

Providing Language Access Services for Limited English Proficient Parents in Washington Schools

OEO Feasibility Study for Foreign Language Educational Interpreter Training and Certification

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This report was requested by the Washington State Legislature under Second Substitute House Bill 1709 to investigate the feasibility of developing a state foreign language education interpreter training program. This program would create a pool of trained interpreters who would provide services for schools to communicate effectively with their limited English speaking parents. The study includes data relating to the current need for interpreters, information from school districts and community members regarding current practices in the provision of foreign language interpreters, an inventory of interpreter training programs and community resources in Washington, and an overview of applicable federal and state laws.

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Executive Summary

Immigration has been a hallmark of the American experience since its founding. Over the past two decades, the number of children in the United States living with immigrant parents grew 60 percent and accounted for 25% of children under the age of 18.¹ Washington's population continues to become more diverse. The foreign-born population in our state grew by 48% between 2001 and 2011; the largest percentage increase was from Asia (39.8%) and the second largest was from Latin America (30.7%). It is estimated that 46.7% of Washington's total foreign-born population is limited in English proficiency, or "LEP".²

Immigrant families who speak a home language other than English should be considered powerful assets in their children's education and partners with a shared responsibility for student learning and achievement. In addition, the engagement of all families is a matter of equity and fairness, and an essential component of school and student success.

Research has consistently demonstrated that family engagement is one of the most significant factors that cuts across language, socioeconomic, cultural and other barriers to support student academic success. However, parents from immigrant communities experience many obstacles to engaging in their children's education. Both teachers and principals consistently identify family engagement as one of the most challenging aspects of their work, becoming even more difficult when families in their school community come from different cultures and speak a variety of languages. It is imperative we begin to see these challenges as a lack of opportunity perpetuated by policies and practices that make the educational environment "hard to access" rather than viewing LEP parents as hard to reach.

Evidence shows that immigrant families care deeply about their children's education and often do not have the "cultural brokerage" skills to navigate a complex educational system, including the English language skills needed to communicate with school personnel or to understand basic information schools send home. LEP parents may struggle with assisting their child with homework, interacting with their child's teacher, or participating in school activities. Affording LEP parents access to interpreters and translated materials is a requirement of law, and decades of research also confirms that engaging families in their children's education at every stage of development improves school readiness, produces higher gains in academic achievement, and increases graduation rates. In fact, family engagement is a more accurate predictor of student achievement than family income or socio-economic status.

It is critically important that educators implement culturally competent and culturally responsive practices into their daily interactions to meet the needs of the LEP families in their

¹ Migration Policy Institute, 2014 <http://www.migrationpolicy.org/programs/data-hub/charts/children-immigrant-families?width=1000&height=850&iframe=true>

² Migration Policy Institute, 2012 Washington Demographics and Social. MPI Data Hub: <http://www.migrationpolicy.org/data/state-profiles/state/demographics/WA>

communities, which includes the routine use of interpreters in the educational setting and providing written information in a parent's primary language.

Communication is the basis for any good partnership and the formation of strong relationships, and that holds true for every family - including families whose primary language is not English. When schools, families and communities work together, children do better in school, stay in school longer, enjoy their education and improve their lives.

In conducting research and developing this report as part of a feasibility study directed by the Washington state legislature under Substitute House Bill 1709, we learned several important facts:

- More than 250 of the state's 295 school districts reported serving students with non-English home languages in the past school year, and in any given year, any school district may serve one or more families with limited English proficiency.
- Language access is a collaborative endeavor in Washington schools, involving not only teachers, but everyone from school secretaries to IT personnel, Superintendents to federal grant administrators.
- While Spanish is the predominant home language of LEP families, more than 60 other languages are spoken by large numbers of LEP families in Washington. In total, over 200 different languages are spoken in homes across the state.
- There is a clear legal obligation for school districts to provide information to LEP parents in their primary language so that they can be fully engaged in the education of their children.
- Each year districts are required to identify students who are learning English and ensure those students receive appropriate instruction. Districts report annually to the state regarding the number of English Language Learner students they serve. Through the process of identifying ELL students, districts are able to identify some portion of the parents in the district with limited English proficiency. However, most districts do not collect information specifically on the total numbers of LEP families in their district, and most do not have a uniform system available to all school personnel for identifying individual families that indicate they need access to an interpreter for communication with the school.
- Only a handful out of the 157 respondents indicated on a statewide survey that their districts have developed written guidance for staff and families regarding how and when interpretation and translation services should be accessed.
- Interpretation services in educational settings are underutilized. When they are used, they are often provided by untrained school district staff or volunteers who do not have a clear understanding of their role, or the ethics and methodology of interpreting. Most frequently, school districts use persons who have some level of fluency in English and the parents' home language, but are not trained as interpreters (including paraeducators, community volunteers, staff members, family members and students).

- School personnel are largely unaware of how to access and use a telephone language line or video conferencing, examples of two “on-demand” systems for interpreting in any language that can be accessed anywhere in the state by every district.
- When school staff use a telephone language line, most report they have never been trained in how to conduct a conversation or a meeting using an interpreter.
- Most trained, certified interpreters, when used, do not have training in educational terminology. There is no program or requirement that exist in Washington state to provide training specific to the educational setting in professional or higher education coursework for interpreters.
- Reluctantly, some districts have become desperate enough to use students to interpret, sometimes even using students with disabilities to interpret for their parents in IEP meetings.
- Many families report they are not told of their right to ask for an interpreter, they experience long delays in getting access to an interpreter if one is made available, and there are times interpreters don’t speak their native dialect, making communication ineffective.
- School districts report having difficulty finding and recruiting sufficiently qualified interpreters and translators.

“Sometimes when school buses are late to pick up or drop off our children, we can’t call for the issue since there is not interpretation service at [the] transportation department.”

--Chinese speaking parent

Providing language access services to LEP families is a requirement of both federal and state law and prevents discriminatory practices from occurring in schools. Given the challenges with obtaining trained interpreters in the significant variety of languages spoken across our state, it would be prudent for all districts to be prepared to offer comprehensive language access services that include a telephone language line and/or video-conferencing to all LEP families in their district. These “on demand” services allow districts to offer interpretation without delay, in all languages, with trained interpreters. This is critically important for districts that report small numbers of LEP parents and in districts where multiple languages are spoken. No district can offer in-person interpreting in all languages whenever it is needed, so all districts should have this option to meet the needs of its LEP families and its staff.

When face-to-face interpreting is desirable in meetings, conferences and for complex communication situations, it is important that the interpreter offering services to LEP families is trained, certified, understands their role, is culturally and linguistically competent, is fluent in the parent’s native language and dialect, and has educational terminology sufficient to convey the meaning of the information being discussed. Because Washington does not have certification or training for “education interpreters” except in the area of deaf interpretation, it is important for our state to consider a new certification category for this area of educational interpreting and translation.

In conducting this feasibility study, reports from school districts and LEP families have revealed significant gaps in the consistent provision of adequate language access services for families in our public schools. It also has brought to light existing institutional and human resources available in our state, as well as models for interpreter training, certification and ethics, that point to the feasibility of developing foreign language education interpreter training programs designed to create a more robust pool of trained interpreters to communicate with limited English speaking parents in our state's public schools.

Based on the information received from districts and families, OEO makes the following recommendations to improve the ability of public schools to ***better take advantage of currently existing*** language access services:

- 1) The state should require all school districts to follow specific procedures for the **timely and accurate identification of LEP families and their language access needs**. At a minimum, the state should require data collection on the number and preferred home languages of each LEP family in every district.
- 2) The state should **require every school district to adopt a family language access policy** that incorporates procedures for **when and how to access an interpreter** and **prohibits the use of students or children as interpreters** for school-related communication.³ The procedures should include clear, written guidance to all school administrators, teachers and other appropriate staff regarding when and how to access an interpreter (in-person, telephone, and video-conferencing) or translation services in a timely manner, to ensure the district can meet its obligations in communicating with LEP parents.⁴ Utilizing guidance materials created by the U.S. Department of Justice, the state can assist districts in assessing their language access needs and developing appropriately tailored plans.⁵
- 3) The state should **require training for all school staff on how to access and utilize an interpreter**. The state and districts could partner with the Puget Sound ESD and other ESDs to review (and update or expand as necessary) existing training materials, and **make that training available in various formats, including webinars and video conferencing, for all staff in every district** in how to work with an interpreter during a conversation with an LEP parent. (For example, understanding the role of the interpreter, protocols and tips for effective and respectful interactions using an interpreter, including: allowing more time for the conversation; speaking directly to the person you are meeting with, not the interpreter; pausing between ideas; checking for understanding; matching the

³ Dear Colleague Letter: English Learner Students and Limited English Proficient Parents, January 7, 2015, available here: <http://www2.ed.gov/about/offices/list/ocr/ellresources.html>.

⁴ See Sample Model Family Language Access Policy at Appendix F.

⁵ Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs, May 2011, available at: http://www.lep.gov/resources/2011_Language_Access_Assessment_and_Planning_Tool.pdf.

parent's voice, volume and level of eye contact during interpretation; and understanding cultural barriers that may interfere with communication.)

- 4) **Every school district in the state should have easy access to a telephone language line.** Any school or district that is part of the Washington state purchasing cooperative may arrange to use the state contracted phone interpretation services which provide access to interpretation in over 170 different languages on demand. Meaningful access requires that all staff understand what number to call, what account number exists for the district, and have training in how to work with an interpreter. Once a school or district has established an account, users can access interpreters in just a few minutes and immediately begin communicating with a family who speaks limited English.
- 5) **The state should develop professional certification standards for foreign language educational interpreters.** There are currently no professional certification standards for foreign language interpreters in public schools. There are also no specific post-secondary interpreter training programs that incorporate modules for interpreting in educational settings. Both the Department of Social and Health Services and the Washington Courts, however, have established certification standards and assessments. Also Bellevue, Pierce, and Walla Walla Colleges currently offer post-secondary certificate level programs that prepare individuals to take professional certification exams in medical, legal and social services fields. While specific terminology differs across fields, the core competencies of fluency, methodology and the ethics of interpretation and translation are consistent and easily extended into the field of education. The state should work with the State Board for Community and Technical Colleges to encourage existing interpreter certification and training programs to add a module that includes education terminology and interpreting in school settings to their standards and competencies for interpreters. Once the state develops certification and assessment standards for educational interpreters, educational terminology and practices can be incorporated into existing training programs, like those in Bellevue, Pierce and Walla Walla. The state has already articulated a thorough process for certifying educational interpreters for students (and parents) who are deaf and could readily follow a very similar process for foreign language education interpreters.
- 6) The state should require each district to **demonstrate that all individuals used as interpreters with LEP families have received adequate, appropriate training in the specific role of interpreter and demonstrate competency in the various skills required for interpretation.** There are an increasing number of bilingual individuals working in schools and many of these bilingual staff might be ideal candidates for interpreter training so that they better understand the role of an interpreter, demonstrate measured competency, fluency in English and another language, and have an understanding of interpreter ethics, methodologies and educational

- terminology. In educational settings, there are limited professional development opportunities available currently, but they could be expanded. The Puget Sound Educational Service District (PSESD) provides leadership in this area through in-service training for bilingual school district staff who may serve as interpreters. Highline School District has also taken initiative by providing free brief online tutorials for bilingual staff who may be used as interpreters as well as for staff working with interpreters.
- 7) The state should **update and publicize** to districts, families, interpreter training programs, and language access service providers the **existing educational terminology glossaries**, currently available on the Center for Improvement in Student Learning webpage in Somali, Spanish and Vietnamese. **It should also develop these glossaries in the other most common languages spoken among LEP parents in our state.**⁶ Due to the large number of LEP individuals in our state, there is an existing pool of interpreters and translators providing services in various non-educational contexts, who can provide effective services for public schools with additional familiarity with the educational setting and terminology.
 - 8) The state should continue to **expand the bank of “frequently used” translated education documents** in the most common languages spoken by LEP families in Washington, and make them available to all districts for free. The state should also encourage districts to either use the translated model forms provided by the state or to obtain translations of their district-adopted forms that are most frequently used, including, but not limited to, forms relating to students with disabilities, student attendance, harassment, intimidation and bullying, and school discipline.
 - 9) The state should **continue to promote multicultural and multilingual school environments and develop incentives for bilingual graduates from our public schools to pursue certification and employment in the field of education, including in the role of language access providers for LEP parents.** As the number of LEP parents in our public schools grows, so too does the number of students with bilingual abilities. The state has recently taken steps to foster bilingualism in our students by offering Dual Language programs, World Language Credits and the Washington State Seal of Biliteracy on diplomas.⁷ The state can take further steps to encourage our bilingual students to pursue employment in our public schools as bilingual educators, administrators and language access service providers.
 - 10) The state should work with language assistance providers **to increase the access to on-demand video-conferencing interpretation services.** We know that much of our communication is non-verbal and there is great value in the ability to talk face to face. We also know that it is not realistic to expect that qualified interpreters in all of

⁶ <https://www.k12.wa.us/CISL/FamilyEngagement/Communicating/Glossaries.aspx>.

⁷ <http://www.k12.wa.us/worldlanguages/SealofBiliteracy.aspx>.

the different languages spoken by our public school families will be able to be physically present in all of the different regions and corners of the state. By increasing the availability and accessibility of video-conferencing interpretation services, the state can help ensure effective communication between families and schools.

Family engagement is a core component in strategies to eliminate the opportunity gap and appears in social justice goals that seek to disrupt discriminatory systems that perpetuate disparate outcomes based on race, ethnicity, and color. In order to engage in their child's education, parents must be fairly afforded the basic opportunity to share and understand information and concerns that are vital to their child's well-being, health, safety, and education.

Providing effective language access services in schools not only assists educators in their ability to build strong school communities and support student learning, it also assists families to understand what is happening in the school environment, it helps families overcome feelings of apprehension, encourages LEP parents to be part of school-wide events and school community activities, and helps them support all aspects of their children's growth – cognitively, physically, socially and emotionally. Research shows that such partnerships also improve the economic stability and security of families.

It is not enough to focus our language efforts only on students. As a system, our public schools must give educators the tools they need to build strong partnerships with all families, including those with limited English proficiency. The work of education must address the needs of parents and children together, starting with access to the most human aspect of relationships – communication.

I. Defining Parent Involvement: Participation in Regular, Two-way, and Meaningful Communication

Parents with school-aged children want to be, and are increasingly expected to be active participants in all aspects of their children's education – from helping with homework, to understanding and complying with school rules, to developing plans to support learners with special needs. With evidence showing the critical role of this family engagement in student success, more federal and state laws are expressly requiring schools to take steps to communicate with and engage parents.

The Elementary and Secondary Education Act (ESEA) passed in 1965 and amended most recently in 2001 mentions parents more than 300 times. Title I of the ESEA outlines several programs designed to support learning for struggling students, and one entire section of Title I of the Act is devoted solely to parental involvement.⁸ It outlines the core elements that incorporate many of the other parental involvement provisions of the Act. The Act requires that every school district and every school receiving Title I dollars have a written parent involvement policy, and build school capacity to effectively implement the parent policy provisions. This parent involvement policy must be developed jointly with, approved by, and distributed to parents of participating children and the local community. Districts' parent involvement policies must ensure that strong plans for parental involvement are in place in every Title I school, and should be designed to encourage and sustain active parental involvement.⁹

The ESEA provides a specific statutory definition for parent involvement to mean “the **participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities...**”¹⁰

This includes ensuring that parents play an integral role in assisting learning, are encouraged to be actively involved at school and are full partners, included in decision-making and on advisory committees.

“A teacher told her child something that was considered culturally inappropriate and the mother went back to talk to the teacher and principal. The principal refused to provide an interpreter.”

-- Amharic speaking parent

⁸ ESEA, PL 107-110—JAN. 8, 2002 Title I, Section 1118, 20 U.S.C. , available at:

<http://www2.ed.gov/policy/elsec/leg/esea02/107-110.pdf>.

⁹ “Parental Involvement,” [http://www.ncpie.org/nclbaction/parent_involvement.html] NCLB Action Briefs (April 23, 2004).

¹⁰ Title IX, Part A, Sec. 9101(32) [<http://www2.ed.gov/policy/elsec/leg/esea02/pg107.html>] 20 U.S.C. 7801(32). The bulk of the discussion that follows on the general importance of parental involvement is taken from a [Non-Regulatory Guidance Memorandum](http://www2.ed.gov/programs/titleiparta/legislation.html) [<http://www2.ed.gov/programs/titleiparta/legislation.html>] on NCLB issued by the U.S. Department of Education (April 23, 2004) [hereinafter “NCLB Non-Regulatory Guidance”]. The definition of “parental involvement” is found at Item A-1, “What is parental involvement under No Child Left Behind?”

Regular communication with parents at all levels of the education system – state education agencies, districts and schools – is described as “the foundation of effective parent involvement.”¹¹ The Act specifies that communication should be in an “understandable” format and, “to the extent practicable,” in a language that parents can understand.¹² The broad scope of the communications activities included within these requirements is illustrated in an appendix to the Guidance, “Key Title I, Part A Parental Notice Requirements.”¹³

Guidance from the U.S. Department of Education on implementation of the parent involvement provisions advises that schools “must implement effective means of outreach” to parents of LEP students to inform them of how they can be involved in the education of their children, and more specifically, to be “active participants” in assisting children to reach proficiency in English as well as to achieve high levels and meet state standards in core academic subjects.¹⁴ Outreach to parents also includes “sending notice of opportunities for, and holding, regular meetings for the purpose of formulating and responding to recommendations from parents of Title I, Part A students.”¹⁵

Various other federal and state laws ensure that parents receive notice of their rights in relation to their child's school matters as well as notice of how their child is doing at school. The Family Educational Rights and Privacy Act (FERPA), for example, was enacted to protect the confidentiality of education records and to assure the right of parents to access them.¹⁶ FERPA not only requires that parents be allowed to review their children's educational records, but that schools “respond to reasonable requests for explanations and interpretations of the records.”¹⁷ Washington state law requires that districts give notice to parents and guardians of immunization requirements,¹⁸ students' unexcused absences,¹⁹ and, for students in eighth through twelfth grades, notice of student assessments, graduation requirements, and additional district graduation requirements.²⁰

¹¹ Title IX, Part A, Sec. 9101(32) [<http://www2.ed.gov/policy/elsec/leg/esea02/pg107.html>] 20 U.S.C. 7801(32); see also [Non-Regulatory Guidance Memorandum](#) regarding Family and Community Engagement issued by the U.S. Department of Education (April 23, 2004) [hereinafter “NCLB Non-Regulatory Guidance”], available here: [<http://www2.ed.gov/programs/titleiparta/legislation.html>].

¹² NCLB Non-Regulatory Guidance, A-8.

¹³ NCLB Non-Regulatory Guidance, Appendix B [the full text of this chart is attached as Appendix B-4].

¹⁴ NCLB Non-Regulatory Guidance, C-8.

¹⁵ *Ibid.*

¹⁶ 20 U.S.C. 1232g(e), prohibiting distribution of funds to any educational agency or institution “unless [it] *effectively* informs the parents of students, or the students, if they are eighteen years of age or older, or are attending an institution of postsecondary education, of the rights accorded to them by [FERPA].” [Emphasis supplied.]; 34 CFR 99.7(b)(2)(a district has “flexibility to determine how to effectively notify” LEP parents, provided the notice “is consistent with applicable civil rights laws.” 61 Fed.Reg. 59,293 (Nov. 21, 1996).

¹⁷ 20 U.S.C. 1232g(a)(1)(A) and (B); 34 CFR 99.10(a).

¹⁸ RCW 28A.210.120.

¹⁹ RCW 28A.225.020

²⁰ RCW 28A.320.208.

These are only a few examples of situations in which districts are mandated to provide notice to parents – the number and types of situations in which districts voluntarily work to communicate helpful and important information to families is vastly broader.

II. Defining “Language Access Services”

The term “language access services” is used throughout this report to encompass the broad spectrum of services used and required to facilitate communication and understanding between speakers of different languages.

A. Interpretation, Translation and Notice of their Availability

While the terms interpretation and translation are often used interchangeably in colloquial conversation, they refer to two different types of communication: oral and written. Both are necessary components of a comprehensive language access plan, which must also include means for notifying individuals of their availability.

Interpretation involves the immediate communication of meaning from one language (the source language) into another (the target language). An interpreter conveys meaning orally, while a translator conveys meaning from written text to written text. These services are commonly provided through face-to-face (in person) interpreting, video or telephone interpreting, “sight” (oral) translation of written materials, and “standard” translation (conveying written materials from one language into written materials in another language). The term “language access services” can be used to reference interpretation and/or translation services, used separately or together. The term “language access service provider” is used to reference a person providing the language access service, i.e., the interpreter or the translator. While some individuals are trained in both interpretation and translation, they require significantly different skills and abilities.

Providing notice to limited English proficient individuals – in a language they can understand – of the availability of free interpretation and translation services is one of the key components of a successful language access plan.²¹

B. “Limited English Proficiency”

Individuals with “limited English proficiency” (LEP), are persons who are unable to communicate effectively either verbally or in writing, or both, in English because their primary language is not English and they have not developed fluency in the English language.²² A

²¹ See LEP.gov's self-assessment and planning tool: <http://www.lep.gov/selfassesstool.htm>.

²² <http://www.hhs.gov/ocr/civilrights/resources/specialtopics/lep/>. Also see, [LEP.GOV, a Federal Interagency Website with FAQs, explaining that](#) “Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or ‘LEP.’ <http://www.lep.gov/faqs/faqs.html#OneQ1>.” The U.S. Department of Justice (“DOJ”) has stated, “Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand

person with limited English proficiency may have difficulty in one or more of four domains of language: speaking, listening, reading and writing.²³ Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. In many situations, fluency with all four domains is necessary for effective communication; therefore, it is not necessary that a person be of limited proficiency in all domains to be considered LEP.²⁴

Whether a parent is considered LEP may vary with the service, benefit or encounter at issue. That is, “LEP status may be context-specific.”²⁵ For example, a parent “may have sufficient English language skills to communicate basic information,” but may not have sufficient skills to communicate the detailed, specific information that may be needed in a particular context.²⁶ It is the context of the situation, and the parent’s level of proficiency, that matters. Thus, even a parent who can communicate effectively with school staff regarding routine matters may require different services when communicating in the context of a disciplinary hearing, or an individualized education program (IEP) meeting where complex and technical information regarding the child’s disability will be discussed.

It is also critical to remember that there are many families in which children have developed fluency in English, while their parents primarily speak a different language and have limited English proficiency. In many cases, language access services will be needed to communicate with parents whose children have not been identified or received services as ELL, or have received services and exited from an ELL program.²⁷

English can be limited English proficient, or ‘LEP,’ entitled to language assistance with respect to a particular type of service, benefit, or encounter.” [DOJ Recipient LEP Guidance](#), 67 Fed. Reg. 41455 (No. 117, June 18, 2002) at 41459 [<http://www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf>].

²³ According to the [Center for Adult English Language Acquisition](#) [http://www.cal.org/caela/esl_resources/collections/factsheets.html], the [National Reporting System](#) [<http://www.nrsweb.org/>] assesses proficiency across six levels: speaking/listening, reading/writing, and functional and workplace skills. General research on language acquisition suggests that it takes from 5-7 years to go from not knowing any English at all to being able to accomplish most communication tasks necessary using English.

²⁴ See DOJ Recipient LEP Guidance, 67 Fed. Reg. at 41457, 41459 (defining LEP individuals as those with “a limited ability to read, write, speak or understand English”) (emphasis added).

²⁵ See, for example, DOJ [Planning Tool](#): [http://www.lep.gov/resources/LEP_Corrections_Planning_Tool.htm] Considerations for Creation of a Language Assistance Policy and Implementation Plan for Addressing Limited English Proficiency in a Law Enforcement Agency.” (“LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address, etc.) but may not have sufficient skills to communicate detailed information (e.g., medical information, eyewitness accounts, information elicited in an interrogation, etc.) in English.”).

²⁶ *Id.*

²⁷ Dear Colleague Letter: English Learner Students and Limited English Proficient Parents, January 7, 2015, available here: <http://www2.ed.gov/about/offices/list/ocr/ellresources.html>.

III. Demographics of Parents with Limited English Proficiency in Washington State

Washington State's LEP population ranks 10th in the nation and constitutes more than eight percent of its total population.²⁸ Washington State's general LEP population increased by 202.1% from 1990 (165,000 persons) to 2010 (512,000 persons), causing the State to rank ninth in the nation in its rate of growth and 10th in the nation among those states with the largest number of LEP individuals.²⁹ During this time, the State's LEP population grew from 3.7% of the total (165,202 out of 4.5 million) to 8.1% of the total 511,576 out of 6.3 million).³⁰

During approximately the last ten years, the number of students with non-English home languages increased by 25%. The Office of the Superintendent of Public Instruction (OSPI) data identifies 236 different home languages among ELL students, but, as would be expected, the number of speakers varies considerably and falls into fairly distinct categories. Of the approximate 64,000 identified English Language Learner (ELL) students, only nine languages – Spanish, Russian, Vietnamese, Somali, Chinese, Ukrainian, Korean, Tagalog, and Arabic – are spoken by more than 1,000 students; only Spanish is spoken by more than 4,000 students.³¹

ELL students constituted 9.0 percent of Washington State's total enrollment (94,155 students of 1,050,284 total enrollment) in the 2012-2013 school year.³² This reflects an increase from a percentage of 6.9 percent (65,889 of 956,027) since the 2004-2005 school year.³³

²⁸ See LEP Data Brief from the Migration Policy Institute, available here:

<http://www.migrationpolicy.org/research/limited-english-proficient-individuals-united-states-number-share-growth-and-linguistic>.

²⁹ LEP Data Brief, Immigration Policy Institute, "Limited English Proficient Individuals in the United States: Number, Share, Growth, and Linguistic Diversity," *National Center on Immigrant Integration Policy* (December 2011) at 4-5; available at: <http://www.migrationpolicy.org/research/limited-english-proficient-individuals-united-states-number-share-growth-and-linguistic>.

³⁰ *Id.* / *Source:* Authors' tabulations from the US Census Bureau's 2010 American Community Survey (Table B16001. *Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over*) available at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml> and 1990 Decennial Census (Table 1. *Language Use and English Ability, Persons 5 Years and Over, by State*) available at <http://www.census.gov/hhes/socdemo/language/data/census/table1.txt>

³¹ See data accessible from the OSPI k-12 Data & Reports page, here: <http://data.k12.wa.us/PublicDWP/Web/WashingtonWeb/Home.aspx>.

³² Although there are multiple sources providing data concerning the number of LEP *persons* in the United States, see, for example, http://www.lep.gov/demog_data/demog_data.html, most data sources concerning education tend to focus on the number and distribution of ELL/ESL *students* - for example, to determine eligibility for programs such as English as a Second Language, High Intensity Language Training, and bilingual education.

³³ Data from OSPI website, <http://data.k12.wa.us/PublicDWP/web/Washingtonweb/DataTables/ELLDTViewer.aspx>. A map illustrating distribution of ELL students by school district is attached as Appendix A-1.

A. Estimated Number of LEP Parents of Washington Public School Students

While there are some data available, there is no comprehensive data that can tell us the number or illustrate the distribution by geography or language group of LEP parents in Washington public schools.³⁴ This is in part because there is no controlling state definition of “LEP Parents” and also because currently there is no mandate that data on LEP Parents be reported to OSPI. Some data, however, is collected through a voluntary question included on surveys regarding students’ primary languages.

Districts are required to adopt written procedures for the identification of each *student's* primary or first language and need for English Language instruction.³⁵ OSPI’s Migrant and Bilingual Education Office has developed a [Home Language Survey](#) (HLS), which is available in 36 languages³⁶ (in addition to [English](#)). While not all school districts are required to use the Home Language Survey in its entirety, school districts are required to ask the following two questions:

- What language did your child first learn to speak?
- What language does your child use the most at home?

Responses to these questions for each student are reported to the state through CEDARS, the Comprehensive Education Data and Research System.³⁷

There are also two questions concerning the *student's* preferred language of communication,³⁸ and one question inviting the *parent(s)* to indicate language preference, and by implication English language proficiency.³⁹ OSPI collects district level data twice each year on the number

³⁴ Conversations with [Migrant and Bilingual Education](#) [<http://www.k12.wa.us/Migrantbilingual/default.aspx>], Office of the Superintendent of Public Instruction (Oct. 3, 2014).

³⁵ The state procedures are found at:

<http://www.k12.wa.us/MigrantBilingual/pubdocs/TBIPGuidelinesIdentification.pdf>

³⁶ Amharic; Arabic; Bosnian; Burmese; Chinese; Chuukese; Farsi; French; Hindi; Hmong; Ilocano; Japanese; Karen; Khmer; Korean; Laotian; Marshallese; Nepali; Oromo; Portuguese (Brazilian); Punjabi; Romanian; Russian; Samoan; Somali; Spanish; Swahili; Tagalog; Tamil; Telugu; Thai; Tigrinya; Turkish; Ukrainian; Urdu; Vietnamese.

³⁷ OSPI makes this data publically available at:

<http://data.k12.wa.us/PublicDWP/Web/WashingtonWeb/Home.aspx>.

³⁸ Ques. 2: What language did your child first learn to speak? Ques. 3: What language does YOUR CHILD use the most at home? Both of these questions are referenced to WAC 392-160-005: “*Primary language*” means the language most often used by a student (not necessarily by parents, guardians, or others) for communication in the student's place of residence.

³⁹ “If available, in what language would you prefer to receive communication from the school?” OSPI Home Language Survey.

of ELL students, the number of students with non-English home languages, and the different languages spoken in students' homes.⁴⁰

The "Number of Students with Non-English Home Language" refers to *all* students and is inclusive of, but not limited to, those who are receiving ELL services. Among those families where students report that a non-English language is spoken in the home, some numbers of the parents are bilingual – that is, they speak a non-English language at home and are also proficient in English. Because we know, however, that a significant number of students who are proficient in English have parents with limited English proficiency who need language assistance in order to communicate with schools, the number of students with a Non-English Home Language is more likely to be a useful proxy than the number of ELL students, for estimating the number of LEP parents.⁴¹

OSPI data show that, for the 2004-05 through the 2012-13 school years, the number of students with non-English home languages increased from about 160,000 to almost 200,000, a 25% increase.⁴² By comparison, the number of ELL students increased by only 14%.⁴³ The following chart shows the total numbers of students in the state public schools with a non-English home language reported in the last six years.

School Year	Number of Students with Non-English Home Language (All Languages)	Number of ELL Students
2012-13	219,263	94,155
2011-12	204,412	87,696
2010-11	193,780	89,225
2009-10	178,181	81,662
2008-09	166,138	84,662
2007-08	159,141	82,544

⁴⁰ <http://data.k12.wa.us/PublicDWP/web/Washingtonweb/DataTables/ELLDTViewer.aspx>, English Language Learners - Languages Spoken by Washington Students. A tabulation listing the 236 languages, ranked by number of students, is reproduced at Appendix A-2.

⁴¹ By comparison, for example, according to the Washington State Education Research & Data Center, in 2000 there were approximately 180,000 Washingtonians who spoke English "less than well" or "not at all," the vast majority of them in the 20-44 age range, which comprises those most likely to have school-aged children. [English Language Learners in Washington](http://www.erd.c.wa.gov/faq/pdf/raq001_ell.pdf) [http://www.erd.c.wa.gov/faq/pdf/raq001_ell.pdf], Education Research & Data Center, Office of Financial Management, State of Washington.

⁴² See Data Table for English Language Learners-Languages Spoken by Washington Students: <http://data.k12.wa.us/PublicDWP/web/Washingtonweb/DataTables/ELLDTViewer.aspx>.

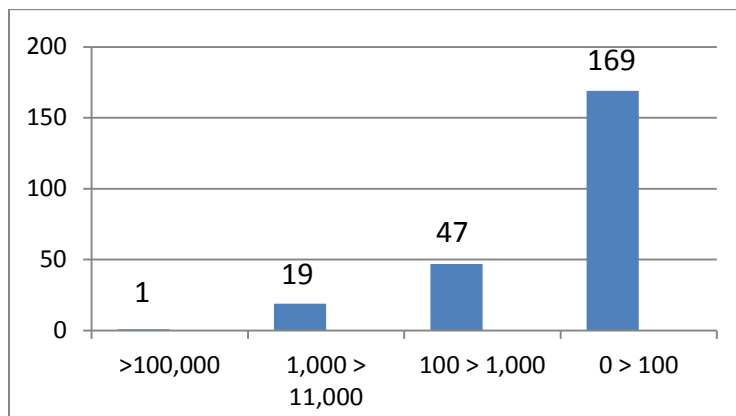
⁴³ See Data Table for English Language Learners-Number of English Language Learners (ELL): <http://data.k12.wa.us/PublicDWP/web/Washingtonweb/DataTables/ELLDTViewer.aspx>.

B. Classification of Language Groups

The OSPI data indicates that as many as 236 different languages are spoken by families of our state's public school students, but the number of speakers varies considerably and falls into fairly distinct categories. Not unexpectedly, Spanish is by far the most frequently spoken identified home language, with slightly more than 134,000 identified speakers within the state. On the other end of the spectrum, 169 languages are identified as being spoken by fewer than 100 speakers within the state. Of the remainder, 19 languages are spoken by 1,000 to 11,000 persons and 47 spoken by from 100 to 1,000 persons.

Number of Speakers	Number of non-English Languages Spoken at Home
> 100,000	1
1,000 - 11,000	19
100 - 1,000	47
0 - 100	169

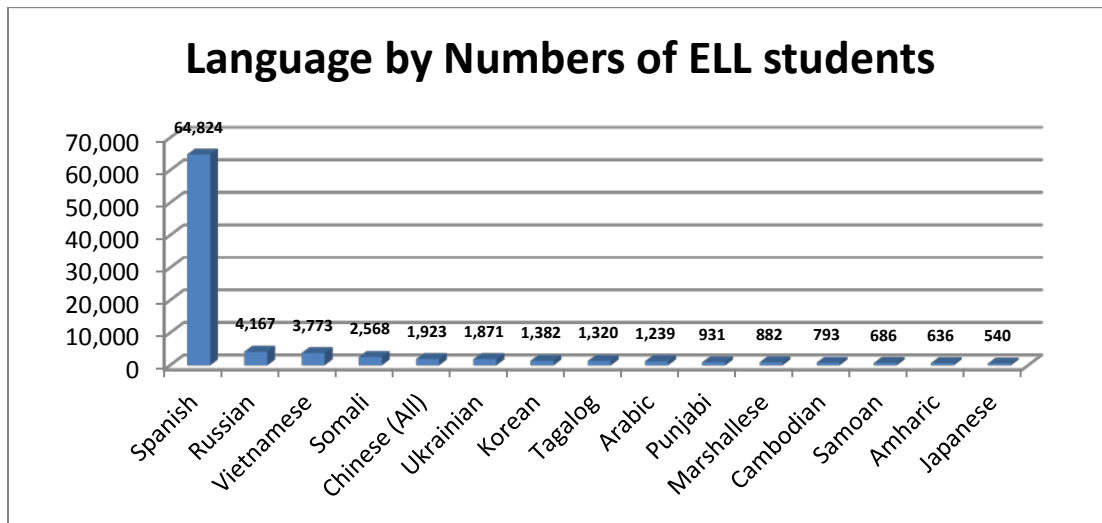
The following graph provides another illustration of the relative distribution of the language groups:



Number of languages grouped by number of speakers, e.g. 1 group having more than 100,000 speakers.

This wide disparity is reflected in the distribution of languages among ELL students. As illustrated in the following chart, except for Spanish, no non-English language is spoken by more than 5,000 students and the vast majority of languages are spoken by fewer than 1,000.⁴⁴

⁴⁴ Appendix A-2.



C. Geographic Distribution of Language Groups by School District

The geographic distribution of home language groups among the 295 school districts in Washington State can be viewed in at least two ways: by the raw number of students with non-English home languages and by the percentage of families within the district reporting non-English home languages.⁴⁵ Significant differences appear once the 42 districts reporting no non-English home languages are removed.⁴⁶ School districts reporting the largest *number* of students with non-English home languages are:

School District	Numbers of Students Reporting Non-English Home Languages (Total = 391,623 Students)
Seattle Public Schools	12,525
Kent School District	10,535
Pasco School District	9,641
Yakima School District	8,971
Highline School District	7,679
Bellevue School District	7,330
Federal Way School District	7,110
Renton School District	6,107

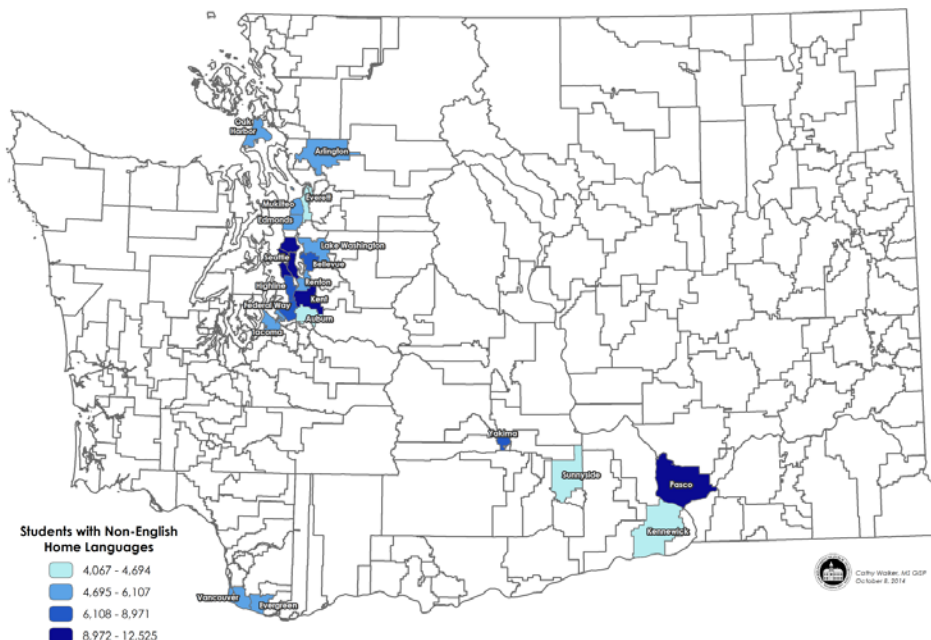
⁴⁵ A complete listing comparing both views is attached to this report as APPENDIX A-3

⁴⁶ Those districts were: Nespelem, Almira, Benge, Bickleton, Carbonado, Colton, Crescent, Creston, Curlew, Damman, Dixie, Evergreen (Stevens), Garfield, Grapeview, Griffin, Inchelium, Index, Keller, LaCrosse, Lamont, Mary M Knight, Mill A, North River, Oakesdale, Odessa, Onion Creek, Orchard Prairie, Palouse, Queets-Clearwater, Rosalia, Selkirk, Shaw Island, Skamania, Sprague, Stehekin, Steptoe, Summit Valley, Taholah, Thorp, Washtucna, Wishkah.

Oak Harbor School District	5,997 ⁴⁷
Arlington School District	5,783 ⁴⁸
Tacoma School District	5,559
Edmonds School District	5,483
Evergreen School District (Clark)	5,444
Lake Washington School District	5,363
Mukilteo School District	5,319
Vancouver School District	5,061
Auburn School District	4,694
Everett School District	4,518
Kennewick School District	4,178
Sunnyside School District	4,067

As can be seen in the following map, these districts are relatively concentrated in the Puget Sound area and the lower Yakima Valley:

**Top 20 School Districts with Highest Number
of Students Having Non-English Home Languages**



⁴⁷ This is the number reported in the State k-12 Data Reports for English Language Learners – Languages Spoken by Students, but it appears to be incorrect. Data included in the state report card shows that the total student population for this district in October 2012 was only 5,611, less than the 5,997 reported students with non-English home languages.

