

Equal Access to Justice: A Brief History of the Efforts and Challenges in California

*Kevin G. Baker, Counsel, Assembly Judiciary Committee
November 16, 2005*

I. California Efforts to Address Access to Justice

A. 1996 State Bar Working Group Report and Recommendations

California joined the current national dialog on access to justice nearly ten years ago. In 1996 a working group on access to justice appointed by the State Bar published the results of its three-year study in a report entitled *And Justice For All: Fulfilling the Promise of Access to Civil Justice in California*. This comprehensive study examined whether the legal needs of the state's indigent population were being met, and estimated the additional funding necessary to meet the unmet legal needs of the poor and near-poor. The report offered a set of findings and recommendations, along with funding options for increasing access to justice for both low and moderate-income Californians and enhancing funding for legal services. Specifically, the report concluded among other findings:

- **The Legal Needs of Three Out of Four Poor Californians Are Not Being Met.** The legal needs of approximately three-quarters of all poor people are not being met at all. The legal needs of the other one-quarter are sometimes met only partially and the number of poor people in California continues to increase at a pace faster than that of the state's overall population. The legal needs of the poor fall primarily into the areas of housing, food, health, family, employment, education, consumer finance, and individual rights. Those Californians who often need legal representation on matters that may be critical to their very survival include battered women, children, youth, the disabled, the elderly, farm workers, the homeless, minorities, single parents, the unemployed, and victims of crime.
- **Pro Bono Services and Financial Contributions Can and Should Be Increased But Cannot Alone Meet California's Unmet Legal Needs.** Experience in the U.S. and other countries demonstrates that the private bar, acting on its own, cannot and should not be called upon to provide full representation for California's civil indigent. California lawyers perform a substantial amount of pro bono work and it is reasonable to expect more lawyers to provide representation or financial contributions to legal services programs in the future; nonetheless, the private bar alone cannot approach meeting all the unmet legal needs of the poor.
- **Funding for Legal Services Must Be Increased Dramatically.** The 1996 Access to Justice Working Group estimated that it would require an additional \$250 to \$300 million (in 1993 dollars) to fill the gap between the 1993 level of

funding (about \$100 million) and the amount required to provide justice to almost six million poor people then living in California. In 1996, there were 130 fewer legal services attorneys and over two million more poor people in the state than there were in 1980. There was one attorney for every 11,000 poor people in a state where there is approximately one lawyer for every 300 people in the rest of the population. With respect to increased funding for legal services, the report identified a number of preliminary options, including having the state government pay for legal representation out of general revenues for those who cannot afford it, developing ways to ensure that California lawyers continue to increase the substantial pro bono efforts they are already making with strong support from the organized bar, increase litigation-related fees, diverting class action residuals, increasing the net yield on the Legal Services Trust Fund, and expanded efforts to increase philanthropic giving to fund legal services for low-income people.

- **California Has Just As Great a Responsibility to Ensure Adequate Counsel Is Provided to All As It Does to Supply Judges and Courthouses.** Access to justice is a fundamental and essential right in a democratic society. Access to justice requires access to lawyers. The governments of most industrial democracies have established a legal right to free assistance of lawyers in civil cases for low-income citizens, and many industrialized democracies fund legal representation for low-income citizens in civil cases at a much higher level than does the United States or California.
- **A Lack Of Representation Not Only Disadvantages Litigants, It Burdens the Justice System Itself.** More fundamentally, a lack of representation detracts from public confidence in the justice system when the financial situation of a party is more likely than the merits of an issue to determine the outcome. Legal services programs promote peaceful dispute resolution, efficiently serve millions of poor clients, and promote an ordered society and the peaceful resolution of disputes. Equally important, legal services programs promote confidence in low-income people that our system of laws can work for them. Many of the services provided to legal services clients actually result in a savings to local and state government entities.
- **Near-Poor and Moderate-Income Californians Also Require Increased Access to Civil Legal Services.** While almost two million California households (representing around five million people) lived below 125% of the poverty line in 1990, another 2.2 million households (representing over six million people) lived just above this level, struggling to maintain a minimum standard of living. Many of these families are unable to afford legal services for pressing needs without some form of legal assistance. And, those who try to represent themselves are very likely to lose, even when the evidence indicates they should prevail. Consideration must be given to establishing some level of subsidized legal services or other means to increase meaningful access to justice for the near-poor.

