



Court-Ordered DWI Education in Texas Addressing Language Barrier Challenges

Author:
Cinthya Fillips

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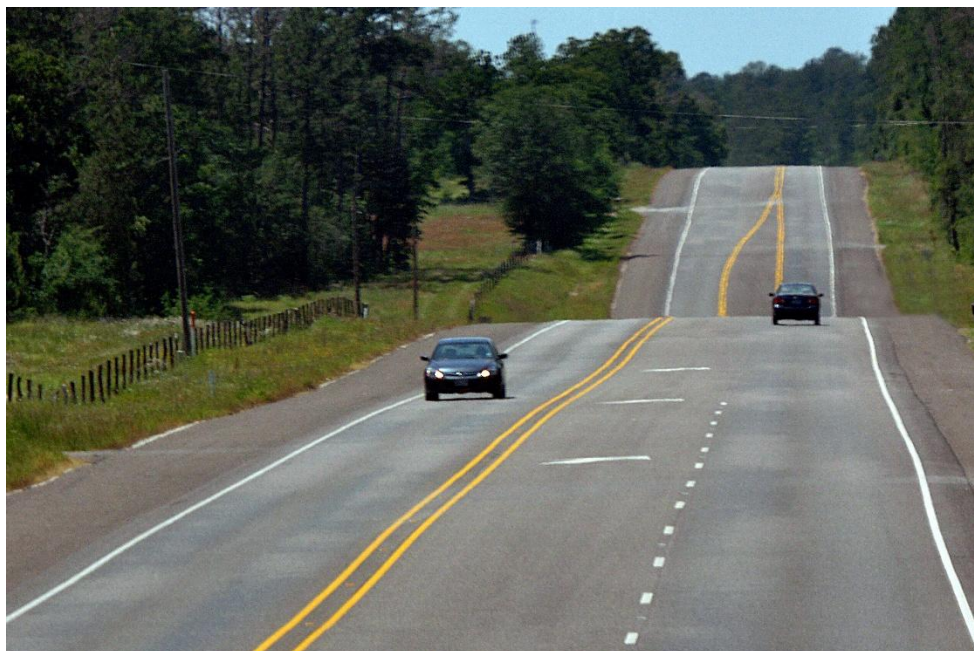
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List of Acronyms

DWI	Driving While Intoxicated
LEP	Limited English Proficiency
LMS	Learning Management System
SWOT	Strengths, Weaknesses, Opportunities, and Threats
TAC	Texas Administrative Code
TDLR	Texas Department of Licensing and Regulation
TxDOT	Texas Department of Transportation



Executive Summary

This report addresses the growing challenge of language barriers in court-ordered driving while intoxicated (DWI) education courses in Texas. In the Lone Star State, impaired driving remains a significant safety concern, with 340 arrests per 100,000 licensed drivers in 2023 (Smith, 2024). With over 17 percent of Texas's 30.5 million residents being foreign-born and a rising diversity of languages (U.S. Census Bureau, 2020), courts face difficulties ensuring limited English proficiency (LEP) individuals complete mandated DWI education and intervention programs. Regulated by the Texas Department of Licensing and Regulation (TDLR) under Chapter 171 of the Texas Government Code and Chapter 90 of the Texas Administrative Code, these programs require 12 and 32 hours of instruction, respectively. The Texas A&M Transportation Institute proposes four potential solutions:

1. Hiring on-site interpreters.
2. Having translated curriculum materials.
3. Offering a hybrid app-based model option.
4. Utilizing an asynchronous learning management system (LMS) delivery method.

Recommendations include TDLR-led translation products, pilot LMS initiatives, interpreter training subsidies, and a public-private resource-sharing partnership. These feasible strategies aim to enhance DWI court-ordered education accessibility by aligning with TDLR's non-discrimination mandate and offering scalable alternatives within current statutory frameworks.



Chapter 1. Introduction

Impaired driving remains a critical public safety issue in Texas. The state ranks as the third worst state for such offenses in 2023, with 340 arrests per 100,000 licensed drivers (Smith, 2024). This challenge is compounded by Texas's rapidly growing and diversifying population. According to the U.S. Census Bureau (2020), the state is home to over 30.5 million residents, more than 17 percent of whom are foreign-born. Many of these individuals speak English as a second language, and the number of languages spoken in Texas has reached 164, with 15 percent being a language other than Spanish (Statistical Atlas, 2024; Migration Policy Institute, 2023).