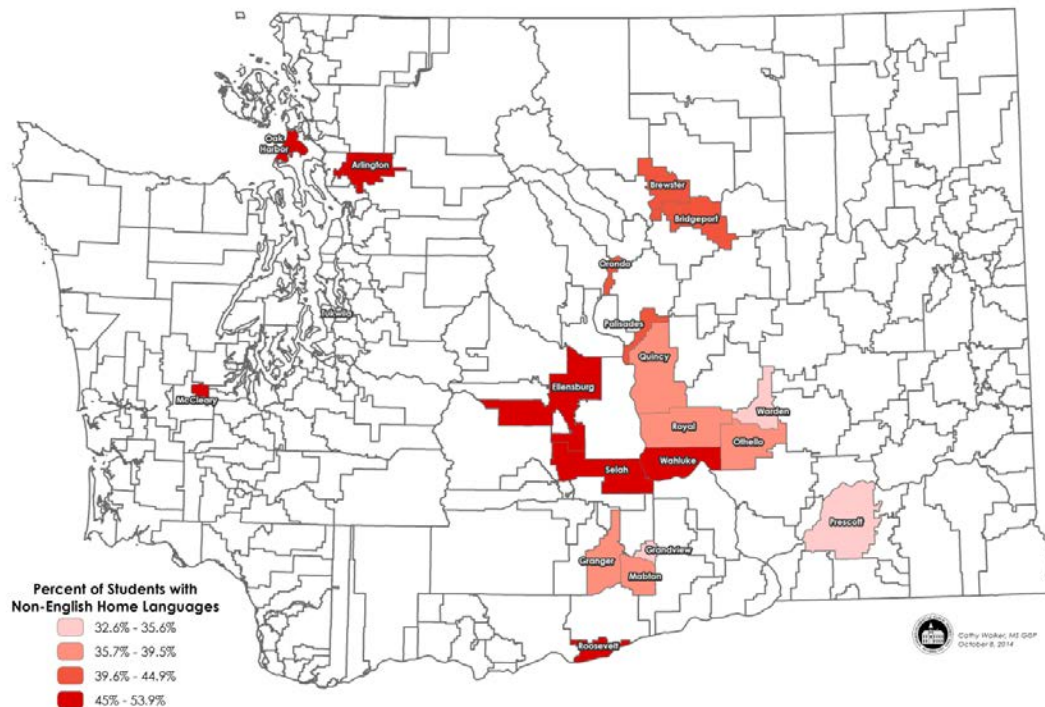
⁴⁸ This also appears to be an incorrectly reported number. Arlington School District data on the Washington State Report Card shows a total of only 5,487 students in the October, 2012 student count, compared to the 5,783 students with non-English home languages reported in the k-12 Data Reports for English Language Learners.

By contrast, the school districts reporting the largest *percentages* of families with non-English home languages are:

School District	Percent of Student Population Reporting non-English Home Languages (Total = 40,448 students)
Selah School District	53.9
Oak Harbor School District	53.5
McCleary School District	53.2
Ellensburg School District	52.2
Arlington School District	52.2
Roosevelt School District	51.8
Wahluke School District	49.5
Orondo School District	44.9
Palisades School District	44.7
Brewster School District	43.1
Bridgeport School District	43.0
Royal School District	39.5
Quincy School District	38.5
Othello School District	36.9
Mabton School District	36.8
Granger School District	36.0
Prescott School District	35.6
Tukwila School District	35.0
Warden School District	33.1
Grandview School District	32.6

Following is a map showing the geographical distribution of these school districts within the state:

Top 20 School Districts with Highest Percentage of Non-English Home Languages



Most of the districts with the highest percentages of students with non-English home Languages have relatively small total student populations. It is also worth noting that the total number of students with non-English home languages in the first group of districts (those with highest raw numbers) is almost ten times more than the total number of students with non-English home languages reflected in the second group of districts (those with highest percentages): at 391,623 v. 40,448.

D. Summary of Demographics of LEP Parents in Washington

Data and information collected and reviewed for this study show that:

- Washington State LEP parents are geographically concentrated in relatively few school districts; Spanish-speaking parents are by far the largest group of LEP parents in the State, and only nine other non-English languages are spoken by 1,000 or more ELL students;
- In large districts like Kent and Seattle that serve the largest total numbers of students with non-English home languages, even while they must provide access to families speaking more than 100 different languages, there are still relatively significant numbers of parents who share a common home language. For example, in Seattle in 2012-13, among students reporting a non-English home language, 25% identified Spanish as their

home language; 16% Vietnamese; 15% Somali; 8% Chinese-Cantonese and 5% Tagalog. In the Kent School District, 32% of students reporting non-English home languages identified Spanish as a home language; 8% Vietnamese; 8% Punjabi; 7% Ukrainian; and 6% Somali.⁴⁹

- In many of the districts reporting the highest percentages of their student population with a non-English home language, the majority of those students report Spanish as their non-English home language. In Selah School District, for example, among students reporting a non-English language spoken at home, 99.7% identified that language as Spanish.

These patterns of geographic and language group concentrations of LEP parents have important implications both for districts' legal obligations and for the availability of cost-effective options in providing language access services. Considering only the total number of different home languages spoken by parents of public school students can make the project of ensuring adequate language access for every family and school daunting, to say the least. The availability of telephone and video conferencing interpreter services in more than 170 languages, however, means that any school can effectively communicate with each of its families even if they serve only a small number of families with multiple different languages.

Additionally, the significant numbers of individuals who share the most common home languages makes it possible for districts to pool resources for translation and interpretation services. The geographic concentration of LEP parents makes it more practical for districts with the highest percentages of LEP parents to employ bilingual staff and trained interpreters and translators directly, reducing overall costs for services.⁵⁰

IV. Current Practices and Existing Resources in Washington State Public Schools

To gather information for this feasibility study, OEO created and sent a survey to school personnel and convened focus groups of LEP families. OEO also looked for examples of written policies or guidance memos from districts in the state. While funding for this study did not permit an exhaustive search for all currently existing language access practices and resources,

⁴⁹ District level data can be viewed at OSPI's k-12 Data and Reports page, here:

<http://data.k12.wa.us/PublicDWP/web/Washingtonweb/DataTables/ElIDTViewer.aspx>.

⁵⁰ There is an important distinction between bilingual employees and interpreters or translators. In many cases, with appropriate training and clarification of roles, bilingual employees can also serve as interpreters for other staff. It is critical, however, that any person acting in the role of interpreter maintains the core ethical standards of: precision, competency, confidentiality and avoiding conflict of interest. See, for example, introductory interpreter training materials for bilingual individuals from the Speak Your Languages project by the Highline School District, here: <http://www.speakyourlanguages.com/courses/selfstudy1/index.htm> and linked to OSPI's page on Interpretation and Translation Services for School Districts, here: <https://www.k12.wa.us/Equity/Interpretation.aspx?printable=true>. Even when bilingual employees are not serving as interpreters or translators, they provide critical access to families with limited English proficiency and aid the district in meeting its obligations to communicate effectively with LEP parents by providing points of contact with the school.

this provides a helpful picture of ways that districts in our state are currently working to ensure adequate language access services to their LEP parents and areas where significant gaps in services remain.

A. Districts' Responses to Survey on Current Language Access Practices

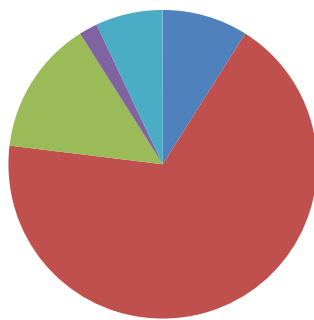
In Summer 2014, OEO and OSPI partnered to create and send a survey to school personnel in Washington that focused on language access for families with limited English proficiency. We received 157 responses from districts across the state.⁵¹ The individuals responding on behalf of districts represented a range of positions, from IT specialists to bilingual specialists, special education teachers to superintendents. The largest numbers of responses came from principals, supervisors, and program directors. Every ESD in Washington participated in the survey, with the greatest representation coming from ESDs 113 (27 respondents) and 189 (25 respondents).

The survey responses provide a valuable illustration of the ways in which districts currently attempt to identify parents needing language access services and provide notice to parents of the availability of those services. The survey responses also shed light on the types of situations in which districts commonly provide interpreter services and the individuals districts commonly rely upon to provide interpretation.

1. Means for Identifying LEP Parents and their Language Access Needs

The majority of respondents indicated that they rely on a variety of means, including enrollment/registration documents and home language surveys to identify parents with language access needs. Only three of the 157 respondents did not include either enrollment/registration or home language surveys among the sources they relied upon for identifying LEP parents; in those districts, they identified family requests, teacher feedback and family/community nights as means for identifying families in need of language assistance.

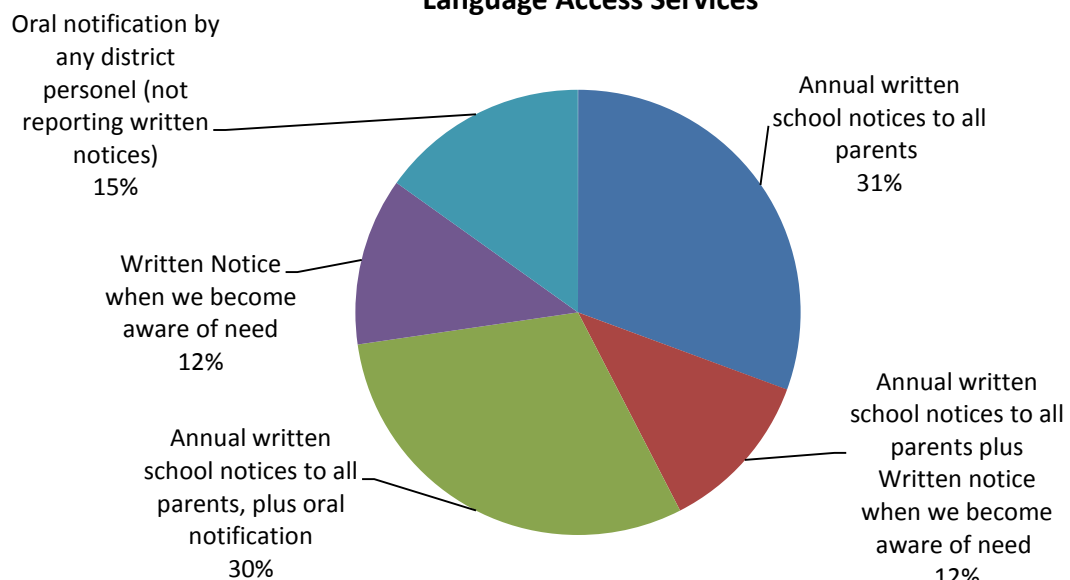
⁵¹ See Appendix D-2 for complete data on OSPI survey.

Means for Identifying Parents Needing Language Assistance

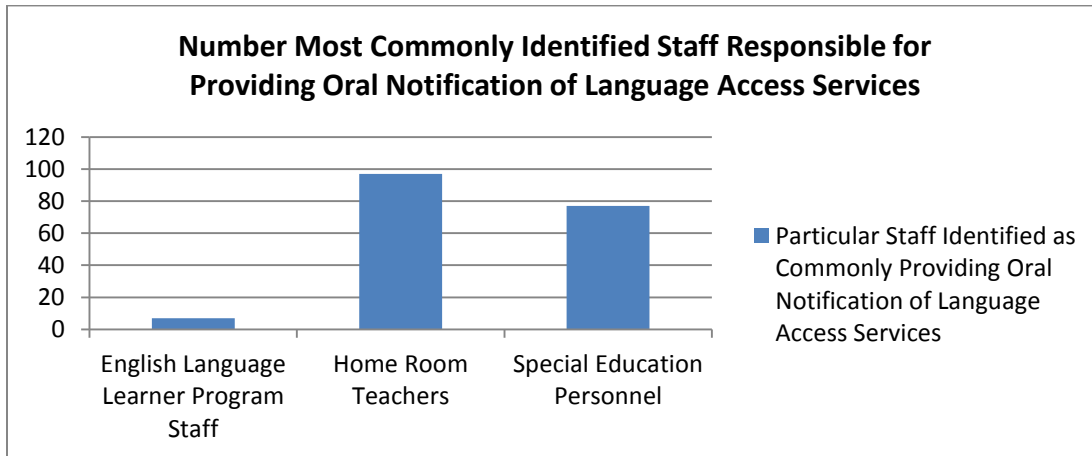
- Enrollment/Registration only 9%
- Enrollment/Registration, Home Language Survey and Other (family community night, family request, teacher feedback, students) 68%
- Enrollment/Registration and Other (teacher feedback, family community night, family request) 14%
- Family Request and Other (family community night, teacher feedback) 2%
- Home Language Survey and Other (family request, family/community night, teacher feedback) 7%

2. Notifying Parents of the Availability of Language Access Services

To inform parents of the right to and availability of free language access services, the majority of responding districts report providing written notice, either through annual notices provided to all parents, written notice to specific parents when the district becomes aware of the need, or both. Some respondents did not identify any written methods of notifying parents but reported a variety of individuals who provide oral notification.

Reported Methods of Providing Notice to Parents of Availability of Language Access Services

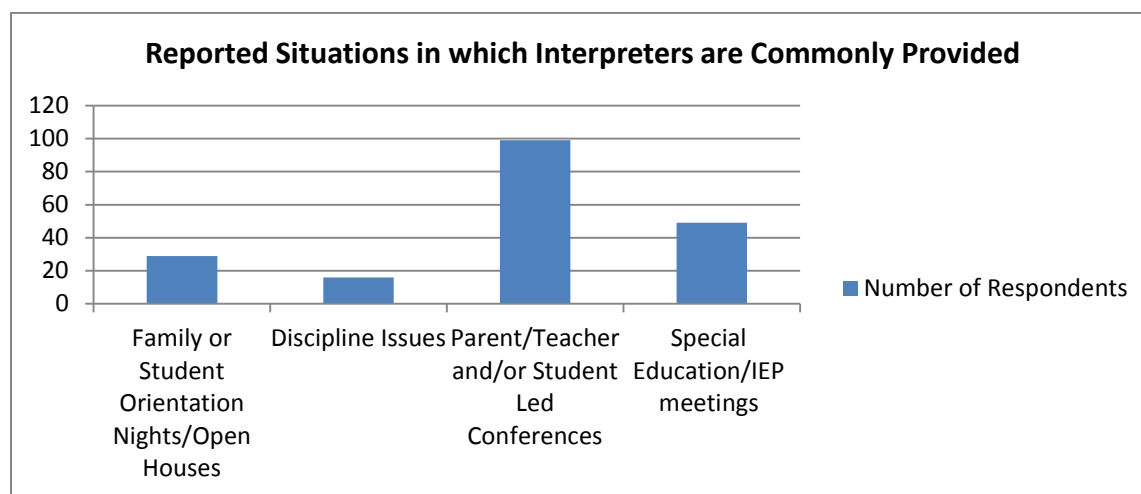
When asked to identify which staff provided oral notification of language access services, the most commonly identified were home room teachers and special education personnel. The frequency with which each was listed is shown in the graph below.



3. Situations in which Interpreters are Commonly Provided

Districts reported a variety of instances in which school and district staff rely on interpreters to communicate with parents. According to survey responses, there is a wide range in practice, from never providing interpretation or providing it only on request, to providing it on a daily basis, during school meetings and events, including extracurricular or summer programs.

The most common scenario for providing language access is when parent and student rights are involved (*e.g.*, discipline, IDEA, absenteeism) or for events targeting parental participation (*e.g.*, family nights, orientations). The situations identified most often among respondents to the survey were: parent conferences, special education related meetings and family nights or open houses. Student discipline matters were also identified by a number of respondents.



Respondents also provided information regarding the types of documents that are commonly translated into other languages for parents. Several responses explained that their district relies exclusively on translated materials made available by OSPI; others explained that all of their school's correspondence with parents is available in both English and Spanish. Some reported the availability of translations in Spanish and at least one other language, but many noted that translations are available in Spanish only.

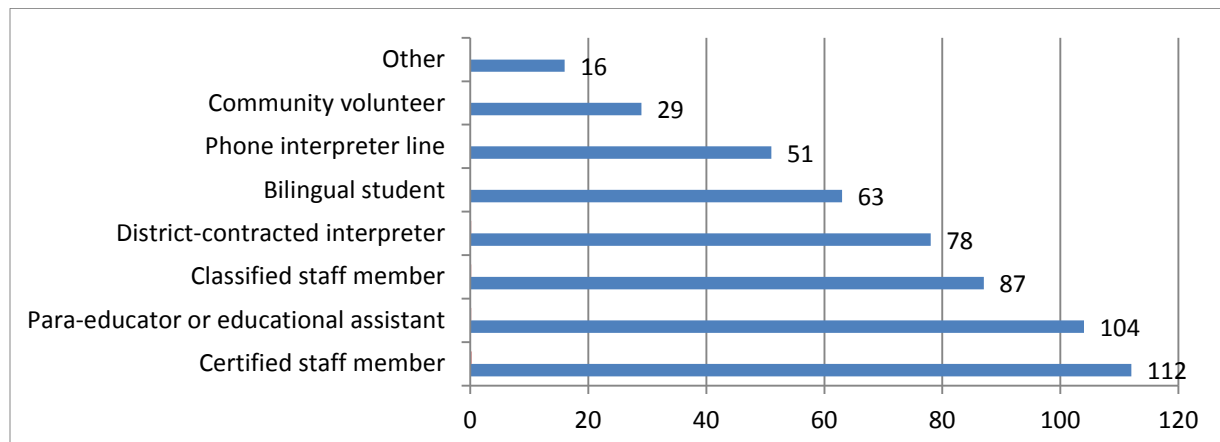
4. Requests for Language Access Services

The demand for language access is tangible. Survey respondents were asked to indicate the frequency of requests for interpretation and/or translation either as none or within ranges of: 1-15; 16-35; 36-50 or more than 50 over the past two years. More than a third of the administrators and other school personnel responding to the survey indicated they received more than fifty requests for these services in a two-year period. Twenty-three respondents indicated they had not received any requests during that time period. Given the great differences among the sizes of districts in our state it is not surprising to see significant differences in the frequency of the need for language access services between districts. The challenge for districts is that whether they receive only a few requests or hundreds, they must be able to arrange the language access services needed to communicate with each of their students' parents.

5. Individuals Relied Upon to Provide Language Access Services

When trying to provide language access, schools and districts often draw on the skills of personnel that are on hand in the building, such as certified staff members, paraeducators, educational assistants, and classified staff members. For example, in response to a question regarding how language access services have been provided, schools and districts report that: bi-lingual students were used 11.67% of the time – slightly less often than district-contractor interpreters (14.4%), but more often than a phone interpreter line (9.44%).

**Individuals relied upon to Provide Foreign Language
Oral Interpreting/Written Translation Services for Families**

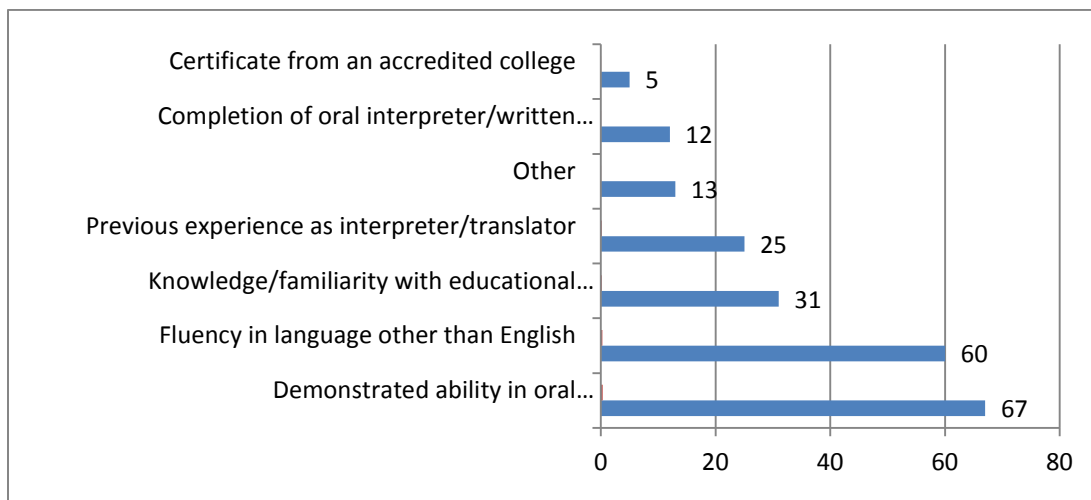


6. Training and Qualifications of Individuals Providing Language Access Services

Just this month, the U.S. Department of Education's Office for Civil Rights together with the U.S. Department of Justice released additional guidance for districts regarding language access for students and families, re-emphasizing that interpretation should be provided by individuals who are not only bilingual (that is, fluent in English and another language), but also have the training and skills necessary to provide interpretation services.⁵² According to responses to the district survey, this remains an area in need of improvement.

Almost half of survey respondents thought their schools and districts did not have specific qualifications for interpreters or translators. Among those school personnel who responded that their school or district does require specific qualifications of language providers, less than a third (31%) selected knowledge or familiarity with the education system and terminology as a chief determinant and only a quarter (25%) identified previous experience as an important factor. Some type of unidentified training ("completion of course in interpreting or translating") was identified as an important qualification by only 6% percent of the respondents.

Qualifications of Language Service Providers (if specified)



7. School or District Level Language Access Policy

Only 7 of the individuals responding to the survey, from districts located in ESDs 113, 114, 121, and 189), indicated that their district had adopted a language access policy.

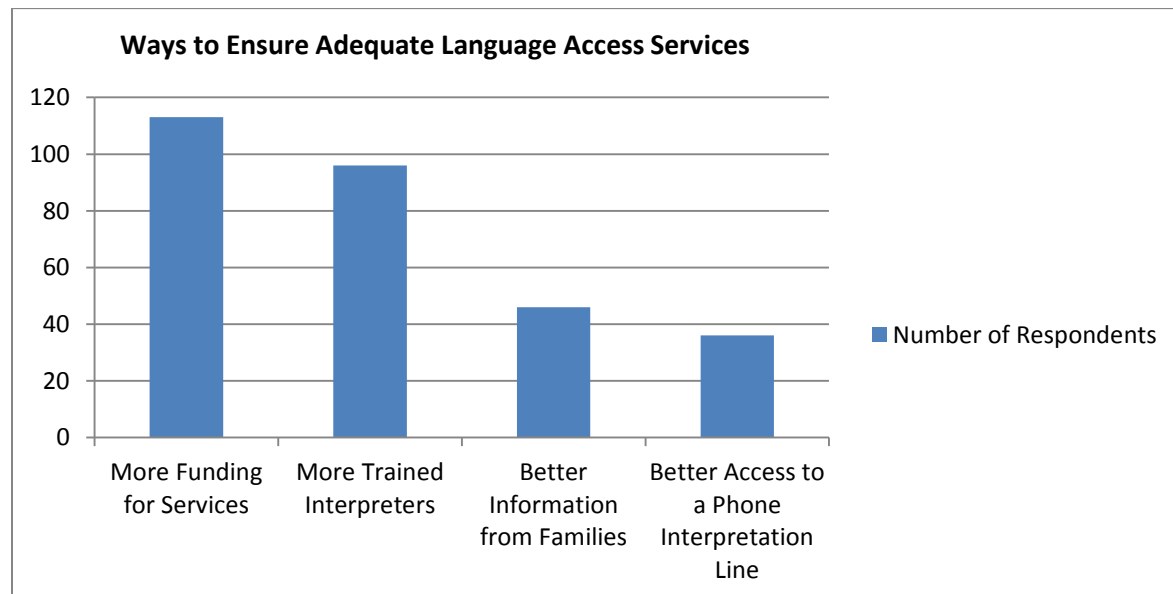
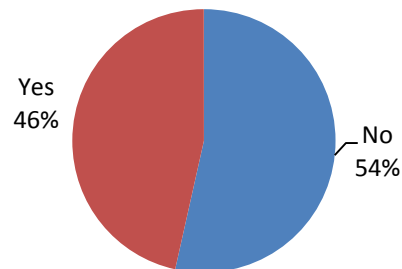
⁵² The next section of this report and the federal government's website regarding language access services, www.lep.gov, explain some of the significant distinctions between serving as a bilingual staff person and serving as an interpreter.

8. Unmet Need for Adequate Language Access Services

The majority of respondents from schools and districts stated that they do not believe they have adequate access to trained interpreters and translators to meet all of the needs of their LEP families.

Overwhelmingly, respondents (113 of them) cited the need for more funding as the biggest barrier to language access for LEP families. The need for access to more trained interpreters was the second most commonly chosen answer (96 respondents).

Do You Feel You have Adequate Access to Interpreters?



These survey responses show that schools and districts are working in a variety of ways to try to meet the need for language access services, but that the need is going unmet in too many situations. The responses also highlight several steps districts can take to begin improving access for LEP families to the information it shares with all parents, including development of language access policies. When language access is successful for families and schools, it is a collaborative effort, involving everyone from front-desk personnel to teachers to federal grant administrators.

B. Community Feedback from LEP Parent Focus Groups

The Office of the Education Ombuds, with facilitation by Open Doors, a Seattle-area nonprofit, conducted focus groups with 99 LEP families in 9 different languages.⁵³ These families had 215 students enrolled in Washington schools. Among those students, 150 received services only in general education, 61 also received special education services, and 4 participated in advanced learning programs. While the families spoke different languages — Arabic, Amharic, Chinese, Korean, Russian, Somali, Spanish, Tigrinya, and Vietnamese — they shared some common concerns and experiences regarding their abilities to understand their children’s educational experiences and access the school system.

1. Infrequent Notice of the Right to Interpreter Services

LEP families report across language groups, with few exceptions, that they are not usually informed about their rights to interpreters. Enrollment appears to be the key process by which families learn about interpreter services, if they ever do. The few exceptions noted were for Tigrinya-speaking, as well as Chinese-speaking families. Tigrinya-speaking families have experienced interpreters as a default part of the enrollment process; during enrollment, the interpreters explain these rights to families in their home language. Chinese-speaking families reported being told about interpreters, but noted that it was not usually framed in terms of rights, but rather about availability. Amharic-speaking families were equally divided about whether or not they were informed about these rights, but one family, for example, noted that it was framed as available on a limited basis. Spanish-speaking families overwhelmingly reported, for example, that they are not usually informed about these rights, and that when any conversation about interpretation happens, it is in English. Arabic-speaking and Korean-speaking families concurred. Vietnamese-speaking families report learning about the services, if they ever do, through their children in English.

2. Denials or Delays when Interpreter Services are Requested

With the exception of Chinese-speaking, Korean-speaking, and Tigrinya-speaking families, overwhelmingly LEP families in the focus groups reported having asked for interpreters by reaching out to a mix of teachers, office staff, and school administrators. The Chinese, Korean, and Tigrinya-speaking families were less likely to ask for interpreters. Meetings with school personnel were often rushed and confusing, and parents felt discouraged in the process of asking for interpreters. Most families, with the exception of Amharic speakers, report that immediate phone interpretation is never or rarely offered.

All of the Somali-speaking families asked for interpreters, and overwhelmingly, they were denied interpreters. Only two families reported having immediate access to phone interpreters when they asked for assistance.

⁵³ See Appendix D-1 for complete data on the focus group discussions.

Even though Spanish is the most common language among LEP families in Washington schools, these families struggle to get services just as other LEP families do. Spanish-speaking families overwhelmingly reported asking for interpreters by reaching out to teachers, office staff, and principals, but they noted that the schools denied these requests for their general education students. They experience many situations where they are pressured to sign important school documents and agree to IEPs where no interpreters have been provided, even though they have made the requests. Schools have either denied these families interpreters or simply not provided them at the meetings. One family reported having immediate access to a phone interpreter.

Most Tigrinya-speaking families have not asked for interpreters, but when they do, interpreters are usually provided. Sometimes, however, these interpreters do not speak the same dialect as the families. For two families, the school offered phone interpretation immediately, but by that, the families meant that they received voicemail in their native language.

3. Challenges with Ineffective Interpretation

LEP families reported having limited access to effective interpretation. Families described challenges with understanding the information from school officials when the interpreter was not fluent in the parent's language. They also reported concerns that the person assigned as the interpreter did not always interpret everything that was said, sometimes added the interpreter's own perspective, or changed the meaning of the person's statements in the interpretation, leaving the participants in the meeting with only partial and sometimes inaccurate understandings of what the others were trying to communicate. Additionally, some families report being treated with a lack of respect by the individuals working as interpreters, who sometimes were dismissive of parents' opinions and took time in meetings to provide parents their own advice.

“One [of my] students [who has an IEP] was suspended for 60 days without a paper explanation. Every time I request an interpreter I am told no one is available. My student has to interpret for these meetings. I don’t know how to get my son back into school.”

--Somali speaking
parent

Desperate to have meaningful dialogue with their children’s schools, these LEP families often provided their own interpreters—whether they were the students themselves, other family members, or friends. In doing so, families attempted to overcome some of the deficits of the interpreters in the pool utilized by Washington schools—primarily, delays, the mismatch of interpreters’ and families’ languages or dialects, interpreters’ deficits in understanding educational terms and the school system, and the lack of respectful interaction between parents and interpreters. However, these efforts were often a bandage to the problem and families left important conversations, such as special education determinations and discipline meetings, sensing that they had failed to understand what was happening.

4. Opportunities for Improvement in Language Access Services

The LEP families interviewed seek a better path forward—one that calls for greater accountability of both schools and the interpreters that work for them. They envision a system where interpreters can be more readily available. Interpreters would be both skilled in the families' native language and English, and demonstrate additional competence in education terminology and the ethics of the profession (*e.g.*, confidentiality, privacy, respect).

LEP families rely on interpreters at some of the most pivotal times of their children's educational careers, but do so currently with a sense of unease given the frequent problems with effective, appropriate interpretation.

C. Language Access Resources Available from OSPI and Online

Districts can currently find a variety of resources to utilize in meeting their language access needs from OSPI and other districts. OSPI provides translations of various sample and model forms in the state's most common languages, educational glossaries in three languages, and information about how districts can contract with telephone interpretation providers. There are also various materials available on district websites that could serve as examples for other districts working to improve their communication with LEP families.

The OSPI Office of Equity and Civil Rights has the responsibility and authority to investigate, monitor and enforce districts' compliance with anti-discrimination laws.⁵⁴ In 2012, it issued guidelines for school districts titled "[Prohibiting Discrimination in Washington Public Schools](#)" that include some specific questions and answers, as well as example scenarios, describing districts' obligations in relation to providing language access services.⁵⁵

In 2013, OSPI issued an informational bulletin amplifying and clarifying districts' language access requirements.⁵⁶ The 2013 bulletin emphasizes that districts must provide meaningful access to all vital communications, in a manner "sufficient so that parents can make well informed decisions about their children's participation in the school district's programs and services."⁵⁷ The bulletin notes that districts should develop a process to identify the language needs of its parents and inform staff on how to access language services when needed. OSPI's 2013 bulletin also addresses the use of different categories of funds to provide language access services in different situations.

⁵⁴ See generally: Chapters 28A.640 and 28A.642 RCW, Chapter 392-190 WAC and OSPI Guidelines for School Districts "[Prohibiting Discrimination in Washington Public Schools](#)" (Feb. 2012) [<http://www.k12.wa.us/Equity/ProhibitingDiscrimination.aspx>].

⁵⁵ "[Prohibiting Discrimination in Washington Public Schools](#)" Guidelines at p. 16-17.

⁵⁶ [OSPI Bulletin No. 021-13](#), "Equity and Civil Rights/Migrant, Bilingual and Native Education" (Informational) May 31, 2013 [<https://www.yumpu.com/en/document/view/23744105/civil-rights-requirements-to-provide-interpretation-and-translation->].

⁵⁷ *Id.*

OSPI's Equity & Civil Rights office also maintains a [webpage](#) devoted to language services for school districts. It includes information and links for:

- Phone-based interpreting services available to all districts pursuant to a state contract;
- Training and ethical standards for interpreters and translators;
- Training for staff working with interpreters;
- Sample translated documents; and
- Multiple links to additional information.

The Equity and Civil Rights language services webpage posts the following documents translated into nine⁵⁸ languages:

- Sample harassment, intimidation, and bullying reporting form;
- Discrimination complaint flyer for parents;
- Student athletic interest survey;
- Sample Section 504 notice of parent rights; and
- Sample nondiscrimination statement.

The OSPI Special Education department also posts translated forms relating to IEP services,⁵⁹ and the Center for Improvement of Student Learning page includes links to educational glossaries translated into three different languages.⁶⁰

Although these resources are available, it is not clear that they are being widely utilized. Responses to the district survey suggest there are still gaps in the awareness of the availability of telephone language line contracts and many schools and districts where no contract has been yet established. The sample translated forms made available by OSPI could be useful both for building libraries of district specific documents in the predominant languages of their families and as sources for educational terminology for individuals serving as interpreters. Districts are not mandated to use the OSPI forms, however, and many districts with significant LEP parent populations do not use the OSPI model special education forms and therefore also do not use the translated versions. Even where translated forms are available, both districts and families report that it is rare that student-specific information in those forms is translated.

We found a handful of language access guidelines directed to school and district staff that are currently or previously were available on district websites, including:

- Everett Public Schools, "Setting a Standard for Language Translation and Interpreter Services,"⁶¹

⁵⁸ In addition to English, Cambodian, Chinese, Korean, Punjabi, Russian, Somali, Spanish, Tagalog and Vietnamese.

⁵⁹ The notice of procedural safeguards required by IDEA is provided in translated form at OSPI's [special education webpage](#) [<https://www.k12.wa.us/SpecialEd/Families/Rights.aspx>] in Khmer, Korean, Russian, Somali, Spanish, Ukrainian and Vietnamese. Additional forms are available in various languages at: <https://www.k12.wa.us/SpecialEd/Families/Rights.aspx> and <http://www.k12.wa.us/specialed/Data/ModelStateForms.aspx>.

⁶⁰ <https://www.k12.wa.us/CISL/FamilyEngagement/Communicating/Glossaries.aspx>.

- Seattle Public Schools Translation and Interpretation Services Guidelines.⁶²
- Shelton School District Translation Process Memo.⁶³

Language access plans that have been developed in districts in other states following OCR compliance reviews and complaint investigations provide additional detailed examples of how districts can implement plans and procedures designed to ensure effective communication to LEP families. As one example, the Tulsa Public Schools' plan is described in Section VI below. The Tulsa/OCR resolution agreement is attached as Appendix B-1, and Tulsa's most recent Language Assistance Plan can be found on the district's website.⁶⁴

V. Language Access Service Standards, Training and Ethics

Though standards, training and ethics for foreign language interpreters in public schools has received relatively little attention and no state-level regulation in Washington, there are a variety of programs, resources and models for interpretation services that could be readily expanded into the field of education.

Washington State recently established minimum standards for deaf interpreters working in public schools, and for years has maintained and implemented certification and training requirements for interpreters and translators working in state courts and social services. While the level of training and experience required varies somewhat among the fields in which interpreters and translators routinely provide services, the core competencies and ethical standards are consistent.

While some agencies (DSHS, courts and medical providers) directly employ individuals as interpreters and/or translators, the majority of language access service providers work as independent contractors or for a private agency. Employees of intermediary agencies (language service suppliers)⁶⁵ are paid at compensation rates and terms set by the suppliers.⁶⁶

⁶¹ Included as Appendix C-3.

⁶² http://district.seattleschools.org/modules/groups/homepagefiles/cms/1583136/File/Departmental%20Content/ell/Translation%20and%20Interpretation%20Services_%20Guidelines.pdf?sessionId=8bc570b506745d3e28448755f3c2ec18.

⁶³ <https://www.sheltonschoools.org/Departments/specialservices/SitePages/TranslationServices.aspx>.

⁶⁴ http://www.tulsaschools.org/3_Parents/language_translation.asp.

⁶⁵ Examples are [LanguageLine Services](http://www.language.com) [<http://www.language.com>], [Cyracom International](http://www.cyracom.com) [<http://www.cyracom.com>], [Universal Language Service](http://universallanguageservice.com/) [<http://universallanguageservice.com/>], and [Indemand Interpreting](http://www.indemandinterpreting.com) [<http://www.indemandinterpreting.com>].

⁶⁶ Cost concerns are also the primary driver of the movement to "on line" language services, e.g., telephonic and video. Among the concerns about telephonic interpreting: (1) it is estimated that over 70% of language conveyed is body language. As such, telephone interpreting may inhibit some elements of natural communication. Clinical situations are an example of occasions in which telephone interpreting is likely to be less effective – particularly if the setting is therapeutic. (2) It may sometimes be difficult for a telephone interpreter to interpret effectively between parties – particularly if the line is occasionally bad, or if the nonverbal cues of a speaker help to further

School districts also contract with outside agencies for interpretation and translation services. Because of this common reliance on independent contractors who often obtain certification in more than one field, it is reasonable to expect that if the state should create such a requirement, individuals currently working as professional interpreters in other fields would be motivated and able to obtain additional training and certification to provide foreign language interpretation in public schools.

A. Interpreter Standards and Certification in Other Fields

Individual interpreters, such as those who staff telephone language lines, may provide services in multiple fields. However, for the legal, medical and social service fields, among others, the individual must have obtained a specific certification, had specific training and/or adhere to specific codes of ethics.⁶⁷

1. Credentialing of Interpreters/Translators

The American Translators Association identifies the components of credentialing as follows:⁶⁸

Certification (“Professional Certification”) is a process to assure qualification or competence to perform a job or task. It can be awarded by a professional society, university, or from a private non-profit or for-profit certifier. Certification may be time-limited and renewal may require specific types and amounts of continuing education.⁶⁹

convey the intended meaning of their speech. However, it should be noted that a qualified telephone interpreter is trained to pick up on nonverbal language – such as intonation within the voice, emphasis, breathing and tone of voice. (3) Some individuals using the telephone interpreting service may only feel confident in respect to the interpreting process if the interpreter is physically present.

⁶⁷ See, for example, “[What Does It Mean to Be A Certified Linguist?](#)”

[<http://www.lep.gov/resources/TRUST%20ME%20I%27M%20CERTIFIED%20%203-19-14%20%20508.pdf>],

prepared by the Federal Coordination and Compliance Section of the Department of Justice, noting that “certified” could mean: (1) The linguist is a practicing interpreter and translator, but is only certified in one skill (e.g., translation, but not interpretation). (2) The linguist is certified in one field (e.g., medical), but is not certified to provide language services in the required field (e.g., legal). (3) The linguist is not certified, but is instead “registered,” “licensed,” or “qualified” by the certifying body through a less rigorous process. (4) The translator is certified in only one language direction (Spanish ⇄ English), and is not certified to translate in the other (English ⇄ Spanish). (5) The linguist received his/her certification, without training or prior experience, from an online open - book exam (or other unsuitable assessment). (6) The linguist received an inadequate certification that did not assess the necessary skills (e.g., the “certified translator” was never assessed in reading).

⁶⁸ See the ATA Paper on Language Interpretation and Language Translation Services, Nov. 13, 2014, available online at: http://www.atanet.org/pressroom/homeland_security_response.pdf.

⁶⁹ These may include all or some of the following: continuing education; contact information update; oath renewal; proof of hours worked; criminal background check.

Accrediting Entity/Certifying Body/Board: This may be a private organization or governmental agency in charge of accrediting and regulating⁷⁰ professions, such as interpreters. Certifying bodies can be classified as follows:

- **Vendor Driven:** entities whose members are in the business of selling interpreter services (e.g., language services companies or professional associations).
- **Vendor-Neutral:** entities whose members are engaged in both buying and selling interpreter services.
- **Non-vendor:** entities whose members are not engaged in selling interpreter services (e.g., government agency).

Certified Interpreter: This normally denotes an interpreter whose interpreting skills have been objectively and reliably tested in at least one direction (e.g., English into Spanish or Spanish into English) in at least one of the three modes of interpretation: simultaneous, consecutive and sight translation.

Associate/Authorized/Qualified/Registered/Screened Interpreter: an untested interpreter, but otherwise deemed qualified to provide language interpretation services in a particular language pair. Some entities rely on language proficiency for one or both languages tested by a third party; others test for oral memory skills in a particular language pair.

