# Board Policy Equity Lens Tool

## Title of board policy being reviewed:

IKJA-AI Use for Language Access, Translation and Interpreting in MESD K-12 Education

## Describe the purpose of this policy:

The purpose of this policy is to ensure that the use of artificial intelligence (AI) in language access services supports — and does not compromise — equitable access to education for multilingual students and families. It establishes clear standards to ensure AI is used responsibly, ethically, and in compliance with federal civil rights laws, including Title VI, ADA, EEOA, and IDEA. The policy affirms that meaningful language access is a civil right and that AI is a support tool, not a replacement for qualified human translators and interpreters.

## What is your experience with this policy:

This policy reflects a proactive and preventative approach to emerging technology in education. It builds on longstanding language access practices and civil rights requirements while providing clearer guardrails around AI use. The development process highlighted the importance of balancing innovation with legal compliance, professional standards, and equity.

Implementation will require ongoing training, monitoring, and refinement; however, the policy provides a strong framework to ensure AI supports — rather than undermines — meaningful access for multilingual students and families.

**What is the plan to communicate this policy to staff, students, and/or families? What is the plan to communicate this policy to linguistically diverse students and their families?**

**Is this policy:**

Easy to locate for staff?

> This policy and a summary of this policy will be available on the MESD web page. The summary of this policy is also available on the MESD website in Spanish, Chinese, Russian, Somali, and Vietnamese and, upon request, the summary and/or policy may be translated into other languages.

Accessible to students and families?

> This policy and a summary of this policy will be available on the MESD web page. The summary of this policy is also available on the MESD website in Spanish, Chinese, Russian, Somali, and Vietnamese and, upon request, the summary and/or policy may be translated into other languages.

Included in onboarding, intake, or other training?

> This policy will be communicated to staff through inclusion in the employee handbook, review during onboarding, and periodic reminders from Human Resources. The policy will also be posted on the district website for easy access.

Clear and easy to understand?

Yes. The policy is organized into clearly labeled sections outlining purpose, legal foundations, permitted and prohibited uses, and accountability measures. It defines expectations for staff and vendors and distinguishes between appropriate and inappropriate uses of AI in language access. The language is direct and grounded in established civil rights law and professional standards, making expectations transparent and actionable.

## People

How are people affected positively or negatively by the policy? What potential barriers might people encounter? What barriers might be reduced by this policy?

This policy positively impacts multilingual students and families by reinforcing their right to accurate, timely, and culturally responsive communication. It reduces the risk of miscommunication in high-stakes situations such as special education, discipline, and health matters, and strengthens privacy protections. It also supports educators by providing clear guidance on appropriate AI use and maintaining professional quality standards.

Potential barriers may include longer turnaround times for translations due to required human review, staff adjustment to new compliance expectations, and the need for additional training or approved tools.

However, the policy reduces more significant barriers, including reliance on inaccurate machine-only translations, inequitable access to critical information, civil rights violations, and privacy risks. Overall, it prioritizes equity and meaningful access over convenience or speed.

Can you identify the racial or ethnic groups affected by this policy, program, practice, or decision? Do you know the potential impacts to these populations? If you don't know, how will you find out?

This policy most directly affects multilingual students and families, who are disproportionately from racially and ethnically diverse communities, including Latino/a/x, Black, Asian, Pacific Islander, Middle Eastern, African immigrant, and other immigrant and refugee populations. These communities are more likely to experience language barriers in educational settings and, historically, inconsistent access to accurate translation and interpreting services.

The potential positive impact is increased protection of civil rights, improved accuracy in communication, stronger access to special education and due process protections, and greater trust between families and schools. By prohibiting machine-only translation in high-stakes situations, the policy helps prevent miscommunication that could disproportionately harm these populations.

Were these populations involved in any way, at any point in the development, implementation, and evaluation of this policy? If so, when and how?

The populations most impacted by this policy—multilingual students and families—were represented through language access staff expertise, review of civil rights guidance, and consideration of documented language access complaints and service trends. Professional translators, interpreters, and staff responsible for family engagement informed the development of guardrails around appropriate AI use.