This adds up to an estimated 5.10 million limited English proficiency (LEP) individuals. While Spanish speakers make up most of this group, approximately 777,750 LEP individuals speak languages other than Spanish.

While Texas has historically provided Spanish language legal and civic resources, the growing linguistic diversity now presents broader challenges for the criminal justice system, particularly in addressing driving while intoxicated (DWI) offenses. Currently, Texas courts are managing over 216,000 DWI cases. County courts handle the majority, with more than 173,000 cases involving first and second offenses, while district courts oversee nearly 25,000 felony DWI cases. These courts have already processed over 44,000 convictions and nearly 16,000 deferred adjudications in 2023, reflecting a substantial and ongoing burden (Texas Office of Court Administration, 2024).

**Approximately
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Assuming equal likelihood of DWI offenses across all language groups, about 2.55 percent of all DWI cases—roughly 5,508 in a given year—likely involve non-Spanish speaking LEP individuals. Language barriers significantly impact the delivery of court-ordered DWI education programs, which are often mandated as part of sentencing or probation.

Roughly 5,508 DWI cases in a given year involve non-Spanish speaking LEP individuals.

Moreover, the Texas Administrative Code (TAC) (Title 16, Chapter 90) requires course providers to “make provisions for persons unable to read and/or speak English” and mandates that each course be delivered in a single language. This regulation underscores the need for parallel course offerings in multiple languages to ensure that LEP individuals can fully comply with court orders and access rehabilitative services.

As Texas continues to grow and diversify, addressing these language access challenges is essential to ensuring compliance with the state’s DWI response. The intersection of a high DWI caseload and a multilingual population presents a pressing operational challenge for Texas courts. Addressing this issue will require strategic investment in language access services, multilingual program development, and policy coordination to ensure that all individuals can fully participate in and comply with the justice process regardless of language proficiency.

State Legislative Regulations for Court-Ordered DWI Education Courses

Chapter 171 of the Texas Government Code and Chapter 90 of the TAC regulate the Texas Department of Licensing and Regulation’s (TDLR’s) oversight of court-ordered programs, including DWI education and intervention programs. These programs aim to educate and rehabilitate per judicial mandates (TDLR, n.d.). Court-ordered providers must secure TDLR-issued licenses with program-specific endorsements, submit applications and fees, and meet eligibility criteria varying by delivery method or location (16 TAC §90.20, §90.21; Gov’t Code §171.0101, §171.0102, §171.0103). Licenses, valid for two years, are non-transferable, requiring 30-day ownership change notifications (16 TAC §90.24; Gov’t Code §171.0201, §171.0202). Instructors must also hold TDLR licenses with endorsements and must complete the required training (16 TAC §90.40, §90.41; Gov’t Code §171.0151, §171.0155, §171.0103).

Programs use TDLR-approved curricula, delivered in approved in-person or online formats with security, attendance verification, and privacy measures (16 TAC §90.80, §90.90; Gov’t Code §171.0301, §171.0055, §171.0053(b)). Providers maintain and submit records for audits (16 TAC §90.50; Gov’t Code §171.0053(a)(4), §171.0354), ensuring non-discrimination (16 TAC §90.54(e); Gov’t

Code §171.0302) and accessibility for non-English speakers (Crim. Proc. Code §42A.053(b), 16 TAC §90.42(e)). Licenses and TDLR contact details must be provided, with fees, schedules, and methods disclosed (16 TAC §90.80(h)–(i); Gov’t Code §171.0304, §171.0305). Certificates are issued upon completion and submitted to courts (16 TAC §90.91; Gov’t Code §171.0303), with electronic transmission possible (16 TAC §90.91(e); Gov’t Code §171.0057). Violations, including certificate misuse, incur penalties (Gov’t Code §171.0056, §171.0351, §171.0356), with all requirements meeting or exceeding TAC standards, as shown in Table 1.