- **Self-Help Services Should Be Increased Until Adequate Legal Representation Can Be Provided.** As an interim measure until adequate legal representation can be provided to all who need it, programs that assist litigants in representing themselves in court proceedings should be developed and enhanced, although such programs can never provide equal access to justice.
- **Establishment of Commission on Access to Justice.** A California Commission on Access to Justice should be created to provide ongoing leadership, to explore new sources of funding, and to oversee efforts to increase funding and improve delivery methods.

B. 2002 California Commission on Access to Justice Report and Recommendations

To explore implementation of the recommendations of the State Bar’s working group, the California Commission on Access to Justice was established in 1997. This twenty-three member commission of lawyers and academic, business and community leaders is composed of ten representatives appointed by the State Bar, along with members selected by the Governor, the Judicial Council, the California Judges Association, the President Pro Tem of the Senate, the Speaker of the Assembly, the California Chamber of Commerce, the California League of Women Voters, the California Labor Federation, the California Council of Churches, the California Attorney General and the Consumer Attorneys of California.

After five years of study, the CCATJ issued its initial report in 2002, entitled *The Path to Equal Justice*. When it started its work, the Commission found that “access to justice for the poor was near the bottom of California’s public policy agenda. California was one of a few states that had not appropriated government funds to support civil legal services for the poor. Legal services programs helped low income clients facing critical legal needs, but they were often underfunded and understaffed. Courts were not equipped to assist those who appeared without lawyers, and some even posted signs that discouraged litigants from asking for help. Despite broad public support for legal aid programs, California was far from living up to our country’s goal of ‘justice for all,’ and – worse yet – few people in power seemed concerned about that failure.”

The 2002 report found that California had taken its first steps toward adequate funding of equal justice with the Legislature’s establishment of the Equal Access Fund in the 2000-2001 state budget, allocating an initial appropriation of \$10 million a year and placing California among the 40 state governments that fund legal aid. The report found that the private sector had also responded with an unprecedented level of commitment. While public funding increased 27 percent after correcting for inflation, private funding of legal services – primarily from foundations and law firms – increased more than 55 percent.

In addition, the Commission reported that legal aid providers and other participants in California’s justice community are developing a more cost-effective, accessible system for delivering justice to lower-income residents. The report also found that, under the

leadership of the Chief Justice, the judicial system is becoming much more accessible by increasing pro bono representation and making the courts more user-friendly for those who don't have lawyers by creating a statewide self-help Web site, providing family law facilitators in every county, partnering with legal services providers to place centers for self-help assistance in several courthouses, and launching a statewide task force on self-represented litigants to find long-term solutions.

Despite this progress, however, the Commission reported that low-income Californians continue to face dire circumstances. In 2000, California's poverty rate remained higher than the national average, and the gap between rich and poor had only worsened: during the decade of the 1990s, the number of people in poverty – and the number of potential legal aid clients – jumped 30 percent. Similarly, the report found that while many poor people have been placed in jobs by new welfare-to-work programs, those jobs are usually low-paying. Twenty-six percent of California workers earn poverty-level wages. The result is a substantial increase in the number of working poor who remain impoverished even as they work part- or fulltime jobs, the report concluded.

The CCATJ reported that government, private and other sources of funding provided nearly \$149 million for California legal services programs in 2000, up from approximately \$101 million in 1996. As a result, the access gap – the difference between the funding needed and the total resources available for legal services – began to shrink, from \$440 million in 1996 to \$384 million in 2000. Yet, even with the increased funding and the diminishing access gap, the CCATJ found that just 28 percent of the legal needs of the state's poor and lower-income residents were being addressed at the time of the report. Some of the new funding, the report found, simply compensated for a loss in federal funding and state trust fund (IOLTA) support. In addition, California continues to lag far behind other industrial states in its funding of legal services for the poor.