Accreditation: This describes what must be done to obtain a specific certification, and may include some or all of the following:

- Interpreter coursework portfolio or degree
- Written exam
- Oral exam: testing in all three modes – simultaneous, consecutive and sight translation. Accrediting entities have different passing score requirements for interpreter certification.
 - While some require 80% in each mode, others require an equally weighed combined score in a couple of modes or directions.
 - For languages in which there are no interpreting skills tests available, language proficiency scores in both working languages are a reliable way to assess foundational language skills necessary for interpreting. However, these oral language proficiency tests DO NOT evaluate interpreting skills.
- Training: interpreting skills, terminology, ethics and protocol
- Background information: criminal records check, fingerprinting, security clearance
- ID badge
- Oath: interpreters swear to abide by a specific code of professional conduct
- References: peer review and portfolio

⁷⁰ Regulation may include disciplinary sanctions or actions for violation of the interpreters' code of professional conduct against which they have been accredited.

- Roster: accredited interpreters' name and contact information is placed on a list available to the public

Standards for language service providers may be established by one or more organizations: a certifying body, a professional association, and by groups representing the area of services. Areas of services would include healthcare services, court services, conference services and conflict zone services.⁷¹ With the exception of legal language service providers,⁷² basic standards for language service providers, in the form of "certifications," are most frequently established by national associations,⁷³ and thereafter adapted and modified by state-level chapters. This is an important exception, because the standards for legal language service providers are generally viewed as the highest and, consequently, may explain the substantially higher compensation available for legal providers.

State law requires that the courts establish and implement a comprehensive plan to provide adequate interpretation for limited English proficient individuals.⁷⁴ The Washington State Administrative Office of the Courts operates the Court Interpreter Program, which oversees training and testing of certified and registered spoken language interpreters.⁷⁵ Courts must set standards for interpreters and ensure provision of a reasonable fee and reimbursement for reasonable actual expenses. The interpreter must be tested and certified as proficient in writing and orally in English and the language to be interpreted. All interpreters in legal proceedings, whether or not certified or qualified, must abide by a code of ethics established by Supreme Court rule.⁷⁶ Finally, trial courts must develop a written language assistance plan to provide a framework for the provision of interpreter services for non-English-speaking persons accessing the court system in both civil and criminal legal matters.

Similarly, state law requires that the Department of Social and Health Services (DSHS) provide adequate language access services for LEP individuals served by the agency.⁷⁷ DSHS has developed a Language Testing and Certification Program (LTC) which provides bilingual

⁷¹ "Conference services" describes interpreting conducted primarily in the simultaneous mode for persons attending congresses, conventions, seminars, summits, or other meetings. These interpreters frequently work in other areas such as business, media, labor, diplomatic and liaison interpreting. "Conflict Zone services" encompasses interpreting in areas affected by conflict, disaster or other emergency situations. This category includes military and humanitarian interpreting.

⁷² See, e.g., [Standards for Performance and Professional Responsibility for U.S. Federal Courts](http://www.uscourts.gov/uscourts/FederalCourts/Interpreter/Standards%20for%20Performance.pdf) [[http://www.uscourts.gov/uscourts/FederalCourts/Interpreter/Standards for Performance.pdf](http://www.uscourts.gov/uscourts/FederalCourts/Interpreter/Standards%20for%20Performance.pdf)]. States also establish qualifications for language service providers required for employment in their judicial systems.

⁷³ A list of associations by country can be found at [Wikipedia here](http://en.wikipedia.org/wiki/List_of_translators_and_interpreters_associations) [http://en.wikipedia.org/wiki/List_of_translators_and_interpreters_associations].

⁷⁴ RCW 49.60.030 [<http://app.leg.wa.gov/rcw/default.aspx?cite=49.60.030>]; RCW Ch. 2.43. [<http://app.leg.wa.gov/rcw/default.aspx?cite=2.43&full=true>].

⁷⁵ See http://www.courts.wa.gov/programs_orgs/pos_interpret/.

⁷⁶ General Rule 11.2, available here: http://www.courts.wa.gov/programs_orgs/pos_interpret/index.cfm?fa=pos_interpret.display&fileName=generalRule11.

⁷⁷ RCW 74.04.025.

certification and testing services to ensure quality services to the DSHS LEP populations. The LTC develops policies and procedures for certification of bilingual employees, administers language proficiency testing, provides consultation in establishing policies regarding quality of language services and manages a roster of certified interpreters and translators.⁷⁸

Ensuring the availability of quality interpretation services requires ongoing effort. On May 15, 2014, the Governor's Interagency Council on Health Disparities adopted the Language Access Policy Paper issued by the State System and Health Disparities Workgroup making a number of recommendations to assist state agencies in providing meaningful language access services.⁷⁹ The Policy Paper is reproduced at Appendix C-1.

2. Ethical Codes for Language Service Providers

Professional associations of interpreters and translators, courts and other government agencies have adopted codes of ethics that contain a common core of principles guiding the practice of interpretation.⁸⁰ There are some variations among the codes reflective of the particular fields in which they apply; however, each reflects, among several others, the following guiding principles:

- Accuracy or Precision: requiring that interpreters/translators faithfully render the source language message, omitting or adding nothing, giving consideration to linguistic variations in both source and target languages, conserving the tone and spirit of the source language message.
- Confidentiality: requiring that interpreters/translators not divulge any information obtained through their assignments.
- Self-evaluation: requiring that interpreters/translators accurately and completely represent their certifications, training, and experience and not accept interpreter or translation assignments for which they are not qualified.
- Impartiality and Avoiding Conflict of Interest: requiring that interpreters/translators disclose any real or perceived conflict of interest which would affect their objectivity in the delivery of service.
- Professional Development: requiring that interpreters/translators develop their skills and knowledge through professional training, continuing education, and interaction with colleagues and specialists in related fields.

⁷⁸ <https://www.dshs.wa.gov/fsa/language-testing-and-certification-program>.

⁷⁹ Available here: <http://healthequity.wa.gov/Portals/9/Doc/Publications/Reports/HDC-Reports-July-2014-ActionPlan.pdf>.

⁸⁰ See, for example, [Code of Ethics for Medical Interpreters](http://www.imiaweb.org/code/default.asp) adopted by International Medical Interpreters Association [<http://www.imiaweb.org/code/default.asp>]; [National Code of Ethics for Interpreters in Health Care](http://www.ncihc.org/ethics-and-standards-of-practice) adopted by the National Council on Interpreting in Health Care [<http://www.ncihc.org/ethics-and-standards-of-practice>]; [Canons for Court Interpreters](http://www.najit.org/about/NAJITCodeofEthicsFINAL.pdf) adopted by the National Association of Judiciary Interpreters and Translators [<http://www.najit.org/about/NAJITCodeofEthicsFINAL.pdf>]; [Code of Ethics and Professional Practices](http://www.atanet.org/governance/code_of_ethics_commentary.pdf) adopted by the American Translators Association, [http://www.atanet.org/governance/code_of_ethics_commentary.pdf].

These principals are equally applicable in educational settings. Many of the situations where interpreters are needed in schools involve sensitive communications regarding confidential matters, and interpreters must be as cognizant of the district's obligations to maintain confidentiality as is any other district staff. In some situations, the interpreter may find that schools and parents are in disagreement, making it critical that everyone participating has confidence in the neutrality of the interpreter. Communications between a school and parents not infrequently have legal implications (matters of consent, etc.) and may include medical terminology, particularly if special education is involved.

In addition to technical fluency in two languages, it is generally recognized that the effectiveness of language services also requires competence in intercultural communications. However, as the ATA has stated, though there are tests to evaluate oral and written language proficiency skills, no tests have been developed to measure competency in intercultural communication skills.⁸¹

The Washington State Courts Code of Conduct for Court Interpreters⁸² and the Washington State Department of Social and Health Services (DSHS) Interpreter Code of Ethics⁸³ (included as Appendix E-2), provide helpful examples of how these Codes can be structured.

The following chart identifies some of the jurisdictions and/or associations that have promulgated codes of ethics or practices concerning major areas of interpreting. It is not meant to be exhaustive.

Interpreting Area	Federal	State	Non-Governmental Associations	
Legal (divided into Court services and Out-of-Court services or quasi-judicial services)	Court Interpreters Act, 28 U.S.C. Sec. 1827	NCSC Consortium for Language Access in Courts (CLAC, aka the Consortium); Washington State Interpreter Commission (GR 11.1); Public Service interpreting, RCW 41.56.030(10)	Northwest Translators & Interpreters Society (NOTIS)	National Association of Judiciary Interpreters (NAJIT)

⁸¹ ATA Paper on Language Interpretation and Language Translation Services, 12 (Nov. 13, 2014).

⁸² [Rule 11.2 Code of Conduct for Court Interpreters](#).

⁸³ *Language Interpreter and Translator Code of Professional Conduct* (<http://www.dshs.wa.gov/ltc/ethics.shtml>)

Healthcare (settings where medical services/social services provided)	Certification Commission for Healthcare Interpreters (CCHI); International Medical Interpreters Association (IMIA); National Council on Interpreting in Health Care (NCIHC)	DSHS interpreters and translators	National Board of Certification for Medical Interpreters (NBCMI) Washington Chapter (IMIA)	California Healthcare Interpreting Association (CHIA) ⁸⁴
Conference (business, media, labor, diplomatic, liaison services)	United Nations Interpretation Service	U.S. Dept. of State, Office of Language Services	International Association of Conference Interpreters (AIIC)	American Association of Language Specialists (AALS)
Conflict Zone (military, humanitarian services)	AIIC General Principles of International Humanitarian Law	Red T [501(c)(3) nonprofit organization dedicated to the protection of translators and interpreters in conflict zones and other adversarial settings]	American Translators Association (ATA)	National Association of Judiciary Interpreters (NAJIT)

B. State Requirements for Sign Language Interpreters in Washington Public Schools

Washington state law currently requires that the Professional Educator Standards Board (PESB) adopt standards and publicize available assessments available for "educational interpreters," but refers only to individuals providing sign language translation, not foreign language interpretation.⁸⁵

Following legislative direction, the PESB has developed recommendations regarding minimum assessment results for educational interpreters.⁸⁶ According to state law, educational interpreters employed by district must have achieved the performance standard by the beginning of the 2016-17 school year. In its report of the recommended minimum assessment results, PESB explains that many of the individuals currently providing sign language interpretation services in schools have taken and met the minimum standards on the assessment, indicating motivation to have their skills assessed.

⁸⁴ http://c.ymcdn.com/sites/www.chiaonline.org/resource/resmgr/docs/standards_chia.pdf.

⁸⁵ RCW 28A.410.271.

⁸⁶ See Educational Interpreter Standards Recommendations, from PESB, available through link, here: http://www.pesb.wa.gov/press_release/2013/05-23-13_deaf_ed.

The PESB report also notes that standards for educational sign language interpreters have been set in the majority of other states as well, establishing qualifications including a minimum of high school diploma or equivalent or associates degree, an assessment of skills and continuing education.⁸⁷

The PESB ultimately recommended a 3.5 on a 5 point scale as a minimum score on Educational Interpreter Performance Assessment as "most achievable for increasing the number of qualified interpreters."⁸⁸ The PESB noted that the 4.0 level could be recognized by individual school districts as a measure for establishing a salary schedule or acknowledgement system for interpreters with higher scores or abilities in multiple modalities or multiple grade levels.

C. Existing Interpreter Training and Certification Programs

Individuals wanting to achieve competency in providing interpretation services can complete a post-secondary certificate program, participate in training programs offered directly by agencies that contract for their services, or both.

1. Post-Secondary Translation and Interpreter Training Certificate Programs

Training or certification programs offered by unaffiliated organizations, *i.e.*, colleges or universities, are typically centered around a general overview of common practices and procedures, such as technology, public and private resources, ethics, common skills and practices, and business principles, with focuses on specific environments such as legal, medical or social services as an option for students to specialize.

The best known program in Washington is Bellevue College's [Translation and Certificate Program](http://www.bellevuecollege.edu/ce/translation-and-interpretation-certificate-program-overview/), which offers an interpreter certificate, a translator certificate or a combined certificate. Entrance to the program requires "speakers who are highly fluent in English and at least one other language, determined by interview;" however, no post-secondary degree is required for enrollment. As both certificates share common core courses, only four additional required courses for 36 credits (360 hours of instruction) are required for both certificates (interpreting and translation).⁸⁹ The program's non-language-specific core courses are taught in English. The curriculum includes research skills, business practices, ethics, terminology management, and technology. Language-specific courses are offered in select languages; availability in a specific language is sporadic because it depends upon the availability of sufficient student speakers of the language. Completion of either certificate program requires minimum of 1½ to 2 years, *i.e.*, five core courses and three language-specific courses for a total of 24 credits (240 hours of instruction). No specialization or certification in type of service provision, *e.g.*, medical, legal, etc., is offered. Most classes meet evenings for two to three

⁸⁷ See PESB's Recommendations, at p. 3.

⁸⁸ Id. at p. 11.

⁸⁹ The course overview is available here: <http://www.bellevuecollege.edu/ce/translation-and-interpretation-certificate-program-overview/>.

hours once a week for 10 weeks. Classes may be presented on campus or via webinar.⁹⁰ For the 2013-14 school year, total tuition fees for either the interpreter or translator certificate program were \$4,800 for Washington State residents or \$12,547 for non-Washington State residents.

A language services program is also offered by [Pierce Community College](#).⁹¹ The program's website advises that a certificate option can be completed in one year by full time students,⁹² while an associate's degree takes about two years. Entrance to the program is by a skills assessment test through the Pierce College assessment center. According to the [program's website](#), the total program averages \$5,795 (tuition, fees, books, and supplies). The program offers certificates in [community interpreting](#), legal interpreting, medical interpreting and social service interpreting.

An English/Spanish medical interpreting program is offered by Allied Health Technology Programs in conjunction with Yakima Valley Community College (YVCC). According to the [program's website](#), it is offered only during Fall and Spring quarters and consists of two courses: medical terminology and medical interpreting in Spanish, for a total of 10 credits (5 credits per course). According to the [YVCC tuition fees schedule](#) for the 2014-15 academic year, the total cost of this course would be \$1,188 for Washington State residents; \$1,318 for residents of others states and \$2,908 for non-U.S. residents. Walla Walla Community College offers a similar option with its [Spanish Medical Interpreter/Translator Program](#).⁹³ Its website includes information about required courses, fees and the length of the program.⁹⁴

We were able to identify only one post-secondary language services training and certificate program that focused on services in the educational setting. The program was developed by the [University of Georgia](#) as an online course for the training of educational interpreters to facilitate communications between LEP parents and school system personnel. The course requires 30 hours (8 weeks) of on-line classroom time, costs \$649 and grants graduates a "Professional Interpreter in Education" certificate. Four broad learning objectives are identified: introduction to school interpretation; interpreter standards of practice and ethics; interpreter roles; and interpreter modes.⁹⁵

⁹⁰ The program's website, [which states](#) that "courses are not available in an online or distance format," is not up to date [<http://www.bellevuecollege.edu/ce/translation-and-interpretation-cert-faq/>].

⁹¹ Although the program's website remains accessible, it is not clear that this program is still being offered. Attempts to contact program personnel were unsuccessful.

⁹² However, the program's website notes that less than 10 students completed the program in 2012-13.

⁹³ <http://web.wvcc.edu/healthsciences/spanish-medical-interpreter-program/>.

⁹⁴ http://www.wvcc.edu/cat/degree_sequence.cfm?cc=200&dc=HO&EPC=438Y.

⁹⁵ A description of the course details and learning objectives [can be found here](#) <http://www.georgiacenter.uga.edu/sites/default/files/pie-details-8-15-14.pdf>.

2. Program-Specific Training for Interpreters in Different Fields

The focus of other language service training programs tends to reflect the orientation of the provider. For example, trainings sponsored by legal organizations will focus on language services in the judicial setting, while those sponsored by medical or health care organizations will focus on those environments.

The DSHS Language Testing and Certification program makes available practice study booklets and audio samples for individuals preparing to take the assessment for certification as medical or social service interpreters in eight of the state's most common non-English languages.⁹⁶

The [Puget Sound ESD 121](#) offers a program to schools (not the general public), to assist them in creating and administering an in-house bilingual interpreter service. The interpreter development program, which costs schools about \$1,500, consists of the following services: creating a bilingual interpreter program; interpreter training (6 hours); staff training; how to work with an interpreter (3-6 hours); interpreter booster training (3 hours).

VI. Review of Federal and State Laws on Provision of Language Access Services in Public Schools

Principles of non-discrimination are at the core of language access obligations for government funded entities. In order for any institution – including schools – to be truly open equally to all persons in the community, it must be able to communicate across language differences. Accordingly, to ensure equitable access to individuals of all national origins, including those whose primary language is not English, government programs, including public schools, must provide appropriate language access services to individuals with limited English proficiency.⁹⁷

The right to equitable access is established by federal and state anti-discrimination laws which prohibit government programs from excluding individuals from participation or denying benefits of their programs on the basis of race, color or national origin.⁹⁸ In addition to anti-discrimination provisions, various federal and state laws applicable in public schools have incorporated specific requirements relating to the provision of language access services to LEP Parents. This report does not include a comprehensive review of relevant statutes and cases, but focuses instead on how existing laws inform the provision of language access services in public school settings.

⁹⁶ <https://www.dshs.wa.gov/fsa/language-testing-and-certification-program/study-materials>.

⁹⁷ Pursuant to the legislation directing OEO to conduct this feasibility study, we include here a brief background and summary of the federal and state legal requirements associated with schools' obligation to provide language access services.

⁹⁸ See, Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d et seq., and its implementing regulation, at 34 C.F.R. Part 100; *Lau v. Nichols*, 414 U.S. 56 (1974); Washington Law Against Discrimination, Chapter 49.60 RCW; and Chapter 28A.642 RCW.

A. Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964⁹⁹ provides, among other things, that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies.”¹⁰⁰ Title VI is applicable in any program or activity that receives federal funding, including schools, courts and social services.¹⁰¹ Public schools’ compliance with Title VI is monitored and enforced by the U.S. Department of Education’s Office for Civil Rights (OCR).¹⁰²

Over the years, responsible federal agencies, including OCR, have developed guidance materials and taken action to enforce Title VI in these different settings.¹⁰³ In 1970, OCR, then a part of the Department of Health, Education and Welfare, issued a memorandum to school districts addressing a variety of LEP-related issues.¹⁰⁴ The 1970 memorandum explained districts’ obligations under Title VI to “take affirmative steps to rectify the language deficiency in order to open its instructional program to [LEP students]”,¹⁰⁵ and also explained:

School districts have the responsibility to adequately notify national origin-minority group parents of school activities which are called to the attention of other parents. Such notice in order to be adequate may have to be provided in a language other than English.¹⁰⁶

In 1974, the U.S. Supreme Court agreed, in a case called *Lau v. Nichols*, that failure to take reasonable steps to provide meaningful access to government funded programs for LEP individuals would violate Title VI and its prohibition on national-origin discrimination.¹⁰⁷ *Lau v. Nichols* was a case brought by students of Chinese ancestry who did not yet speak English, seeking access to San Francisco’s public school system.¹⁰⁸ The Court recognized that those students who did not understand English and were not provided any supplementary instruction

⁹⁹ 42 U.S.C. § 2000d et seq., and its implementing regulation, at 34 C.F.R. Part 100.

¹⁰⁰ 42 U.S.C. § 2000(d) (July 2, 1964). [<http://www2.ed.gov/about/offices/list/ocr/index.html>].

¹⁰¹ 42 U.S.C. §2000d.

¹⁰² <http://www.justice.gov/crt/about/cor/coord/titlevi.php>. Many federal agencies have Offices for Civil Rights, commonly referred to as “OCR.” In this document, OCR refers only to the Office for Civil Rights within the U.S. Department of Education.

¹⁰³ See links to specific federal agency guidance materials, including guidance from the DOJ, at www.lep.gov.

¹⁰⁴ “[Identification of Discrimination and Denial of Services on the Basis of National Origin](#),” 35 Fed. Reg. 11595 (July 18, 1970) [<http://www2.ed.gov/about/offices/list/ocr/docs/lau1970.html>].

¹⁰⁵ Id.

¹⁰⁶ Id.

¹⁰⁷ *Lau v. Nichols*, 414 U.S. 563 (1974); See also, U.S. Department of Justice, “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons” (67 Fed. Reg. 41455, 41458 (June 18, 2002) (DOJ Recipient LEP Guidance) [<http://www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf>].

¹⁰⁸ The Court’s decision in *Lau v. Nichols* can be found here: [<https://supreme.justia.com/cases/federal/us/414/563/case.html>].

in the English language were “effectively foreclosed from any meaningful education.”¹⁰⁹
Quoting from the 1970 OCR memorandum, the Court stated in reference to LEP students:

[W]here the inability to speak and understand the English language excludes national origin-minority group children from effective participation in the educational program offered by a school district, the district must take affirmative steps to rectify the language deficiency in order to open its instructional program to these students.¹¹⁰

Following the decision in *Lau*, federal agencies have applied its principles generally in understanding the obligations of recipients of federal funds in relation to LEP individuals. In 2000, the President issued Executive Order 13166 requiring federal agencies to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.¹¹¹ Each federal agency was directed to draft guidance, specifically tailored to its recipients, which addressed communication with LEP applicants and beneficiaries in a manner consistent with LEP guidance from DOJ that was issued on the same day as the Executive Order.¹¹²

B. Determining Reasonable Steps to Ensure Meaningful Language Access – the Four Factor Analysis

In 2000, the U.S. Department of Justice (DOJ) published guidance for “Enforcement of Title VI of the Civil Rights Act of 1964 National Origin Discrimination Against Persons with Limited English Proficiency.”¹¹³ Known as the “DOJ 2000 LEP Guidance,” this set forth general principles for federal agencies to apply in crafting guidance documents for their agency-specific recipients of federal funds. The guidance introduced a four-factor analysis to determine whether recipients of federal financial assistance are taking reasonable steps to ensure the meaningful access of LEP individuals. The four factors are:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- (2) the frequency with which LEP individuals come in contact with the program;
- (3) the nature and importance of the program, activity, or service provided by the program; and
- (4) the resources available to the grantee/recipient and costs.¹¹⁴

¹⁰⁹ 414 U.S. at 566.

¹¹⁰ Id. at 568.

¹¹¹ “Improving Access to Services for Persons with Limited English Proficiency” (August 11, 2000)

[<http://www.justice.gov/crt/about/cor/13166.php>]

¹¹² Id.

¹¹³ “Enforcement of Title VI of the Civil Rights Act of 1964 National Origin Discrimination Against Persons with Limited English Proficiency” (DOJ 2000 LEP Guidance). 65 Fed. Reg. 50123, 50124–50125

[<http://www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20867.pdf>].

¹¹⁴ Id.

In June 2002, DOJ issued a guidance document specific to programs receiving DOJ funds, the “DOJ Recipient LEP Guidance.”¹¹⁵ The DOJ Recipient LEP Guidance repeated the four-factor analysis and provided additional explanation regarding the balance of interests the factors are intended to protect by ensuring meaningful access by LEP persons to critical services while not imposing undue burdens on small business, small local governments, or small nonprofits.¹¹⁶ DOJ describes the four factors as a “flexible and fact-dependent standard,” and cautioned that “the flexibility that recipients have in addressing the needs of the LEP populations they serve does not diminish, and should not be used to minimize, the obligation that those needs be addressed.”¹¹⁷

Regarding how agencies should factor in costs, DOJ explained that cost considerations should be part of determining the reasonableness of different types of language access services. DOJ noted that:

[C]osts could be inappropriately ignored or minimized to justify the provision of a particular level or type of language service where less costly equally effective alternatives exist.¹¹⁸

Where there are a relatively small number of individuals who speak a particular language, communication does not include vital information, or costs are prohibitive, those factors may weigh in favor of using more cost effective means – such as telephone versus in person interpretation or oral interpretation of written documents – they do not, however, justify failure to provide needed language services. Indeed, as DOJ acknowledged:

[T]he identified need for language services might be quite costly for certain types of recipients in certain communities, particularly if they have not been keeping up with the changing needs of the populations they serve over time.¹¹⁹

This four factor analysis has since been applied across sectors, including in public schools, as explained in the next section.

C. OCR’s Enforcement of Title VI in Relation to LEP Parents

OCR has developed various specific guidance materials focused on the analysis of what types of programs – from dual language classes, transitional bilingual programs to pull-out English as a Second Language services – and what types of assessment plans are sufficient to satisfy schools’ obligations in relation to LEP *students*. Just this month, OCR, jointly with DOJ, issued additional

¹¹⁵ See DOJ Recipient LEP Guidance, 67 Fed. Reg. 41455, [<http://www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf>].

¹¹⁶ DOJ Recipient LEP Guidance, 67 Fed. Reg. at 41459.

¹¹⁷ Id. at 41457.

¹¹⁸ Id. at 41457.

¹¹⁹ Id.

guidance in the form of a “Dear Colleague” letter that clarifies steps school districts must take to ensure that LEP parents and guardians have meaningful access to district and school-related information.¹²⁰

In reviewing districts’ compliance with Title VI in relation to LEP *Parents*, OCR applies the four factors and explanatory principles from the DOJ Recipient LEP Guidance to the school context.¹²¹ Recent compliance reviews and complaint resolutions from OCR provide considerable detailed guidance regarding how districts can meet their obligation to provide access to LEP Parents of public school students.¹²² OCR has completed approximately three dozen Title VI enforcement actions in the last decade. For this report, we detail two recent actions that address when and how to meet the obligation of communicating with LEP parents - one addressing general education matters, the other also discussing special education procedures.

D. Tulsa Public Schools Compliance Review

A review of OCR’s Resolution Agreement with Tulsa Public Schools¹²³ regarding its language assistance practices highlights several key principles for districts’ compliance with Title VI, including: the value of developing a written language access plan, the importance of ensuring individuals serving as interpreters are appropriately trained; and the different obligations districts have depending on the predominance of various language groups.¹²⁴

In May 2010, OCR opened a compliance review to assess whether the Tulsa Public Schools (TPS), discriminated against LEP parents and guardians by failing to ensure they have meaningful access to information that is provided to parents and guardians in English. Tulsa is the second largest school district in Oklahoma, serving approximately 41,000 students. During the 2009-2010 school year, TPS served a total of 6,412 English language learner (ELL) students. Approximately 93% of the district’s ELL students speak Spanish. The other predominant languages spoken by its ELL students are Hmong, Vietnamese, Arabic, Portuguese, Truka and Urdu.

¹²⁰ U.S. Department of Education and U.S. Department of Justice Dear Colleague Letter: English Learner Students and Limited English Proficient Parents, January 7, 2015, direct link here: <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-el-201501.pdf>. The Section specific to communication with Parents and Guardians begins at p.37.

¹²¹ Id.

¹²² Compliance reviews (random reviews undertaken as part of the general monitoring process) and complaint resolutions (investigations and settlements undertaken in response to a formal complaint).

¹²³ Tulsa (OK) Public Schools (2-4-2013; OCR 07-10-5002). OCR’s press release, letter to the school district and the text of the resolution agreement are attached as Appendix B-1. They are also available on OCR’s website, here: <http://www2.ed.gov/about/offices/list/ocr/docs/investigations/07105002.html>.

¹²⁴ A “predominant language group” is defined in the Tulsa Public Schools’ Resolution Agreement as “each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the LEP parent/guardian population eligible to be served or likely to be affected or encountered.” OCR Resolution Agreement, *Tulsa Public Schools* (1/22/2013; [OCR Docket No. 07105002](http://www2.ed.gov/about/offices/list/ocr/docs/investigations/07105002-b.html)) [<http://www2.ed.gov/about/offices/list/ocr/docs/investigations/07105002-b.html>].

When OCR opened its compliance review, TPS did not yet: have written policies or procedures for responding to parent requests for documents in languages other than English or requests for foreign language interpreters; track or keep records regarding which parents had been identified as LEP, requests from LEP parents for translation or interpreter services, or translation/interpreter services that it had provided to LEP parents; have a set process for notifying LEP parents that interpreters and translators were available for school-related communications; consistently evaluate or assess the language skills of employees and contractors used as interpreters and translators or provide training regarding the role of an interpreter/translator, the ethics of interpreting and translating, and the need to maintain confidentiality; or consistently provide LEP parents who speak languages other than Spanish with access to the same information that the District provided to English-speaking parents.

In order to resolve the compliance issues and ensure meaningful access to parents and guardians with limited English proficiency, TPS proposed a Resolution Agreement that included development of a written language assistance plan; implementation of a training requirement for district staff regarding how to ensure language access for all families; training for individuals serving as interpreters and translators; and development of a process for identifying and translating vital written documents into the language of each predominant language group in the district.

1. Written Language Assistance Plan

As part of the Resolution Agreement, Tulsa agreed to develop a written Language Assistance Plan. Though development of a written plan is not an absolute requirement to comply with Title VI, most agencies will find the benefits warrant the effort as a plan provides a framework for provision of reasonable and necessary language assistance, a structure for ongoing training and review, and a means for documenting the agency's compliance with Title VI.¹²⁵

Tulsa agreed to address several critical pieces in its plan, including:

- guidance and procedures for identifying parents and guardians who may need language assistance;
- procedures to ensure appropriate staff were aware of parents' need for language assistance; and
- steps to ensure effective notice to LEP parents and guardians of the availability of free language assistance services and how parents and guardians could access those services.¹²⁶

For its staff, the Language Assistance Plan would include information on how to timely obtain language assistance for parents and guardians.¹²⁷

¹²⁵ 2002 DOJ Guidance, at 41455.

¹²⁶ See Tulsa Public Schools' Language Assistance Plan for the 2013-2014 School Year, p.6, available online at: http://www.tulsaschools.org/3_Parents/_documents/pdf/_languageAssistance/Language_Assistance_Plan.pdf.

2. Training and Ethical Standards for Interpreters and Translators

Another key part of Tulsa’s Resolution Agreement addressed ethical standards and training requirements for individuals serving in the role of interpreter or translator for the district. Tulsa agreed to establish standards and processes for ensuring that the interpreters and translators used by the District are proficient in the languages spoken by the students, parents and guardians; are competent to provide interpretation and/or translation; and will adhere to ethical standards for interpreters and translators. The plan also explains that use of family members or friends for interpretation or translation is generally not acceptable and that minor children can never serve as interpreters or translators.¹²⁸

Because of the prevalence of technical terms in many discussions regarding student disabilities and special education services, some districts, including Tulsa under its new Language Assistance Plan, require that individuals providing interpretation for IEP matters also demonstrate familiarity with special education terms.¹²⁹

“Using a child to interpret the issue for the parents will create more problems. They only say things that benefit themselves and even lie or change words to avoid fault to them. Children undermine the parent’s authority by making the situation seem smaller than it is.”

--*Vietnamese speaking parent*

3. Access for All Families -- Written Translations for Predominant Language Groups

Like many districts in Washington State, the majority of LEP families in Tulsa are Spanish-speaking families. At the same time, TPS also serves families speaking more than 70 other non-English languages. OCR’s compliance review identified concerns both with the district’s communication with families speaking the less common languages and with the adequacy of language access services provided to Spanish speaking families.

Tulsa had bilingual Spanish/English speaking employees who also served as interpreters and had translated some materials into Spanish. However, the district had not had a process in place to ensure the quality of the interpretation services. It also had not had a process in place to ensure that vital written documents were translated into Spanish and its other predominant language groups.¹³⁰

¹²⁷ The TPS Plan notes that a brief powerpoint presentation would be created and made available to schools and district departments to publicize and inform all district staff of available interpretation and translation resources. Id. at 13.

¹²⁸ Id. at p. 12.

¹²⁹ Id. at p. 12.

¹³⁰ There are a variety of situations where schools are required to provide written notice – as opposed to just oral notice – to parents. Requiring written notice is one way to ensure that parents get complete, accurate information; that the information is available to be referenced when necessary (such as information about a student’s rights or student progress), and to document that information was in fact provided. Providing equal access for parents with

DOJ guidance notes that it will not always be feasible to require agencies to provide *written translations* of *all* written notices in *every* language.¹³¹ When there is a large number and/or large proportion of families that speak the same language, however, providing equivalent written notice is more cost-efficient and practical.

Even where written translation into a low incidence language is not feasible, districts cannot simply deny some parents access to information and programs. Districts must still communicate the information in the written notices to all LEP parents, typically by providing an oral interpretation of a written document.

TPS's Resolution Agreement addressed both of these issues by agreeing to:

- ensure that parents and guardians who speak less predominant languages will be advised of who to contact in the District if they need assistance in understanding vital written documents; and
- develop a process for identifying and translating vital written documents into the language of each "predominant language group," defined as each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the LEP parent/guardian population eligible to be served or likely to be affected or encountered.

The list of typical vital documents identified in the TPS Resolution Agreement encompasses documents relating to rights and safeguards for students with disabilities; student discipline; registration and enrollment; emergency notification forms; report cards and progress reports; notice of conferences or meetings; opportunities for extra-curricular activities, advanced classes, guidance counseling and more. The list, which is not meant to be all-inclusive, can be found in Appendix B-1.

The current Language Assistance Plan adopted by TPS provides one example of how to set up a process for ensuring availability of interpretation services and effective and efficient translation of vital documents.¹³²

A final critical component of the TPS plan is the requirement for an annual evaluation of the plan's effectiveness. As language assistance needs and resources change over time, regular review of a language assistance plan can help ensure continual compliance Title VI obligations.

limited English proficiency often means providing those families the same benefit of *written* notice of that information in a language they understand.

¹³¹ See DOJ Recipient LEP Guidance, 67 Fed. Reg. 41455, [<http://www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf>].

¹³² See Language Assistance Plan, posted here: http://www.tulsaschools.org/3_Parents/language_translation.asp. Another example is the Compliance Agreement from an OCR Compliance Review of the DeKalb County School District in Georgia (GA) (04-11-5002), available here: <http://www2.ed.gov/about/offices/list/ocr/docs/investigations/04115002.html>.

E. Los Angeles Unified School District Investigation and Resolution Agreement

In 2008, the Los Angeles Unified School District (LAUSD) reached an agreement with OCR to resolve allegations that the district had discriminated against students with disabilities and their limited English proficient, Spanish-speaking parents by failing to translate IEP documents and failing to provide adequate oral interpretation services at IEP meetings.¹³³

During the 2007-2008 school year, LAUSD's K-12 schools enrolled 693,680 students, making it the largest school district in the state of California. The student population included 240,389 English learner (ELL) students and 225,463 students who are identified as fluent English proficient (FEP), but whose primary or home language is other than English. Together, these students comprised 67% of LAUSD's total student population. Spanish is the primary or home language of over 400,000 students, approximately 90% of LAUSD's total ELL and FEP student population.

The complaint, involving 16 students with disabilities at 15 different schools, alleged that the students' parents, who had limited or no English proficiency, had experienced significant delays ranging from two to nine months after making a request for written translations of their children's IEPs. In addition, seven of the families alleged that they had not received adequate oral interpretation at IEP meetings. In investigating the complaint, OCR considered the districts' obligations under both Title VI and under Section 504 of the Rehabilitation Act.

The complaint investigation and Resolution Agreement highlight the need for continual review of language assistance plans and procedures to ensure they are being implemented in a timely, appropriate manner. Prior to this complaint investigation, LAUSD had already put in place various procedures to ensure provision of trained oral interpreters and had set goals for providing timely translations of IEP documents.¹³⁴ These procedures were part of a modified consent decree in the matter of *Chanda Smith v. Los Angeles Unified School District*.¹³⁵

1. Providing *Timely* Access to Translated IEP Documents

Prior to the investigation, LAUSD had adopted goals for ensuring that translations of IEPs would be provided within 30 days. OCR's investigation identified concerns with the lack of clarity in

¹³³ Los Angeles (CA) USD (10/8/2008; OCR 09-07-1225); OCR's letter to the school district and the text of the resolution agreement are attached as Appendix B-2.

¹³⁴ LAUSD's current IEP translation request form notes that translations must be completed within 30 days of a parent's written request.

¹³⁵ An initial Consent Decree had been approved on April 15, 1996. Since that time, there have been continuing negotiations about and modifications of the consent decree (a history of the proceedings can be [found here](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0CCMQFjAA&url=http%3A%2F%2Fwww.oimla.com%2Fpdf%2Fhistory_chanda_smith_consent_decree.pdf&ei=u55zVPvQM5CvogStYDQDg&usg=AFQjCNE8zFNHibG7QqufrA9VFLkqKhgew&sig2=UAVNctxttaxE28gPKdXBQ&bvm=bv.80185997,d.cGU)) [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0CCMQFjAA&url=http%3A%2F%2Fwww.oimla.com%2Fpdf%2Fhistory_chanda_smith_consent_decree.pdf&ei=u55zVPvQM5CvogStYDQDg&usg=AFQjCNE8zFNHibG7QqufrA9VFLkqKhgew&sig2=UAVNctxttaxE28gPKdXBQ&bvm=bv.80185997,d.cGU].

terms of who was tracking to ensure translations were provided in a timely manner and some individuals who still mistakenly believed that parents could be required to consent to the IEP before the district would provide a translation. There was also indication that parents were not always informed of their right to obtain a translation of their child's IEP. The district agreed to take steps to further improve its system for translations.

2. Improving a System of Ensuring Quality Oral Interpretation

OCR's investigation also focused on the question of whether oral interpretation services provided to families in IEP meetings were adequate. Though the district had established a training program for individuals serving as interpreters, OCR found that only 7 of the 12 involved in the complaint had completed the training. Also, in interviews with parents and the interpreters themselves, OCR found that some interpreters provided summaries of a discussion rather than word-for-word interpretations and/or decided for themselves which portions of a discussion to interpret. Several interpreters stated that they did not know or were not comfortable with special education terminology. OCR acknowledged the extensive efforts that had been made to improve interpretation services but still found the district was not in compliance.

To resolve the complaint, LAUSD agreed to take additional detailed actions concerning its system for monitoring and ensuring the adequacy of interpretation in IEP meetings, receiving parent information and assuring parent rights, and reporting compliance to OCR. The texts of the OCR letter and resolution agreement provide an excellent snapshot of the practices and procedures considered necessary by OCR to satisfy current legal requirements.

These are just two examples of the various OCR actions that have addressed compliance with Title VI and other federal non-discrimination statutes. Attached as Appendix B-3 is a listing of recent OCR actions, briefly indicating by category actions that have been required to comply with various Federal non-discrimination statutes concerning non-discrimination against LEP parents.

F. Parent Participation and Informed Consent under the Individuals with Disabilities Education Act (IDEA)

As is evident from survey responses from Districts and the example of the LAUSD complaint investigation, the area of special education is one of special focus for ensuring adequate language access services for parents.

There are many examples of laws that require schools to provide certain information to parents or guardians and many that encourage schools to invite parent participation in decision making. Among these, the Individuals with Disabilities Education Act (IDEA),¹³⁶ stands out for the comprehensive requirements for parent participation in decision-making about the

¹³⁶ 20 U.S.C. 1400, *et seq.*, as amended, and implementing regulations at 34 CFR Part 300.

identification, evaluation and educational placement of a child with a disability.¹³⁷ One of the key purposes of the IDEA was to “[s]trengthen the role and responsibility of parents and ensur[e] that families of [children with disabilities] have meaningful opportunities to participate in the education of their children at school and at home.”¹³⁸ Not only does the IDEA require districts to provide meaningful opportunities for parents to participate in making decisions about whether or not to evaluate a child, whether a child should receive special education services, and if so, what those services should include; it also requires that districts obtain *informed, written consent* from parents or guardians before evaluating a child or providing special education services.¹³⁹

In arranging meetings to discuss a student’s Individualized Education Plan (IEP), districts must take “whatever action is necessary to ensure that the parent understands the proceedings of the IEP Team meeting, including arranging for an interpreter for parents . . . whose native language is other than English.”¹⁴⁰

“Consent” is defined by IDEA regulations to mean that “the parent has been fully informed of all information relevant to the activity for which consent is sought, in his or her native language, or other mode of communication;” and that “the parent understands and agrees in writing” to the activity for which consent is sought, and “the consent describes that activity and lists the records (if any) that will be released and to whom.”¹⁴¹

The IDEA requires that various types of important information be provided to parents in writing, including information about procedural safeguards (such as, the requirements for informed consent; the right to prior written notice of decisions relating to a student’s evaluation, placement or services; the right to review records; students’ rights in relation to discipline and formal dispute resolution options). The IDEA provides that the explanation of these procedural safeguards be “written in the native language of the parents (unless it clearly is not feasible to do so).”¹⁴²

In addition to the guidance from OCR, the U.S. Department of Education’s Office of Special Education Programs (OSEP) has provided some guidance on the question of whether and when the IDEA requires that IEPs and related documents must be provided in a written translated form versus through oral interpretation.