Table 1. General Program Requirements and Additional Program Requirements

General Program Requirements	DWI Education Program and DWI Intervention Program
Legal Reference	- Government Code §171.0001(7): Described by Article 42A.403, Code of Criminal Procedure. - Code of Criminal Procedure §42A.403: Mandates completion as a condition of community supervision for certain intoxication offenses.
Program Provider License	- Must hold a TDLR-issued program provider license with an endorsement for the Educational Program for Intoxication Offenses (§171.0101, §171.0103). - License not transferable (§171.0201).
Instructor Requirements	- Must hold a TDLR-issued instructor license with an endorsement for the Educational Program for Intoxication Offenses (§171.0151, §171.0153). - Must complete TDLR-approved instructor training course and examinations/assessments (§171.0155). - Must carry license during instruction (§171.0152(b)).
Curriculum and Materials	- Curriculum developed by TDLR or its authorized representative (§171.0301(a)). - Must use TDLR-approved curriculum and supplemental educational materials (§171.0053(a)(6), §171.0301(b)).
Program Delivery Format	- Can be offered in-person or online (§171.0055). - Must be delivered in the format or location approved by TDLR (§171.0301(b)(3)).

General Program Requirements	DWI Education Program and DWI Intervention Program
Program Structure and Content	- Structure, length, content, and delivery method prescribed by TDLR rules (§171.0053(a)(2)). - Must include criteria for program administration, participant completion, and record maintenance (§171.0053(a)(1),(3),(4)).
Participant Completion	- Participants receive a uniform, serially numbered certificate of program completion upon successful completion (§171.0001(2), §171.0303). - Certificate issuance and submission to courts/agencies regulated by TDLR rules (§171.0303(b)–(d)).
Non-Discrimination	- Providers and instructors prohibited from discriminating against participants based on sex, race, religion, age, national or ethnic origin, or disability (§171.0302).
Program Security and Privacy	- TDLR rules may include requirements for program security, attendance verification, and participant privacy (§171.0053(b)(1)–(2)).
Reporting and Records	- Providers must maintain and submit participant and program records to TDLR (§171.0053(a)(4)–(5), §171.0303(e)–(f)). - Different information may be required for this program (§171.0053(c)).
Fees	- TDLR sets fees for license issuance/renewal, instructor training, materials, and certificate issuance (§171.0054(a)). - Fees are nonrefundable (§171.0054(b)).
License Term and Renewal	- Licenses valid for one or two years, as set by TDLR rules (§171.0251). - Instructors must complete continuing education for renewal (§171.0253).
Code of Ethics	- Providers and instructors must adhere to TDLR’s published code of ethics (§171.0056).
Display and Information	- Providers/instructors must display licenses or provide license numbers to participants and provide TDLR contact information for complaints (§171.0304). - Must provide participants with course fees, schedules, delivery methods, and locations (§171.0305).

General Program Requirements	DWI Education Program and DWI Intervention Program
Audits and Investigations	- TDLR may conduct audits (on-site, remote, or other means) to verify compliance (§171.0354). - Providers/instructors must cooperate with audits and investigations, providing records unless prohibited by law (§171.0354(b), §171.0355).
Prohibited Practices	- No false, misleading, or deceptive advertising (§171.0351(1)). - No issuing/selling certificates to unauthorized persons (§171.0351(2)). - Unlawful transfer or possession of certificates is a Class A misdemeanor (§171.0356, §171.0357).
Disciplinary Actions	- TDLR may deny, revoke, suspend, or reprimand licenses for violations of Chapter 171, fraud, harm to participants, ethics violations, or conduct standards (§171.0352). - Subject to penalties under Occupations Code (§171.0353).

DWI Education Program Requirements

The court-ordered DWI Education Program, mandated under Article 42A.403 of the Texas Code of Criminal Procedure, is designed for first-time DWI offenders as defined under Penal Code §49.04. The program aims to educate participants on the effects of impairment, the legal consequences of driving while intoxicated, and strategies for prevention. The course requires a total of 12 instructional hours, delivered over a minimum of three sessions. Each session must last at least two hours, with breaks included. In-person classes are limited to a maximum of 30 participants and a minimum of three, while online class sizes may vary, provided appropriate monitoring is in place. To assess learning, the program includes both pre- and post-tests. Upon successful completion, participants receive a certificate, which must be submitted within 10 days, in accordance with 16 TAC §90.45(a)–(c).

DWI Intervention Program Requirements

The DWI Intervention Program, also mandated under Article 42A.404 of the Texas Code of Criminal Procedure, is designed for repeat or DWI offenders and emphasizes rehabilitation. The program requires a total of 32 instructional hours delivered over a 15-week period, with no more than 6 hours of instruction per week. Classes are limited to a maximum of 15 participants, while online class sizes may vary, provided appropriate monitoring is in place. The program includes pre- and post-tests, which must be documented in participant records. Upon successful completion, participants receive a certificate, which must be submitted within 10 days, in accordance with 16 TAC §90.46(a)–(c).