Among the remaining tasks, the Commission's 2002 report recommended:

- **Additional Funding Is Needed:** During the next five years, the Equal Access Fund must be dramatically enhanced, and total resources for legal services for California's poor should be increased so that at least 50 percent of the legal needs of the poor are being met. Public and private sector leaders must be actively involved to ensure adequate government funding for legal services is available to reach this important five-year goal.
- **Financial and Pro Bono Contributions by Legal Profession Should Be Increased:** Financial and pro bono contributions from attorneys and law firms must increase. While achieving accessible justice is a societal responsibility, and the goal of increasing state funding reflects that assumption, the legal profession must also fulfill its responsibility for playing a lead role in the effort to improve the justice system.
- **Self-Help Should Be Expanded and Improved:** Assistance for unrepresented litigants must continue to expand and be improved and access to lawyers must be

available when necessary to ensure equal justice. Sophisticated systems for sorting cases must be developed to distinguish between those that require lawyers and those where unrepresented people have an equal chance if given some assistance.

- **Language Services Are Essential to Access:** Litigants with limited English proficiency must receive assistance in order to fully understand and participate in the judicial process. In many areas of the state, a third or more of all litigants may lack fluency in English. Particularly when they are self-represented, they cannot hope for justice without the assistance of trained interpreters and other services that can help them understand and present their cases, and courts must have the ability to provide adequate certified interpreters.
- **Urban/Rural Equity:** A statewide plan must be completed and implemented to eliminate disparities in legal services resources between urban and rural areas. In part because of California's heavy dependence on local private funding, legal services are unequally distributed across the state. While no area has adequate funding, many rural areas remain grossly underfunded.

II. The Continuing “Justice Gap” in Legal Services Support

The most recent national estimate of the extent to which legal needs remain unmet comes from a September 2005 report of the federal Legal Services Corporation (LSC). It is not known to what extent this report reflects the current needs in California, although some commenters have suggested that it under-estimates the state's current needs. The report, *Documenting the Justice Gap In America*, confirms the continued existence of “a major gap between the legal needs of low-income people and the legal help that they receive.” In fact, the unmet legal need appears to be unchanged. According to the LSC:

At least 80 percent of the civil legal needs of low-income Americans are not being met. Moreover, 50 percent of the eligible people seeking assistance from LSC-funded programs in areas in which the programs provide service are being turned away for lack of program resources. Although state and private support for legal assistance to the poor has increased in the last two decades, level (or declining after factoring in inflation) federal funding and an increased poverty population have served to increase the unmet demand.

Assuming that state and private funding increases were to keep pace, it will take at least a five-fold funding increase to meet the documented need for legal assistance, and a doubling of LSC's current funding of the basic field grant just to serve those currently requesting help

Specifically, the LSC found:

- For every client served by an LSC-funded program, at least one person who sought help was turned down because of insufficient resources.

- Only a very small percentage of the legal problems experienced by low-income people (one in five or less) are addressed with the assistance of either a private attorney (pro bono or paid) or a legal aid lawyer.
- The per capita ratio of legal aid attorneys funded by all sources to the low-income population is a tiny fraction of the ratio of private attorneys providing personal civil legal services to the general population. There is one legal aid attorney for 6,861 low-income persons. By contrast, the ratio of attorneys delivering civil legal assistance to the general population is approximately one for every 525 persons, or thirteen times more.

According to the LSC, “the enormity of the justice gap documented in this report means that eliminating the gap will require a sustained, long-term effort involving a partnership of federal and state governments, the private bar, and concerned public and private parties. A key first step is to quantify what it would take to provide necessary access to civil legal assistance. This report concludes that doing so will require increasing our nation’s capacity to provide civil legal assistance to *five times* the current capacity.”

In response to the shortfall in legal services funding, a number of states have instituted programs to generate funding through, for example, bar dues and pro hac vice fees, as well as directing class action cy pres residual funds to legal services programs.

III. Court Responses to Increased Numbers of Pro Se Parties

The Judicial Council reports that “California’s courts are facing an ever increasing number of litigants who go to court without legal counsel largely because they cannot afford representation. Self-represented litigants typically are unfamiliar with court procedures and forms as well as with their rights and obligations, which leaves them disadvantaged in court and consumes significant court resources. Accordingly, the Judicial Council has made access to the courts for self-represented litigants one of its top priorities.” (Judicial Council, Fact Sheet, Programs for Self-Represented Litigants (2/05).)