¹³⁷ See also, Kolb, W., “When “Practicable” and “Feasible” May Mean “Mandatory”: The Rights of Limited English Proficient Parents,” School Law Bulletin, September 2010, at p.14 (“IDEA is unique among major pieces of federal legislation for the specific recognition it gives to LEP parents.”).

¹³⁸ 20 U.S.C. 1400(c)(5)(B) [emphasis added].

¹³⁹ See IDEA at 20 U.S.C. 1414(1)(D)(i)(I) (requiring informed consent before conducting an evaluation) and (a)(1)(D)(i)(II) (requiring informed consent before providing special education and related services).

¹⁴⁰ 34 C.F.R. 300.322(e).

¹⁴¹ 34 CFR 300.9.

¹⁴² 20 U.S.C. 1415(d)(2).

In a guidance letter responding to questions posed by a district administrator, known as Letter to Boswell,¹⁴³ OSEP was asked “whether or not the translation of individualized education program (IEP) documents into the parent's native language is required under the Individuals with Disabilities Education Act (IDEA)” and, specifically, “whether it is ethical and legal to ask parents to sign a form that states they have been duly informed in their native language of the information shared by the IEP Team, instead of translating all of the IEP documents.”¹⁴⁴ OSEP began its response by acknowledging that there is no requirement in IDEA nor in its accompanying regulations that all IEP documents must be translated. The agency continued, however, by briefly recounting the many instances in the IEP process that require informed parental consent, the role of parents as members of the IEP team and districts’ obligation to “take *whatever action is necessary* to ensure that the parent understands the proceedings of the IEP Team meeting, including arranging for an interpreter for parents with deafness or whose native language is other than English.”¹⁴⁵

In light of the requirement to ensure parents are “fully informed” of “all relevant information” before consenting to services, OSEP explained further:

For parents who read in their native language, providing the parents with written translations of the IEP documents may be one way for a school district to demonstrate that the parent has been fully informed of their child's educational program. If, however, the child's parents are unable to read in their native language, written translations of the IEP documents may not show that the parent was fully informed. In those instances the school district (or State educational agency) should ensure that there is another mechanism in place to make certain that these parents are fully informed of all relevant information about the activity for which they are consenting.¹⁴⁶

Many states – including Washington – make available written translations of notices procedural safeguards and various IEP related forms in the predominant languages spoken by parents in the state.¹⁴⁷ These translated forms can greatly reduce the cost of translation for schools and districts, but by themselves they are not sufficient to provide access to the information families

¹⁴³ Letter to Boswell, 49 IDELR 196, 108 LRP 2214 (Sept. 4, 2007) [emphasis added]

[<https://www2.ed.gov/policy/speced/guid/idea/letters/2007-3/boswell090407iep3q2007.doc>].

¹⁴⁴ The writer stated that some of the parents in the school district could read in their native language and some could not, explaining that the school district provides translators at IEP meetings so parents can participate in the meetings in their native language. At the conclusion of the meeting, the parents are asked to sign a consent form in their native language that states the parents are fully informed of the contents of their child's education program. Additionally, following the IEP meeting, the translator provides the parents with a copy of the IEP documents in the parents' native language. The question was whether or not providing written translations of all the IEP documents is necessary.

¹⁴⁵ Id.

¹⁴⁶ Id.

¹⁴⁷ See OSPI's Special Education Forms page for links to model forms translated into seven different languages: <http://www.k12.wa.us/specialed/Data/ModelStateForms.aspx>.

need to participate in and make informed decisions about their child's educational program. The forms, for example, describe parents' rights to receive prior written notice of certain decisions and to pursue a complaint or request a hearing if they disagree with the decision. But the forms do not provide the information regarding the decision the district is proposing to make in regard to a particular child, or the reasons for it. Without this information, parents are not able to make an informed decision about whether or not to contest the district's decision.

OCR's resolution of the complaint in LAUSD provides an example of the steps a district must take to comply with both Title VI and Section 504 in ensuring all parents have meaningful access to information and opportunity to participate in the development of a child's IEP. That includes, in many instances, providing written translations of individual students' IEP related documents.

G. Federal and State Student Privacy Laws Interaction with Language Access Services

Federal and state laws protect students' rights to privacy in their educational records. At the federal level, the Family Educational Rights and Privacy Act (FERPA) protects the confidentiality of education records, requiring consent of parents or students, if they are 18 or older, before protected records may be disclosed.¹⁴⁸ Washington state law echoes the same privacy protection for student records and requirement for parent consent before disclosure.¹⁴⁹ Under other Washington state laws, students have some additional privacy protections against disclosure of information relating to family planning and substance abuse treatment.¹⁵⁰

Much information that is shared in educational situations where interpreters are used is the kind of information protected by student privacy laws. Accordingly, just as any other district employee, contractor or volunteer, individuals who serve as interpreters must also be aware of and take steps to comply with these confidentiality requirements.

¹⁴⁸ 20 U.S.C. 1232g(e), prohibiting distribution of funds to any educational agency or institution "unless [it] *effectively* informs the parents of students, or the students, if they are eighteen years of age or older, or are attending an institution of postsecondary education, of the rights accorded to them by [FERPA]." [Emphasis supplied.]; 34 CFR 99.7(b)(2)(a district has "flexibility to determine how to effectively notify" LEP parents, provided the notice "is consistent with applicable civil rights laws." 61 Fed.Reg. 59,293 (Nov. 21, 1996).

¹⁴⁹ RCW 28A.605.030.

¹⁵⁰ See, for example, <http://www.washingtonlawhelp.org/resource/your-right-to-keep-your-medical-records-priv>.

VII. Findings and Recommendations

FINDINGS

1. By and large, school districts across the state do not appear to have a uniform or consistent way to identify the LEP parents that reside in their districts and the state does not collect information specifically about the number of LEP parents across the state. Even when information about home language is collected on student enrollment forms or through Home Language Surveys for ELL purposes, it does not appear to be used to determine if a parent who is limited in English proficiency needs or wants an interpreter to communicate with the school, or if the parent needs access to translated documents. Of course, parents would have to be asked and/or notified in their primary language in the first place to understand that they can ask for an interpreter, and it is not clear how districts across the state inform parents of this right.
2. Most school districts have not identified criteria for determining when interpretive language services should be provided or informing LEP parents of their availability; consequently, the provision of interpretive language services is inconsistent and infrequent both within and among school districts.
3. A substantial number of school personnel do not appear to be aware of a school district's obligation to determine a parent's need for language services, how to provide those services or where to obtain them. For example, most LEP parents report that they are not informed of the right to or offered language access services; similarly, many school personnel have indicated that they are unaware of the availability of interpreters or other language access services or how to obtain them.
4. The provision of language access services to LEP parents is required in a broad array of settings, involves a specialized vocabulary spanning educational, medical and legal terminology and may raise unique ethical concerns. For example, interpretive language services may be required in a generalized setting such as a school board meeting (conference services), a parent-teacher conference, or an IEP meeting, and each of these may involve the use of documents that require sight-translation. Moreover, the terminology, particularly in special education settings, is likely to require knowledge of a psychological, educational, medical and legal vocabulary.
5. Most educators do not appear to have received training in how to work effectively with interpreters. For example, when talking with an LEP parent or conducting a meeting with an LEP parent, educators should be trained to look at the parent, not the interpreter, to pause and slow down when talking, and to leave sufficient time as interpreted conversations take longer. In addition, it is important for educators to understand that interpreters can alert them to cultural issues that may be interfering with communication and whether additional

explanation may be needed to ensure understanding, but that it is not appropriate for interpreters to insert their own opinions or advice into a conversation.

6. In developing language access plans, school districts must take into account the four factors identified by OCR and the DOJ, including: the number or proportion of LEP parents in the district; the frequency with which the district will need to communicate with the LEP parents; the nature and importance of the program or service provided by the district; and resources available to the district and costs. All forms of language services (face-to-face, video and telephonic) should be considered by all districts, but video and telephonic services should be available in every district to meet the needs of all LEP families, regardless of their number or what language they speak.

RECOMMENDATIONS

The information gathered in the course of this study from school district staff and community members highlights significant gaps in the current provision of adequate language access services to LEP parents in Washington Public Schools. Many districts have taken significant steps, such as developing contracts with language access service providers, hiring bilingual employees and translating some vital documents into the predominant languages of their LEP parent populations. In many cases, however, these efforts will not be sufficient to ensure effective communication with each LEP family in districts across the state. The “Dear Colleague” letter issued this month (January, 2015) from OCR and the DOJ serves as a reminder of the nature and scope of districts’ responsibility to ensure their programs are open and accessible to all by communicating effectively with all parents, including parents with limited English proficiency. Based on the preceding findings and analysis, OEO makes the following recommendations:

1. Mandate periodic collection of data to enable the provision of appropriate language access services to all LEP parents.

Providing language services to LEP parents is not possible in the absence of data identifying which parents need language access services and in what languages they need assistance. At the present time, these data are not consistently or comprehensively compiled. The existing [Home Language Survey](#) (Appendix C-2) is intended to identify each *student’s* primary or first language, but it contains a preliminary question: “If available, in what language would you prefer to receive communication from the school?”¹⁵¹ School districts are not required to use the home language survey, although all questions contained on it must be included in whatever form the school district uses. Knowing the number and languages of LEP parents in each district

¹⁵¹ The Home Language Survey is part of the “[Transitional Bilingual Instruction Program](#)” (WAC 392-160), intended to identify student eligibility for TBIP; it is part of the process of determining if a language other than English is spoken at home and if the student first spoke a language other than English.

will help the state and local districts plan and budget effectively to provide these required services.

Recommendation: Within one year, the state should require all school districts to follow specific procedures for the timely and accurate identification of LEP families and their language service needs,¹⁵² and collect that information. At a minimum, the procedures should require collection and reporting of data on the numbers of and preferred home language of each LEP parent/guardian in the district.

2. Require every school district to adopt a family language access policy that includes procedures for providing *qualified* interpreting services to all LEP parents who need them.

As was recently reiterated by OCR and the DOJ, “[s]chool districts...have an obligation to ensure meaningful communication with LEP parents in a language they can understand and to adequately notify LEP parents of information about any program, service, or activity of a school district ... that is called to the attention of non LEP parents.”¹⁵³ A district’s ability to meet this obligation in a timely and cost effective manner depends upon the existence of clear policies and procedures that both district staff and families can turn to for guidance in how to access interpretation and translation services when they are needed. Survey responses from school districts suggest that there are currently only a handful of districts where written policies, procedures or other guidance documents are available, explaining to district and school building staff this obligation to provide language access services and how to make that happen. Feedback from community members suggests that there is an equal need for development of written policies and procedures that inform families of the right to language access services and how they can request them from their school.

Written policies and procedures should provide clear guidance to all school administrators, teachers and other appropriate staff regarding when and how to access an interpreter (in-person, telephone, and video-conferencing) or translation services, in a timely manner, to ensure the district can meet its obligations in communicating with LEP parents. The policies should also specify minimum requirements for any individual providing interpretation or translation services on behalf of the district, including that the district will not rely on minors to provide interpretation for LEP parents or guardians. Attached as Appendix F is a sample language access policy developed by a group of stakeholders, including OEO, WSSDA and the Washington State Coalition for Language Access.

Recommendation: Within the next year, the state should require that all school districts develop written policies and procedures guiding the provision of appropriate language access services to all LEP parents and guardians. The state should review these plans to

¹⁵² This could be accomplished by requiring all school districts either to use the home language survey or to add those information items to the form the district uses.

¹⁵³ <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-el-201501.pdf>.

ensure that they include all essential elements of an effective language access plan and that they clarify that the district will not rely on bilingual students and other minors to provide interpretation or translation services for families.

3. On an annual basis, train all school personnel on the necessity for language services, when and how to ascertain whether LEP parents need language services, and how to access and use language services.

Survey responses from school districts and feedback from community members show that there are significant gaps in districts' identification of LEP parents' needs for language access services and concerns with the quality of services that are provided. Once language access needs are identified, staff need training to ensure knowledge of what options are available to meet those needs and how to use interpreting services effectively. Effective and respectful communication with another person through an interpreter requires that the speaker allows more time for the conversation; speaks directly to the other person in the conversation, not the interpreter; pauses between ideas; checks for understanding; matches the parent's voice, volume and level of eye contact during interpretation; and understands or is alert to cultural barriers that may interfere with communication.

Recommendation: Within two years, the state should:

- 1) Develop a training program, to be required for all school personnel on an annual basis, explaining the legal requirements for providing language services to LEP parents, how appropriate use of those services will facilitate communication between LEP families and educators, how to ascertain and document the need for those services, and how to provide those services*
- 2) Develop a training program on the most effective practices when using telephone, videoconferencing and in-person interpreters including understanding the role of interpreters; and*
- 3) make these trainings widely available in various formats, including webinars and videoconferencing in addition to traditional forms of training.¹⁵⁴*

4. Monitor to ensure every school district in the state has established an account allowing its staff ready access to a telephone language line.

The most substantial shortfall demonstrated by surveys of both school personnel and LEP parents was between the need for interpreting services and their availability. For example, in response to how language services have been provided, schools and districts reported that bi-

¹⁵⁴ See examples of online training materials made available by Highline School District (Speak Your Languages, available, here: <http://www.speakyourlanguages.com/courses/interpreter/index.htm>), and trainings available at Puget Sound ESD.

lingual students were used 11.67% of the time – slightly less than district-contractor interpreters (14.4%), but more than a phone interpreter line (9.44%).

Though there may never be sufficient numbers of language service providers to enable *face-to-face* interpreting services for all LEP parents at any time, there are ways to ensure availability of the necessary language access services across the state in a timely, consistent and equitable way.

Districts both large and small will likely need to be able to access telephone interpreters at some point to communicate in a timely and effective manner with each of their LEP parents. In large districts, the telephone language lines may be needed to communicate with families who speak less-common non-English languages. In small district or rural districts, access to a telephone language line may be necessary to communicate with LEP parents when the district is not able to identify qualified interpreters available to provide in-person services.

Recommendation: within the next year, the state should ensure each district has created an account through the available state contract or other similar private contract for telephone interpreter services.

5. Develop professional certification standards for foreign language educational interpreters in public schools.

The state can help ensure that each district is able to meet its obligations to provide equitable access for all families by developing a training and certification program and establishing minimum standards for individuals providing foreign language interpretation services in schools.

The state has charged the Professional Educator Standards Board with recommending minimum standards for individuals providing deaf interpretation in public schools, but no such standards currently exist for foreign language interpreters in public schools. The state has established certification standards and assessments that apply to individuals providing interpretation services in our state courts, medical facilities and social services. These requirements help ensure that the interpreters serving our state agencies have demonstrated the core competencies of fluency, methodology and the ethics of interpretation and translation. The state has already articulated a thorough process for certifying educational interpreters for students (and parents) who are deaf and could readily follow a very similar process for foreign language education interpreters.

Recommendation: within two years, in conjunction with existing professional organizations and associations, and with reference to the process and standards developed for deaf education interpreters,¹⁵⁵ the state should develop a program of minimal qualifications and standards for educational foreign language interpreters,

¹⁵⁵ Found at <https://app.leg.wa.gov/CMD/Handler.ashx?MethodName=getdocumentcontent&documentId=HFRCqv2fAoY&att=false>

which should include at a minimum: (a) a measure of fluency and literacy in English and a second language; (b) a measure of knowledge of educational vocabulary in English and in the other language; (c) training in conflict of interest and ethics for interpreting; (d) interpreting for meaning and the role of the interpreter.

6. Require districts to demonstrate that all individuals used as interpreters with LEP families have received adequate, appropriate training in the specific role of interpreter and demonstrate competency in the various skills required for interpretation.

Both the survey of school personnel and the feedback from the community meetings demonstrated that, far too often, individuals without the appropriate skills or training are being called upon to provide interpretation services, leading to breakdowns in communication between schools and families. Some of the individuals being asked to serve as interpreters have not had training in the specific ethics and methodologies for interpretation, and/or are not familiar with education terminology. Some districts identified fluency in both languages as a requirement for individuals providing interpretation, but there is no indication of established, effective means to screen interpreters for fluency in both languages. Until standards and a certification process are firmly in place for educational foreign language interpreters, training of bilingual staff in the methods and ethics of interpretation should be a minimum requirement for all districts. In all circumstances the use of a child or student as the interpreter should be prohibited.¹⁵⁶ These requirements should be reflected in each district's written language access policy.

Recommendations:

- (1) effective immediately, the state should prohibit districts from relying on a child of LEP parents or other student to provide necessary language access services; and*
- (2) within two years, the state should require districts to demonstrate that they have established minimum qualifications, including training in the role and methodology of interpreting, as well as effective means to screen their interpreter pool for these minimum qualifications.*

7. Update, publicize and expand the existing educational terminology glossaries with translations to common non-English languages spoken among LEP parents.

Educational terminology glossaries have already been created in three of the most common non-English languages spoken among LEP parents (Somali, Spanish and Vietnamese).¹⁵⁷ The state could greatly aid districts in their efforts to ensure quality interpretation for all LEP

¹⁵⁶ It is important to distinguish between asking a student to interpret – that is, to relay one person's comments to another in a different language (which is not appropriate) – and asking bilingual student leaders to engage with LEP families in their primary languages, such as in the role of student ambassador (which can be a positive way to welcome all families and celebrate multilingualism and multiculturalism).

¹⁵⁷ See glossaries available here: <https://www.k12.wa.us/CISL/FamilyEngagement/Communicating/Glossaries.aspx>.

families by publicizing these more widely and creating similar glossaries in the other common languages.

*Recommendation: over the next three years, the state should update and publicize to districts, families, interpreter training programs and language access service providers the existing Somali, Spanish and Vietnamese educational terminology glossaries and develop similar glossaries in the other common languages spoken among LEP parents in the state.*¹⁵⁸

8. Expand the bank of “frequently used” translated documents.

Building on the state bank of frequently used translated documents will decrease costs for districts in meeting their obligations to provide adequate written translations for LEP families. The state and school districts communicate significant amounts of important information to families throughout the school year about their children’s education, and must communicate all of this information equally to LEP parents. The state can ensure families receive accurate information by building upon the existing number of available translations for common forms. Various forms are currently available through links on different OSPI webpages and could be collected into a comprehensive bank of translated documents with a means for adding to it as more materials are translated into more languages over time.

Recommendations: within one year, the state should:

- 1) identify a core of documents routinely used to communicate with and notify English-speaking parents, and translate each of them into the languages spoken by LEP parents within the state;*
- 2) establish a website page from which all of the documents could be publicly accessible by school district, and maintain and revise the documents as necessary; and*
- 3) require districts to either use the translated model forms provided by the state (e.g. forms for special education related matters), or demonstrate the availability of translations of the equivalent district specific forms.*

9. Continue to promote multicultural and multilingual school environments and develop incentives for bilingual graduates from our public schools.

As the number of LEP parents in our public schools grows, so too does the number of students with bilingual abilities. The state has recently taken steps to foster bilingualism in our students by offering Dual Language programs, World Language Credits and the Washington State Seal of Biliteracy on diplomas.¹⁵⁹ The state can take further steps to encourage our bilingual students to pursue employment in our public schools as bilingual educators, administrators and language access service providers.

¹⁵⁸ For another example, see <http://www.neparentcenters.org/glossary/glossary.html>.

¹⁵⁹ See <http://www.k12.wa.us/WorldLanguages/CompetencyBasedCredits.aspx> and <http://www.k12.wa.us/worldlanguages/SealofBiliteracy.aspx>.

Recommendation: the state should continue to develop incentives for bilingual graduates from our public schools to pursue certification and employment in the field of education, including in the role of language access providers for LEP parents.

10. Increase access to on-demand video-conferencing interpretation services.

We know that much of our communication is non-verbal and there is great value in the ability to talk face to face. We also know that it is not realistic to expect that qualified interpreters in all of the different languages spoken by our public school families will be able to be physically present in all of the different regions and corners of the state. By increasing the availability and accessibility of video-conferencing interpretation services, the state can help ensure effective communication between families and schools.

Recommendation: the state should work with language access providers to increase the availability of on-demand video-conferencing interpretation services in educational settings.

VIII. Appendices

APPENDIX A: WASHINGTON STATE DEMOGRAPHIC INFORMATION

- A.1. Distribution of ELL Students by School District
- A.2. Number of Students per each Non-English Home Language (236) reported by OSPI
- A.3. Distribution of Language Groups by School District by Number of Students and Percentage of Families

APPENDIX B: FEDERAL LAW MATERIALS

- B.1. Tulsa (OK) Public Schools (2-4-2013; OCR 07-10-5002)
- B.2. Los Angeles (CA) USD (10/8/2008; OCR 09-07-1225)
- B.3. Recent OCR actions concerning non-discrimination against LEP parents.
- B.4. U.S. Department of Education Non-Regulatory Guidance Memorandum on NCLB, Appendix B, Key Title I, Part A, Parental Notice Requirements (April 23, 2004).
- B.5. Tabulation of state survey of practices concerning LEP parents.

APPENDIX C: STATE DOCUMENTS

- C.1. Governors Interagency Council on Health Disparities, Language Access Policy Paper
- C.2. OSPI Home Language Survey (English)
- C.3. Everett School District Family Language Access Policy
- C.4. PESB's Educational Interpreters (Deaf Interpreters) Standards Recommendations

APPENDIX D: TEXTS OF SURVEY RESULTS

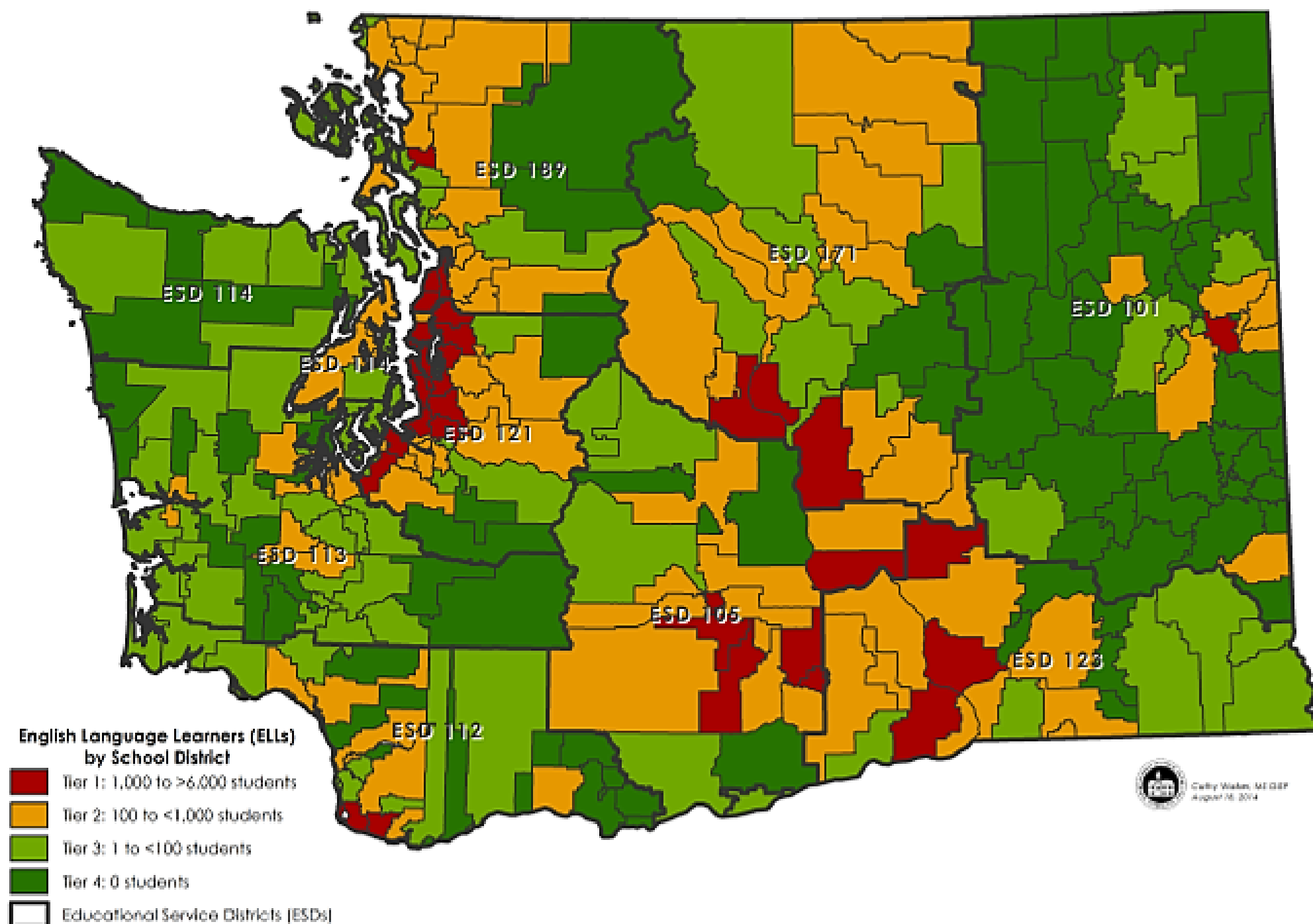
- D.1. Community Survey Results
- D.2. OSPI Survey Results

APPENDIX E: LANGUAGE SERVICE PROVIDER CERTIFICATION, TRAINING AND ETHICS

- E.1. Selected Sources of Certification, Training and Ethics
- E.2. DSHS Code of Ethics/Language Interpreter and Translator Code of Professional Conduct

APPENDIX F: K-12 SAMPLE LANGUAGE ACCESS POLICY

English Language Learners (ELLs) by School District



State - Aggregate
English Language Learners - Languages Spoken by Washington Students
October Enrollment; 2012-13; All Languages

- Indicates no data

Rank Within State	School Year	Language	Number of Students with Non English Home Language	Number of ELL Students
1	2012-13	Spanish	134,420	63,964
2	2012-13	Russian	10,721	4,010
3	2012-13	Vietnamese	10,221	3,519
4	2012-13	Polish	5,437	31
5	2012-13	Ukrainian	5,032	1,820
6	2012-13	Korean	4,375	1,256
7	2012-13	Somali	3,959	2,083
8	2012-13	Tagalog	3,645	1,186
9	2012-13	Chinese-Cantonese	2,715	591
10	2012-13	Punjabi	2,433	902
11	2012-13	Cambodian	2,293	795
12	2012-13	Arabic	2,290	1,227
13	2012-13	Unknown	2,233	313
14	2012-13	Chinese-Mandarin	1,965	529
15	2012-13	Chinese-Unspecified	1,935	523
16	2012-13	Japanese	1,552	453
17	2012-13	Amharic	1,375	544
18	2012-13	Samoan	1,324	601
19	2012-13	Marshallese	1,184	904
20	2012-13	Hindi	1,179	323
21	2012-13	Rumanian	895	295
22	2012-13	Lao	845	264
23	2012-13	Tigrinya	742	274
24	2012-13	Urdu	704	203
25	2012-13	French	660	227
26	2012-13	Telugu	641	163
27	2012-13	Nepali	600	481
28	2012-13	German	585	107
29	2012-13	Farsi	553	188
30	2012-13	Thai	501	187
31	2012-13	Bosnian	482	163
32	2012-13	Tamil	475	103
33	2012-13	Hmong	455	168
34	2012-13	Mixteco	415	322
35	2012-13	Swahili	414	223
36	2012-13	Oromo	401	143
37	2012-13	Sinhalese	355	14
38	2012-13	Turkish	350	194
39	2012-13	Portuguese	345	111
40	2012-13	Chuuk	321	222
41	2012-13	Ilokano	320	138
42	2012-13	Pilipino/Filipino	313	96
43	2012-13	Toishanese	294	107

44	2012-13	Moldavian	267	111
45	2012-13	Burmese	262	199
46	2012-13	Hebrew, Modern	259	74
47	2012-13	Karen	242	226
48	2012-13	Indonesian	217	63
49	2012-13	American Sign Language	215	4
50	2012-13	Bulgarian	210	39
51	2012-13	Mien	184	44
52	2012-13	Gujarati	169	33
53	2012-13	Mandingo	167	92
54	2012-13	Marathi	166	36
55	2012-13	Chamorro	162	44
56	2012-13	Khmer	149	51
57	2012-13	Chinese-Taiwanese	147	35
58	2012-13	Bengali	139	32
59	2012-13	Malayalam	138	36
60	2012-13	Italian	135	22
61	2012-13	Tongan	124	57
62	2012-13	Cham	115	24
63	2012-13	Kurdish	114	60
64	2012-13	Serbo-Croatian	113	19
65	2012-13	Mongolian	112	41
66	2012-13	Kosraean	111	70
67	2012-13	Albanian	108	32
68	2012-13	Dutch	99	25
69	2012-13	Swedish	95	15
70	2012-13	Wolof	94	47
71	2012-13	Kannada	89	21
72	2012-13	Chin	83	79
73	2012-13	Danish	79	8
74	2012-13	Armenian	79	26
75	2012-13	Ethiopic	78	39
76	2012-13	Finnish	77	11
77	2012-13	Kikuya	76	33
78	2012-13	Soninke	71	36
79	2012-13	Makah	71	-
80	2012-13	Pashto	65	34
81	2012-13	Creole	64	38
82	2012-13	Hungarian	63	13
83	2012-13	Persian	62	17
84	2012-13	Czech	59	26
85	2012-13	Norwegian	57	7
86	2012-13	Cebuano	55	21
87	2012-13	Twi	52	29
88	2012-13	Nuer	52	23
89	2012-13	Haitian Creole	51	30
90	2012-13	Kanjobal	50	38
91	2012-13	Carolinina	48	10
92	2012-13	Tibetan	47	14
93	2012-13	Palau	47	19
94	2012-13	Chungki/Chunkese	46	28
95	2012-13	Yakima	45	-

96	2012-13	Dinka	42	30
97	2012-13	Pohnpeian	41	27
98	2012-13	Mam	40	36
99	2012-13	Lithuanian	40	8
100	2012-13	Kirundi	39	32
101	2012-13	Afrikaans	38	9
102	2012-13	Greek, Modern	34	9
103	2012-13	Fijian	34	17
104	2012-13	Dari	33	20
105	2012-13	Byelorussian	31	6
106	2012-13	Tarasco	31	24
107	2012-13	Luganda	30	16
108	2012-13	Fula	29	11
109	2012-13	Bantu	28	20
110	2012-13	Igbo	27	7
111	2012-13	Trukese	25	14
112	2012-13	Bangala	25	11
113	2012-13	Kinyarwanda	25	23
114	2012-13	Lingala	24	17
115	2012-13	Visayan	24	12
116	2012-13	Liberian	24	10
117	2012-13	Sudanese-Arabic	23	8
118	2012-13	Akan	22	8
119	2012-13	Egyptian-Arabic	21	8
120	2012-13	Slovak	20	5
121	2012-13	Malay	20	9
122	2012-13	Edo	20	2
123	2012-13	Ibo	19	6
124	2012-13	Pushtu	19	10
125	2012-13	Krio	17	8
126	2012-13	Efik	16	-
127	2012-13	Estonian	16	2
128	2012-13	Hawaiian	16	5
129	2012-13	Georgian	16	6
130	2012-13	Bisaya	16	10
131	2012-13	Chinese-Fukienese	15	-
132	2012-13	Romansch	15	3
133	2012-13	Triqui	15	13
134	2012-13	Croatian	15	2
135	2012-13	Yap	15	4
136	2012-13	Salish	15	6
137	2012-13	Yoruba	14	-
138	2012-13	Ewe	14	6
139	2012-13	Nigerian	13	-
140	2012-13	Kmhmu	13	5
141	2012-13	Icelandic (Old)	13	5
142	2012-13	Aguateco	13	10
143	2012-13	Uzbek	13	7
144	2012-13	Krahn	12	4
145	2012-13	Mandinka	12	8
146	2012-13	Eritai	12	1
147	2012-13	Turkic	12	5

148	2012-13	Ga	12	6
149	2012-13	Karenni	11	11
150	2012-13	Sindhi	11	7
151	2012-13	Latvian	10	-
152	2012-13	Chao	9	1
153	2012-13	Jamaican	8	1
154	2012-13	Acholi	8	3
155	2012-13	Oriya	7	2
156	2012-13	Kru	7	6
157	2012-13	Bemba	7	2
158	2012-13	Slovenian	7	1
159	2012-13	Azerbaijani	7	4
160	2012-13	Sotho	6	4
161	2012-13	Taishan	6	3
162	2012-13	Pulau-Guai	6	3
163	2012-13	Navajo	6	3
164	2012-13	Berber	6	3
165	2012-13	Bambara	6	1
166	2012-13	Shona	5	-
167	2012-13	Marquesan	5	4
168	2012-13	Susu	5	2
169	2012-13	Bassa	5	3
170	2012-13	Sahaptian	4	2
171	2012-13	Javanese	4	1
172	2012-13	Fallani	4	2
173	2012-13	Kpelle	4	2
174	2012-13	Fanti	4	1
175	2012-13	Chewa	4	1
176	2012-13	Assamese	4	4
177	2012-13	FraFra	3	2
178	2012-13	Mano	3	1
179	2012-13	Balochi	3	3
180	2012-13	Herero	3	-
181	2012-13	Papago	3	-
182	2012-13	Balinese	3	1
183	2012-13	Konkani	3	2
184	2012-13	Saraiki	3	-
185	2012-13	Temne	3	-
186	2012-13	Tamazight	3	-
187	2012-13	Bikol	3	2
188	2012-13	Luo	3	1
189	2012-13	Hausa	3	2
190	2012-13	Aymara	2	-
191	2012-13	Makua	2	2
192	2012-13	Saurashtra	2	-
193	2012-13	Haida	2	1
194	2012-13	Lai	2	2
195	2012-13	Cakchiquel	2	1
196	2012-13	Maya-Quiche	2	2
197	2012-13	Sonrai	1	-
198	2012-13	Tulu	1	-
199	2012-13	Bamana	1	-

200	2012-13	Chagatai	1	-
201	2012-13	Quileute	1	-
202	2012-13	Kazakh	1	-
203	2012-13	Sao	1	-
204	2012-13	Nanai	1	-
205	2012-13	Guarani	1	-
206	2012-13	Chalchiteco	1	-
207	2012-13	Manchu	1	-
208	2012-13	Puyallup	1	-
209	2012-13	Hokkien	1	-
210	2012-13	Tswana	1	1
211	2012-13	Hiligaynon	1	-
212	2012-13	Zapoteco	1	1
213	2012-13	Tajiki	1	-
214	2012-13	Tedim	1	-
215	2012-13	Sanskrit	1	1
216	2012-13	Tuvin	1	-
217	2012-13	Stoney	1	-
218	2012-13	Kishinau	1	1
219	2012-13	Pali	1	-
220	2012-13	Kirgiz	1	-
221	2012-13	Yao	1	-
222	2012-13	Yupik	1	1
223	2012-13	Irish	1	-
224	2012-13	Nez Perce	1	-
225	2012-13	Pahlavi	1	-
226	2012-13	Chuvash	1	1
227	2012-13	Macedonian	1	1
228	2012-13	Sogdian	1	-
229	2012-13	Ute	1	-
230	2012-13	Urian	-	-
231	2012-13	Fulfulde	-	-
232	2012-13	Anuak	-	-
233	2012-13	Cornish	-	-
234	2012-13	Nyanja	-	-
235	2012-13	Bilen	-	-
236	2012-13	Kashmiri	-	-

School District	% Non English Home Languages	Total # Student Enrollment (2012-13)	Total # Student Enrollment (2012-13)	# Students with Non-English Home Languages	School District
Selah School District	53.9%	3,426	50,640	12,525	Seattle Public Schools
Oak Harbor School District	53.5%	5,609	27,577	10,535	Kent School District
McCleary School District	53.2%	313	16,070	9,641	Pasco School District
Ellensburg School District	52.2%	3,001	15,369	8,971	Yakima School District
Arlington School District	52.2%	5,482	18,390	7,679	Highline School District
Roosevelt School District	51.8%	31	19,015	7,330	Bellevue School District
Wahluke School District	49.5%	2,191	22,216	7,110	Federal Way School District
Orondo School District	44.9%	193	14,967	6,107	Renton School District
Palisades School District	44.7%	18	5,609	5,997	Oak Harbor School District
Brewster School District	43.1%	935	5,482	5,783	Arlington School District
Bridgeport School District	43.0%	813	29,070	5,559	Tacoma School District
Royal School District	39.5%	1,581	20,739	5,483	Edmonds School District
Quincy School District	38.5%	2,719	26,473	5,444	Evergreen School District (Clark)
Othello School District	36.9%	3,877	24,993	5,363	Lake Washington School District
Mabton School District	36.8%	912	14,886	5,319	Mukilteo School District
Granger School District	36.0%	1,530	22,938	5,061	Vancouver School District
Prescott School District	35.6%	366	14,720	4,694	Auburn School District
Tukwila School District	35.0%	2,944	18,923	4,518	Everett School District
Warden School District	33.1%	986	17,022	4,178	Kennewick School District
Grandview School District	32.6%	3,521	6,524	4,067	Sunnyside School District
Toppenish School District	32.0			3,693	Selah School District
North Franklin School District	31.7			3,163	Wenatchee School District
Sunnyside School District	31.2			3,131	Ellensburg School District
Manson School District	30.9			2,982	Mount Vernon School District
Pasco School District	30.1			2,891	Issaquah School District
Highland School District	29.7			2,857	Othello School District
Yakima School District	29.3			2,821	Northshore School District
WA State Center for Childhood Development	28.5			2,776	Clover Park School District
Union Gap School District	26.9			2,398	Toppenish School District
Lake Chelan School District	24.5			2,394	Spokane School District
Mount Vernon School District	23.4			2,297	Grandview School District
Prosser School District	21.8			2,290	Moses Lake School District
Wapato School District	21.7			2,134	Wahluke School District
Paterson School District	21.6			2,092	Quincy School District
Pateros School District	21.5			2,078	Tukwila School District
Soap Lake School District	21.4			1,910	Battle Ground School District
Highline School District	20.9			1,855	Puyallup School District
Renton School District	20.4			1,780	Marysville School District
Wenatchee School District	20.2			1,721	Franklin Pierce School District
College Place School District	19.4			1,687	Shoreline School District
Bellevue School District	19.2			1,610	Walla Walla Public Schools
Kent School District	19.1			1,492	Wapato School District
Mukilteo School District	17.9			1,408	Eastmont School District
Federal Way School District	16.0			1,322	North Franklin School District
Auburn School District	15.9			1,318	North Thurston Public Schools
Lake Quinalt School District	15.9			1,316	Bellingham School District
Burlington-Edison School District	15.7			1,245	Royal School District
Cashmere School District	15.7			1,242	Prosser School District

Kiona-Benton City School District	15.5
Touchet School District	15.5
Finley School District	15.4
South Bend School District	15.0
Oroville School District	14.9
Moses Lake School District	14.2
Cascade School District	14.2
Entiat School District	14.0
Lind School District	13.8
Edmonds School District	13.2
White Salmon Valley School District	12.9
East Valley School District (Yakima)	12.8
Nooksack Valley School District	12.7
Walla Walla Public Schools	12.6
Tonasket School District	12.6
Seattle Public Schools	12.4
Eastmont School District	12.4
Kennewick School District	12.3
Mount Adams School District	12.3
Everett School District	12.0
Franklin Pierce School District	11.5
Columbia (Walla Walla) School District	11.3
Vancouver School District	11.1
Clover Park School District	11.1
Fife School District	10.7
Lake Washington School District	10.5
Evergreen School District (Clark)	10.3
Ephrata School District	10.1
Tacoma School District	9.7
Shoreline School District	9.5
Aberdeen School District	9.5
Lynden School District	9.2
Easton School District	8.8
Kittitas School District	8.8
Office of the Governor (Sch for Blir)	8.7
Centralia School District	8.5
Okanogan School District	8.5
Zillah School District	8.4
Raymond School District	8.1
Waterville School District	8.1
Cape Flattery School District	8.1
Issaquah School District	7.8
Monroe School District	7.8
Shelton School District	7.8
Marysville School District	7.7
Mount Baker School District	7.6
Winlock School District	7.3
Battle Ground School District	7.2
Northshore School District	6.9
Mossyrock School District	6.9
Ferndale School District	6.7
Ocosta School District	6.7
Woodland School District	6.5
Mansfield School District	6.5