Additional Language Challenges in DWI Education and Intervention Program Delivery

The TAC (16 TAC §90.46(b)(7)) requires instructors of the DWI Intervention Program to conduct a minimum of two individual sessions and an individual exit interview with each participant. Additionally, under 16 TAC §90.42(f), instructors must screen each participant using a designated instrument, which must be administered either by the instructor or under their direct supervision and include appropriate referral information.

These requirements are critical for ensuring individualized attention, accurate assessment, and effective rehabilitation. However, they present an operational challenge when participants are LEP individuals. In many cases, instructors may not speak the participant's language, and the regulations do not currently mandate the use of certified interpreters for these one-on-one sessions. This creates a compliance gap: instructors are legally obligated to conduct meaningful individual interactions and screenings yet may be unable to do so effectively without language support.

Instructors must screen each participant using a designated instrument, which must be administered either by the instructor or under their direct supervision and include appropriate referral information.

Instructors may not speak the participant's language, and the regulations do not currently mandate the use of certified interpreters for these one-on-one sessions.



Chapter 2. Analysis and Proposed Solutions

As part of this investigation, practical solutions were identified to address language barrier issues related to court-ordered alcohol education. Various products and approaches are available; however, potential solutions can be organized into three distinct product types, as shown in Table 2, and two delivery methods (i.e., asynchronous or synchronous).

Table 2. Types of Products to Address Language Barriers

Product Type	Barrier Addressed
Interpreter-Based*	• A trained interpreter is present in the classroom (face-to-face or virtually). • At least one interpreter is assigned to each language represented other than English. • Participants listen to the interpreter using headphones. • Translation of written and/or visual materials is provided in addition to the interpreter managing the verbal delivery.

Product Type	Barrier Addressed
Personal Apps	• Phone and/or laptop-based applications interpret verbal communication for the individual user. • Participant listens to interpreter using headphones or reads on device screen. • Translation of written and/or visual materials is provided in addition to the interpreter managing the verbal delivery.
Translation	• Curriculum is provided in a translated format prepared in advance. • For video or virtual content, verbal communication is provided using closed captioning in the participant's language of choice. • Visual content and other course materials are provided to the participant in their language of choice in a digital or paper format.

* Note: TDLR does not consider an interpreter who translates English into another language or who relays training content to participants in their native language to be an instructor. Consequently, the interpreter who translates the learning material into another language is not bound to obtain an instructor license to aid a TDLR licensed education provider and is therefore exempt from licensing regulations. The responsibility for ensuring requirements for training online rests with the licensed court-ordered education provider. It is their responsibility to ensure that all requirements are met, which include interpretation and translation services for those student learners who speak languages other than English.

Synchronous and Asynchronous

There are two major types of virtual education delivery modes: synchronous and asynchronous.

Synchronous Courses

This instructional model involves synchronous learning within a virtual classroom setting, where participants engage in real time with both the instructor and their peers. In this format, the instructor actively monitors student attendance and participation throughout the session. Additionally, course progress and completion are tracked in real time by either the instructor or the designated training provider, ensuring accountability and immediate feedback.

Asynchronous Courses

A self-paced and asynchronous learning model is delivered through a learning management system (LMS). In this format, participants access course materials such as videos, slides, and audio recordings at times that suit their individual schedules. Each section of the course can include minimum time requirements to ensure that participants meet the instructional hour standards typically required in classroom settings. The LMS also supports the delivery of content in multiple languages, allowing users to select the language in which they are most comfortable learning. Attendance and engagement are monitored through digital tracking features that are built into the course platform. Instructors are responsible for reviewing these data to ensure active participation. The LMS maintains records of course completion, which are accessible to both participants and authorized individuals for reporting and compliance purposes.

Strengths, Weaknesses, Opportunities, and Threats Analysis of the Types of Products and Delivery Methods

It is essential to ground proposed solutions in both regulatory requirements and practical considerations to effectively address language barriers in court-mandated programs. The TAC (Title 16, Chapter 90) mandates that course providers accommodate individuals who cannot read or speak English and stipulates that each course must be delivered in a single language. This regulatory framework necessitates the development of parallel course offerings in multiple languages. Evaluating the feasibility and impact of such solutions through a strengths, weaknesses, opportunities, and threats (SWOT) analysis, considering Texas's demographic realities and compliance obligations under the TAC, will provide further insights into practical solutions to the problem, as shown in Table 3 and Table 4.

