

To: SameGoal Inc.

From: Chad L. Mowery and Lauren Konrai-Mori

Date: December 22, 2025

Re: Analysis Regarding Regulatory Status of Machine-Translated Documents

INTRODUCTION

SameGoal Inc. (“SameGoal”) retained our firm to conduct an analysis of the legal obligations on Local Education Agencies (“LEAs”) to English learners, multilingual students, and their families following the Department of Education’s rescission of its Federal English Learner [Dear Colleague Letter](#). In particular, we reviewed and analyzed federal laws and regulations to determine such obligations. As will be discussed below in further detail, while the Department of Education rescinded the Federal English Learner Dear Colleague Letter in August 2025, the legal obligations of LEAs to English learners, multilingual students, and their families have not changed, including the need for human review of any machine-translated documents.

LEGAL REVIEW AND CONCLUSIONS

At SameGoal’s request, we reviewed federal laws and regulations to determine the status of LEAs’ obligations to review machine-translated documents as previously described by the Department of Education in its Federal English Learner Dear Colleague Letter. In August 2025, the Department of Education rescinded the Federal English Learner Dear Colleague Letter as part of more wide-ranging policy efforts. Despite the Department’s rescission of said Dear Colleague Letter, the underlying statutes, like the Individual with Disabilities Education Act and the Equal Education Opportunities Act, which provide federal protections for these students and their families, remain unaltered. On a similar note, a number of states provide equivalent protections under state laws and regulations that are largely unaffected by the Department of Education’s actions. Thus, in our opinion, the requirements around a LEA’s obligations to English learners, multilingual students, and their families also remain unchanged.

Our analysis reviewed a number of federal statutes and regulations to come to this conclusion. For example, Title VI of the Civil Rights Act of 1964 provides that individuals cannot be discriminated against based on race, color or national origin under any program or activity that receives federal financial assistance. Under Title VI, recipients of federal financial assistance are required to take reasonable steps to provide meaningful access to such information to individuals with limited English proficiency in appropriate languages. This obligation has been interpreted to include translations for important and vital documents and language assistance services to individuals, such as oral interpretation. Additionally, the Equal Educational Opportunities Act of 1974 establishes that all children enrolled in public schools are entitled to equal education opportunities regardless of race, color, sex, or national origin, requiring appropriate action to be taken to overcome barriers, such as language barriers. Similarly, Title III of the Every Student Succeeds Act (formerly the Elementary and Secondary Education Act) allocates federal funds to support the English language acquisition, enhancement, and academic achievement for English learners and multilingual students, including an obligation for LEAs to implement effective outreach to parents of English learners and multilingual students. Where addressed, these statutes and the underlying regulations and guidance require more than simple machine translations to fulfill a LEA's obligations.

Based upon these laws and regulations, a number of federal and state courts have defined a LEA's responsibilities to English learners, multilingual students, and their families. In many instances, these courts have held school districts liable for failing to provide adequate translation and interpretation services. The decisions support the idea that machine translation is not enough to satisfy the LEA's obligations, and that the applicable law requires human review and oversight of any machine translation to comply with adequate translation requirements. The Department of Education's rescission of the Federal English Learner Dear Colleague Letter does nothing to reverse these court decisions.

Even in non-educational contexts, a number of governmental entities have created the obligation to provide adequate translation and interpretation services, which also supports our analysis. For example, the U.S. Department of Health issued a Dear Colleague Letter in December 2024 that provided the same restrictions and cautions about the use of machine translations in the health care context that the Department of Education's rescinded Dear Colleague Letter included in the education sphere. This more recent guidance, even if not in the education area, is informative as to how federal agencies view reliance on this technology without human review and oversight. Such guidance could also be utilized

by courts to inform their opinion on whether or not machine translation alone is enough to fulfill requirements created by federal law in a number of areas, including education.

In sum, LEAs are still obligated to ensure that essential information has been accurately translated to English learners, multilingual students, and their families. That obligation, based upon existing statutes and regulations, court cases, and other governmental guidance, requires that machine-translated documents be reviewed and edited by an individual qualified to do so. SameGoal should ensure that its systems are designed to help LEAs fulfill this requirement.