1,199	Burlington-Edison School District
1,109	Bethel School District
1,094	Monroe School District
1,087	Granger School District
807	Brewster School District
778	East Valley School District (Yakima)
766	Fife School District
735	Highland School District
732	Longview School District
724	Richland School District
704	Snohomish School District
702	Ferndale School District
695	Lake Chelan School District
693	Bridgeport School District
686	Olympia School District
666	Mabton School District
658	Shelton School District
645	Lake Stevens School District
644	Warden School District
643	Central Valley School District
619	Aberdeen School District
605	Centralia School District
558	University Place School District
552	West Valley School District (Yakima)
540	Sumner School District
525	Lynden School District
524	Sedro-Woolley School District
521	Camas School District
503	Kelso School District
481	Omak School District
471	Ephrata School District
466	Cashmere School District
461	Kiona-Benton City School District
457	Mead School District
451	Central Kitsap School District
408	Nooksack Valley School District
398	East Valley School District (Spokane)
395	Manson School District
387	North Kitsap School District
381	Tahoma School District
379	Cascade School District
374	Bremerton School District
344	Mercer Island School District
341	Enumclaw School District
338	White Salmon Valley School District
328	Union Gap School District
328	McCleary School District
326	Snoqualmie Valley School District
313	College Place School District
294	Riverview School District
292	Mount Baker School District
289	Woodland School District
286	Finley School District
278	Cheney School District

Conway School District	6.2
Sedro-Woolley School District	6.1
Sultan School District	6.0
Naches Valley School District	6.0
Bellingham School District	5.9
Star School District	5.9
West Valley School District (Yakima)	5.6
Rochester School District	5.6
Longview School District	5.5
Washington Military Department	5.4
Elma School District	5.3
San Juan Island School District	5.3
Willapa Valley School District	5.3
Meridian School District	5.2
Trout Lake School District	5.2
Blaine School District	5.1
Goldendale School District	5.1
Onalaska School District	5.1
Naselle-Grays River Valley School District	5.1
Kelso School District	5.0
Omak School District	5.0
Lopez School District	5.0
University Place School District	4.9
Pullman School District	4.8
Reardan-Edwall School District	4.7
Wahkiakum School District	4.7
Puyallup School District	4.5
North Thurston Public Schools	4.5
Ocean Beach School District	4.5
North Mason School District	4.4
Riverview School District	4.4
Kahlotus School District	4.4
East Valley School District (Spokane)	4.3
Hoquiam School District	4.3
Spokane School District	4.2
Quillayute Valley School District	4.2
Camas School District	4.1
Mercer Island School District	4.0
Wishram School District	4.0
Lake Stevens School District	3.9
Enumclaw School District	3.8
Bremerton School District	3.8
Kettle Falls School District	3.8
Lakewood School District	3.7
Olympia School District	3.6
Ridgefield School District	3.6
Snohomish School District	3.5
Chehalis School District	3.5
Cheney School District	3.3
Sumner School District	3.2
Bethel School District	3.1
Richland School District	3.0
North Kitsap School District	3.0
Colville School District	2.9

276	Tonasket School District
273	Quillayute Valley School District
256	Prescott School District
250	Rochester School District
249	Sultan School District
249	Pullman School District
247	Meridian School District
237	Mount Adams School District
235	Peninsula School District
226	Yelm School District
223	Blaine School District
223	Tumwater School District
220	Zillah School District
205	Chehalis School District
203	West Valley School District (Spokane)
201	Columbia (Walla Walla) School District
200	South Kitsap School District
189	Oroville School District
189	North Mason School District
186	Soap Lake School District
184	Okanogan School District
176	Stanwood-Camano School District
175	Lakewood School District
168	Naches Valley School District
163	Orondo School District
161	South Bend School District
159	Steilacoom Hist. School District
158	Ridgefield School District
157	Elma School District
155	Washougal School District
142	Sequim School District
141	Hoquiam School District
138	Anacortes School District
123	Pateros School District
118	Raymond School District
117	Kittitas School District
109	Colville School District
103	Orting School District
101	Goldendale School District
100	Winlock School District
98	White River School District
96	Entiat School District
94	Port Angeles School District
90	San Juan Island School District
88	Ocosta School District
87	Ocean Beach School District
80	Onalaska School District
80	Granite Falls School District
77	Vashon Island School District
77	Bainbridge Island School District
76	Touchet School District
73	Mossyrock School District
72	Cape Flattery School District
72	Kettle Falls School District

Great Northern School District	2.9
Skykomish School District	2.7
Snoqualmie Valley School District	2.6
West Valley School District (Spokane)	2.6
Anacortes School District	2.6
Coupeville School District	2.6
Wilson Creek School District	2.6
Central Valley School District	2.5
Tahoma School District	2.5
Washougal School District	2.5
Sequim School District	2.5
Vashon Island School District	2.5
Steilacoom Hist. School District	2.5
Brinnon School District	2.5
Mead School District	2.4
Toledo School District	2.4
Stevenson-Carson School District	2.3
Orcas Island School District	2.3
Port Townsend School District	2.3
Orting School District	2.2
Central Kitsap School District	2.0
Yelm School District	2.0
La Center School District	2.0
Methow Valley School District	2.0
Evaline School District	2.0
Stanwood-Camano School District	1.9
Granite Falls School District	1.9
Tumwater School District	1.8
Starbuck School District	1.8
Valley School District	1.8
Cle Elum-Roslyn School District	1.7
Green Mountain School District	1.6
Mary Walker School District	1.6
Orient School District	1.6
Satsop School District	1.6
Cosmopolis School District	1.5
Castle Rock School District	1.4
Hockinson School District	1.4
Montesano School District	1.4
Pomeroy School District	1.4
Peninsula School District	1.3
White River School District	1.3
Dieringer School District	1.3
Chimacum School District	1.3
Lyle School District	1.3
Port Angeles School District	1.2
Napavine School District	1.2
Mount Pleasant School District	1.2
Clarkston School District	1.1
Dayton School District	1.1
Loon Lake School District	1.1
Morton School District	1.1
South Kitsap School District	1.0
Bainbridge Island School District	1.0

69	Naselle-Grays River Valley School District
64	La Center School District
59	Port Townsend School District
57	Reardan-Edwall School District
57	Clarkston School District
54	Hockinson School District
53	Lind School District
53	Conway School District
53	WA State Center for Childhood Deafness
50	Lake Quinault School District
50	Coupeville School District
49	Paterson School District
48	Stevenson-Carson School District
45	Waterville School District
41	Wahkiakum School District
40	Dieringer School District
38	Toledo School District
38	Castle Rock School District
37	Montesano School District
37	Medical Lake School District
37	Valley School District
35	Willapa Valley School District
33	Orcas Island School District
31	Cle Elum-Roslyn School District
29	Roosevelt School District
28	Chimacum School District
25	South Whidbey School District
24	Methow Valley School District
24	Riverside School District
23	Lopez School District
23	Tenino School District
22	Trout Lake School District
19	Napavine School District
19	Eatonville School District
18	Mary Walker School District
17	Palisades School District
16	Easton School District
14	Deer Park School District
13	Mansfield School District
12	Kalama School District
12	Pioneer School District
10	Dayton School District
10	Newport School District
10	North Beach School District
10	Toutle Lake School District
9	Pomeroy School District
9	La Conner School District
9	Colfax School District
9	Office of the Governor (Sch for Blind)
8	Rainier School District
8	Freeman School District
8	Quilcene School District
8	Washington Military Department
8	Wilson Creek School District

Medical Lake School District	1.0
Southside School District	1.0
Harrington School District	1.0
Ritzville School District	1.0
Tenino School District	.9
Quilcene School District	.9
Republic School District	.9
South Whidbey School District	.8
Riverside School District	.8
Darrington School District	.8
Pioneer School District	.8
Toutle Lake School District	.8
La Conner School District	.7
Colfax School District	.7
Glenwood School District	.7
Liberty School District	.7
North Beach School District	.7
Centerville School District	.6
Kalama School District	.6
Rainier School District	.5
Boistfort School District	.5
Cusick School District	.5
Eatonville School District	.5
Endicott School District	.5
Klickitat School District	.5
Newport School District	.5
Northport School District	.5
Chewelah School District	.4
Freeman School District	.4
Oakville School District	.4
Wilbur School District	.4
Wellpinit School District	.3
Hood Canal School District	.3
Adna School District	.3
Columbia (Stevens) School District	.3
Coulee-Hartline School District	.3
Deer Park School District	.3
St. John School District	.3
Tekoa School District	.3
Waitsburg School District	.3
Grand Coulee Dam School District	.2
Nine Mile Falls School District	.2
Pe Ell School District	.2
Asotin-Anatone School District	.1
Concrete School District	.1
Davenport School District	.1
White Pass School District	.1
Nespelem School District	(0)?
Almira School District	(0)?
Benge School District	(0)?
Bickleton School District	(0)?
Carbonado School District	(0)?
Colton School District	(0)?
Crescent School District	(0)?

7	Darrington School District
7	Lyle School District
7	Morton School District
7	Ritzville School District
7	Wishram School District
6	Chewelah School District
6	Liberty School District
6	Nine Mile Falls School District
6	Orient School District
6	Republic School District
5	Green Mountain School District
5	Kahlotus School District
5	Loon Lake School District
4	Cosmopolis School District
4	Southside School District
4	Adna School District
3	Wellpinit School District
3	Great Northern School District
3	Cusick School District
3	Grand Coulee Dam School District
3	Northport School District
2	Brinnon School District
2	Hood Canal School District
2	Evaline School District
2	Harrington School District
2	Oakville School District
2	Satsop School District
2	Skykomish School District
2	Waitsburg School District
2	Wilbur School District
1	Asotin-Anatone School District
1	Boistfort School District
1	Centerville School District
1	Columbia (Stevens) School District
1	Concrete School District
1	Coulee-Hartline School District
1	Davenport School District
1	Endicott School District
1	Glenwood School District
1	Klickitat School District
1	Mount Pleasant School District
1	Pe Ell School District
1	St. John School District
1	Star School District
1	Starbuck School District
1	Tekoa School District
1	White Pass School District
(0)?	Nespelem School District
(0)?	Almira School District
(0)?	Benge School District
(0)?	Bickleton School District
(0)?	Carbonado School District
(0)?	Colton School District
(0)?	Crescent School District

Creston School District	(0)?
Curlew School District	(0)?
Damman School District	(0)?
Dixie School District	(0)?
Evergreen School District (Stevens)	(0)?
Garfield School District	(0)?
Grapeview School District	(0)?
Griffin School District	(0)?
Inchelium School District	(0)?
Index School District	(0)?
Keller School District	(0)?
LaCrosse School District	(0)?
Lamont School District	(0)?
Mary M Knight School District	(0)?
Mill A School District	(0)?
North River School District	(0)?
Oakesdale School District	(0)?
Odessa School District	(0)?
Onion Creek School District	(0)?
Orchard Prairie School District	(0)?
Palouse School District	(0)?
Queets-Clearwater School District	(0)?
Rosalia School District	(0)?
Selkirk School District	(0)?
Shaw Island School District	(0)?
Skamania School District	(0)?
Sprague School District	(0)?
Stehekin School District	(0)?
Steptoe School District	(0)?
Summit Valley School District	(0)?
Taholah School District	(0)?
Thorp School District	(0)?
Washtucna School District	(0)?
Wishkah Valley School District	(0)?



(0)?	Creston School District
(0)?	Curlew School District
(0)?	Damman School District
(0)?	Dixie School District
(0)?	Evergreen School District (Stevens)
(0)?	Garfield School District
(0)?	Grapeview School District
(0)?	Griffin School District
(0)?	Inchelium School District
(0)?	Index School District
(0)?	Keller School District
(0)?	LaCrosse School District
(0)?	Lamont School District
(0)?	Mary M Knight School District
(0)?	Mill A School District
(0)?	North River School District
(0)?	Oakesdale School District
(0)?	Odessa School District
(0)?	Onion Creek School District
(0)?	Orchard Prairie School District
(0)?	Palouse School District
(0)?	Queets-Clearwater School District
(0)?	Rosalia School District
(0)?	Selkirk School District
(0)?	Shaw Island School District
(0)?	Skamania School District
(0)?	Sprague School District
(0)?	Stehekin School District
(0)?	Steptoe School District
(0)?	Summit Valley School District
(0)?	Taholah School District
(0)?	Thorp School District
(0)?	Washtucna School District
(0)?	Wishkah Valley School District

Title VI: (LEP); Tulsa Public Schools (District) (OK) Compliance Review (07-10-5002)

On February 4, 2103, OCR resolved a Title VI compliance review of the Tulsa Public Schools (District). OCR's review assessed whether the District discriminates against limited English proficient (LEP) parents and guardians by failing to ensure they have meaningful access to information that is provided to parents and guardians in English. Prior to the completion of OCR's investigation, the District submitted a Resolution Agreement that, when fully implemented, will address the issue assessed in the compliance review. At the time OCR opened the compliance review, the District did not have written policies or procedures for responding to parent requests for documents in languages other than English or requests for a foreign language interpreter, and did not consistently track or keep records regarding which parents in the District are LEP and when the District received requests from and provided translation or interpreter services, or translation/interpreter services to LEP parents. OCR's preliminary investigation indicated that the District did not have a set process in place for notifying LEP parents that it has interpreters and translators available for school-related communications and sometimes had students serve as interpreters for parents. The investigation also suggested that the District did not consistently evaluate or assess the language skills of the District and non-District employees it uses as interpreters and translators and did not provide training to its foreign language interpreters and translators regarding the role of an interpreter/translator, the ethics of interpreting and translating, and the need to maintain confidentiality. In addition, the investigation noted that the District did not have as many resources in place for communicating with LEP parents who speak a language other than Spanish as it did for Spanish-speaking parents.

Under the Resolution Agreement, the District must submit a detailed plan to OCR for providing language assistance services to LEP parents and guardians ensuring the parents and guardians have meaningful access to information about the District's programs and activities. As part of its implementation of this plan, the District will provide language assistance services to all LEP parents and guardians of District students who need such assistance with respect to information about school programs and activities that are provided to other parents and guardians. The Resolution Agreement also requires the District to provide training for administrators and staff regarding the provision of language assistance services to LEP parents and guardians, and to ensure that all District employees who serve as interpreters and translators for LEP parents and guardians are appropriately trained and proficient in the languages spoken by the parents/guardians. OCR will monitor the District's compliance with the Resolution Agreement.

Compliance Resolution

Tulsa Public Schools (District)

OFFICE FOR CIVIL RIGHTS, REGION VII

February 4, 2013

J. Douglas Mann, Esq.
Rosenstein, Fist & Ringold
525 South Main, Suite 700
Tulsa, Oklahoma 74103

Re: OCR Docket No. 07105002

Dear Mr. Mann:

This letter is to notify you of the determination made by the U.S. Department of Education (Department), Office for Civil Rights (OCR), regarding OCR Docket No. 07105002. In this compliance review, which OCR opened on March 31, 2010, OCR assessed whether the Tulsa Public Schools (District), Tulsa, Oklahoma, discriminate against limited English proficient (LEP) parents and guardians by failing to ensure they have meaningful access to information that is provided to parents and guardians in English. This letter confirms the voluntary resolution of the compliance review.

OCR is responsible for enforcing Title VI of the Civil Rights Act of 1964 (Title VI), 42 United States Code (U.S.C.) § 2000d, and its implementing regulation, 34 C.F.R. Part 100. Title VI prohibits discrimination on the basis of race, color, or national origin by recipients of Federal financial assistance (FFA). As a recipient of FFA from the Department, the District is subject to Title VI.

OCR investigated whether the District violated the regulation implementing Title VI, at 34 C.F.R. § 100.3(a) and (b), which provides, in relevant part, that recipients of Federal financial assistance may not, directly or through contractual or other arrangements, on the ground of national origin, exclude persons from participation in their programs, deny them any service or the benefits of their programs, or subject them to separate treatment. Specifically, the Title VI implementing regulation, at 34 C.F.R. § 100.3(b)(2), provides that, in determining the types of services or benefits that will be provided, recipients may not utilize criteria or methods of administration that have the effect of subjecting individuals to discrimination because of their national origin.

Pursuant to the regulation, the District has an obligation to ensure "meaningful access" to its programs and activities to LEP parents. Specifically, under Title VI, the District has an obligation to "adequately notify" national origin-minority group parents of school programs and activities that are called to the attention of other parents. The terms "adequately notify" and "meaningful access" means that parents who are LEP - based on their ability to read, speak, write, or understand spoken English - are not to be excluded from, or denied the benefits of, the District's programs and activities.

The District is the second largest school district in Oklahoma, serving approximately 41,000 students. During the 2009-2010 school year, the District served a total of 6,412 English language learner (ELL) students. Approximately 93% of the District's ELL students speak Spanish. The other predominant languages spoken by the District's ELL students are Hmong, Vietnamese, Arabic, Portuguese, Truka and Urdu.

The information obtained during OCR's investigation indicates that the District did not have written policies or procedures for responding to parent requests for documents in languages other than English or requests for a foreign language interpreter. The District did not consistently track or keep records regarding which parents in the District are LEP, requests from LEP parents for translation or interpreter services, and translation/interpreter services that it has provided to LEP parents. OCR's preliminary investigation indicated that the District did not have a set process in place for notifying LEP parents that it has interpreters and translators available for school-related communications; OCR also noted that students sometimes serve as interpreters for their parents or other students' parents. The investigation also suggested that the District did not consistently evaluate or assess the language skills of the District and non-District employees it uses as interpreters and translators and did not provide training to its foreign language interpreters and translators regarding the role of an interpreter/translator, the ethics of interpreting and translating, and the need to maintain confidentiality. OCR also noted that the District does not consistently provide LEP parents who speak languages other than Spanish with access to the same information that the District provides to English-speaking parents.

Prior to the completion of OCR's investigation, the District submitted a signed agreement (copy enclosed) on January 28, 2013, that when fully implemented, will address the issue assessed in this compliance review. The agreement requires the District to develop a written plan to provide language assistance to LEP parents. The plan will include processes for:

- notifying LEP parents and guardians, in a language they will understand, of the availability of free language assistance services with respect to information about school programs and activities;
- identifying LEP parents and guardians who may need language assistance;
- ensuring that each school building documents in a database the LEP parents and guardians identified as needing language assistance services;
- ensuring that the central administration maintains a District-wide list of LEP parents and guardians identified by each building as needing language assistance services;
- ensuring that each school and the central administration office document the language assistance services provided to LEP parents and guardians;

- ensuring that when the children of LEP parents/guardians transfer from one building to another within the District, information regarding the language assistance needs of the parents/guardians is transferred to the building to which the children transfer;
- advising District staff who are likely to interact with LEP parents and guardians about how to timely obtain language assistance for the parents and guardians;
- ensuring that the interpreters and translators the District uses are proficient in the languages spoken by students and parents/guardians in the District, are competent to provide interpretation and translation services, and are appropriately trained; and
- identifying and translating vital written documents into the language of each frequently encountered LEP parent group eligible to be served and/or likely to be affected by the District's program or activities..

The agreement also requires the District to evaluate the effectiveness of its Language Assistance Plan, provide annual training to District administrators and staff members about the District's procedures for identifying and providing language assistance to LEP parents and guardians, and provide annual training to District employees who serve as foreign language interpreters and/or translators for LEP parents and guardians about the role of an interpreter/translator, the ethics of interpreting and translating, and the need to maintain confidentiality.

OCR will monitor the implementation of the agreement and the District's actions to ensure the District's compliance with Title VI. The District has agreed to provide data and other information in a timely manner in accordance with the reporting requirements of the agreement. OCR will conduct additional visits and request additional information as necessary to determine whether the District has fulfilled the terms of the agreement and is in compliance with Title VI with regard to the issues in the review. Should the District fail to fully implement the agreement, OCR will take appropriate action to ensure the District's compliance with Title VI, including possibly initiating administrative enforcement or judicial proceedings to enforce the specific terms and obligations of the agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10), or judicial proceedings to enforce this agreement, OCR shall give the District written notice of the alleged breach and a minimum of sixty (60) calendar days to cure the alleged breach.

This letter sets forth OCR's determination in an individual OCR case. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public.

Under the Freedom of Information Act, it may be necessary to release this document and related records upon request. In the event that OCR receives such a request, it will seek to protect, to the extent provided by law, personal information which, if released, could reasonably be expected to constitute an unwarranted invasion of privacy.

OCR is committed to prompt and effective service. If you have any questions regarding this letter, please contact Kelli Douglas, Supervisory Attorney, at (816) 268-0564 (voice) or (877) 521-2172 (telecommunications device for the deaf), or by e-mail at kelli.douglas@ed.gov.

Sincerely,

/s/

Angela M. Bennett
Director

Enclosure

cc: Janet Barresi
State Superintendent of Public Instruction

Resolution Agreement

Tulsa Public Schools OCR Docket Number 07105002

The Tulsa Public Schools (District), Tulsa, Oklahoma, submits this Resolution Agreement (Agreement) to the U.S. Department of Education, Office for Civil Rights (OCR), to resolve OCR Docket No. 07105002 and ensure that the District provides limited English proficient parents and guardians meaningful access to information it provides to parents and guardians in English, as required by Title VI of the Civil Rights Act of 1964 (Title VI), 29 United States Code (U.S.C.) § 2000d, and its implementing regulation at 34 Code of Federal Regulations (C.F.R.) Part 100.

The District acknowledges that under Title VI, it has an obligation to adequately notify national origin-minority limited English proficient (LEP) parents and guardians of school programs and activities that are called to the attention of other parents/guardians. The District further acknowledges that under Title VI, it has the responsibility to ensure meaningful access by LEP persons to information about its programs and activities.

The District agrees to take the following actions:

DEVELOPMENT AND IMPLEMENTATION OF LANGUAGE ASSISTANCE PLAN FOR COMMUNICATION WITH PARENTS AND GUARDIANS

1. By September 6, 2012, the District will develop and submit to OCR for review and approval a plan for providing language assistance services to LEP parents and guardians of District students (Language Assistance Plan) that ensures they have meaningful access to information about the District's programs and activities. As part of its implementation of its Language Assistance Plan, the District will provide language assistance services, as required by law, to all LEP parents and guardians who need language assistance with respect to the information provided to other parents about school programs and activities. These language assistance services may include the use of various services such as onsite translators/interpreters, telephonic translators/interpreters services, and translation programs. At a minimum, the Language Assistance Plan will also include the following:

(a) A process for notifying LEP parents and guardians of the availability of free language assistance services with respect to information about school programs and activities. The notification will include information about how to access the services and identify a District contact person who can answer any questions regarding parental communication and assist parents/guardians in accessing interpreter services or translated documents. The notification will be provided in the languages available to the District via "TransAct Parent Notifications" and "Language Line Services." The notice will, at a minimum, be published on the District's website at the homepage and under the "Parents" section of the website, in the "Student and Family Guide to Success formerly known as the Behavior Response Plan" handbook, and on all school websites and site bulletin boards.

(b) A process for identifying LEP parents and guardians who may need language assistance, including, at a minimum: (1) through home language surveys as created by the Oklahoma State Department of Education in languages contained in those forms; (2) asking parents in a language they understand (in writing and/or orally as appropriate) if they need written translations or oral interpretation of communications and if so, to specify the language(s) needed; and (3) through an interactive process between parents and students and staff at the school sites.

(c) A process ensuring that each school building documents in its PowerSchool database (or a similar database) LEP parents and guardians identified as needing language assistance services. This process will also ensure that the information in the database regarding which parents/guardians are LEP is available to all staff in the building who may interact with LEP parents and guardians, as well as to the central administration. Staff for purposes of the Agreement will include all relevant administrators, teachers, counselors, and support staff.

(d) A process ensuring that the central administration through its PowerSchool database (or a similar database) maintains a District-wide list of LEP parents and guardians identified by each building as needing language assistance services.

(e) A process ensuring that each school and the central administration office keeps a log of or documents in another format, the language assistance services it provides to LEP parents and guardians. The log (or alternate form of documentation) will identify the date the language assistance service was provided, the type of services provided (e.g., interpreter service for Section 504 meeting), and the service provider (by name or, if the services were provided through a company, the name of the company). The log will include translation and interpreting services provided, including but not limited to, scheduled or pre-arranged interactions between the parents and District staff or administrators, Section 504 and IEP meetings, discipline hearings, and parent-teacher conferences.

(f) A process through its PowerSchool database (or a similar database) ensuring that when the children of LEP parents/guardians transfer from one building to another within the District, information regarding the language assistance needs of the parents/guardians is transferred to the building to which the children transfer.

(g) A process by which District staff who are likely to interact with identified LEP parents and guardians are advised of the parents'/guardians' need for language assistance services, the circumstances under which they may need assistance (e.g., parent-teacher conferences, documents related to disciplinary actions, disciplinary hearings, documents related to IEPs or Section 504 Plans, and IEP team meetings), the means by which they may timely obtain such assistance for the parent, the available translated documents, and the applicable record-keeping and reporting requirements.

(h) A process by which the District ensures that the interpreters and translators it uses are proficient in the languages spoken by students and parents/guardians in the District and competent to provide interpretation and translation services. The District will also ensure that all interpreters and translators are trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.

(i) A process by which District staff may obtain, in a timely manner, appropriate, qualified translators or interpreters as needed (this could include the use of various services such as onsite translators/interpreters, telephonic translators/interpreters services, and translation programs). The District's means to provide the services must be well-publicized and accessible to staff.

(j) A process for notifying relevant District staff, on an annual basis, that the use of family members and friends for the provision of language assistance is not encouraged. The notice shall state that the use of such individuals may raise issues of confidentiality, privacy, or conflict of interest, and that, in many circumstances, such persons are not competent to provide quality, accurate interpretations. Additionally, the notice shall state that the use of minor children raises particular concerns about competency, quality, and accuracy of interpretations and it is not advisable to use such children to convey information about their own education and/or complex information.

(k) A process for identifying and translating vital written documents¹ into the language of each predominant language group. For languages that are less predominant, the District will ensure that students and parents/guardians have been advised, in a language that they understand, of who to contact in the District if they need assistance in understanding vital written documents. The District will notify staff members that these translations are available. "Predominant language group" means each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the LEP parent/guardian population eligible to be served or likely to be affected or encountered.

2. Within thirty (30) days of completing the training required by paragraph 5 below, the District will begin implementing the Language Assistance Plan at the District level and at all District schools. Within six (6) weeks of full implementation, the District will provide OCR documentation showing it has implemented the Language Assistance Plan. Full implementation must occur within ninety (90) days of the beginning of implementation.

3. By December 31, 2013, the District will conduct its first annual evaluation of its Language Assistance Plan, as implemented, and determine what, if any, changes it will make to the Language Assistance Plan for the following school year to make it more effective.

4. By January 15, 2014, the District will provide OCR documentation showing it has satisfied item 3 of this Agreement.

TRAINING FOR ADMINISTRATORS AND STAFF

5. Within sixty (60) days of OCR's approval of the Language Assistance Plan (excluding summer recess) and by October 1 annually thereafter, the District will provide training to all District principals and other administrators and staff members who have direct contact with LEP parents and guardians about the procedures for obtaining language assistance for LEP parents/guardians. The training must address, at a minimum:

(a) Title VI's prohibition against discrimination on the basis of race, color, or national origin, including the District's obligation to ensure that LEP parents and guardians have meaningful access to information that is provided to parents and guardians in English;

(b) what translation and interpretation services (including documents already translated) the District has available to provide language assistance services to LEP parents and guardians and how District employees may access the services to facilitate communication with LEP parents and guardians;

(c) how to identify LEP parents and guardians in need of language assistance;

(d) how and when to notify parents and guardians of District students that the District has interpreters and translators available to facilitate communications regarding school-related matters at no cost to the parents/guardians;

(e) how and where to document which parents and guardians of District students are LEP and in need of language assistance;

(f) how the District will ensure District employees, non-District contractors, and, if applicable, volunteers it uses to provide language assistance to LEP parents and guardians are proficient in the languages spoken by students and parents/guardians in the District and competent (including the requirements of item 1(h) of this Agreement), to provide such services; and

(g) who to contact with questions about the District's procedures for obtaining language assistance services for LEP parents and guardians.

6. The District will provide OCR documentation within six (6) weeks of full implementation of the Language Assistance Plan, showing it has provided the initial training session required by item 5 of this Agreement. The District does not have to provide documentation of subsequent training sessions unless OCR requests such documentation. The documentation of the initial training session must include:

(a) the date, time, and location of the training;

(b) the topics addressed at the training;

(c) copies of handouts distributed to the training participants;

(d) the name(s) and title(s) of the individual(s) who conducted the training; and

(e) one or more sign-in sheets with the name and title of each employee who participated in the training, and, if applicable, the school at which each employee works.

7. By October 1, 2013, and by October 1 annually thereafter, the District will ensure that all District employees who serve as interpreters and/or translators for LEP parents and guardians are proficient in the languages spoken by students and parents/guardians in the District and have received training on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality. The District is not required to provide the training itself, and District employees who serve as interpreters and/or translators do not have to repeat the training once they have received it. The annual requirement is to ensure that new interpreters and translators receive this training.

8. By November 1, 2013, the District will provide OCR documentation showing that the District employees who served as interpreters and/or translators for LEP parents and guardians during the first quarter of the 2013-14 school year are proficient in the languages spoken by students and parents/guardians in the District and have received the training required by item 7 of this Agreement.

The District understands that OCR will not close the monitoring of this Agreement until OCR determines that the District has fulfilled the terms of the Agreement and is in compliance with the regulation implementing Title VI at 34 C.F.R. § 100.3, which was at issue in this case. The District also understands that by signing this Agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirements of this Agreement. Further, the District understands that during the monitoring of this Agreement, if necessary, OCR may visit the District, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the District has fulfilled the terms of this Agreement and is in compliance with the regulation implementing Title VI at 34 C.F.R. § 100.3, which was at issue in this case.

The District understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement or judicial proceedings to enforce this Agreement, OCR shall give the District written notice of the alleged breach and a minimum of sixty (60) calendar days to cure the alleged breach.

/s/

1/22/2013

Dr. Keith E. Ballard, Superintendent
Tulsa Public Schools

Date

¹ Typical vital documents may include the following: notice of procedural safeguards in the context of providing children with disabilities with a free appropriate public education (FAPE) under Section 504 of the Rehabilitation Act of 1973 (Section 504) and the Individuals with Disabilities Education Act (IDEA); documentation related to eligibility and placement decisions under Section 504 and IDEA; disciplinary notices and procedures; registration/enrollment forms, emergency notification forms, and other forms most commonly used by the District to communicate with parents; report cards and student progress reports; notices of parent-teacher conferences or meetings; parent handbooks and fact sheets; documentation regarding the availability of academic options and planning, including gifted and talented programs, enrollment opportunities and pre-requisites for AP/honors classes, alternative language programs, college preparedness planning, and counseling and guidance services; screening procedures that request information from parents about the child's language background and the parents' preferred language for communication with the school; requests for parent permission for student participation in District/school sponsored programs and activities; and announcements distributed to students/parents that contain information about school and District activities for which notice is needed to participate in such activities (e.g. testing, school performances, co-curricular activities, activities requiring an application).

51 IDELR 229

Los Angeles (CA) Unified School District

09-07-1225

Office for Civil Rights, Western Division, San
Francisco (California)

October 8, 2008

265.025 Participants in/Procedures for IEP Meeting
390.017 In General

Summary

A district's failure to properly train its oral interpreters and to communicate the requirements for obtaining written translations of IEP meetings violated of Section 504 and Title II. OCR noted that more than half of the interpreters it interviewed had not participated in the district's translator training program and had not been asked to demonstrate their competency. Furthermore, some interpreters stated that they merely summarized IEP meetings, or translated portions of meetings. Others acknowledged that they were not comfortable translating special education terminology into Spanish. Although the district had improved its interpretation services pursuant to a prior resolution agreement, the frequency and types of concerns that were observed persuaded OCR that systematic problems continued to exist. The district's efforts also came up short with respect to providing written translations of IEP meetings. Although the speed with which the district provided such translations had improved, some parents still believed that they had to consent to an IEP before receiving a translation. "The role of parents of students with disabilities in the identification, evaluation and placement process is essential," OCR wrote. In a district in which the primary language of most parents was not English, remaining flaws in the district's processes resulted in the inability of many parents to fully understand IEP meetings and effectively participate in the IEP process. The district entered an additional resolution agreement, promising to further clarify to parents that consent is not a prerequisite to receiving a translation, and to improve its oversight of interpreter training.

Stephen Chen, Team Leader

Dear Ms. Spears,

The U.S. Department of Education, Office for Civil Rights (OCR) has completed its investigation of the above-referenced complaint against the Los Angeles Unified School District (District). The complaint alleged that the District discriminated against students¹ with disabilities and their limited English-proficient (LEP) and monolingual Spanish-speaking parents, based on national origin and disability. Specifically, OCR investigated whether the District denied these parents the opportunity to meaningfully participate in the special education process by (1) failing to translate Individualized Education Program (IEP) documents, and/or (2) failing to provide adequate oral interpretation services at IEP meetings.

OCR investigated the complaint under the authority of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Dis-

abilities Act of 1990, and their implementing regulations. Title VI prohibits discrimination on the basis of race, color or national origin in programs and activities operated by recipients of Federal financial assistance. Section 504 prohibits discrimination on the basis of disability in programs and activities operated by recipients of Federal financial assistance. OCR also has jurisdiction as a designated agency under Title II of the Americans with Disabilities Act of 1990 over complaints alleging discrimination on the basis of disability that are filed against certain public entities. The District receives Department funds, is a public education system, and is subject to the requirements of Title VI, Section 504, Title II and their regulations.

In this case, OCR gathered evidence by reviewing documents and information submitted by both the complainant and the District, and interviewing relevant District staff and LEP and monolingual Spanish-speaking parents. OCR also interviewed staff at seven different District schools, including two non-public schools (NPSs) and one charter school. Several staff interviews were conducted by telephone.

Based on the evidence, OCR concluded that the District was not in compliance with Title VI and Section 504/Title II and their implementing regulations. Throughout the investigation and subsequent discussions, the District indicated its willingness to address problems identified by OCR. After a series of discussions between OCR and the District, on October 24, 2008 the District signed a resolution agreement to address the compliance concerns. The applicable legal standards, a summary of the facts gathered during our investigation, the reasons for our determinations, and the case resolution are summarized below.

The Title VI implementing regulations at 34 C.F.R. § 100.3(a) and (b) provide that recipients of Federal financial assistance may not, directly or through contractual or other arrangements, on the ground of race, color or national origin, exclude persons from participation in its programs, deny them any service or benefits of its programs, provide any service or benefit which is different or provided in a different manner from that provided to others. Section 100.3(b)(2) provides that, in determining the types of services or benefits that will be provided, recipients may not utilize criteria or methods of administration, which have the affect of subjecting individuals to discrimination because of their race, color or national origin.

On May 25, 1970, pursuant to its authority under Title VI, the Department of Education issued a memorandum entitled "Identification of Discrimination and Denial of Services on the Basis of National Origin" (35 Fed. Reg. 11,595). The May 25th memorandum clarified OCR policy under Title VI on issues concerning the responsibility of school agencies to provide equal educational opportunity to limited English proficient national origin minority students. The memorandum states that school districts must adequately notify national origin minority group parents of information that is called to the attention of other parents, and that such notice may have to be provided in a language other than English in order to be adequate. OCR analyzes whether or not a school district has met its obligation under Title VI in a manner consistent with the U.S. Department of Justice (DOJ) "Guidance to Federal Financial Assistance

Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (67 Fed. Reg. 41455, June 18, 2002). Under the DOJ Guidance, the extent of a recipient's obligation to provide language assistance to LEP individuals is determined by balancing four factors: 1) the number or proportion of LEP individuals likely to encounter the program; 2) the frequency with which LEP individuals come in contact with the program; 3) the nature and importance of the services provided by the program; and 4) the resources available to the recipient.

The Section 504 implementing regulations, at 34 C.F.R. § 104.33, require school districts to provide a free appropriate public education (FAPE) to students with disabilities. An appropriate education is defined by the regulations as one which includes the provision of regular or special education as well as related aids and services which have been designed to meet the individual needs of the student with a disability, and which has been developed in accordance with the procedural requirements of §§ 104.34 through 104.36, pertaining to educational setting, evaluation, placement and procedural rights. Implementation of an individualized education program (IEP) developed in accordance with the individuals with Disabilities Education Act (IDEA) is one means of meeting these requirements. OCR interprets the Title II regulations, at 28 C.F.R. §§ 35.103(a) and 35.130(b)(1)(ii) and (iii), to require districts to provide a FAPE at least to the same extent required under the Section 504 regulations.

Section 104.35(c) requires that, in interpreting evaluation data and in making placement decisions (i.e., decisions about whether any special services will be provided to the student and, if so, what those services are), school districts must draw information from a variety of sources, including cultural background, which OCR interprets to include linguistic background. Information from all sources must be carefully considered and documented. Placement decisions must be made by a group of persons, including parents, who are knowledgeable about the student, including the student's language background, the meaning of the evaluation data, and placement options.

Background

- During the 2007-2008 school year, the District's K-12 schools enrolled 693,680 students,² making it the largest school district in the state of California. The student population included 240,389 English learner (EL) students and 225,463 students who are identified as fluent English proficient (FEP) but whose primary or home language is other than English. Together, these students comprised 67% of the District's total student population. Spanish is the primary or home language of over 400,000 students, approximately 90% of the District's total EL and FEP student population.

- The investigation in this case involved 16 students with disabilities at 15 different schools³. The complaint alleged that the students' parents, who were limited or non English proficient, had experienced significant delays in receiving translated versions of their children's IEPs after making a request; the alleged delays for the most recent IEPs of the students ranged from two to nine months⁴. In addition, seven families alleged

that they had not received adequate oral interpretation at IEP meetings.

- OCR visited and interviewed staff at the following seven schools: Academia Avance Charter School⁵, Coldwater Canyon Preparatory Non-Public School⁶, Frances Blend School,⁷ Frostig Center Non-Public School, Hollywood High School, Taft High School, and Tenth Street Elementary School. These seven schools have varying demographics; at five⁸ of the schools, the student population whose first language is Spanish ranges from 28% to 92% of the enrollment.

Issue 1: Whether the District Failed to Provide Written Translations of Students' IEPs⁹

- As result of the lawsuit in *Chandra Smith v. Los Angeles Unified School District, et al.*, the District entered into a "Modified Consent Decree" that set goals and benchmarks for various aspects of the District's special education programs, including providing timely translations of IEP documents. In response, the District's Special Education Division developed a plan providing that by June 30, 2006, the District would complete 85% of IEP translations in seven primary languages within 30 days, 95% within 45 days, and 98% within 60 days. While the District failed to meet this goal as of November of 2006, in September of 2007 the District reported that 96.2% of translation requests were processed in 30 days, 98.9% in 45 days, and 99.5% in 60 days.

- When the District was made aware of the complaint allegations in this case (and the related cases mentioned above), it promptly translated the IEPs of the identified individual students. Therefore OCR did not investigate the circumstances of the delays in the individual students' situations. The District has expressed its willingness to respond promptly to any problems with IEP translation that are brought to its attention. The District believes that its IEP translation system, which serves large numbers of parents, is reliable and that the identified cases were exceptions. However, while overall the IEP translation system may be operating well, during OCR's investigation of issue two regarding oral interpretation, OCR found indicators that there were several problems in the written translation system for IEPs that appeared to be continuing.

- The District has a specified process for informing LEP parents of their right to translation of their child's IEP. The District IEP form, which is generated through a computerized online system called Welligent, has two check-off boxes, one indicating that the parent/guardian was informed of the right to a written translation of the IEP; and a second one indicating whether the parent has requested a translation. As the IEP team completes an IEP during a meeting, these two provisions are reviewed with parents¹⁰. In addition, the District separately advises site administrators to ask parents at the end of the IEP meeting if they would like to have all or part of the IEP translated.