Table 3. SWOT Analysis for Proposed Solutions

Factor	Hiring On-Site Interpreters — Synchronous Delivery	Translated Curriculum Materials — Synchronous Delivery	Hybrid Model with App-Based Support — Synchronous Delivery	Asynchronous LMS Delivery
Strengths	TAC §90.42(e) compliance, real-time access, high engagement	Long-term access (\$2,500–\$5,000)	Low cost (\$2,500–\$5,000), flexibility	Scalable (\$15,000–\$30,000)
Weaknesses	High costs (\$600–\$1,200), rural scarcity	Upfront costs, update needs	App accuracy, device access issues	High initial costs, literacy gaps
Opportunities	Funding via TAC §90.54 compliance	Grants for scalability	Pilot testing, rural reach	State/federal grants, language access
Threats	Rural access limitations, variable comprehension	Lack of real-time interaction, outdated materials	Variable comprehension, inconsistent delivery	Regulatory delays, digital barriers

Table 4. Cost, Scalability, and Language Coverage Analysis for Proposed Solutions

Solution	Cost	Scalability	Language Coverage
Interpreters	\$600–\$1,200/session	Low (rural limits)	High (real-time)
Materials	\$2,500–\$5,000	High	Moderate (written)
LMS	\$10,000–\$20,000	High	Moderate (digital)
Hybrid	\$15,000–\$25,000	Moderate	High

Solution 1: Hiring On-Site Interpreters

Employing trained interpreters for in-person or virtual classes is one potential solution to regulatory requirement of ensuring provisions for LEP individuals.

Hiring on-site interpreters ensures compliance with TAC §90.42(e), providing real-time, high-engagement translation for LEP individuals among Texas’s 17 percent foreign-born population (U.S. Census Bureau, 2020). One of the drawbacks is the high cost (\$600–\$1,200 per 12-hour course, if translator fees are between \$50–\$100/hour and rural interpreter shortages limit scalability across diverse languages) (U.S. Bureau of Labor Statistics, 2023). Opportunities include aligning with TDLR’s non-discrimination mandate to secure

state funding. Threats involve TDLR penalties for interpreter unavailability and rural access challenges, necessitating partnerships to enhance feasibility.

Solution 2: Translated Curriculum Materials

A second potential solution is to translate materials into priority languages with closed captioning prior to providing synchronous training sessions.

Translated curriculum materials offer strength through long-term accessibility with a one-time investment, reducing reliance on interpreters. The weakness lies in upfront costs (translation costs \$0.10–\$0.20 per word, with a 5,000-word curriculum costing \$500–\$1,000 per language; initial setup for five languages is \$2,500–\$5,000) and the need for periodic updates to reflect legislative changes (U.S. General Services Administration, 2023). Opportunities include broader implementation; TDLR can provide the translated materials to ensure consistency across the state, though the threat of reduced engagement due to absent real-time interaction must be mitigated. Threats also include outdated materials risking non-compliance. This solution supports written comprehension but needs integration with interactive delivery.

Solution 3: Hybrid Model with App-Based Support

Another proposed solution involves the integration of mobile or computer-based interpretation applications to facilitate real-time language translation for program participants. These digital tools are designed to interpret spoken communication and deliver the translated content directly to the user. Participants can engage with the interpretation either by listening through headphones or by reading the translated text displayed on their device screens. In another words, combining in-person classes with translation apps and translated handouts.

The hybrid model's strength is its low initial cost of \$2,500–\$5,000 for 30 users across five languages (app subscriptions cost \$0–\$50 per device annually; handouts cost \$500–\$1,000 per language), providing flexible support. Weaknesses include variable app accuracy. Opportunities for pilot testing to measure rural reach are promising, though threats from inconsistent comprehension due to technology dependence require monitoring. This model also needs clear TDLR guidelines. This approach offers a scalable and potentially cost-effective means of overcoming verbal language barriers, particularly in settings where in-person interpreters are not readily available.

Solution 4: Asynchronous LMS Delivery

One example of a potential solution is to develop an asynchronous LMS course with translated content that maintains the regulatory framework. The administrative code is not clear if the asynchronous mode of instruction is not permissible.

