz, B. (2018). The cost of not addressing the communication barriers faced by hospitalized patients. *Perspectives of the ASHA special interest groups*, 3(12), 99–112.

<https://doi.org/10.1044/persp3.SIG12.99>

<sup>4</sup> Al Shamsi, H., Almutairi, A. G., Al Mashrafi, S., & Al Kalbani, T. (2020). Implications of Language Barriers for Healthcare: A Systematic Review. *Oman medical journal*, 35(2), e122. <https://doi.org/10.5001/omj.2020.40>

<sup>5</sup> Lopez Vera, A., Thomas, K., Trinh, C. et al. A Case Study of the Impact of Language Concordance on Patient Care, Satisfaction, and Comfort with Sharing Sensitive Information During Medical Care. *J Immigrant Minority Health* 25, 1261–1269 (2023). <https://doi.org/10.1007/s10903-023-01463-8>

<sup>6</sup> U.S. Bureau of Labor Statistics. (2024, August 29). Occupational Outlook Handbook: Interpreters and Translators <https://www.bls.gov/ooh/media-and-communication/interpreters-and-translators.htm>

4. Strengthen compliance and enforcement mechanisms for existing language access laws to ensure that federally funded entities meet their legal and ethical obligations to LEP individuals.
5. Promote research and data collection on the impact of language access on healthcare efficiency, patient safety, and cost reduction, reinforcing the case for sustained investment in language services.
6. Promote education and training for healthcare professionals on the importance of using qualified language services, and best practices for working effectively with interpreters to ensure equitable and non-discriminatory care for all patients.

By implementing these strategies, the Commission can play a pivotal role in protecting the civil rights of millions of individuals who rely on language services to access care.

Thank you for your time and consideration. We look forward to your leadership in this critical effort and are available to support the Commission in carrying out this important work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jorge U. Ungo', with a stylized, cursive script.

Jorge U. Ungo  
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Cc: Natalya Mytareva, CCHI Executive Director