- Site administrators are responsible for ensuring that requests for translation are processed. According to District guidance and as understood by site administrators interviewed by OCR, site administrators should first attempt to have the IEP document translated by trained¹¹ staff at their school; if no qualified staff member is available at the site, the site adminis-

trator is responsible for sending the request to the District's central Special Education Translation Unit.

- Most IEPs are translated through the District's Special Education Translation Unit. The Unit has eleven trained staff members who respond to requests for written translations of IEPs. Assessment reports and other related documents are translated by the District's central translation office¹².

- School sites can submit requests to have the Special Education Translation Unit translate an IEP through the online Welligent system. Additionally, school administrators can contact the Special Education Translation Unit directly. Requests must be submitted to the Special Education Translation Unit within a day of the parent's request to translate.

- In interviews with OCR, some school site administrators indicated that they were confused about what role they play in getting translated IEPs to parents. Several administrators said that sometimes the translated version of the IEP completed by the Translation Unit is delivered back to the school site but other times it goes directly to the parent. These administrators also said that they have no way of knowing whether or not the IEP from the Translation Unit is sent directly to the parent unless the parent notifies the school that they never received it.

- Information provided by the District indicates that sites are expected to have a system for documenting and monitoring requests for IEP translation. However, only one school site visited by OCR had a mechanism for tracking the status of requests for written translations of IEPs, although that school site did not record when the parent/guardian received the translated document.

- OCR's interviews with school site administrators and school staff who have served as interpreters during IEP meetings indicated that some staff were uncertain about whether or not a parent/guardian must consent to the contents of an IEP as a prerequisite to having the document translated. Several parents interviewed reported instances when they were told that consent was required as a prerequisite to receiving an IEP translation.

- This same issue arose in OCR's investigation of a prior complaint (09-05-1169). The District agrees that LEP parents may not be required to consent to an IEP before receiving a translation. In June 2006, in response to the prior complaint, the District gave OCR an assurance that it would correct this problem by making changes to the Welligent system so as to allow a request for translation to be processed without parental consent to the IEP.

- OCR found, however, that the May 2007 edition of the Special Education Division's Update stated, in a section on procedures for submitting IEP translation requests, that before submitting the request administrators should "(4) Ensure that the IEP document includes page 1, 9 (with appropriate boxes checked) and 10 (with parent signature)".

- During the course of OCR's investigation, the District sent out the August-September 2007 Special Education Division Update to schools, which includes a section entitled "Clarification of Information in May 2007 Update". It makes clear that a translation may be requested by a parent prior to signing the IEP in agreement.

- On October 12, 2007, the District updated its translation request form to ensure that all school site administrators are aware that requests for translation can be submitted to the District for translation regardless of whether parent has signed his or her consent to the IEP.

- During interviews towards the conclusion of OCR's investigation of this case, school site administrators confirmed that they had been made aware that parent/guardian consent was not required for an IEP translation request to be submitted to the District.

- Notwithstanding steps the District has taken to clarify and strengthen the IEP translation process, in addition to the consent issue described above, OCR found that other aspects of the process envisioned by the District was not always implemented. At two of the seven schools visited, for example, OCR was directly told by staff that parents/guardians were not consistently informed of their right to written translations of the IEP documents. There were other misunderstandings about the system. For example, one site administrator incorrectly thought that the District's Welligent system could translate the document into Spanish immediately following the IEP meeting.

- With respect to the length of time it takes to complete a translated IEP, when OCR began its investigation in May 2007, school site administrators and interpreters reported that written translations through the Special Education Translation Unit were taking several months to complete. But towards the completion of the investigation, it appeared that the processing time had been reduced to as little as two to three weeks in some cases. District representatives re-affirmed that 96% of IEP translation requests submitted to the Special Education Translation Unit are currently completed within 30 days.

More than two thirds of the District's students come from families whose primary or home language is other than English. Parents of elementary and secondary students are expected to have regular and frequent contact with their children's schools under a number of federal and state laws that require or support parent participation in the educational programs serving their children. This includes the special education program, in which parents of students with disabilities are guaranteed certain due process rights during identification, evaluation and placement. The participation of parents in the identification of students' disabilities and in formulating students' programs is essential. The District is responsible for implementing appropriate methods for ensuring that all LEP parents are provided with a meaningful opportunity to participate in the special education process and meaningful access to special education information concerning their children.

The District did not dispute that there had been delays in providing translations of some of the IEPs of individual students identified in the complaints filed with OCR. During the course of the investigation, the District promptly provided written translations of IEP documents for all the individual students named. However, OCR advised the District about the continuing compliance concerns regarding how school sites process requests for IEP translation that were identified during our investigation and are described above.

During the investigation the District, on its own initiative, took proactive steps to address misunderstandings about the parent consent requirement by issuing additional clarification to school sites through the Special Education Division Updates and by making changes to the translation request form. The District also continues to disseminate information on the correct process for requests for IEP translation during training sessions for staff and administrators.

In addition, under the terms of the resolution agreement in this case, the District will take further steps to ensure that its system for IEP translation is working properly. Under the agreement the District will provide additional information to parents/guardians in the IEP meeting notice form stating that parents are not required to sign their consent to an IEP as a condition to receiving a written translation, and add information in the "Parent Input Survey" distributed at IEP meetings that explains how the parent/guardian can follow up with the site or District directly if they do not receive a written translation after having requested one. The District will also revise its Reference Guide 1596 to provide guidance to school sites on how to track requests for written translation of IEP documents.

Issue 2: Oral Interpretation at IEP Meetings

- The Modified Consent Decree does not cover oral interpretation for LEP parents at IEP meetings. Pursuant to resolution agreements in two prior cases where OCR identified problems with interpretation at IEP meetings (09-03-1182 and 09-05-1169), the District agreed to do the following: develop administrative guidelines for staff setting forth the procedures for providing oral interpretation to LEP parents/guardians at IEP and Section 504 meetings; ensure the provision of competent oral interpretation services by trained and knowledgeable staff; provide training District-wide for site staff who will act as interpreters; develop a system to monitor the adequacy of oral interpretation at IEP meetings using random site visits and a LEP parent survey; and expand existing training for site administrators on their responsibilities for ensuring that interpreters are provided. The agreement in 09-07-1169 also outlined and clarified the informal and formal processes the District would use to respond to complaints from parents about the interpretation provided at IEP meetings.

- The District's administrative guidelines for oral interpretation are contained in Reference Guide REF-1596, Division of Special Education, April 4, 2005. Under the Guide, school site principals are responsible for utilizing bilingual site staff to provide oral interpretation at IEP meetings and maintaining a roster of oral interpreters at the school site who have attended the District interpreter training. Principals are expected to make every effort to have a sufficient number of bilingual site personnel attend training to meet the needs of LEP parents of disabled children at the school.

- Each semester the District has offered training sessions on interpretation at IEP meetings. The sessions train staff on guidelines and protocols the District has developed. The protocols cover a range of issues including how the IEP process works, how to prepare for a meeting, the goals of interpretation, an interpreter's ethical standards and responsibilities (including the requirement to provide complete and accurate

interpretation), and modes of interpretation. Participants are also provided with the District glossary of special education terms. During fall 2008, the District scheduled six such training sessions, each enrolling 25 staff members.

- When a request for interpretation at an IEP meeting is made by a parent/guardian and a qualified school site interpreter is not available for the meeting, the site administrator can request an interpreter from the Special Education Translation Unit.

- Parents/guardians can request interpreters for their students' IEP meetings when they return the parent notification form sent home before the meeting, or they can contact the school directly. Additionally, most teachers and administrators interviewed during OCR's site visits stated that they know which parents/guardians at their school are LEP, based on the home language survey filled out when children are enrolled at a school; administrators and teachers stated that they initiate contact with parents to ask whether or not they want an interpreter present during IEP meetings.

- Notwithstanding the efforts the District has made to increase the number of staff trained to interpret, OCR's investigation in this case showed that at least seven of the 12 interpreters used in the IEP meetings of students named in the complaint had not gone through the District training at the time they interpreted at the meetings.¹³ Several interpreters interviewed said they had attempted to attend the District training but were turned away because the sessions were already at capacity. Three of the interpreters interviewed had not demonstrated bilingual ability on a District assessment.

- One interpreter who had gone through the District's training said that, while he interpreted the main parts of the discussion at IEP meetings, he only interpreted side conversations when a parent directly asked for interpretation of the conversation. Another interpreter stated that she does not interpret portions of discussions at meetings if she feels that the conversation is unrelated to the student's IEP.

- Some of the LEP parents interviewed by OCR indicated that interpreters summarize conversations during the IEP meetings and that meetings are not interpreted word-for-word. Several parents gave OCR examples of instances when someone at their student's IEP meeting spoke at length, but the interpreter interpreted only a portion of what was said or gave a brief summary. Most parents also stated that they felt interpreters were not able to adequately translate special education terminology. One interpreter interviewed stated that he recalled a parent complaining of this problem during an IEP meeting.

- One parent told OCR that inadequate interpretation was provided in IEP meetings on more than one occasion despite her repeated complaints to the school and repeated requests for a qualified interpreter.

- Advocates who participated in IEP meetings with LEP parents told OCR that interpreters often were inadequately trained and were not sufficiently familiar with special education terminology, and that bilingual staff at some schools were asked to interpret regardless of their experience or training. One advocate told OCR she regularly has to stop IEP meetings to remind the interpreter to interpret all the statements made

during the meeting. She explained that, otherwise, the interpreters either failed to interpret some parts of the meeting or they summarized statements and missed critical information.

- While some of the interpreters stated that they regularly use the District's special education terminology glossary, several interpreters told OCR that they do not know special education terminology and/or do not have a copy of the glossary. When OCR asked those interpreters what they do during meetings when they need to interpret technical words or phrases, some said they make do by trying on their own to explain a term or by getting help from the parent themselves in figuring it out. OCR noted that a number of the students identified in the OCR complaints had significant disabilities, making knowledge and understanding of medical and/or psychological terminology extremely important in discussions of the students' needs.

- The majority of interpreters interviewed stated that they do not regularly use the Spanish IEP form to help parents follow along during meetings.

- OCR noted that in several of the specific instances investigated, the interpreters being used during IEP meetings had to leave the meetings early. Parents told OCR that when that occurred, the remainder of the meetings either went without interpretation or bilingual teachers tried to interpret as best they could but did not interpret word-for-word. Some teachers told OCR that they have attempted to interpret meetings after the interpreters left, but did not feel it was explicitly their role.

- In general, LEP parents indicated to OCR that the quality of interpretation at IEP meetings was better if the interpreter was from the Special Education Translation Unit.

- During the November 27, 2007 District Board of Education meeting, representatives of community organizations, advocates, and parents addressed a resolution to restore funding for the District's central translation unit¹⁴. Although the discussion at the meeting addressed all aspects of translation services throughout the District, some speakers talked about experiences in IEP meetings, stating their belief that oral interpretation is frequently not adequate, describing problems similar to those cited above. One advocate described an instance where she was present during an IEP meeting in which the interpreter told a parent of an autistic student that her child had been evaluated as a "slow learner." A parent also described the difference when adequate interpretation was provided in IEP meetings, saying that this allowed her to understand and fully participate in the meeting.

- As part of the resolution of case number 09-07-1169, the District agreed to conduct 19 random site visits to verify that interpreters are complying with the "Guidelines for Interpreting at IEP Team Meetings." Three District staff members conducted the random site visits using the District's four-point rubric to assess the interpretation provided. OCR interviewed two of the three staff members assigned to conduct the site visits. One staff member did not observe IEP meeting interpreters at all of the school sites to which the staff member was assigned, either because an interpreter was not requested for any of the meetings scheduled on the date of the visit, or LEP parents who were attending IEP meetings on that day preferred

not to have an observer. The second staff member, who had not attended the District interpreter training, did not observe interpreters at any IEP meetings¹⁵. Instead the staff member spoke with administrators and parents who volunteered to be interviewed. The two staff members told OCR that they found that the interpreters whom they did observe were proficient. The District did not maintain documentation of the results of the random site visits.

- The District believes that, overall, its system for providing interpretation at IEP meetings is working well and emphasizes that it has vigorously continued the process for training staff to act as interpreters. The District noted that in response to the portion of the Parent Input Survey which gauges parent satisfaction with the quality of interpretation at IEP meetings, parents who participated in the survey are satisfied with the quality of interpretation at the IEP meetings they attended.

As mentioned above, under Section 504/Title II, the role of parents of students with disabilities in the identification, evaluation and placement process is essential. Under Title VI and the May 25th Memorandum, the District is responsible for implementing appropriate methods for ensuring that LEP parents are provided a meaningful opportunity to participate in the process, including meaningful access to important information concerning their children. Under Title VI and the DOJ Guidance, in providing oral interpretation to program participants, school districts must ensure the competency of the provider. Without adequate, competent interpretation during the special education process, LEP parents are denied the opportunity to participate in their children's IEP meetings to the same extent as English proficient parents. The Guidance states that, while competency does not necessarily require formal certification, it requires more than self-identification as bilingual. School districts must ensure that interpreters demonstrate proficiency and the ability to communicate information accurately and completely in both languages, and also have knowledge in both languages of any specialized terms or concepts specific to the program.

OCR recognizes that the District has both devoted resources and undertaken extensive efforts to improve interpretation for LEP parents in the special education process, and acknowledges the District's commitment to this issue. There has been wide dissemination of Reference Guide 1596 and training has been scheduled and expanded on a regular basis. Nevertheless, at all of the schools OCR visited there were indications, some more serious than others, that interpretation during the IEP process was not meeting either the District's own expectations or the goals of the resolution agreement in case no. 09-07-1169. While school staff members who had interpreted at IEP meetings at the sites OCR visited stated that they were bilingual, more than half had not gone through the District's training to learn appropriate methods and standards for interpretation. A number of them had not been asked to demonstrate to the District their language competency. These deficiencies were demonstrated in several ways. Some interpreters provided summaries of a discussion rather than word-for-word interpretations and/or decided for themselves which portions of a discussion to interpret. Several interpreters stated that they do not know or are not comfortable with special education termi-

nology in Spanish. Parents told OCR of experiences where they felt they had not received full or accurate translation of IEP meetings. Although the number of schools OCR visited was small in relation to the size of the District, the frequency and types of concerns that were observed persuaded OCR that systemic problems continue to exist. In addition, while the District conducted its own monitoring audits pursuant to the resolution agreement in case no. 09-07-1169, based on the information submitted about these audits, OCR concluded that the audits did not fully accomplish the purposes intended by the agreement. For these reasons OCR concluded that the District was not in compliance with Section 504/Title II, Title VI and the May 25th Memorandum with respect to the provision of oral interpretation at IEP meetings.

Under the resolution agreement signed by the District on October 24, 2008, the District will strengthen its system for monitoring and ensuring the adequacy of interpretation at IEP meetings by: revising Reference Guide 1596 to clarify the requirements staff must meet to be eligible to interpret at IEP meetings; making improvements to the process for school site submission of interpreter rosters, with additional District-level review and oversight of site staff training and eligibility, and revision of the Reference Guide to emphasize site administrators' responsibilities for ensuring adequate interpretation. The District will also develop written guidelines for the internal auditing process, including requirements for documentation, and expand the number of random school site IEP meeting observations. Finally, the District will revise the Parent Input Survey distributed after meetings by adding additional questions concerning the availability and quality of the interpretation, and notice of parents rights, with a District telephone number parents/guardians can use if they wish to pursue complaints about the quality of interpretation.

The submission of the signed agreement, contingent upon its full implementation resolves the areas of non-compliance identified during this investigation. OCR is closing the investigation portion of this complaint as of the date of this letter. OCR will monitor the implementation of the agreement. OCR is notifying the complainant of these findings by a concurrent letter.

Under the Freedom of Information Act, it may be necessary to release this document and related records upon request. In the event that OCR receives such a request, it will seek to protect, to the extent provided by law, personal information that, if released, could reasonably be expected to constitute an unwarranted invasion of privacy.

OCR routinely advises recipient of Federal funds and public education entities that Federal regulations prohibit intimidation, harassment or retaliation against those filing complaints with OCR and those participating in the complaint resolution process. Complainants and participants who feel that such actions have occurred may file a separate complaint with OCR.

OCR would like to thank you and the other District representatives, and in particular Donnalyn Jaque-Anton and Kevin O'Connell, for the courtesy and cooperation extended to OCR during the investigation and resolution of this case. If you have any questions regarding this letter, please contact Sara Berman,

Staff Attorney, at (415) 486-5504 or Brian Lambert, Staff Attorney, at (415) 486-5524.

¹ OCR notified the District of the identity of the students during the investigation. We are withholding their names from this letter to protect their privacy.

² This data is based on information from the California Department of Education website for the 2007-2008 school year.

³ This case, no. 09-07-1225, was originally filed on behalf of 12 students and their parents. Four other complaints (09-07-1150, 09-07-1153, 09-07-1189 and 09-07-1342) were filed separately by individual parents raising issues concerning translation and interpretation. Case numbers 09-07-1150 and 09-07-1153 also contained unrelated issues and were investigated and resolved separately. OCR notified the District that any general concerns about the IEP translation and/or interpretation process that were identified during the investigation of those two complaints would be addressed in this case. OCR administratively closed case no. 09-07-1342, which involved a District charter school, and folded the allegations into this investigation. Case no. 09-07-1189 was administratively closed after OCR was notified that there was an agreement between the District and the parent.

⁴ The complaint alleged that prior IEPs, from up to two years earlier, had also not been translated. OCR did not investigate these allegations which were outside the time frame for the filing of complaints with OCR.

⁵ Public charter schools, as recipients of federal funds from the Department of Education, must comply with federal civil rights laws, including the requirement to ensure that LEP parents have a meaningful opportunity to participate in the special education process. There are both "dependent" and "independent" charter schools in the District. The District requires dependent charter schools to comply with District policies and procedures on translation and interpretation. Independent charter schools in the District may follow District requirements or use other methods that meet Federal requirements.

⁶ When a school district places a student with a disability at a non public school (NPS), the District is responsible for ensuring that the requirements of the Section 504/Title II regulations concerning FAPE are met; in addition, students who are placed by the District in an NPS and their parents are protected under Title VI from discrimination on the basis of race, color or national origin.

⁷ OCR interviewed staff at this school in relation to the case no. 09-07-1153.

⁸ OCR did not obtain data about the demographics of the two NPS's included in this investigation, but administrators interviewed at both those schools stated that there were few Spanish-speaking families at their school.

⁹ IEPs are documents developed under the IDEA. While OCR does not enforce the IDEA, as stated above the development of an IEP in accordance with the IDEA is one means of compliance with Section 504. The Title VI principles concerning the rights of LEP parents/guardians during the identification, evaluation and placement process for their disabled children are applicable to the process for all students with disabilities, whether identified as eligible under IDEA or Section 504.

¹⁰ There are versions of the IEP form in several of the District's major languages which LEP parents can follow during an IEP meeting.

¹¹ The District has developed "Guidelines for the Written Translation of the Individualized Education Program (Spanish)", and provides scheduled training sessions on the Guidelines for individuals who do IEP translations. The Guidelines cover ethics, procedures and standards for IEP translation, as well as a glossary of technical terms used in the special education process.

¹² The issue of translation of assessment reports was not an allegation in this case and therefore was not investigated.

¹³ OCR was unable to interview several interpreters used in the named students' IEP meetings because they were unreachable at the time of the investigation; OCR thus was unable to determine their training status.

¹⁴ The District has a central translation unit for matters other than special education.

¹⁵ The staff member observed some other parent informational meetings.

Los Angeles Unified School District

Resolution Agreement

In order to resolve issues raised in complaint docket number 09-07-1225 filed with the U.S. Department of Education, Office of Civil Rights (OCR), the Los Angeles Unified School District (District) agrees to take the following actions:

A. The District Will Strengthen Its System for Monitoring and Ensuring the Adequacy of Interpretation in IEP Meetings as Set Forth Under Item 1. of the Resolution Agreement in 09-05-1169 by Taking the Following Steps

1. The District will revise Reference Guide 1596 to state that school site staff eligible to interpret at IEP team meetings (including meetings in non-public and dependent charter schools¹) must meet the following criteria²:

a. Classified staff who (i) qualify as bilingual by District standard³, (ii) complete the District's IEP interpreter training, and (iii) demonstrate sufficient knowledge of special education terminology utilizing the District's Glossary of Special Education Terms.

b. Certificated special education bilingual personnel who (i) have A-level fluency or a BCC or BCLAD, and (ii) have attended the District's IEP interpreter training and/or have been provided the District's IEP Interpretation Protocol Information.

c. Certificated non-special education bilingual personnel who (i) have A-level fluency or a BCC or BCLAD, (ii) have attended the District's interpreter training and/or have been provided the District's IEP Interpretation Protocol Information, and (iii) have knowledge of special education terminology utilizing the District's Glossary of Special Education Terms.

2. The District will revise Reference Guide 1596 to include a statement that the same requirements set forth above are also applicable to Section 504 team meetings.

3. The District will also amend or revise Reference Guide 1596 to require that, beginning in 2008-2009, in addition to the current requirement to annually maintain a roster of District trained IEP interpreters, school administrators will also be responsible for providing annually to the Division of Special Education, no later than February 19 of the current 2008-2009 school year and October 15 of each school year thereafter, a list of school site staff who will be used to interpret IEP team meetings during the coming year and who are eligible under the criteria set forth in paragraph A.1.

4. The District will develop a norm chart, using a formula or other District designed method, indicating the number of eligible interpreters schools need to have in order to provide oral interpretation at IEP team meetings. The chart will be based on the number of individual school site requests for interpreters at IEP team meetings for the preceding school year or other District identified method.

5. The District will review the rosters from school sites to identify the number of staff who are eligible to provide oral interpretation at IEP team meetings, and the number of additional staff, if any, the school needs to meet the District

requirements according to the norm chart. The District will also identify the school sites that have not submitted the roster.

a. The District will use this information as part of its determination for upcoming interpreter training sessions.

b. The District will notify in writing those school sites that have submitted a roster but need additional eligible interpreters to meet the local school needs per the District standard, and will notify those schools that have not submitted the roster of the requirement to adhere to Reference Guide 1596.

The notification will include the following information: "Your school has identified XX number of staff currently trained and/or eligible to provide oral interpretation for IEP meetings. Please identify XX additional staff members who are eligible to interpret at IEP team meetings or are willing to become eligible by attending the District's training on one of the following available dates. ..."

c. The District will notify administrators at sites identified under A.5.b of upcoming training and remind administrators that, under revised Reference Guide 1596, the school site will use interpreters who have attended the District's IEP interpreter training or who are otherwise eligible to interpret IEP meetings according to the criteria set forth in section A.1 of this agreement.

d. Any site staff who will be used by administrators to interpret, but who have not yet completed the requirements set forth in A.1 will meet these requirements within six school months after the site receives notice from the District of the number of eligible interpreters needed at the site.

e. Any site staff who are used by administrators to interpret, but who have not yet completed the requirements set forth in A.1 will meet these requirements within six school months of the date of the IEP Team meeting in which the site staff member was used to interpret.

6. The District will revise Reference Guide 1596 to reinforce the administrator's or administrative designee's responsibilities during interpreted IEP team meetings to include checking with the parent for understanding of the oral interpretation at various points throughout the IEP team meeting.

7. The District will revise Reference Guide 1596 to add guidance for school sites to follow regarding how to provide adequate interpretation whenever an interpreter has to leave during an IEP team meeting.

8. The District will develop written guidelines for its internal auditing process, initiated under Item 1.C of the resolution agreement in 09-05-1169, for verifying that school site IEP team meeting interpreters are complying with the standards indicated in the District's "Protocol for Interpreting at IEP Meetings." The guidelines for the auditing process will reflect the following:

a. The audits will be conducted by bilingual individuals who are familiar with the District's "Protocol for Interpreting at IEP Meetings" and who have special education expertise.

b. Each semester, at each of 20 randomly selected schools throughout the District, including non-public and charter schools, auditors will observe at least one IEP team meeting where an interpreter is used.

c. The individuals conducting the audit will complete an audit form for each IEP meeting they have observed to document whether the interpretation was provided in a manner consistent with the District's "Protocol for Interpreting at IEP Meetings" and that specifically notes the following:

- i. Date, time and location of the IEP meeting observed.
- ii. Identifier and target language of the interpreter.
- iii. Whether the interpreter has attended the District's IEP interpreter training or otherwise met District requirements.
- iv. Whether the interpreter is listed on the school's roster of eligible IEP interpreters.
- v. Whether the interpretation was complete and accurate in conveying all information provided during the IEP team meeting, taking into account whether the interpreter accurately interpreted special education terminology and the interpreter's proficiency in the target language.
- vi. Whether the parent was asked at various points during the IEP team meeting if the parent understood the information that was being interpreted.
- vii. Whether the interpreter was present for the duration of the IEP team meeting and, if not, the steps that were taken to provide interpretation for the remainder of the meeting.

d. Individuals conducting the audit will provide feedback to the site administrator/designee after the IEP team meeting. The auditor will prepare a written list of any recommendations need to provide adequate interpretation at the site, as applicable. A copy of the completed observation forms and recommendations will be given to the school principal, the Division of Special Education, and the Educational Equity Compliance Office.

B. Parent Information and Rights

1. Continue to utilize District's "Notification to Participate in an Individual Education Program (IEP) Meeting" form, which includes a check box for parent request for an interpreter, and add the following information to the form: Non or limited-English speaking parents/guardians have the right to have an interpreter provided to allow meaningful participation in the IEP team meeting. Parents/guardians may request postponement of the IEP team meeting if they believe that the interpretation provided during the IEP team meeting does not allow for meaningful participation. Parents/guardians are not required to sign the IEP in agreement or disagreement as a condition to having a written translation of completed IEP.

2. The District will revise the "Parent Input Survey" that is distributed as part of every IEP to include additional items pertaining to oral interpretation and translation -- Letters c, d, e, f, and h would be additions. The survey will be provided in parent/guardian's home language.

a. If I needed an oral interpretation of the IEP team meeting an interpreter was provided.

b. The interpretation of the IEP team meeting allowed me to participate in the IEP meeting.

c. The interpretation of the IEP team meeting enable me to make an informed decision regarding my child's education.

d. The interpreter stayed for the duration of the IEP team meeting.

e. If the interpreter left the IEP before the meeting was over, another staff member served as the interpreter and the interpretation was adequate.

f. I am aware that, if I am dissatisfied with the adequacy of the oral interpretation at the IEP team meeting, I can file a complaint with the school site principal or by calling the Special Education Compliance Department at (213) 241-3335.

g. If I needed a written translation of the IEP, translation services were offered.

h. I am aware that, if I do not receive a copy of the translated IEP, I can contact the site administrator or call the Special Education Compliance Department at (213) 241-3335.

If the answers to any item 13-10 was No, please discuss your concern(s) with the site administrator or call the Special Education Compliance Department at (213) 241-3335.

3. Continue to provide the IEP Translation Cover sheet.

4. The district will revise Reference Guide 1596 to provide guidance to school sites regarding how to maintain a record that shows that translated IEP documents are provided to the requesting parent(s).

C. Reporting Requirements

1. By October 31, 2008, the District will provide OCR with a draft of the revisions to Reference Guide 1596 as described in A.1, A.2, A.3, A.5, A.6, A.7, and B.4. Within 20 days of approval from OCR, the District will provide OCR with documentation that the Reference Guide has been issued to school site administrators.

2. By April 15, 2008, and December 15, 2009, pursuant to A.5, the District will provide OCR with a list of the schools that have not submitted the roster of staff eligible to interpret at IEP team meetings or who do not have enough staff eligible to interpret, along with a sample of the notification letter provided to the site administrators.

3. By October 31, 2008, the District will provide OCR with a draft of the guidelines and audit form described in A.8, a draft of the norm chart described in A.4, and a copy of the parent information notice described in B.1. Upon approval from OCR, the District will adopt the guidelines and audit form (A.8), and norm chart (A.4).

4. Within 20 days of the end of each semester, beginning in February 2009 through July 2010, the District will provide OCR with documentation of the results of the internal audits. The documentation will include copies of the completed audit forms and the recommendations made by the auditors, if applicable.

5. OCR will conduct on-site visits, conduct telephone interviews and/or request and review records as necessary to confirm implementation of this agreement. The reporting requirements described above will conclude on July 30, 2010, if the District demonstrates that it has consistently implemented its monitoring system for providing adequate interpretation in IEP meetings.

¹ In providing parent interpretation at IEP team meetings, independent charter schools in the District may follow the requirements of the District Reference Guide or use other methods that meet Federal and state requirements.

² OCR acknowledges that, in some instances, an interpreter who has met all the eligibility criteria may not be available for a specific meeting due to scheduling or staffing problems. However, in such cases, the District will ensure that the interpretation provided allows for meaningful participation for the non or limited English-speaking parent(s)/guardian(s).

³ LAUSD Classified Bilingual Proficiency Test.

Appendix B-3: OCR actions involving LEP parents¹

Entity	Complaint/ Compliance	OCR Case File #	Date
Orleans Parish (LA) School Board	Complaint	06-13-1644	7/23/2014
Jefferson Parish (LA) Public School System	Complaint	06-12-1539	7/9/2014
Collegiate Academies (LA)	Complaint	06-13-1645	5/22/2014
Adams Co. (CO) School District	Complaint	08-10-1112	4/25/2014
Hazelton (PA) Area School District	Compliance	03-10-5002	4/11/2014
Tigard-Sualatin (OR) School District	Compliance	10-10-5002	1/27/2014
Yuma (AZ) Elementary School District	Complaint	08-13-1207	11/26/2013
Mt. Diablo (CA) School District	Compliance	09-09-5001	11/15/2013
DeKalb County (GA) School District	Compliance	04-11-5002	7/29/2013
San Mateo (CA) School District	Complaint	09-12-1175	5/21/2013
DeQueen (AR) School District	Compliance	06-10-5001	12/6/2012
Arizona Department of Education	Compliance	08-06-4006	8/31/2012
Dearborn (MI) Public Schools	Compliance	15-10-5001	5/30/2012
Tulsa (OK) Public Schools	Compliance	07-10-5002	4/17/2012
New London (CT) Public Schools	Compliance	01-10-5002	12/19/2011
Los Angeles (CA) Unified School District	Compliance	09-10-5001	10/11/2011
Cleveland (OH) Metro School District	Complaint	15-08-1276	9/15/2011
Arizona Department of Education	Complaint	08-09-4026	5/24/2011

¹ Listed in reverse chronological order.

Los Angeles (CA) Unified School District	Complaint	09-07-1225	11/8/2008
Dallas (TX) Independent School District	Complaint	06-06-1156	6/1/2006

Appendix B: Key Title I, Part A Parental Notice Requirements
U.S. Department of Education Non-Regulatory Guidance Memorandum on
NCLB (April 23, 2004)

Key Title I, Part A Parental Notice Requirements*	When	By whom		
		SEAs	LEAs	Schools
Annual report cards (SEAs and LEAs disseminate to parents, schools, and the public, an annual report card with aggregate information, including student achievement (disaggregated by category), graduation rates, performance of LEAs, teacher qualifications, and other required information). <i>[Section 1111(h)(1) and (2), ESEA.]</i> Guidance, B-5 (SEA) and C-7 (LEA).	Annually	✓	✓	
Individual student assessment reports (SEAs, in consultation with LEAs, provide to parents, teachers, and principals of students in <u>all</u> schools individual student interpretive, descriptive, and diagnostic reports, which allow specific academic needs to be understood and addressed, and include information on the student's achievement on academic assessments aligned with State academic achievement standards). <i>[Section 1111(b)(3)(C)(xii), ESEA.]</i>	As soon as practicable after the assessment is given	✓		
Progress review (SEAs disseminate to parents, LEAs, teachers and other staff, students, and the community the results of the SEA's yearly progress review of each LEA (including progress in carrying out parental involvement responsibilities); LEAs disseminate to parents, teachers, principals, schools, and the community the results of the LEA's yearly progress review of each school). <i>[Section 1116(a)(1)(C), (c)(1)(B) and (c)(6), ESEA.]</i> Guidance, B-7 (SEA) and C-20 (LEA)	Annually	✓	✓	
LEAs identified for improvement (SEAs notify parents of children enrolled in schools in the LEA that the LEA has been identified for improvement and other information). <i>[Section 1116(c)(1) and (6), ESEA.]</i> Guidance, B-8.	Promptly upon identification	✓		

Key Title I, Part A Parental Notice Requirements*	When	By whom		
		SEAs	LEAs	Schools
LEAs identified for corrective action (SEAs disseminate to parents and public information on corrective actions taken by SEA). <i>[Section 1116(c)(10)(E), ESEA.]</i> Guidance, B-9.		✓		
Schools identified for school improvement, corrective action, or restructuring (LEAs provide to parents of each student an explanation of what the identification means, how the schools compare to others, reasons for the identification, the LEA's and school's response, how parents can become involved, any corrective action taken, the parental choice and supplemental services options as applicable, restructuring, and other information). <i>[Section 1116(b)(6), 7(E), and 8(C), ESEA, and 34 CFR 200.37(5).]</i> Guidance, C-21, C-22, and C-23.	Promptly following identification		✓	
Schools identified for corrective action – supplemental services notice (LEAs serving schools that fail to make adequate yearly progress (AYP) by the end of the first full school year after being identified for improvement provide notice to parents of the availability of supplemental services, the identity of the providers, a description of the services, and other information). <i>[Section 1116(e)(2), ESEA.]</i>	Annually (at a minimum)		✓	
Schools identified for restructuring (LEAs serving schools that fail to make AYP after 1 full school year of corrective action provide prompt notice to teachers and parents and provide opportunity to comment and participate in preparing a restructuring plan). <i>[Section 1116(b)(8)(C), ESEA.]</i> Guidance, C-27.	Promptly after school misses AYP following 1 full school year of being in corrective action		✓	
Written parental involvement policies (LEAs notify parents of Title I, Part A children of district-level written parental	Determined by LEA		✓ (LEA	✓ (school

Key Title I, Part A Parental Notice Requirements*	When	By whom		
		SEAs	LEAs	Schools
involvement policy; schools notify parents and community of school's written parental involvement policy). [Section 1118(a)(2) and (b)(1), ESEA.] Guidance, C-3 and C-4 (LEA), and D-1 (school).			policy)	policy)
Written SEA complaint procedures (LEAs disseminate free of charge to parents of students, and to appropriate private school officials or representatives, adequate information about the SEA's written complaint procedures for resolving issues of violation(s) of a Federal statute or regulation that applies to Title I, Part A programs). [34 CFR Section 200.11(d).]	Determined by SEA		✓	
Parents' right to know – teacher and paraprofessional qualifications (LEAs inform parents of Title I, Part A students that parents may request, and the LEA then will provide, certain information on the professional qualifications of the student's classroom teachers and paraprofessionals providing services to the child). [Section 1111(h)(6)(A), ESEA.] Guidance, C-6.	Annually, at beginning of school year		✓	
Parents' right to know – student achievement (schools provide to each individual parent information on the level of achievement of the parent's child in each of the State academic assessments). [Section 1111(h)(6)(B)(i), ESEA.] Guidance, D-10. NOTE: This requirement may be covered by the SEA's individual student assessment report indicated above.	Determined by LEA.			✓
Parents' right to know - non-highly qualified teachers (schools provide to each individual parent timely notice that the parent's child has been assigned, or taught for 4 or more consecutive weeks by, a teacher who is not highly qualified). [Section 1111(h)(6)(B)(ii), ESEA.] Guidance, D-3.	Timely			✓
Title I, Part A meeting (schools invite				

Key Title I, Part A Parental Notice Requirements*	When	By whom		
		SEAs	LEAs	Schools
parents to an informational meeting to inform them about the school's participation in Title I, Part A programs and explain the requirements and their right to be involved). <i>[Section 1118(c)(1) and (2), ESEA.]</i> Guidance, D-5.	Annual			✓
Title I, Part A information (schools provide to parents of participating children specific information about Title I, Part A programs, and opportunity to request regular meetings). <i>[Section 1118(c)(4), ESEA.]</i> Guidance, D-6.	Timely			✓
Limited English proficient students - general (LEAs implement effective outreach to inform parents of limited English proficient children of how those parents can be involved in their children's education and active participants in helping their children attain English proficiency, high achievement levels in core academic subjects, and meet State standards, including notice of opportunities for and holding regular meetings). <i>[Section 1112(g)(4), ESEA]</i> Guidance, C-9.	Regular (meetings)		✓	
Limited English proficient students - language instruction educational programs (LEAs inform parents of limited English proficient children identified for participation or participating in a Title I, Part A-funded language instruction educational program under Title III of the ESEA, of: reasons for the identification, level of English proficiency, methods of instruction, how the program will help the child, and other information; LEAs inform parents of a child with a disability how the language instruction educational program meets the objectives of the child's individualized educational program (IEP)). <i>[Section 1112(g)(1)(A) and (3), ESEA.]</i> Guidance, C-9 and C-10.	Annually, not later than 30 days after the beginning of school year for children ID'd before beginning of year; otherwise within first 2 weeks of child being placed in language instruction program.		✓	

Key Title I, Part A Parental Notice Requirements*	When	By whom		
		SEAs	LEAs	Schools
Limited English proficient students - insufficient language instruction educational programs (eligible entity using Title I, Part A funds for a language instruction educational program under Title III of the ESEA provides separate notice to parents of a child identified for participation in, or participating in, the program to inform them that the program has not made progress on the annual measurable achievement objectives). <i>[Section 1112(g)(1)(B), ESEA.]</i>	Not later than 30 days after the failure occurs		✓ (or other eligible entity)	
Students with the most significant cognitive disabilities (a State that measures the achievement of students with the most significant cognitive disabilities based on alternate achievement standards must ensure that parents are informed that their child's achievement will be based on these alternate standards. The SEA must also ensure that parents are informed of the actual achievement levels of these students, particularly in the case of an LEA that exceeds the 1% cap on counting proficient scores for AYP). <i>[Section 1111(b)(3), ESEA, and 34 CFR Section 200.6(a)(2)(iii)(A)(2), 200.13(c)(4)(v)]</i>	Determined by SEA	✓		

***This table includes key Title I, Part A statutory and regulatory requirements for notice or information given or disseminated to parents of students participating in Title I, Part A programs. It is not intended to be an exhaustive list, and does not include consultation, collaboration, technical assistance, training, or other types of requirements. Except where otherwise indicated, the terms “LEAs” and “schools” refer to local educational agencies (LEAs) and schools with programs funded under Title I, Part A of the Elementary and Secondary Education Act (ESEA).**

STATE	LAWS/REGULATIONS RELATED TO GENERAL EDUCATIONAL INTERPRETING (link to texts)	EFFECTIVE DATE(S)	RESPONSIBLE STATE AGENCY (link to website)	CERTIFICATION/TRAINING REQUIRED? (C/T or NONE)
	<i>Citations to state statutes/regulations/policies</i>	<i>Date(s) stat/reg/policy effective; indicate which if different</i>	<i>Name of state agency primarily responsible for administration/oversight/monitoring</i>	<i>C = certification required; T = training required; NONE = neither required.</i>
<div>Required: 1</div> <div>No response: 23</div> <div>None exist: 27</div>				
AL	No response			
AK	None			
AZ	None	TUSD program		
AR	No response			
CA	Required	California Education Code, Section 48985	LAUSD Translations Unit	
CO	No response			
CT	None			
DC	No response			
DE	No response			
FL	None			
GA	None	University of Georgia on-line training program for educational interpreting		
HI	None	University of Hawaii at Manoa Center for Interpretation & Translation Studies (primarily East Asian languages, e.g., Chinese, Japanese, Korean; no evidence of education focus)		
ID	No response			
IL	No response			
IN	No response			
IA	None			
KS	No response			
KY	No response			
LA	None			
ME	None			
MD	Limited	<a href="http://mgaleg.maryland.gov/webmg
a/frmStatutesText.aspx?article=gsg&
section=10-
1103&ext=html&session=2014RS&ta
b=subject5">http://mgaleg.maryland.gov/webmg a/frmStatutesText.aspx?article=gsg& section=10- 1103&ext=html&session=2014RS&ta b=subject5		
MA	None			
MI	No response			
MN	None	See St. Paul Public Schools	Training pgms for spoken language interpreters: Program on Translation and Interpreting at Univ. of MN (legal & healthcare) MDE & Univ of MN collaborate on 2 college-level courses on SPED interpreting; Century College has 2 yr. associate degree pgm, including 1 course in educational interpreting	
MS	None			
MO	None			
MT	None			
NE	None			
NH	None			
NJ	No response			
NM	No response			
NY	None	See NYC Translation & Interpretation Unit		
NC	No response			
ND	None			
NV	No response			
OH	None			
OK	No response			
OR	None			
PA	No response			
RI	No response			
SC	None			
SD	No response			
TN	No response			
TX	No response			
UT	None			
VT	None			
VA	None			
WA	None			
WV	No response			
WI	None			
WY	None			

Background:

In accordance with RCW 43.20.275, the Governor's Interagency Council on Health Disparities (Council) is authorized to collect information and make recommendations to improve the availability of culturally and linguistically appropriate services within public and private agencies. It is also authorized to gather information to understand how the actions of state government ameliorate or contribute to health disparities. In alignment with those statutory responsibilities, in May 2011, the Council passed a motion to select the state system as a priority and convened an ad hoc workgroup of Council members to develop recommendations for the full Council's consideration. The workgroup first convened on August 1, 2012 and agreed to focus on language access to state services. This policy paper provides context and supporting research that the workgroup used to prepare its recommendations for the Council.