The asynchronous LMS delivery's strength is its scalability, with an upfront cost of \$15,000–\$30,000 for 1,000 users across five languages (LMS licensing costs \$5–\$10 per user annually, with \$10,000–\$20,000 for initial content per language), offering widespread access. Using an LMS approach will also provide additional access for all participants, especially individuals in more remote areas, eliminating limitations on scheduling due to work or personal responsibilities. Weaknesses include high initial costs and potential digital literacy barriers among offenders. It will also require more time for planning and content creation, a pilot period testing the program, and considerations for assessment and scalability. Opportunities for broad language coverage are significant, though threats from regulatory delays necessitate careful planning. This model needs clear TDLR guidelines.

For this option to stay in compliance with TAC's §90.48(a)-(f)'s "robust monitoring," the provider must include time-stamped login tracking, progress logs, and randomized quizzes. Users would need to be assigned unique credentials, with session times logged to verify the 12-hour requirement (TAC §90.42), for example. Module completion data, secured per Texas Department of Information Resources standards, would track participant progress. Quizzes, aligned with TDLR curricula, would require an 80 percent passing rate, ensuring comprehension. These measures, adapted from federal e-learning protocols, guarantee accountability without real-time interaction.

The asynchronous LMS delivery's strength is its scalability.

Addressing the Additional Language Challenges in DWI Education and Intervention Program Delivery

Texas regulations require DWI Intervention Program instructors to conduct two individual sessions, an exit interview, and a supervised screening using a designated tool. While these measures aim to ensure personalized assessment and rehabilitation, they present challenges for participants with LEP. Instructors may not speak the participant's language, and current rules do not mandate certified interpreters, creating a gap between compliance and effective communication. A further complication arises with translated

screening tools, which may lose validity when adapted linguistically or culturally, potentially undermining the accuracy of assessments.

Based on these limitations, several additional proposed solutions have been identified to address language barriers in court-ordered DWI education programs:

- a) **Use of Certified Interpreters:** Mandate or encourage the use of certified interpreters during individual sessions and screenings, especially when instructors are not fluent in the participant's language.
- b) **Culturally and Linguistically Validated Screening Tools:** Develop or adopt screening instruments that are not only translated but also validated for the target population to preserve the tool's reliability and diagnostic value.
- c) **Instructor Training and Support:** Provide training for instructors on how to work effectively with LEP participants, including how to use interpreters and culturally appropriate communication strategies.
- d) **Policy and Regulatory Updates:** Recommend updates to the TAC to explicitly address language access requirements, including interpreter use and validated translated materials.

Translated screening tools may lose validity when adapted linguistically or culturally, potentially undermining the accuracy of assessments.



Chapter 3. Recommendations

Recommendation 1: Translate the Court-Ordered Program Materials and Distribute to Course Providers

TDLR should seek legislative funding to cover the training materials translation costs, and mandate private providers to adopt the multilingual course materials. This initiative would leverage private sector expertise to create translated curricula and closed-captioned videos, aligning with TAC §90.42(e). By reducing financial barriers, TDLR can ensure increased access for LEP individuals to the court-mandated courses, while maintaining quality assurance oversight.

Recommendation 2: Pilot Asynchronous LMS Course Delivery

TDLR, in collaboration with the Texas Department of Transportation (TxDOT), could also fund a pilot program where an organization transforms the existing DWI court-mandated education courses to an asynchronous LMS, incorporating translations for priority languages based on U.S. Census data (U.S. Census Bureau, 2020). This option

might require an amendment to permit digital tracking. Since this format will require additional time and planning, a potential timeline to take into consideration can be found below:

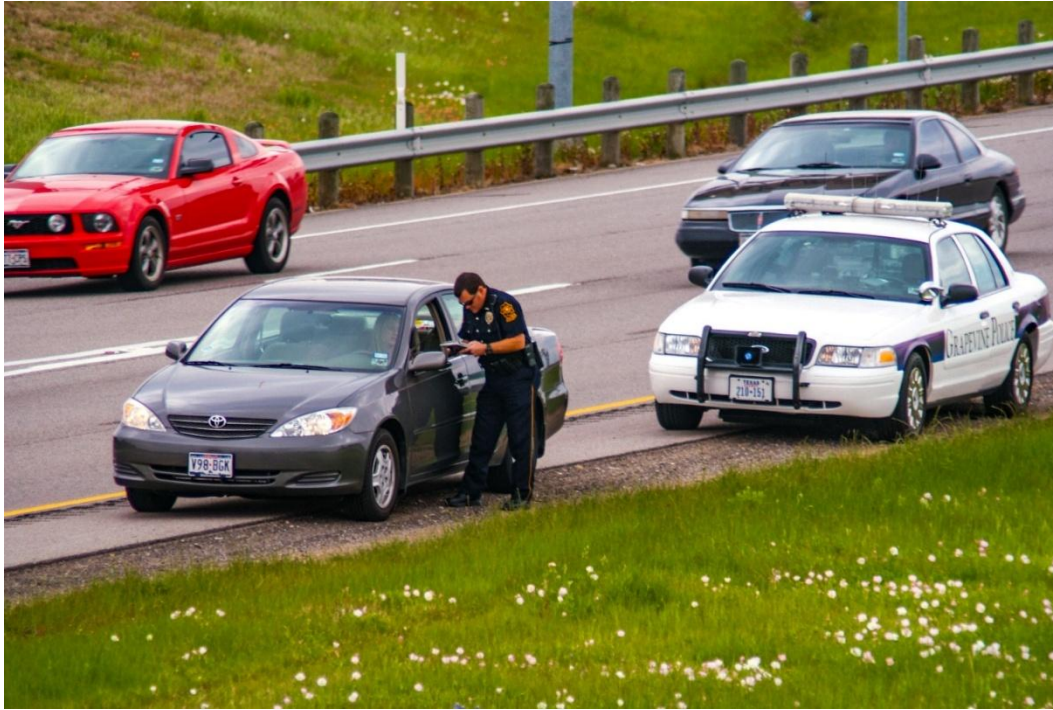
- **Months 1–5: Planning and Content Creation**
 - Determine the state’s LEP population needs.
 - Develop materials and screening tools; update the instructor training manuals to include dealing with LEP individuals.
- **Months 5–9: Pilot**
 - Pilot the course using an LMS platform for a set number of course participants.
 - Deploy the new materials with participants.
 - Assess completion rates and collect user feedback.
- **Months 10–12: Assessment and Scalability**
 - Distribute resources statewide.
 - Update TDLR guidelines, if necessary.

Recommendation 3: Interpreter Training Subsidies

TDLR could pursue funding to subsidize interpreter costs for the required interviews and screenings upon course provider request. These subsidies would offset costs for hiring interpreters to private providers.

Recommendation 4: Public-Private Partnership for Resource Sharing

TDLR could partner with an organization to establish a shared repository of translated DWI education materials, perhaps funded through state grants. This partnership would allow providers to access materials at reduced costs. By reducing duplication, this initiative supports statewide implementation while maintaining TDLR’s oversight and efficiency.



Chapter 4. Conclusion

Language barriers in Texas's court-ordered DWI education programs affect over 17 percent of the state's foreign-born population since these challenges pose a significant risk of increased non-compliance among LEP persons, given the 216,058 DWI cases in 2023 (Texas Office of Court Administration, 2024). The proposed solutions, hiring on-site interpreters, providing translated curriculum materials, offering an asynchronous LMS delivery method, and utilizing a hybrid app-based model, offer TDLR-aligned alternatives with varying feasibility:

- 1) Hiring interpreters is highly feasible in urban areas and leverages immediate engagement. Although, private providers must absorb the \$600–\$1,200 per course cost, recognizing the financial risk and rural limitations.
- 2) Translated materials, with a \$2,500–\$5,000 initial investment, are cost-effective long term. However, providers must anticipate update costs and plan for engagement without real-time interaction.
- 3) Despite a \$15,000–\$30,000 upfront cost, an asynchronous LMS is scalable and accessible, though providers must address digital literacy and regulatory risks, making it a viable long-term option if costs are managed.

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- 4) The hybrid model, with \$2,500–\$5,000 initial costs, offers flexibility and rural reach, but requires providers to mitigate app accuracy and device access challenges.

These recommendations emphasize the development of multicultural materials, pilot programs, subsidies, and partnerships that align with the TAC (e.g., §90.42(e), §90.48) while maximizing the use of existing resources. Private providers must be aware of the associated costs and risks, as outlined in the SWOT analysis, to make informed decisions. Coordination with the courts is essential to ensure that program assignments align with available language options and maintain regulatory compliance. For instance, courts could collaborate with TDLR staff, TxDOT Traffic Safety Specialists, or other relevant entities to identify language translation banks or services capable of providing interpretation and translation for court-ordered alcohol education courses. Establishing strong relationships between courts and court-ordered alcohol education providers and instructors is necessary to ensure that appropriate language accommodation is in place before the course begins.

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