While there is apparently no statewide data on the number of pro se litigants, the Judicial Council reports that the number has clearly expanded greatly in recent years. Although hard information on the number of pro se or “pro per” parties may not be available, the Judicial Council indicates that over 4.3 million of California’s court users are unrepresented, and estimates the number of petitioners bringing matters without legal representation in the following types of cases:

- Unlawful Detainer – 34 % (defendants 90 %).
- Family Law – 67 % (largest counties 72 %) – higher at time of marital dissolution
- Domestic violence restraining order – over 90 %
- Child support – 85 %.
- Paternity – 96%
- Probate – 22 %

General Civil – 16%

In 2001, the Judicial Council established the Task Force on Self-Represented Litigants to coordinate the statewide response to the needs of litigants who represent themselves in court.

The Judicial Council’s Task Force on Self-Represented Litigants has found a “unity of interest between the courts and the public with respect to assistance for self-represented litigants. Lack of legal assistance is clearly an enormous barrier for the public. It also creates a structural gap for courts which are designed to work with litigants who are represented by attorneys. Managing cases involving self-represented litigants is a daily business event at every level of court operations—from filing through calendaring, records management, and courtroom hearings.” (Statewide Action Plan for Serving Self-Represented Litigants, at 1.)

The task force has reported the following key findings:

- Court-based staffed self-help centers, supervised by attorneys, are the optimum way for courts to facilitate the timely and cost-effective processing of cases involving self represented litigants, to increase access to the courts and improve delivery of justice to the public.
- It is imperative for the efficient operation of today’s courts that well-designed strategies to serve self-represented litigants, and to effectively manage their cases at all stages, are incorporated and budgeted as core court functions.
- Partnerships between the courts and other governmental and community-based legal and social service organizations are critical to providing the comprehensive field of services required for success.

Current court programs to address the presence of unrepresented litigants include the following:

- **Internet Web site.** The Administrative Office of the Courts maintains an online Self-Help Center for court users who do not have attorneys and for others wishing to become better informed about the law and court procedures. This site can be found at www.courtinfo.ca.gov/self-help/.
- **Family Law Facilitators.** Family Law Facilitators exist in each of the 58 counties, staffed by licensed attorneys. These facilitators, working for the superior court, guide litigants through procedures related to child support, maintenance of health insurance, and spousal support. They assist with cases involving the local child support agency, many of which are public assistance reimbursement cases. Family law facilitators can assist parties with forms, court procedures, and support calculations, and they provide workshops and referrals to community agencies that assist parents and families.

- **Family Law Information Centers.** The Judicial Council administers three pilot project centers in the Superior Courts of Los Angeles, Sutter, and Fresno Counties. The centers are supervised by attorneys and assist low-income self-represented litigants with forms, information, and resources concerning divorce, separation, parentage, child and spousal support, property division, and custody and visitation. The center staffs work closely with the family law facilitators in these three counties to coordinate services.
- **Legal Services Partnership Grants.** The Judicial Council, working in partnership with the State Bar’s Legal Services Trust Fund Commission, has established self-help centers in California courts. Ten percent of the Equal Access Fund is distributed to legal services programs for court-based services for low-income self-represented litigants. Eighteen programs have been started in California courts to assist litigants in cases involving domestic violence, guardianships, family law, landlords and tenants, and general civil assistance.
- **Model Self-Help Pilot Program.** Five model self-help centers were created in 2002 to pilot new methods of providing services. These five programs – focused on Spanish-speaking court users, multilingual, technology, urban collaboration, and regional coordination – provide translated materials and technological solutions as well as serve as models for replication in other counties.
- **Planning Grants and Implementation Funds.** To assist local courts in determining the needs of the self-represented litigants in their communities, developing partnerships in the communities, and establishing appropriate programs, the Judicial Council has encouraged every court to develop an action plan for serving self-represented litigants.
- **Videos.** The AOC offers several videos regarding custody mediation, domestic violence restraining orders, preparing court forms for an uncontested divorce, and preparing for a family law hearing. Some of these videos are available in a language other than English.
- **Publications for Self-Represented Litigants.** The AOC develops and distributes a wide variety of materials for self-represented litigants. These include: a Summary Dissolution Handbook; Caregivers in the Courts; Adoption Information; and Emancipation Pamphlet.
- **Court Staff Education and Training.** Enabling court staffs to effectively assist self-represented litigants is a key part of the Judicial Council’s mission to make the courts more accessible.