Definitions and Acronyms

LEP: Limited-English Proficiency

Interpretation and Translation:

Interpretation involves the immediate communication of meaning from one language (the source language) into another (the target language). An interpreter conveys meaning orally, while a translator conveys meaning from written text to written text.

Language Access Recommendations for the Council's Consideration:

The following recommendations can assist state agencies in providing meaningful language access to information and services in order to help ensure compliance with Title VI of the Civil Rights Act. The recommendations align with [Results Washington Goal 5](#), "Effective, efficient and accountable government", and specifically the sub topic of customer satisfaction.

1. State agencies should develop and implement language access policies and plans containing the following key elements:
 - Assessment of appropriate language assistance needs using the four-factor analysis outlined in the Department of Justice Guidance.¹
 - Identification and translation of essential public documents.
 - Provision of quality and timely interpretation services.
 - Procedures for training staff on the policy and agency procedures.
 - Posting of signage about the availability of interpretation services.
 - Measurement and reporting system to track services provided.
 - Public awareness strategies.
2. State agencies should designate language access coordinators to oversee and implement their agency's language access plans.
3. The Governor's Office should identify an individual and/or office (at the executive level if possible) to provide central coordination, including the following key functions:
 - Ensure prioritization of language access across agencies.
 - Oversee implementation of agency language access policies and plans.
 - Develop resources, tools, and templates to facilitate implementation across agencies.
 - Convene regular meetings of agency language access coordinators to leverage resources and share best practices.

¹ [Department of Justice Guidance](#) to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons.

Washington Demographics:

Washington's population continues to become more diverse. In 2010, the Office of Financial Management estimated that 27.2% of Washingtonians were people of color, up from 23.8% in 2008 and 20.6% in 2000. Washington's Hispanic population has been the fastest growing group, increasing from 9.3% in 2008 to 11.2% in 2010. The Asian and Pacific Islander population increased from 6.9% to 7.7% over the same period. In 2010, the Black and American Indian/Alaska Native populations accounted for 3.4% and 1.4% of the total population, respectively.²

Moreover, the foreign-born population in Washington State is growing. Between 2000 and 2011, the foreign-born population grew by 48.0% and in 2011, made up 13.3% of Washington's total population.³ The largest share of the foreign-born population was from Asia (39.8%) and the second largest was from Latin America (30.7%). The growth in the foreign-born population is important since in 2011, 46.7% of Washington's total foreign-born population was LEP.⁴ Further, in 2011, 4.2% of all households in Washington were linguistically isolated (i.e., all persons in the household age 14 and over were LEP). Washington State is among the top ten states with the largest LEP population and the highest growth in LEP population.⁵ Currently, there are more than half a million LEP persons in Washington State and the percent of the population age 5 and above living in households where English is spoken less than "very well" has risen from 2.7% in 1980 to 8.0% in 2011.⁶ The most prevalent languages spoken are Spanish, Chinese, Vietnamese, Korean, and Russian.

Federal Requirements for Providing Language Assistance Services:

- [Title VI of the Civil Rights Act](#) ensures no person can be excluded from participation, denied benefits, or subjected to discrimination on the grounds of race, color, or national origin by any recipient of federal financial assistance.
- In *Lau v. Nichols* (1974), the Supreme Court interpreted Title VI as ensuring that LEP individuals are not excluded from participation in federally-funded programs, establishing a link between discrimination based on national origin and discrimination based on language.
- On August 11, 2000, the President signed [Executive Order 13166](#), which required each federal agency to develop a plan to improve access to programs and activities for LEP persons and to draft guidance for its recipients of financial assistance based on guidance from the Department of Justice.
- In February 2011, U.S. Attorney General Eric Holder, issued a [memorandum](#) reaffirming the federal government's commitment to language access obligations under Executive Order 13166. The memorandum listed specific requirements each federal agency must comply with, including developing agency language access working groups and regularly updating agency policies, plans, and protocols.

Four-Factor Analysis

The Department of Justice guidance document ([DOJ Guidance](#)) outlines a four-factor analysis for agencies to consider when developing a plan to ensure meaningful access to the information and services they provide. The four-factor analysis includes:

1. The number and proportion of LEP individuals served.
2. The frequency of contact LEP individuals have with the program or service.
3. The nature and importance of the program.
4. The resources available.

² Washington State Office of Financial Management. [Total Population by Race, age, sex and Hispanic Origin: 2010](#).

³ Migration Policy Institute (2012). MPI Data Hub: [Washington Social and Demographic Characteristics](#).

⁴ Migration Policy Institute (2012). MPI Data Hub: [Washington Language and Education](#).

⁵ Migration Policy Institute (2011). National Center on Immigrant Integration Policy. [LEP Data Brief: Limited English Proficient Individuals in the United States: Number, Share, Growth, and Linguistic Diversity](#).

⁶ Washington State Office of Financial Management. [Languages Spoken at Home](#) (modified May 1, 2013).

Washington Statewide⁷ Requirements for Providing Language Assistance Services:

- Washington State law against discrimination ([RCW 49.60](#)) prohibits discrimination based on race, creed, color, national origin, sex, honorably discharged veteran or military status, sexual orientation, or the presence of any sensory, mental, or physical disability or the use of a trained dog guide or service animal by a person with a disability.
- Washington State policy on diverse cultures and languages ([RCW 1.20.100](#)) welcomes and encourages the presence of diverse cultures and the use of diverse languages in business, government, and private affairs in the state.

Recent Washington Statewide Activities:

- The 2012 Supplemental Budget included a proviso requiring the Office of Financial Management to determine if interpretive services could be contracted in a more effective manner. In response, the office conducted a survey of state agencies to determine which agencies use interpretation services, how those services are obtained, and the cost of such services. The final report, [Study of Procurement of Interpreter Services](#) was submitted in February 2013.
- The Council, through a federal grant, convenes an Interagency LEP Workgroup. This is an informal workgroup of state agency staff who work on language access issues in their respective agencies. The workgroup serves as a forum for staff to learn from each other and leverage resources.
- Recent legislative proposals related to language access have focused on consolidating procurement of language assistance services, collective bargaining for interpreters, and improving access to language services in the education sector. To date, no comprehensive proposals to ensure access to all state services for LEP persons have been introduced.

Washington State Agency-specific Activities:

- Known examples of state agencies with written language access policies and plans include: Transportation, Corrections, Social and Health Services, Health Care Authority, and Employment Security. Several other agencies are currently working to develop written policies and plans.
- Knowledge of language access issues and provision of services among state agencies is uneven. Agencies providing language services are doing so in unique ways to meet agency-specific needs.

Comprehensive Language Access Policies in Other States:

- **Minnesota** law includes [communications service provisions](#) related to hiring of bilingual employees and interpreters and translating materials.
- In 2001, the **Maryland** General Assembly passed a bill requiring a survey to assess the need for interpretation and translation services by state departments, agencies, and programs. In 2002, Maryland adopted a law ensuring equal access to public services for individuals with limited English proficiency ([Title 10-1101](#), [10-1102](#), [10-1103](#), [10-1104](#), and [10-1105](#)).
- In 2004, the **District of Columbia** adopted the [Language Access Act of 2004](#).
- In 2006, the **Hawaii** Legislature enacted the Language Access Law (Act 290) – the law was later amended in 2008, 2009, 2012, and 2013 ([Hawaii Revised Statute 321C](#)).
- In 2011, **New York** Governor Cuomo issued [Executive Order No.26](#) creating a Statewide Language Access Policy.
- In 2012, the **Massachusetts** Office of Access and Opportunity issued [Administrative Bulletin #16](#) - Language Access Policy and Guidelines for executive branch agencies to develop and implement language access plans.

Table 1 provides a list of elements common to many of the statewide policies listed above.

⁷ This briefing document focuses on statewide efforts. Policies that require the provision of language assistance services and/or prohibit discrimination in certain settings (e.g., courts), sectors (e.g., education), or by certain agencies are beyond the scope.

Table 1: Common Provisions of Statewide Language Access Policies

	Assessment, Translation, Interpretation	Coordinating Entity	Agency Points of Contact	Agency Plans
Minnesota	Directs agencies to assess needs using the four-factor analysis, to employ enough bilingual persons or interpreters, and to translate materials to ensure provision of information and services in the language spoken by a substantial number of LEP individuals.	The Commissioner of Administration is charged with determining application of the law to each state agency.	No provision.	No provision.
Maryland	Directs agencies (in a phased-in schedule) to provide interpretation services and translate vital documents for languages spoken by 3% of the service area.	Assigns central coordination and technical assistance to the Department of Human Resources in consultation with the Office of the Attorney General.	No provision.	No provision.
District of Columbia	Directs agencies to utilize the four-factor analysis and provide interpretive services based on results. Directs agencies to translate vital documents in languages spoken by 3% of the population served (or 500 people), whichever is less.	Establishes the position of Language Access Director in the Office of Human Rights to provide oversight, central coordination, and technical assistance.	Directs agencies to designate a language access coordinator who reports directly to the agency's Director. The coordinator is responsible for providing public outreach and obtaining input to guide the agency's plan development.	Directs agencies to establish language access plans and to update the plans every 2 years. Provides for a phased in implementation schedule.
Hawaii	Directs agencies to assess language needs using the four-factor analysis, to provide interpretation services, and to translate vital documents for languages spoken by 5% of the population served (or 1,000), whichever is less.	Establishes an Office of Language Access within the Department of Health and assigns oversight to the Office's Executive Director (ED). Requires the ED to maintain a resource center, provide training, and work to create a certification process among other requirements. Establishes a language access advisory council.	Directs agencies to designate a language access coordinator.	Directs agencies to establish a language access plan.
New York	Directs agencies to translate vital documents into the six most common languages and to provide interpretation services.	Assigns oversight and coordination to the Deputy Secretary for Civil Rights.	Directs agencies to appoint a language access coordinator to monitor compliance.	Directs agencies to publish a language access plan to include an employee training plan among other requirements.
Massachusetts	Directs agencies to use the 4-factor analysis, provide interpretation services, and to translate vital documents (including website information) for languages spoken by 5% of the population served.	The Office of Access and Opportunity within the Executive Office for Administration and Finance created a policy and guidelines and serves in a coordinating, oversight, and technical assistance role.	Directs agencies to designate a language access coordinator who reports to the agency head and is responsible for agency implementation and compliance.	Directs agencies to develop a language access plan consistent with the guidelines and to update every two years. Plans must include a needs assessment, resource assessment, protocols, and a training plan among other requirements.

Select City and Other Local Activities:

- A growing number of cities, including San Francisco, Oakland, Philadelphia, and New York City (to name just a few) have ordinances and/or executive orders in place related to language access to city services.
- In October 2010 in Washington State, King County Executive Dow Constantine issued an [Executive Order](#) on written language translation processes. The executive order establishes a translation process and sets minimum requirements for determining which documents must be translated.
- The New York City Mayor's Office of Immigrant Affairs and Office of Operations recently released a white paper, titled [Language Access 2.0 – Sharing Best Practices, Improving Services, and Setting Future Goals](#), which provides guidance to other states and municipalities considering the adoption of comprehensive language access policies and plans. In 2013, the New York City Office of Immigrant Affairs released a [Blueprint for Language Access](#).

Best Practices

The New York City Office of Immigrant Affairs has identified the following best practices for states and municipalities to include in comprehensive language access policies and plans:

- Requiring all agencies to develop and implement language access plans with deadlines and containing key elements:
 - Assessment of appropriate language assistance needs using the four-factor analysis
 - Identification and translation of essential public documents
 - Provision of quality and timely interpretation services
 - Procedures for training staff on the policy and agency procedures
 - Posting of signage about the availability of interpretation services
 - Measurement and reporting system to track services provided
 - Public awareness strategies
- Providing central coordination at a high level (executive level if possible) to ensure prioritization of language access across agencies. The central coordinating entity should oversee implementation and compliance and develop resources, tools, and templates to facilitate implementation across agencies.
- Requiring all agencies to designate a language access coordinator to oversee and implement their respective agency plans. The central coordinating entity should convene regular meetings of the agency coordinators.

**Office of Superintendent of Public Instruction (OSPI)
Home Language Survey**

Student Name:		Date:
Birth Date:	Gender:	Grade:
Form Completed by: Parent/Guardian Name _____ Relationship to Student _____ Parent/Guardian Signature _____ If available, in what language would you prefer to receive communication from the school? _____ Did your child receive English language development support through the Transitional Bilingual Instruction Program in the last school your child attended? Yes__ No__ Don't Know__		

1. In what country was your child born?	_____
2. What language did your child first learn to speak?*	_____
3. What language does <u>YOUR CHILD</u> use the most at home?*	_____
4. What language(s) do <u>parent/guardians</u> use the most when you speak to your child?	_____ _____
5. Has your child ever received formal education* outside of the United States? (Kindergarten – 12 th grade) ____ Yes ____ No "Formal education" does not include refugee camps or other unaccredited programs for children.	If yes, in what language(s) was instruction given? _____ For how many months? ____
6. When did your child first attend a school in the United States? (Kindergarten – 12 th grade)	_____ Month Day Year
7. Do grandparent(s) or parent(s) have a Native American tribal affiliation? ____ Yes ____ No	

***WAC 392-160-005:** "Primary language" means the language most often used by a student (not necessarily by parents, guardians, or others) for communication in the student's place of residence.

Note to district: A response of a language other than English to question #2 OR question #3 triggers ELL placement testing

May 2014

The Purpose of the Home Language Survey

The Home Language Survey is given to *all* students enrolling in Washington schools. The following information should help answer some of the questions you may have about this form.

What is the purpose of the Home Language Survey?

The primary purpose of the Home Language Survey is to help identify students who may qualify for support to help them develop the English language skills necessary for success in the classroom and who may qualify for other services. It is important that this information be correctly recorded since it can affect the eligibility of students for services they need to be successful in school. Testing may be necessary to determine whether or not additional language and academic supports are needed. No student will be placed in an English language development program based solely on responses to this form.

Why do you ask about the student's first language and language(s) used in the home?

The two questions about the student's language help us to determine:

- if your student may be eligible for assistance with learning English, and
- whether staff at the school should be aware of other languages being used by the student at home.

The language your child first learned may be different from the language your child uses for communication at home now. The responses to both of these questions will assist the school in providing instruction appropriate to the individual student's needs as well as help with communication needs that may arise. Students who first learned a language other than English may qualify for additional supports. Even students who speak English well may still need support in developing the language skills needed to be successful in school.

Why do you ask where the student was born?

This information helps the school district and the state determine if the student meets the definition of immigrant for the purposes of federal funding. This applies even when the student's parents are both US citizens, but the student was born outside of the United States. This form is not used to identify students who may be undocumented.

Why do you ask about my student's previous education?

Information about a student's education will help ensure that the student's education both within and outside of the United States is considered in any recommendations made for participation in programs and district services. The student's educational background is also important information to help determine if the student is making adequate progress toward state standards based on their prior educational background.

Thank you for providing the information needed on the Home Language Survey. Contact your school district if you have further questions about this form or about services available at your child's school.

Setting a Standard for Language Translations and Interpreter Services



May 2011

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Setting a Standard for Language Translations and Interpreter Services May 2011

Language translations and interpreters are essential to making information that is pertinent to students' academic progress and success accessible to parents. Translations and interpreters are basic educational rights of English Language Learners (ELL), as guaranteed by Title VI of the Civil Rights Act of 1964. Under Title VI, recipients of federal financial assistance are responsible for ensuring meaningful access to their programs and activities for persons with limited English proficiency. It is also in the best interest of our students that we communicate effectively with their families and engage parents as much as possible in their children's education.

With over 50 languages represented in Everett Public Schools, however, it is not practical to provide written translations and group interpreters for every language. Without specific guidance, schools make judgments about which languages to provide translations and group interpreters for, and which documents to translate. Guidelines for language translations and interpreters will enable limited English proficient parents to receive greater benefit from our communications with them.

History and Current Situation

In 1970, the Secretary of the Department of Health, Education and Welfare issued a memo regarding language minority children to school districts with more than 5 percent national origin-minority group children. In it, he delineated the responsibilities of these districts to comply with Title VI, including the following: "School districts have the responsibility to adequately notify national origin-minority group parents of school activities which are called to the attention of other parents. Such notice in order to be adequate may have to be provided in a language other than English."

This and later guidance were in response to districts having a significant Spanish-speaking population and no procedures for the translation of vital documents or interpreters for meetings between parents and school staff. It did not give guidance, nor has guidance been provided since, to help districts with multiple languages in their populations determine how to provide access to families who speak "low incidence" languages.

Title I, Part A Final Regulations, 67 Fed. Reg. 71749-50 notes that, *whenever practicable*, written translations of printed information must be provided to parents of limited English proficiency in a language they understand. State education offices and school districts have flexibility in determining what mix of oral and written translation services may be necessary and reasonable for communicating the required information to limited English proficient parents.

In Everett Public Schools during 2010 – 11, over 1,700 students were enrolled in the ELL program. Their families spoke 54 different languages. Forty-one of these languages are spoken by 12 or fewer students. The largest language population is Spanish (772 students; 45 percent of ELL students). The next largest populations are Russian (146 students), Ukrainian (135), Vietnamese (129), and Arabic (109). These are followed by Marshallese, with 70 students.

There are other students not enrolled in the ELL program whose parents also have primary languages other than English. Students not qualifying for ELL services speak 23 additional languages at home, for a total of 77 languages spoken by Everett Public Schools students. It is estimated that the number of families speaking a language other than English at home is over 7,400.

Recommendations

In 2007, Categorical Programs proposed a set of recommendations and procedures to provide districtwide consistency for providing written translations and spoken interpretation. These recommendations are based on the criteria for how to determine an appropriate mix of language services, provided by the Department of Justice's Guidance on Title VI and Executive Order 13166, found in 67 Fed. Reg. 41455-41472 (June 18, 2002). The recommendations were reviewed and revised by a group of school and central office administrators and approved by the Expanded Cabinet. The following questions and recommendations have guided district procedures since:

Question 1: What is the number or proportion of limited English proficient persons in the eligible service population?

Recommendation 1: The district will use the criterion of 100 students when translating districtwide documents.

In a population of 18,500 students, 92.5 students equal 0.5 percent. This means that we translate districtwide documents into Spanish, Russian, Vietnamese, and Arabic. Ukrainians read and understand Russian, so our policy is to translate into Russian only.

Recommendation 2: Key school documents will be translated, and group interpreters will be offered if either 5 percent or more of the students at that school, or 25 or more students, speak a language other than English.

Question 2: What is the importance of the benefit, service, information, or encounter to the LEP person (including the consequences of lack of language services or inadequate interpretation/translation)?

Recommendation 3: There should be a list of documents that are routinely translated at the district and school levels, based on the number of students in the district and school population who speak the selected languages.

Some communications to parents are essential to their understanding and ability to support their students' learning, such as the Student Rights and Responsibilities Handbook, health information, and IEP meetings. Other communications, such as the announcement of a musical performance, are not as critical.

Question 3: What are the resources available to the district and the costs of providing various types of language services?

Recommendation 4: The district will adopt guidelines for the type of documents to be translated, the languages for translations at the district and school levels, and the situations in which individual and group interpreters will be obtained.

The cost of translating every document into languages other than English and providing interpreters for every event would be prohibitive. Additionally, providing translation for even the most vital documents into more than 50 languages would also be cost prohibitive.

Recommendation 5: The district will pay for translation and interpreter services beyond those allowable in ELL grants.

Schools have varying numbers of LEP households. Some schools need daily access to interpreters for student-specific reasons (e.g., discipline), while others need interpreters infrequently. Until 2007, schools were required to pay for those interpreter and translation services.

Payment of Interpreting and Translation Services

Prior to the adoption of the recommendations in 2007, schools paid for all costs of translations and interpreters. For some schools, this was significant. As a result, the costs for translations and interpreters have been assumed by central programs. ELL pays the costs for interpreters for students in the ELL program. Special Education pays the costs for interpreters for students in the Special Education program, or students being evaluated for Special Education placement. The district general fund pays for the remaining students who may need interpreters or translations.

District Language Matrix

The District Language Matrix was created to reflect the current number of ELL students, which languages they speak, and how they are distributed across the schools. It is updated monthly. This information is used to determine which languages will be translated districtwide and for each building. *See attached example of the District Language Matrix.*

Approved Languages for Group Translations and Interpreters Matrix

The information from the District Language Matrix is used to create this matrix, which shows which language(s) will be translated and interpreted for each school for group events. The determination of which language groups will be offered translations and group interpreters is adjusted annually by the district for each school, based on the percentage or number of students who speak each language. Translation will be provided for languages that are spoken by 5 percent or more of the total school population, or 25 or more students. ***Interpreters for individual student conferences (parent-teacher conferences, disciplinary conferences, health concerns, etc.) are provided regardless of the language.*** *See attached example of the Approved Languages for Group Translations and Interpreters Matrix.*

Guidelines

Translation Services

1. Group Translations – District

When a district department or other administrative group creates documents to be shared with parents, they will submit the documents electronically to Categorical Programs to determine whether the documents must be translated. The documents will be translated into those

languages spoken by 5 percent or more of the students to receive the document. Documents will be stored on DocuShare so that they will be available for staff across the district. *See list of documents that are currently available in the Translated District Documents and Forms section below.*

2. Group Translations – Schools

When a school is sending letters, notices or announcements related to academics, safety or health, group translations will be obtained based on the ***Approved Languages for Group Translations and Interpreters Matrix***. Schools will submit the documents electronically to Categorical Programs to determine whether the documents may be translated. Documents that may be useful to other schools will be stored on DocuShare and available for staff across the district. *See list of documents that are currently available in the Translated District Documents and Forms section below*

Schools may request translations for:

- Welcome to school letters
- Invitations to academic events such as curriculum night, math/science/literacy events
- Notices related to student safety and welfare specific to the school (e.g., communicable disease outbreak)
- Academic program information

Because of the cost of translation, all messages should be as broadly usable as possible so the document may be used repeatedly for a number of years with only minimal translation changes (e.g., dates).

Examples of documents that would not be approved for translation:

- Notices of social or sporting events
- PTA newsletters
- Classroom newsletters
- School newsletters
- Nonessential information

3. Individual Translations

When a school or district official needs to communicate in writing with LEP parents about issues specific to their student, individual translations, *regardless of language*, may be obtained. The only limitation is finding a translator in a timely fashion for a low incidence language. However, because of the cost of translating a written document compared to making a phone call with an interpreter, documents will be approved only if it is necessary for the parent to have a written copy. Otherwise, staff will be asked to communicate via phone or in person with an interpreter.

Interpreter Services

1. Group Interpreters – District

When the district conducts public meetings (e.g., boundary committee, budget forums), interpreters will be made available following the recommendations above. Interpreters will also be made available for other languages *upon individual parent request*.

2. Group Interpreters – Schools

When schools hold academic events (e.g., curriculum nights, math nights), interpreters will be offered during these events based on the ***Approved Languages for Group Translations and Interpreters Matrix***. Interpreters will also be made available for other languages *upon individual parent request*.

Schools will not be provided interpreters for classroom events or performances, field trips, sporting events, musical or drama performances.

3. Individual Interpreters

When parents come to school for parent-teacher conferences, IEP meetings, 504 meetings, and other student-specific purposes, schools will provide interpreting services either by phone or on-site meeting with an interpreter *regardless of the language spoken*. Likewise, when school staff need to contact parents for safety, discipline, or academic purposes (e.g., discipline calls and conferences, attendance concern contacts, health contacts), administrators, counselors, and health room personnel will access interpreter services. The only limitation is our ability to find an interpreter in a timely fashion who speaks a low-incidence language (e.g., Sindhi, Tigrinya).

Interpreter Service Companies

Two service companies may be used to request interpreters, **Refugee & Immigrant Services Northwest** and **Language Link**. Each will be used under different circumstances. Please see the information below about when to use **Refugee & Immigrant Services Northwest** versus when to use **Language Link**, and procedures for requesting interpreters through both services.

For questions, please contact Chris Kummerle in Categorical Programs at extension 4031.

Refugee & Immigrant Services Northwest

Refugee & Immigrant Services Northwest has a long-standing and trusting relationship with the refugee communities in Everett. Therefore, if possible, access Refugee & Immigrant Services Northwest first for interpreters.

Interpreting/Translating Coordinator: Elena Olidinchuk 425-388-9595
425-388-9158 FAX
eolidinchuk@everettcc.edu

To request interpreting or translation services service from Refugee & Immigrant Services Northwest, complete one of the following forms (*see attached examples*):

- **Request for Phone Call by Interpreter Form** is used when you need an interpreter to leave a particular message with the parent, or for a three-way call (you, the interpreter and the parent). When appropriate, it provides you an opportunity to write the message just as you would like it read by the interpreter. Please email (preferred method) or fax the request to Elena at Refugee & Immigrant Services Northwest. If your phone call is an emergency, please follow up with a call to Elena to alert her of the situation.
- **Request for On-Site Interpreter Form** is used to request an interpreter for on-site services. It has two sections. Please email (preferred method) or fax the request to Elena at Refugee & Immigrant Services Northwest. (If needed, interpreters should be included in the estimated costs for Title 1 and LAP funded school functions. Those plans need to be submitted to the Director of Categorical Programs for approval.)
 - Top half of the form: Interpreter for Schoolwide Program or Functions
 - Bottom half of the form: Interpreter for student-specific meetings (except district-scheduled parent-teacher conferences, which we arrange separately districtwide).
- **Request for Written Translation in Other Languages Form** is used for any written translation request. All written translation requests will be processed through the Categorical Programs office. Please email your written translation request to Chris Kummerle at ckummerle2@everettsd.org. Allow 3-7 working days for translation completion. **Refugee & Immigrant Services Northwest will no longer accept requests directly from schools.**

All interpreter request forms are available on DocuShare at:

Everett Public Schools District Documents > Departments > Curriculum Alignment & Implementation > Categorical Programs > ELL Forms and Documents Listing
or: <http://docushare.everett.k12.wa.us/docushare/dsweb/View/Collection-1044>

Important Tips:

- In your request, be as detailed as you can regarding what the meeting or call is about. There are interpreters who are specially trained to handle legal and medical issues.
- Reserve 5 – 10 minutes prior to the meeting with a family and an interpreter to introduce yourself and inform the interpreter what materials you will be reviewing in the meeting. This helps the interpreter be more efficient and in tune to the questions the family may have. Plan for meetings with an interpreter to take longer on average than meetings without an interpreter.

Languages available through Refugee & Immigrant Services Northwest:

Arabic
Burmese

Cambodian
Farsi / Persian

French
German

Indonesian
Laotian
Korean
Marshallese

Mandingo
Russian / Ukrainian
Spanish
Swahili

Thai
Vietnamese

Language Link

Language Link is a telephonic interpretation service that provides instant, direct access to professional interpreters over the phone (three-way call). Language Link may be used for emergency situations when Refugee & Immigrant Services Northwest cannot provide an interpreter quickly enough, or for languages that Refugee & Immigrant Services Northwest does not provide.

The following are guidelines to help you in the decision to use Language Link services:

- **Emergency situations that require immediate contact with a parent or guardian**
- **Discipline issues that require immediate parent communication**
- **Student health issues that require immediate parent communication**
- **When the Refugee Forum cannot provide an interpreter in the primary language of the family**

School administrators, nurses, health room personnel, and counselors may access Language Link.

To access Language Link:
Dial 1-800-535-7993
Account # 6517

The operator will take the account number, your name, the phone number of the call's recipient, and the language requiring interpretation. The operator will then connect you to an interpreter and set up an immediate conference call with the parent or guardian.

Any questions regarding Language Link should be directed to Chris Kummerle in Categorical Programs at extension 4031. *See attached list of languages available through Language Link.*

Other Resources

Voice Mail Line for Non-English Speaking Families (425-385-4011)

In collaboration with Refugee & Immigrant Services Northwest, families have access to a telephone voice mail service to leave requests to be contacted by the schools, inform the school of a child's absence, or ask questions about their students' schooling. This line is available in Spanish, Russian, Arabic, Vietnamese and Korean. We may be the only district in the state with this capacity, thanks to our good working relationship with Refugee & Immigrant Services Northwest.

How Does It Work?

1. Parents call the line and follow the instructions presented in their language. They may leave a message for a school or district office, or for a specific staff member.
2. Interpreters access messages from parents within a 24 - 48 hour period. They translate it and send it to Categorical Programs.
3. Categorical Programs forwards the message immediately to the principal and office manager at the appropriate school or department.
4. The school or department responds to the parent within 24 hours of receiving the message, as appropriate.
5. In an emergency, parents are told to call the direct line at Refugee & Immigrant Services Northwest at 425-388-9307. The parent is contacted by an interpreter who communicates their emergency message by a three-way call with the school.

Business cards with the number of and information about the Voice Mail Line are available through Categorical Programs in the following languages (*see attached example*):

- Arabic
- Korean
- Russian
- Spanish
- Vietnamese

Group Interpretation Equipment

Group interpretation equipment (translation boxes) are available for loan from the Categorical Programs office. This equipment enables an interpreter to speak quietly into a sending unit, and his/her voice to be heard through headphones. Each sending unit comes with a set of four to six receivers and eight headphones (splitters are included). Categorical Programs has four sets of translation boxes available for loan. To schedule use of the translation boxes, please contact Chris Kummerle in Categorical Programs at extension 4031.

“Important Information” Translation Flags

For those school or district documents not eligible for translation or languages the district cannot accommodate (see the *Approved Languages for Group Translation and Interpreters Matrix*), an “Important Information” Translation Flag can be used. The flags can be attached to documents that are sent home with the following notice:

“Attached is a document containing important information from your child’s school. Please have this information translated as soon as possible. Thank you.”

The notice flags are available in the following languages:

- Arabic
- Korean
- Russian
- Spanish
- Vietnamese

“Important Information” flags are located on DocuShare at:

Everett Public Schools District Documents > Departments > Curriculum Alignment & Implementation > Categorical Programs > ELL Forms and Documents Listing > “Important Information” Translations

or: <http://docushare.everett.k12.wa.us/docushare/dsweb/View/Collection-1044>

Flags stating only, “*This is very important. Please find someone to translate.*” are attached to this document, in 26 languages.

Blackboard Connect Calls

Schools may translate Blackboard Connect messages for their approved student languages. The school can designate a staff person to record messages in languages other than English, or Refugee & Immigrant Services Northwest can record messages. If you would like help with translations in Blackboard Connect, please contact Diane Bradford in the Communications Department at extension 4040 at least four days before the call is to be sent. If you would like help translating documents, interpreters or other related services, please contact Chris Kummerle in Categorical Programs at extension 4031.

Translated District Forms and Documents

The following forms and documents are translated into the top four district languages (Spanish, Russian, Vietnamese, Arabic) except where otherwise noted. These forms and documents are available on DocuShare at:

Everett Public Schools District Documents > Departments > Curriculum Alignment & Implementation > Categorical Programs > ELL Forms and Documents Listing
or: <http://docushare.everett.k12.wa.us/docushare/dsweb/View/Collection-1044>

- Annual Health History Questionnaire
- Elementary Spring Conference Letters
- ELL Exit Forms (4 languages + Korean)
- ELL Refusal of Services
- Everett Public Schools Enrollment Form
- Excused Absence Forms
- Exit ELL Program to Special Education
- Field Trip Permission Forms
- Free and Reduced Lunch Application (4 languages + Somali)

- Home Language Surveys (4 languages + Korean, Somali, Cambodian, Chinese, Tagalog, Ukrainian)
- Incomplete Immunizations Notice
- Operation School Bell Service Request Form
- Parent – Teacher Conference Letters
- Parent Notification of Student Placement
- Student Residency Form
- Volunteer Application and Disclosure Statement Forms (3 languages – not Arabic)
- ECEAP Survival Words and Phrases

ELL Website

The ELL pages of the district website contain information useful to parents, teachers, and other staff working with ELL students. It includes tips for parents in five languages (Arabic, Spanish, Vietnamese, Korean, Hmong, and Tagalog). There are links to common district forms, as well as to an OSPI site that provides a dictionary of school vocabulary in Russian, Somali, Spanish and Vietnamese. Parent information about the WLPT is provided in Cambodian, Chinese, English, Korean, Russian, Somali, Spanish, Ukrainian, and Vietnamese. WLPT cut scores for each grade level are linked. Information about the ELL program at elementary, middle, and high school is on the website. There is also a link to the Imagine Learning English website for elementary parents and staff, as well as links to other websites that have useful information and resources for ELL parents and students.

The website is located at:

<http://www.everett.k12.wa.us/ell/Home>

It can also be found from the district home page by going to Curriculum > English Lang. Learner.

Everett Public School District Language Matrix

	ICW	IBW	JRE	JGN	JHA	JJA	JJE	JLO	JMA	JMC	JMO	JPC	JSF	JSL	JVR	JWH	JWO	2ES	2EVG	2GMY	2HEA	3NOR	3CHS	3EHS	3MS	SHS	Total
1 ALBANIAN											1																1
2 ANHARIC							2							1						1							8
3 ARABIC		6	3		16	3	1	4	17		14	2	3	2	5	1			3	4			6	7	4	1	104
4 BANTU																	2				1					2	6
5 BENGALI										1			2														3
6 BERBER																											1
7 BOSNIAN		1			1																						3
8 BURMESE					3																						3
9 CAMBODIAN																											7
10 CANTONESE																											21
11 CHINESE	1						1	3	1	1	2	1	1	2	1	1	3	1					2	3	1		26
12 CHINESE-MANDARIN	1									2													1				5
13 CHUKSE								2												1							4
14 DANISH																											1
15 FARSI																					1						4
16 FIJIAN							2				1																4
17 FRENCH																											5
18 FULA										1										1							4
19 GERMAN																											4
20 GURATTI																											2
21 HINDI																											2
22 HONGS																											2
23 HUNGARIAN																											1
24 INDONESIAN																											10
25 JAPANESE																											4
26 KAREN																											8
27 KHER																											1
28 KOREAN																											1
29 KURDISH	4									6	6	3	4	9			5	1			7		4	2	7		56
30 LAO																											3
31 LINGALA																											12
32 MANDINGO																											1
33 MARS-HALLESE																											2
34 MIXTECO																											71
35 NEPALI																											1
36 NIGERIAN																											29
37 OKOMO																											1
38 PASHITO																											2
39 PERSIAN																											4
40 PHILIPPINE																											3
41 POLISH																											4
42 PORTUGUESE																											1
43 PUNJABI																											4
44 RUMANIAN																											4
45 RUSSIAN																											3
46 SOMALI																											6
47 SPANISH																											14
48 SWAHILI																											26
49 TAGALOG																											4
50 TELUGU																											9
51 THAI																											2
52 TRUKISE																											1
53 TURKISH																											5
54 UKRAINIAN																											11
55 URDU																											40
56 VIETNAMESE																											2
57 WOLOF																											9
Total	22	176	32	46	225	32	78	93	121	42	77	41	55	89	51	21	96	35	82	1	30	69	76	111	30	19	1750

Approved Languages for Group Translations and Interpreters

Based on November 2010 Language Matrix

Schools	Spanish	Russian	Arabic	Vietnamese	Marshallese
		Include Ukrainian			
Cedar Wood					
Emerson	X	X			
Forest View					
Garfield	X				
Hawthorne	X	X			X
Jackson					
Jefferson		X			
Lowell	X				
Madison	X				
Mill Creek					
Monroe	X				
Penny Creek					
Silver Firs	X				
Silver Lake	X				
View Ridge	X				
Whittier					
Woodside	X				
Eisenhower					
Evergreen	X				
Gateway					
Heather wood					
North	X				
Cascade HS	X				
Everett HS	X				
Jackson HS					

Schoolwide event translations:

When a school is sending letters, notices or announcements related to academics, safety or health, group translations will be obtained for only the approved languages listed above. The determination of which language groups to be offered translations will be made annually and adjusted periodically by the district for each school, based on the percentage of students who speak each language. (5% of total school population or 25 students per language)

Translations of district documents:

When a district department or other administrative group creates documents that must be shared with parents, they will submit the documents electronically to Categorical Programs, and a district translation committee will determine whether the documents must be translated, and into which languages as listed above.

Interpreter requests for school events:

When a school is having a special event involving families, interpreters will be provided only for the languages indicated above. This is based on the percentage of students who speak each language in that school. This does not include interpreters for student conferences.