Ongoing implementation and evaluation will include opportunities for family feedback, review of language access data, and consultation with community partners serving linguistically diverse populations. This continuous feedback loop is intended to ensure that the policy remains responsive to the lived experiences of affected communities and does not unintentionally create new barriers.

What priorities and commitments are communicated by this policy?

This policy communicates a clear commitment to educational equity, civil rights compliance, and meaningful language access for multilingual students and families. It prioritizes accuracy, cultural responsiveness, and confidentiality over convenience or automation.

The policy affirms that technology must support — not replace — qualified human professionals in high-stakes educational contexts. It reinforces MESD's commitment to Title VI, ADA, EEOA, and IDEA protections, and to ensuring that innovation does not compromise student rights, family engagement, or access to a Free Appropriate Public Education (FAPE).

Overall, it signals that equitable communication is a core responsibility and that AI must be used with accountability and professional oversight.

## Place

What kind of positive or negative environment are we creating?

What are the barriers to more equitable outcomes? (e.g. mandated, political, emotional, financial, programmatic or managerial)

This policy creates an environment of accountability, professionalism, and civil rights protection. It reinforces that equity and meaningful language access are non-negotiable and that innovation must be implemented responsibly. It promotes trust with multilingual families by prioritizing accuracy, confidentiality, and culturally responsive communication.

Some staff may initially experience the policy as restrictive due to guardrails around AI use; however, those guardrails are intended to prevent harm and ensure compliance with federal law.

**Barriers to More Equitable Outcomes**

Barriers may include financial constraints related to funding qualified interpreters and translators, staffing capacity, training needs, and potential pressure to use faster or lower-cost automated tools. There may also be programmatic or managerial challenges in monitoring compliance and ensuring consistent implementation across departments.

Despite these challenges, the policy is designed to reduce larger equity barriers—such as miscommunication, civil rights violations, and exclusion of multilingual families from critical educational decisions—by centering professional standards and legal obligations.

## Power

How is the power of decision-making shared with those it affects?

How have you intentionally involved the communities affected by this policy, program, practice, or decision?

This policy supports shared decision-making by ensuring that multilingual families have meaningful access to information necessary to participate fully in educational decisions, including special education, discipline, and academic planning. By guaranteeing qualified human interpretation and accurate translation in high-stakes contexts, the policy protects families' ability to exercise informed consent and advocate for their students.

In developing and refining this policy, the organization has relied on the expertise of language access professionals, review of civil rights guidance, and analysis of service trends and complaints. Ongoing implementation will intentionally include opportunities for feedback from multilingual families, educators, interpreters, and community partners to ensure the policy remains responsive and equitable in practice.

## Process

Does the policy, program, or decision improve, worsen, or make no change to existing disparities?

Does it create other unintended consequences?

This policy is designed to improve existing disparities by strengthening protections for multilingual students and families who have historically experienced inconsistent or inadequate language access. By prohibiting machine-only translation in high-stakes contexts and requiring professional human oversight, the policy reduces the risk of miscommunication that can negatively impact special education access, disciplinary outcomes, and family engagement.

The policy may introduce operational challenges, such as longer turnaround times or increased costs associated with professional language services. However, these are implementation considerations rather than equity harms. Clear training, resource allocation, and monitoring can mitigate unintended consequences and ensure that the policy advances, rather than restricts, equitable outcomes.

## Plan

How will you reduce the negative impacts and address the barriers?

To reduce potential negative impacts, the organization will provide clear staff training on appropriate AI use, legal obligations, and procedures for requesting qualified language services. Centralized guidance and approved tools will help ensure consistency and prevent confusion.

To address financial and capacity barriers, leadership will prioritize resource allocation for professional translation and interpreting services and explore efficient workflow supports that maintain quality without compromising equity. Ongoing monitoring, family feedback, and review of language access data will allow for adjustments to implementation and timely correction of any unintended impacts.

These actions are intended to ensure the policy strengthens equitable access while minimizing operational burdens.