IV. Pro Bono Publico: The Lawyer’s Role in Equal Access

The ABA Model Rules of Professional Conduct provide: Every lawyer has a professional responsibility to provide legal services to those unable to pay. A lawyer should aspire to

render at least 50 hours of pro bono publico legal services per year. A substantial majority of the 50 hours of legal services should be provided without fee or expectation of fee to persons of limited means or organizations in matters that are designed primarily to address the needs of persons of limited means. In addition, a lawyer should voluntarily contribute financial support to organizations that provide legal services to persons of limited means. (Rule 6.1.)

Likewise, the State Bar of California urges all attorneys to devote a reasonable amount of time, at least 50 hours per year, to provide or enable the direct delivery of legal services, without expectation of compensation other than reimbursement of expenses, to indigent individuals, or to not-for-profit organizations with a primary purpose of providing services to the poor or on behalf of the poor or disadvantaged, not-for-profit organizations with a purpose of improving the law and the legal system, or increasing access to justice. (Pro Bono Resolution, State Bar of California, Board of Governors (2002).) Unlike the ABA model rule, the State Bar's resolution does not address a lawyer's responsibility to contribute financial support.

California Chief Justice Ronald George has frequently and actively urged the profession to meet its pro bono obligations, while the State Bar and local bar associations have undertaken programs to recognize and assist lawyers in performing pro bono work. For example, the Santa Clara County Bar Association recently composed a pro bono task force, resulting in the association's adoption of a new rule establishing that every lawyer has a professional responsibility to provide legal services to those unable to pay. Given the critical need for legal services that exists among persons of limited means in Santa Clara County and elsewhere, the rule provides that lawyers should contribute 60 hours, rather than the 50 hours recommended in Rule 6.1 and the State Bar's resolution. Moreover, the Santa Clara Bar Association's rule sets an aspirational goal of 100 hours. In addition, like the ABA rule, the SCCBA rule notes a lawyer should voluntarily contribute financial support to organizations that provide legal services to persons of limited means. Based on the goal of the nearby Silicon Valley Campaign for Legal Services, the SCCBA pro bono rule sets a financial target of the equivalent of at least one billable hour per year. (The Silicon Valley Campaign For Legal Services is an innovative annual fundraising campaign program, focused on area law firms and businesses, and dedicated to augmenting current contributions to Silicon Valley legal service agencies in order to increase the effectiveness and ability of these legal agencies to assist disadvantaged residents with the most critical of legal issues. For more information regarding the campaign, see <http://www.svcls.org/index.htm>.)

No data is available regarding the level of pro bono commitment currently made by California lawyers. Anecdotally, it is believed that pro bono work may be correlated to some extent with the size of the firm; larger law firms generally providing a greater number of pro bono services than medium and smaller firms. Solo practitioners and small firms face special challenges in providing pro bono legal services, including the direct and personal impact of lost income and availability for fee generating cases. According to the SCCBA report, national surveys (typically based on self-reported information) show that there is a wide range in the amount of pro bono work reported

annually by large law firms. The range is from approximately .5% to 5% of billable hours, with most firms averaging 2% to 3%. Although no reliable information is available, the SCCBA estimated that both the range and average in Santa Clara County are probably similar to what has been observed nationally. However, the report notes, the average is reflective of the efforts of a relatively small group of attorneys; many attorneys do not contribute any time at all on pro bono matters. Furthermore, some firms have not provided significant pro bono services.

Other states have similarly sought to promote pro bono service and financial contributions. Most recently, a number of states have instituted pro bono reporting requirements and more explicitly recognized the level of financial contribution that lawyers should endeavor to provide in addition to or in lieu of hours of service. One report suggests that the nation's oldest pro bono reporting program in Florida has "dramatically increased" pro bono participation and contributions. (See K. Cerovsek, K. Kerr, *Opening the Doors to Justice: Overcoming the Problem of Inadequate Representation for the Indigent*, Georgetown Journal of Legal Ethics (July 2004).)

Other states have sought to encourage pro bono by allowing some portion of continuing legal obligation (CLE) requirements to be met by providing pro bono services. See <http://www.abanet.org/legalservices/probono/clerules.html>.)

In 2001, California enacted AB 913 (Steinberg), providing that law firms that enter into substantial contracts with the state for legal services agree to make a good faith effort to provide a minimum number of hours of pro bono legal services during the duration of the contract. The bill did not mandate reporting, and it is not known what if any impact it has had on the provision of pro bono services by state contractors.

V. Language Barriers Exclude Millions of Californians From Court Services

The California Commission on Access to Justice reported in 2002 that people with limited English proficiency are among those most likely to need assistance in accessing the courts, and least likely to receive it. In its 2002 report on access to justice in California, *The Path to Equal Justice*, the Commission found that 72 percent of the legal needs of low-income families go unaddressed.

Recently, the Commission issued a report, *Language Barriers to Justice in California* (Sept. 2005), examining the scope and impact of language barriers in California's justice system and offering suggestions for ways to improve services for people with limited English proficiency. The Commission pointed out: "Unless every Californian can fully understand and participate in judicial proceedings affecting his or her legal rights, our courts cannot serve their intended purpose and our democracy cannot keep one of its most important promises."

Californians face a dire unmet need for language assistance in the courts, the Commission found. Over one quarter of Californians (roughly 8.8 million people) are foreign born, and roughly 20 percent of Californians (almost 7 million people) speak English less than

“very well” – the minimum realistic threshold for meaningful participation in a judicial proceeding.

Although precise data is apparently not collected, the Commission reports that millions of Californians are involved with legal proceedings every year. English proficiency is a prerequisite to engagement in the legal system. Without English proficiency, the prospect of navigating through the legal system is daunting, particularly since a high percentage of litigants represent themselves in court and therefore cannot rely on an attorney to ensure they understand the proceedings.

The report notes that a constitutional right to a state-funded interpreter in criminal proceedings has long been recognized by the courts; yet, in most civil proceedings – even those affecting fundamental rights – California has not recognized an explicit right to an interpreter. Various state and federal laws arguably require that language minorities receive the same services as persons who speak English. However, the right to an interpreter has been statutorily recognized in only a handful of civil matters, including those involving small claims, domestic violence, parental rights, dissolution of marriage or legal separations involving a protective order, and court-related medical examinations. Unfortunately, even for most of these proceedings, this statutory “right” is illusory because compliance is required only if adequate funds are available from the federal government or from sources other than the state.” According to the Commission, the courts do not have the resources to meet even the existing constitutional and statutory obligations effectively, despite the best efforts of the Judicial Council and Administrative Office of the Courts.

The report notes that in recent years demand for interpreter services has grown steadily, while the number of qualified interpreters has continued to shrink. According to the Commission, limited court resources, a lack of qualified interpreters, and the absence of funding for payment of interpreters for low-income litigants make it impossible to provide interpreters for the vast majority of civil proceedings. Therefore, courts rarely appoint interpreters in civil cases unless parties pay for them. Given the cost of retaining private interpreters in light of the income levels of those who need an interpreter, most civil proceedings are conducted without interpreter services. Unlike with court and deposition reporter fees, for example, which can be reimbursed through the transcript reimbursement fund, there is no corollary for interpreter services. Another significant language access problem, the Commission found, is the unavailability of court documents in languages other than English.

Although the starkest consequence of linguistic barriers to the courts is that justice is denied, the Commission reports, these barriers also impact the efficiency of the courts. Inadequate assistance for litigants with limited English proficiency affects the court’s ability to function properly, causing delays in proceedings, inappropriate defaults, and faulty interpretation that can ultimately subvert justice. The inability to accommodate the language needs of litigants also impairs trust and confidence in the judicial system.

In light of these findings, the Commission recommended the following actions be taken to ensure access to the judicial system for all Californians:

- **Adopt a Comprehensive Language Access Policy for Courts Accompanied by Specific Plans Designed to Achieve Such Access.** The plan should include adequate funding to provide for qualified interpretation and translation services; access to standard court documents in multiple languages; and training and resources to assist court personnel and judges in identifying and addressing language issues.
- **Develop Specific Recommendations for Court Officials and Staff to Implement the Language Access Policy.** The Judicial Council should ensure that adequate training packages and model protocols exist for court staff and judicial officers to address language access issues.
- **Reevaluate the System for Training and Certifying Interpreters.** Existing test approaches, qualification requirements, and models of training should be analyzed. Adequate funding should be sought so that compensation can be set at levels that encourage people to pursue careers in court interpretation.
- **Lawyers and Bar Associations, Legal Services Programs, Law Schools and Law Libraries Should All Strive to Provide Better Service to Persons With Limited English Proficiency.**
- **Compile Existing Data and Conduct Additional Research to Assess the Need for Language Assistance in the Courts.**