Revised January 2011

Everett Public Schools
Request for Phone Call by Interpreter

Emergency/Rush? ☐ Yes ☐ No

Language requested: ☐ Spanish ☐ Vietnamese ☐ Russian ☐ Arabic ☐ Other _____

Name of School/Dept: _____ Name & title of person making request: _____

Name of client (student): _____ Student ID # _____

Is the client (student) currently in the English Language Learner (ELL) Program? ☐ Yes ☐ No

Name of parent/guardian(s): _____

Home phone #: _____ Work/Cell #: _____

Best time to reach parent/guardian(s): _____

Do you want this message left on the phone voice mail or answering machine? ☐ Yes ☐ No

Please type in your message in the space below (or attach an additional sheet) as you would like the message to be read:

Everett Public Schools
Request for Interpreter
(Student Specific Meetings & School Function/Program)

School Function/Meeting

Name of School/Dept: _____ Name of Activity/Program or Function: _____

Date and time interpreter is needed: _____ Start time: _____ End time: _____

Name and title of person making request: _____

Language(s) needed: ☐ Spanish ☐ Vietnamese ☐ Russian ☐ Arabic ☐ Other _____

Student Specific Meeting

Name of Client (Student): _____

Is the client (student) in the English Language Learner (ELL) program? ☐ Yes ☐ No

Is this a requisite meeting for Special Ed? ☐ Yes ☐ No

Name of Parent/Guardian(s): _____

Home Phone #: _____ Cell #: _____ **** Please email request to Elena at elohidin@everettcc.edu (preferred method)
Or Fax request to Refugee Services @ 425-388-9158**

Best time to reach parents/guardians? _____

Refugee and Immigrant Services Northwest Use Only

Name(s) of interpreter(s) assigned: _____

Everett Public Schools
Request for Written Translation in Other Language(s)

Name of School/Dept: _____

Date of Request: _____

Name and title of person making request: _____

Name of Document: _____


Distribution Type (check all that apply):

- ☐ Individual ☐ Classroom
☐ Schoolwide ☐ Districtwide
☐ Web

Language requested: ☐ Spanish ☐ Vietnamese
 ☐ Russian ☐ Arabic ☐ Other _____

Reason for Translation (please check one):

- ☐ Translation is specific to an ELL student or ELL class.
☐ Translation of this material will be available to ELL and other parents and is necessary to their understanding of school requirements. (i.e., Student Rights & Responsibilities, etc.)
☐ Translation of forms specific to Special Education.
☐ Translation of student transcript. Student ID# _____

Additional Notes: 

Please email this request along with your document you wish to be translated (in [Microsoft Word](#) format) to Chris Kummerle in Categorical Programs @ ckummerle2@everettsd.org

If you have any questions, please call 425-385-4031






Language Link
Telephonic Interpreting (3 way call)
Available Languages
1-800-535-7993
Account #6517

Acholi	Hmong	Pashto
Afrikaans	Ho	Polish
Akan	Hungarian	Portuguese
Albanian	Ibang	Portuguese Brazilian
Amharic	Igbo (Ibo)	Potwari
Arabic	Icelandic	Pulaar
Armenian	Ilocano	Punjabi
American Sign Language	Indonesian	Quechua
Ashanti	Italian	Quiche
Assyrian	Jakartanese	Rhade
Azerbaijani	Japanese	Romanian
Bambara	Javanese	Russian
Basque	Kanjobal	Samoa
Basaa	Kannada	Sara
Behdini	Karen	Serbian
Belorussian	Kashmiri	Serbo Croatian
Bengali	Kazakh	Shanghainese
Bosnian	Khmer (Cambodian)	Shona
Bulgarian	Kikuyu	Sichuan
Burmese	Kinyarwanda	Sicilian
Cantonese	Kirghiz	Sindhi
Cape Verde	Kirundi	Sinhalese
Catalan	Korean	Slovak
Cebuano	Kpele	Slovenian
Chamorro	Krahn	Somali
Cherokee	Kurdish	Soninke
Chuukese	Laotian	Sorani
Croatian	Latin	Sotho
Czech	Latvian	Spanish (European)
Danish	Lebanese	Spanish (Latin American)
Dari (Persian)	Lingala	Spanish (Mexican)
Dimli	Lithuanian	Sudanese
Dinka	Luganda	Swahili
Duala	Maay	Swedish
Dutch	Macedonian	Tagalog
Efik	Malagasy	Tahitian
Estonian	Malay	Taiwanese
Ethiopian	Malayalam	Tajiki
Ewe	Maltese	Tamang
Farsi (Persian)	Mam	Tamil
Fijian	Mandarin	Tatar
Finnish	Mandingo	Telugu
Flemish	Mandinka	Teochew
French	Mankon	Thai

French Canadian	Marathi	Tibetan
Frisian (West)	Marshallese	Tigrigna – Tigrinya
Fukinese	Mien	Toishanese
Fula	Mina	Tongan
Fulani	Mixteco Alto	Tsonga
Fuzhou	Mixteco Bajo	Tshiluba
Ga	Moldovan	Turkish
Gaelic	Mongolian	Turkmen
Georgian	Moroccan Arabic	Twi
German	Nahuati	Ukrainian
Grebo	Navajo	Urdu
Greek	Nepali	Uzbek
Gujarati	Norwegian	Vietnamese
Haitian Creole	Nuer	Visayan (Cebuano)
Haka Burmese	Ojibay	Welsh
Hakka	Oromo	Wolof
Hausa	Pahari	Yiddish
Hebrew	Pampangan	Yoruba
Hindi	Papiamento	Zulu

Language Link questions? Call Chris Kummerle in Categorical Programs at x4031.

Voice Mail Line Information Cards

 <p>Arabic</p> <p>مدارس افريت العامه</p> <p>لترك رساله ابلاغ غياب او الاتصال بمدرسة طفلك (425) 385-4011 اتصل على</p>	 <p>Russian</p> <p>Общественные школы Эверета</p> <p>Чтобы оставить сообщение, известить об отсутствии, или связаться со школой вашего ребёнка на Русском языке. Звоните по телефону: (425) 385-4011</p>
 <p>Vietnamese</p> <p>Trường Phổ Thông Trung Học Everett</p> <p>Gọi (425) 385-4011</p> <p>Đề lưu lại lời nhắn, xin phép vắng mặt, hay liên lạc với nhà trường bằng tiếng Việt Nam</p>	 <p>Spanish</p> <p>Escuelas Públicas de Everett</p> <p>Para dejar un mensaje, reportar una ausencia, o contactar la escuela de su hijo en Español Llame al (425) 385-4011</p>
 <p>Korean</p> <p>에버렛 공립 학교</p> <p>한국어로 메시지를 남기거나, 결석을 보고 하거나, 자녀의 학교와의 연락은, (425) 385-4011 로 전화를 하시기 바랍니다.</p>	

Arabic

This is very important. Please find someone to translate.

هذا الأمر مهم للغاية. الرجاء العثور على شخص ليقوم بالترجمة.

Bosnian

This is very important. Please find someone to translate.

Ovo je vrlo važno. Molimo da pronađete nekoga da Vam ovo prevede.

Burmese

This is very important. Please find someone to translate.

ဒါသိပ်ကိုအရေးကြီးပါတယ်။ တစ်ယောက်ယောက်ကိုရှာပြီး ဘာသာပြန်ခိုင်းပါ။

Chinese (Simplified)

This is very important. Please find someone to translate.

此内容非常重要。 请找人翻译。

Chuukese

This is very important. Please find someone to translate.

A men amen fokkun achea, Kose mochen kuta emun pwe epwe tongeni translate.

Czech

This is very important. Please find someone to translate.

Velmi důležité. Najděte, prosím, někoho na překlad.

Farsi

This is very important. Please find someone to translate.

این بسیار مهم است. لطفاً کس را برای ترجمه کردند دریافت کنید.

French

This is very important. Please find someone to translate.

Cet information est très importante. S'il vous plaît, trouvez quelqu'un qui pouvait le traduire.

Gujarati

This is very important. Please find someone to translate.

આ ખૂબ મહત્વપૂર્ણ છે. કૃપાથી ભાષાંતર માટે કોઈને મેળવો.

Japanese

This is very important. Please find someone to translate.

これは非常に重要です。誰か翻訳者を見つけてください。

Karen

This is very important. Please find someone to translate.

အဝဲအံ့မုတ်အကိဒိန်ဒိန်မးလီၤ.
ဝံသးရူယုထံၣ်န့ၣ်ပုၤတဂၤလၢကကွဲးကျိၣ်ထံၣ်က့ၤအီၤတက့ၢ်.

Kirundi

This is very important. Please find someone to translate.

Dukeneye byihutirwa ko mwa turondera umuntu uzi kuvuga ikirundi nticyongeleza.

Korean

This is very important. Please find someone to translate.

이것은 매우 중요합니다. 번역자를 찾으십시오.

Lao

This is very important. Please find someone to translate.

ນີ້ເປັນສິ່ງສຳຄັນ. ກະລຸນາຊອກຫາຄົນແປ.

Mai Mai

This is very important, please find someone to translate.

Kan muhim waaye turjuman weediso afki kinturjumano.

Nepali

This is very important. Please find someone to translate.

यो अत्यन्त महत्वपूर्ण छ। कृपया अनुवाद गर्ने कसैलाई खोज्नु होला।

Oromo

This is very important. Please find someone to translate.

Kunin heddu barbaachisaa, Namaa sii hiiku barbaadadhu.

Russian

This is very important. Please find someone to translate.

Это очень важно. Обратитесь к кому-нибудь за помощью в переводе на ваш язык.

Somali

This is very important. Please find someone to translate.

Kani aad ayuu muhiim u yahay. Fadlan raadso qof kuu turjuma.

Spanish -Latin America

This is very important. Please find someone to translate.

Esto es muy importante. Por favor encuentre a alguien que lo traduzca

Swahili

This is very important. Please find someone to translate.

Hii ni muhimu sana. Tafadhali tafuta mtu wa kutafsiri.

Thai

This is very important. Please find someone to translate.

นี่เป็นเรื่องสำคัญมาก กรุณาหาคนช่วยแปลด้วย

Turkish

This is very important. Please find someone to translate.

Bu çok önemli, lütfen baska bir tercüman bulun

Uzbek

This is very important. Please find someone to translate.

Bu juda muhim. Iltimos, biror tarjimon toping. (Uzbek – Latin format)

Бу жуда муҳим. Илтимос, бирор таржимон топинг. (Uzbek-Cyrillic format)

Vietnamese

This is very important. Please find someone to translate.

Đây là tài liệu rất quan trọng. Vui lòng tìm người giải thích.

Educational Interpreter Standards Recommendations

The Washington Professional Educators Standards Board (PESB) was directed to develop and publish standards for educational interpreters as a result of HB 2127, Sec 501(1)(d)(iii). The specific requirements of this proviso are:

Develop educator interpreter standards and identifying interpreter assessments that are available to school districts that meet the following criteria:

- A. Include both written and performance assessment;
- B. Be offered by a national organization of professional sign language interpreters and transliterators; and
- C. Be designed to assess performance in more than one sign system or sign language.

The board shall establish a performance standard, defining what constitutes a minimum assessment result, for each educational interpreter assessment identified. The board shall publicize the standards and assessments for school district use.

Summary of Recommendations

The workgroup's recommendation for the assessments and performance standard are:

- 1. Educational Interpreter Performance Assessment (EIPA) with a minimum score of 3.5 AND Educational Interpreter Performance Assessment (EIPA) - Written Test – passing score; OR**
- 2. Interpreting Certificate (NIC) with RID certification AND Educational Interpreter Performance Assessment (EIPA) - Written Test – passing score**

The Process

To address the proviso, the following steps were taken that culminated with this report:

February, 2013	Facilitator hired to guide the development of these recommendations through the competitive RFQQ No.2012-13 process in December 2012.
March 25-26, 2013	Meeting of invited representatives of relevant stakeholder groups representing the interests and education of children who are deaf and hard of hearing in Tacoma, WA. <ul style="list-style-type: none">• Representation included the Office of Superintendent of Public Instruction (OSPI), the Center for Childhood Deafness and Hearing Loss (CDHL), local school districts, special schools and programs for deaf and hard of hearing children, and relevant agencies (see Attachment A for a list of participants).

	<ul style="list-style-type: none"> • Several representatives are current consumers of interpreting services. • Work group made recommendations for the standard according to the process outlined in this report.
April-May 15, 2013	Report developed
May 15-June 15, 2013	Written comments were solicited through a distribution of the report and specific instructions for returning input.
June 2013	Written comments analyzed for consideration within report
July 30-31, 2013	Final recommendations presentation to PESB, Olympia, WA

History of Educational Interpreting in Washington and National Perspective

The activities summarized below represent the efforts of professionals and parents to establish standards for educational interpreters in Washington and demonstrate the long-standing need that has existed for this legislation and the work of this group under the Professional Educators Standards Board.

- 2004: State Educational Interpreter Council (SEIC) worked with Senator Fraser of Olympia to develop Senate Bill 5105 that included establishing competencies for educational interpreters, and to identify training programs, funding sources, and distance learning options.
- 2006: Senate and House Education Committees requested that OSPI develop recommendations related to standards for educational interpreters resulting in House Bill 6606. The SEIC developed educational interpreter qualifications and requirements for Level I and Level II tiers and forwarded them to OSPI to send to the legislative committee.
- 2007: The Washington State Institute for Public Policy report, *Educational Services for Deaf, Hard of Hearing, and Deaf-Blind Children in Washington State: Stakeholder Views* identified one of the problems in Washington's deaf education system as having "widespread use of unqualified educational interpreters" (p 14).
- 2010: The Center for Childhood Deafness and Hearing Loss (CDHL) Board of Trustees Report to the Legislature includes Recommendation 4.2: OSPI in consultation with CDHL, should establish state minimum standards and certification requirements for educational interpreters and support access to the assessment of sign language interpreting skills.

On the national level, educational interpreting evolved from the passage of PL 94-142 in 1975, now the Individuals with Disabilities Education Act. Interpreting was specifically added as a related service in the 2004 reauthorization of IDEA with the following definition:

Educational Interpreting Services includes oral transliteration services, cued language transliteration services, sign language transliteration and interpreting services, and transcription services such as CART, C-Print, and TypeWell; and special interpreting services for children who are deaf-blind) (34 CFR 300.34 (c) (4).

At the present time 8 states required educational interpreters to have a general interpreting license, 9 states issue an Educational Interpreter license, and 24 states require educational interpreters to meet their state's standards for a qualified educational interpreter. Ten states have no requirements (WA is in this list until these standards are implemented). The latter two methods are generally managed within the Department of Education. Most states have adopted the following general provisions as part of the "qualifications" for educational interpreters:

- Degree level: High school diploma or equivalent or Associates degree.
- Test: The most common test/standard used to consider an educational interpreter "qualified" is the Educational Interpreter Performance Assessment (EIPA) 3.5 or higher.
- National Certificate: If an interpreter holds the National Interpreter Certification (NIC) from the Registry of Interpreters for the Deaf, most states will consider this person qualified to work as an Educational Interpreter.
- Registry: Some states that outline qualifications also provide a registry to assist school systems locating qualified Educational Interpreter's.
- Remaining "Qualified": States require interpreters to complete continuing education units to remain qualified.

Interpreter assessments evaluate voice-to-sign and sign-to voice skills using videotape stimulus materials and an evaluation procedure based on a rating system .The following tests are used for assessing Educational Interpreter skills (see Attachment B for state by state analysis of current educational interpreter minimum requirements):

EIPA: 37 states

Cut Scores: 6 states- 3.0, 22 states – 3.5, 10 states – 4.0

EIPA–Written Test: 12 states

NIC: 23 states

Educational Signed Skills Evaluation (E.S.S.E.): 2 states (CA, OK)

Quality Assessment Test or Quality Assurance Screening Test (QAST): 6 states

The EIPA and the E.S.S.E. use a 5 point scale that aligns with interpreter skill. The EIPA website (www.classroominterpreting.com) describes the skills for these levels as follows:

Level 1 (Score 1.0-1.9): Beginning Interpreter not ready to interpret

Demonstrates very limited sign vocabulary with frequent errors in production. At times, production may be incomprehensible. Grammatical structure tends to be nonexistent. Individual is only able to communicate very simple ideas and demonstrates great difficulty comprehending signed communication. Sign production lacks prosody and use of space for the vast majority of the interpreted message. An individual at this level is not recommended for classroom interpreting.

Level 2 (Score 2.0-2.9): Advanced Beginner

Demonstrates only basic sign vocabulary and these limitations interfere with communication. Lack of fluency and sign production errors are typical and often interfere with communication. The interpreter often hesitates in signing, as if searching for vocabulary. Frequent errors in grammar are

apparent, although basic signed sentences appear intact. More complex grammatical structures are typically difficult. Individual is able to read signs at the word level and simple sentence level but complete or complex sentences often require repetitions and repairs. Some use of prosody and space, but use is inconsistent and often incorrect. An individual at this level is not recommended for classroom interpreting.

Level 3 (Score 3.0-3.9): Intermediate

Demonstrates knowledge of basic vocabulary, but will lack vocabulary for more technical, complex, or academic topics. Individual is able to sign in a fairly fluent manner using some consistent prosody, but pacing is still slow with infrequent pauses for vocabulary or complex structures. Sign production may show some errors but generally will not interfere with communication. Grammatical production may still be incorrect, especially for complex structures, but is in general intact for routine and simple language. Comprehends signed messages but may need repetition and assistance. Voiced translation often lacks depth and subtleties of the original message. An individual at this level would be able to communicate very basic classroom content, but may incorrectly interpret complex information resulting in a message that is not always clear. An interpreter at this level needs continued supervision and should be required to participate in continuing education in interpreting.

Level 4 (Score 4.0-4.9): Advanced intermediate

Demonstrates broad use of vocabulary with sign production that is generally correct. Demonstrates good strategies for conveying information when a specific sign is not in her/his vocabulary. Grammatical constructions are generally clear and consistent, but complex information may still pose occasional problems. Prosody is good, with appropriate facial expression most of the time. May still have difficulty with the use of facial expression in complex sentences and adverbial non-manual markers. Fluency may deteriorate when rate or complexity of communication increases. Uses space consistently most of the time, but complex constructions or extended use of discourse cohesion may still pose problems. Comprehension of most signed messages at a normal rate is good but translation may lack some complexity of the original message. An individual at this level would be able to convey much of the classroom content but may have difficulty with complex topics or rapid turn taking.

Level 5 (Score 5.0): Advanced

Demonstrates broad and fluent use of vocabulary, with a broad range of strategies for communicating new words and concepts. Sign production errors are minimal and never interfere with comprehension. Prosody is correct for grammatical, non-manual markers, and affective purposes. Complex grammatical constructions are typically not a problem. Comprehension of sign messages is very good, communicating all details of the original message. An individual at this level is capable of clearly and accurately conveying the majority of interactions within the classroom.

Development of Recommendations

The following steps comprised the process for determining performance and written test recommendations and their minimum score.

1. Consideration of existing data regarding current assessments of interpreting skills and knowledge.
2. Identification of relevant criteria on which to evaluate each performance assessment.

3. Evaluation and selection of performance assessments.
4. Evaluation and selection of written assessments.
5. Determination of minimum standard for recommended assessments.
6. Evaluation of process for developing the recommendations.

Consideration of Existing Data Regarding Current Assessments

Three educational interpreter performance assessments and two written assessments were reviewed and considered by the committee. A full description and data regarding each assessment follows as well as a summary of pertinent aspects of the assessments in Table 1.

Performance Assessments

- EIPA
- E.S.S.E.-Interpreting, E.S.S.E.-Receptive
- NIC

Written Assessments

- EIPA Written Test
- NIC Written Test

Educational Interpreter Performance Assessment (EIPA)

The EIPA is the most widely used assessment for educational interpreting skills and is specifically designed for K-12 school interpreters. The EIPA is a national certification managed through Boys Town National Research Hospital in Omaha, NE (www.classroominterpreting.org). To assess the skills of the candidate, the EIPA utilizes two video samples of actual classroom settings called stimulus tapes. The first tape is used to assess the candidate's receptive skills (voice to sign) and the second to assess his/her expressive skills (sign to voice). The tapes are chosen based on the grade level (elementary or secondary) and the sign language or system selected by the candidate. The candidate is videotaped interpreting the classroom tape. Videotapes are analyzed in the areas of grammatical skills, sign to voicing skills, vocabulary, and overall abilities by a 3 member panel of trained experts that match the sign system used by the candidate. Scores from all three evaluators are averaged for each skill area and each domain as well as the overall test score. Scores may range from 0 (no skills demonstrated) to 5.0 (advanced native-like skills). An individual's EIPA score is reported as "EIPA Elementary PSE 4.1" which represents the grade level, the language modality, and the total summary EIPA score. In addition to the score, detailed written feedback on the candidate's strengths and weaknesses and suggestions for improvement are provided in the reports which are returned within 90 days. The language modality options for the EIPA are:

- American Sign Language (ASL)
- Pidgin Signed English (PSE)
- Manually Coded English (MCE) (Note: MCE includes Signing Exact English or SEE, a type of MCE)
- EIPA-Cued Speech (available 2013)

EIPA also offers a pre-hire screen that can be used to get a quick "thumbs up/thumbs down" recommendation regarding an individual's sign skills. Additionally, the EIPA has an internet-based

knowledge assessment. The classroom interpreting website contains guidelines for professional conduct, EIPA practice materials, and other classroom interpreting resources.

Educational Signed Skills Evaluation (E.S.S.E.)

The E.S.S.E. is similar to the EIPA. It focuses on classroom interpreting skills, includes receptive (sign to voice) and expressive (voice to sign) tests with 3 different age levels options (elementary, middle school, high school) and uses classroom stimulus tapes. The receptive component (E.S.S.E.-R) consists of 10 signed sentences and the interpreting (E.S.S.E.-I) segment uses samples of classroom teachers. The assessment results are viewed and scored by a 5 member panel of experts and a report is provided to candidates with their averaged score and an analysis of strengths and weaknesses. Performance is scored on a scale of from 1.0 (beginner, not ready to interpret) to 5.0 (advanced interpreting skills). The sign modes offered are:

- American Sign Language (ASL)
- Pidgin Signed English (PSE)
- Signing Exact English (SEE)

Other services from the SEE Center (www.seecenter.org) include a test for teacher sign skills and a screening test. The following numbers illustrate use of the E.S.S.E. in the U.S. Of the candidates who have taken the E.S.S.E., 86% resided in California, where the SEE Center is based.

Breakdown by mode for E.S.S.E.-I (expressive) since 2002 (total=1953):

- American Sign Language – 18
- Pidgin Signed English – 1362
- Signing Exact English/Signed English – 308
- Mode data missing – 265

Numbers of interpreters taking the E.S.S.E. in the past 3 years nation-wide (total=534):

- 2010 – 252
- 2011 – 160
- 2012 – 122

By comparison, the EIPA was administered to 1786 individuals in 2010, 1674 in 2011, and 1773 in 2012 for a total of 5233.

The California Department of Education data compared the scores of 513 interpreters who took both the EIPA-MCE and E.S.S.E.-SEE. Interpreters who performed at the 3.5 level had comparable passing rates for both tests. Of the interpreters who performed at the 4.0 level, 12% passed the EIPA and 28% passed the E.S.S.E. suggesting the E.S.S.E.-SEE was easier to pass at the 4.0 level.

National Interpreter Certification (NIC)

NIC is a national certification designed for general interpreting offered through the Registry of Interpreters for the Deaf (RID). The examination tests interpreting knowledge and sign skills in three domains:

- General knowledge of the field of interpreting through the NIC knowledge exam (must pass before proceeding to other tests);
- Ethical decision making through the interview portion of the NIC Interview and Performance Exam; and
- Interpreting skills through the NIC Interview and Performance Exam

The NIC Interview and Performance Examination is a vignette-based assessment using video to deliver and record the assessment. Each vignette contains a real world problem or interpreting activity. Seven video-based vignettes represent the stimulus materials (two for the ethics interview, 5 for the performance assessment). A team of up to three trained raters score each vignette using an established scoring rubric. NIC rating determines a pass/fail status of each candidate. A numeric score is provided to give the candidates feedback as to how far below or above the pass/fail point they performed. Some feedback is provided to candidates who do not pass. The NIC requires a minimum of a BA degree for all candidates although an Alternative Pathway Application may offer an alternative to this requirement. Continuing education is required to maintain the NIC.

Candidates earn NIC certification if they demonstrate professional knowledge and skills that meet or exceed the minimum professional standards necessary to perform in a broad range of interpretation and transliteration assignments in all three domains. RID also recognizes educational interpreters with EIPA scores of 4.0 and above who also pass the Educational Interpreter Written Test.

Educational Interpreter Performance Assessment – Written Test (EIPA-WT)

The EIPA-WT is a comprehensive multiple choice test that evaluates the interpreter’s understanding of information that is critical to performing with students in an education setting such as roles and responsibilities of the interpreter, tutoring, child development and relationships with students. The proctored computer-based test contains 177 questions taking about 1.5 to 3 hours to complete and is administered over the internet offering immediate feedback. A passing score on the EIPA-WT is not needed in order to take the Educational Interpreter Performance Assessment.

Table 1. Comparison of pertinent elements of the EIPA, E.S.S.E., and NIC.

	EIPA	E.S.S.E.	NIC
Sign Systems	American Sign Language (ASL) Pidgin Signed English (PSE) Manually Coded English (MCE) EIPA-Cued Speech	American Sign Language (ASL) Pidgin Signed English (PSE) Signing Exact English (SEE)	American Sign Language (ASL) English-based sign systems
Levels	Elementary, Secondary (MS & HS)	Elementary, Middle School, High School	Adult
Length of Tests	1 hour	2.5 hours	1 hour
Diversity of Test	Receptive: 1 situation	Receptive: 1 situation	7 vignettes

Stimulus Materials	Expressive: 5 situations for elementary, 2 situations for secondary	Expressive: 3 situations	
Analysis	Score and Written Report detailing strengths and weaknesses	Score and Written Report detailing strengths and weaknesses	Pass/fail and score with report identifying problem areas for those who fail
Knowledge	Computer-based via Internet 177 MC questions Passing score not required to take the EIPA	None	Computer-based via internet 150 MC questions Scaled score of 500 required to pass
Number of Endorsing States	37	2	23
Proctoring of Test	Local test administrator	Local test administrator	Local test administrator
Cost	EIPA \$310 Cued Speech \$350 Pre-Hire assessment \$100 EIPA Written Test \$200	\$300/test	NIC Knowledge \$285 NIC Interview and performance \$370 (Note: these are member rates for new applicant assessment)

Educational Interpreter Assessment in Washington State

The EIPA Diagnostic Center and the SEE Center provided data on assessment of interpreter candidates in Washington State for this report. Data was not requested from the Registry of Interpreters for the Deaf on the NIC since that test is not specific to educational interpreting. Table 2 reports the numbers of interpreters taking all modes of the EIPA and each mode of the E.S.S.E. in Washington State to date by performance level. Of the interpreters who have already been assessed 86 meet the recommended performance standard. This fact illustrates motivation on the part of interpreters to have their skill levels assessed and should ease the transition to a standard.

Table 2. Test performance profile of individuals who have taken the EIPA and the E.S.S.E. in Washington State. Asterisk indicates the current performance standard is met.

Performance Level	EIPA (all modes)	E.S.S.E.-I SEE (Expressive)	E.S.S.E.-SEE (Receptive)	E.S.S.E.-PSE (Receptive only)	E.S.S.E.-ASL (Receptive only)
4.0 or higher	18*	9*	11	6	2
3.5-3.9	58*	1*	1	6	5
3.0-3.4	39				
2.5-3.0	10	9	7	10	13
2.5 or lower	3				
Total	128	19	19	22	20
Total per					

Identification of Relevant Criteria on which to Evaluate each Performance Assessment

After discussion and deliberation, the work group agreed to the following criteria to evaluate each of the assessments. The issue of test validity and reliability was deferred because the work group did not have sufficient information to evaluate this parameter of the assessments.

- Offered by National organization/ Nationally-recognized assessment (required by proviso)
- Assesses more than one system or language (required by proviso)
- Portability/reciprocity across states and school districts
- Professional development available to increase pass rate
- Feedback in reporting results
- Relevance to classroom interpreting
- Proctoring
- Discourse – based assessment

Evaluation and Selection of Performance Assessments

A rubric was designed to evaluate how well each test addressed each parameter. For this task the committee worked in four groups. First, each of the parameters was discussed to determine a weighting to reflect its importance based on the following scale:

- 1=somewhat important
- 2=important
- 3=critical

Consensus on the weightings was achieved through whole group discussion. The second step of the rubric analysis required each group to rate each assessment according to how well it met each of the parameters. Ratings were made used the following scale:

- 1=poorly meets parameter
- 2=somewhat meets parameter
- 3=meets parameter well

Finally, each group multiplied the parameter weighting by the assessment rating to obtain a score for each parameter. Group scores were averaged to arrive at the average parameter scores. A total score was derived for each assessment by summing the scores. The higher the score the better the assessment met the parameters that were identified for consideration. Table 3 illustrates the group consensus weighting for the importance of each parameter, the group average rating of how well each test met the parameter, and the group average parameter score. The total scores of the average parameter score are located at the bottom of the shaded columns. Based on this scoring rubric, the EIPA best met the established parameters for an educational interpreter assessment, followed by the NIC, then the E.S.S.E.

Table 3. Scoring rubric.

Parameter/Weighting	EIPA		E.S.S.E.		NIC	
	Ave rating “meeting parameter”	Ave Parameter Score	Ave rating “meeting parameter”	Ave Parameter Score	Ave rating “meeting parameter”	Ave Parameter Score
National Test (weighting=3)	3	9	.2	3.75	3	9
Assesses more than 1 mode (3)	3	9	2.38	3.5	2	5.75
Portability (2.5)	2.88	7.57	1.25	3.25	3	7.5
Professional Development (2.5)	2.63	6.56	2.66	6.66	2.75	6.88
Proctoring (3)	3	9	3	9	3	9
Feedback Report (2.38)	3	7.13	3	7.15	1.25	2.89
Relevance to Classroom Interpreting (3)	3	9	2.5	7.5	1.75	5.25
Discourse-based (2.87)	3	8.6	1.25	3.65	2.5	7
TOTAL		65.86		44.46		53.27

A primary discussion point was whether the EIPA-MCE adequately assesses Signing Exact English (SEE) skills. Based upon data and information collected from states using the EIPA and the EIPA Diagnostic Center and the fact that SEE is a derivation of Manually Coded English, the majority of committee members felt that SEE skills was appropriately assessed by the EIPA (see Attachment C. Minority Report for further discussion on this issue).

Psychometric Analysis: Published studies describe the reliability and validity for the EIPA¹ and NIC² while the E.S.S.E. has completed only an internal report of this information. Therefore it was difficult to compare the E.S.S.E. data to that of the other assessments.

Recommendation: Based on the analysis of the assessments and discussion by work group members, the EIPA and the NIC were the recommended assessment options for Educational interpreters in Washington State by the majority of members. The EIPA was recommended by all work group members. Work group member recommendations were: 75% (12/16) EIPA or NIC; 19% (3/16) EIPA or E.S.S.E.; 6% (1/16) EIPA only.

¹ Schick, Williams, & Kupermintz (2005). Look Who’s Being Left Behind: Educational Interpreters and Access to Education for Deaf and Hard of Hearing Students. *Journal of Deaf Education and Deaf Studies* 11 (1), 3-20.

² The Caviart Group, LLC (2012, June). Building Value in Certification – A Status Report of the Enhanced NIC Interview and Performance Examination.

Evaluation and Selection of Written Assessment

The EIPA- Written Test and the NIC Written Test were the two options considered by the committee. The EIPA Written Test was unanimously selected because of its relevance to classroom interpreting.

Determination of Minimum Standard for Recommended Assessments

Performance Assessment:

- EIPA: Advantages and disadvantages were discussed by the work group for the 3.5 and 4.0 levels of the EIPA. The minimum score of 3.5 was selected as the standard because it was felt to be most achievable for increasing the number of qualified interpreters. The score applies to any one of the mode options and at either the elementary or secondary level. The 4.0 level could be recognized by individual school districts if they wanted to establish a salary schedule or other acknowledgement system for interpreters with higher scores and/or those who achieve proficiency in multiple sign modalities or at multiple grade levels.
- NIC: Interpreters who are RID certified are recommended.

Written Assessment: All interpreters must obtain a “pass” score on the EIPA written test.

Evaluation of Process for Developing the Recommendations

Participants were asked to evaluate the process used to determine the recommendations for this report. The following questions were asked via Survey Monkey.

1. To what extent do you feel the meeting achieved the goal of developing recommendations for written and performance tests and their standards for educational interpreters?
2. How effective was the format and overall process used for developing the recommendations for written and performance tests and their standards?
3. How well did we do on making sure everyone was equally involved?

Seventy-five percent of the participants responded. Favorable response rates (good – excellent) were 83.3% for questions 1 and 2, and 91.6% for Question 3. Additional feedback was obtained through open-ended questions that addressed meeting elements that worked best and least for each participant.

Final Recommendations

The following recommendations reflect the majority of work group members. A minority report is included in Attachment C representing the perspectives of the members who recommended the E.S.S.E. in addition to the EIPA for the performance component of the assessment. There was unanimous agreement for the written test recommendation.

Assessments and Performance Standard:

Educational Interpreter Performance Assessment (EIPA) with a minimum score of 3.5, AND
Educational Interpreter Performance Assessment - Written Test – passing score; OR

National Interpreting Certificate (NIC) with RID certification AND Educational Interpreter Performance Assessment - Written Test – passing score.

Attachment A

Educational Interpreter Standards Work Group Participants

Paul Bert	Education Interpreter
Carol Carrothers	WSDS/CDHL
John Bresko	Office of the Superintendent of Public Instruction
Linda Darling	Tacoma School District
Eloisa Williams	Washington State Registry of Interpreters for the Deaf
Char Parsely	Hearing Loss Center
Eric Raff	Office of the Deaf and Hard-of-Hearing
Marie Rendon	Spokane Falls Community College
Rick Hauan	Washington State Center for Childhood Deafness & Hearing Loss
Kris Ching	Washington State Center for Childhood Deafness & Hearing Loss
Karen Mool	Puyallup School District
Peggy Mayer	NW School for Hearing-Impaired Children
Colleen McKearney	Education Interpreter
Brent Stark	NCESD
Ann Curry	FWPS
Paul Glaser	Washington State Registry of Interpreters for the Deaf
Tracy Wilson	PSD
Mary Jaeger	Snohomish School District
Theresa B. Smith	Ph.D., CSC, SC:L - Education Interpreter

Attachment B

State Minimum Standards for Educational Interpreters

State	Skill Test/Criteria			Written Test		
	EIPA	RID	Other	EIPA	RID	Other
Alabama	4	X	QAST			RID approved or Jacksonville SU
Alaska	4			pass		
Arizona	3.5	x	NAD 3 or higher			
Arkansas			QAST			80% on AR Ed Interp Handbook
California	4	x	ESSE 4.0, NAD, ACCI			
Colorado	3.5			pass		
Connecticut		x	NAD 3		pass	
Delaware	4	x				
D.C.						
Florida						
Georgia	3.5	x	QAST, NAD			
Hawaii	3.5		Other - EI I - AA degree in interpreting; EI 11- BA + 2 yrs experience			
Idaho	3.5					
Illinois	3.5	x	ACCI (American Consortium of Cert Interpreters)	pass	pass	
Indiana	3.5	NIC, CT	NAD 4,		pass	
Iowa	3.5	x	EIPA-CS, CLTNCE, NAD 3 or higher			
Kansas	4		QAST			
Kentucky	3					
Louisiana	3			pass		
Maine	3.5	x	NAD 4			
Maryland						
Massachusetts						
Michigan	3.5		MI BEI			
Minnesota	4	X	NAD 3 or higher	pass		
Mississippi	3	x	NAD			
Missouri	3.5					pass state test
Montana	3.5			pass		
Nebraska	3.5	NIC	ACCI 4.0, QAST 4.0, NAD			
Nevada	4					

New Hampshire	3.5	x	NAD	pass
New Jersey	3	x	NAD	
New Mexico	4	x		
New York				
North Carolina	3	x	NAD 4, 5; NC Interpreter Classification A,B, Nat Cued Speech AS	
North Dakota				
Ohio				
Oklahoma	3.5	x	NAD 4, NCI, Signed Exact english 3.5, QA	
Oregon	3.5	x		pass
Pennsylvania	3.5	x	qualified under Sign Language Interpreter and Transliteration Registration Act, NAD 4-5	
Rhode Island	4			pass
South Carolina	3.5			pass
South Dakota	3.5	x	NAD 3	
Tennessee				
Texas	4			
Utah	3.5	x		
Vermont				
Virginia	3.5		QAST	pass
Washington				
West Virginia	3.5	x	NAD 4 or higher	pass
Wisconsin	3			
Wyoming				

Attachment C

Deaf Education Interpreter Project: Work Group Minority Report

The Deaf Education Interpreter Work Group had a contingent of professionals advocating for one manually signed approach to educational interpretation, Signing Exact English (S.E.E.). Unlike American Sign Language (ASL), which is a separate and autonomous visual-manual language unrelated to English, S.E.E. is a manual code for English and allows for more exact transliteration of the spoken message.

While the majority opinion of the workgroup recommended standards for the Education Interpreter Performance Assessment (EIPA) and the Registry of Interpreters for the Deaf (RID) National Interpreter Certification (NIC) along with the written portion of the EIPA, the assessment called the Educational Sign Skills Evaluation (ESSE) was discussed by the workgroup. This report reflects the position of the minority of workgroup members who wanted the PESB to set a standard for the ESSE.

Sign Exact English is a communication option for parents and is used in educational settings in Washington State by approximately 90 K-12 students, state-wide. Interpreters who communicate with deaf and hard of hearing children in SEE contend it is an important system for educational interpretation because of its emphasis on grammatical features of English. SEE interpreters also contend that while the EIPA does have an option for assessment of Manually Coded English, the ESSE better represents SEE. The ESSE also has assessment options for PSE (Pigeon Signed English) and ASL as does the EIPA. In a single testing session, rather than choosing which system the interpreter intends to focus on as in the EIPA, the SEE evaluation team determines the sign system used by the candidate and evaluates accordingly.

While the ESSE is only used in two states, supporters of the SEE system believe that money and politics played a significant role in the preference by states for selecting the RID/NIC or the EIPA. Supporters point to the need to assure a standard for SEE interpreters in Washington State that helps advance options to parents who choose to send their children to schools with SEE interpreters, regardless of the limited adoption of the ESSE in other states.

All workgroup members express strong commitment to supporting deaf children in their education and all members supported the EIPA and RID/NIC plus the written test of the EIPA. Three of the sixteen members asked that the ESSE be included, but that was not supported by the majority. The minority report includes a request that the PESB be prepared to expand the approved assessments in the future as advancements and continuing developments determine.

**STATE OF WASHINGTON
PROFESSIONAL EDUCATOR STANDARDS BOARD
OFFICE OF SUPERINTENDENT OF PUBLIC INSTRUCTION
OLYMPIA, WASHINGTON**

**INFORMAL SOLICITATION
NO. 2013-13
Educational Interpreter Performance Assessment**

The Professional Educator Standards Board (PESB) is soliciting applications from Consultants interested in helping PESB determine “how to appropriately use the national interpreter certification and the educational interpreter performance assessment for educational interpreters in Washington public schools.”

The charge is found in House Bill 1144 which passed the 2013 Legislature and was signed into law. It requires PESB set standards, work that had already progressed from proviso language requirements in the 2012 Supplemental Budget, HB 2127. The bill requires school districts to hire deaf interpreters that meet the standards being prepared by PESB. A contractor with national expertise was hired by PESB and a report is being finalized on the first set of requirements in the bill.

Washington State is one (1) of only eight (8) states that did not required nationally recognized credentials for deaf interpreters. The 2012 Legislature addressed the issue in part in the operating budget with a requirement that PESB identify assessments and set a standard for education deaf interpreting. The standards do not constitute a license. The PESB is required to publish the results. Beginning in late 2012, the PESB established an oversight committee, issued a competitive procurement, awarded a contract, and recruited a stakeholder group of professionals. In March of 2013, the workgroup conducted analysis of available deaf education interpreter assessments, established a minimum score and directed the consultant to write a report. The report is being finalized and will be presented to the PESB in July.

The new charge will be addressed by re-convening a stakeholder workgroup and developing a report to present to PESB and the Legislature. A nationally recognized consultant will facilitate the work and complete and present a report to the PESB, amend as required, and submit the final to the Legislative Education Committees. The stakeholder group will be expanded to include additional school district representation.

SCOPE OF WORK

The contract resulting from this procurement will include the following deliverables:

1. Contractor shall plan a one- (1)-day workgroup event for stakeholders, including school districts, in Washington State to present, review, discuss, and reach consensus on the role of the National Registry of Interpreters of the Deaf (RID) certification and the Education Interpreter Performance Assessment (EIPA) in Washington State as a requirement for districts when hiring interpreters.
2. Contractor shall construct a report with the workgroup’s recommendations directed to the PESB. The PESB will forward the report to the Legislature in December 2013.
3. Contractor shall attend and present the report to the Professional Educator Standards Board for their consideration.

PERIOD OF PERFORMANCE

The period of performance of any contract awarded as a result of this solicitation is tentatively scheduled to begin in July 2013, and be in force through to June 30, 2014, with possible amendments extending the period of performance.

BUDGET

It is anticipated that any contract awarded under this solicitation shall be in an amount not to exceed ten thousand dollars (\$10,000). If OSPI determines it is necessary to increase the Contractor's involvement, OSPI may amend any awarded contract to increase the Contractor's involvement. Such amendment, if any, to increase or decrease the dollar value and extend the period of performance, shall be at the sole discretion of OSPI.

MINIMUM QUALIFICATIONS

Minimum Qualifications:

- Licensed to do business in the State of Washington. If not licensed, provide a written intent to become licensed in Washington within thirty (30) calendar days of being selected as the Apparent Successful Contractor.
- Five (5) years of experience as a consultant to programs in the field of support for individuals who are deaf or hard of hearing.
- Thorough knowledge of deaf education.
- Ability to communicate effectively with stakeholders in their preferred modality.
- Comprehensive background in educational systems and the deaf/hard of hearing population.

Desirable Qualifications:

- Knowledge of the history of Washington State efforts to address educational interpreter services.
- Experience working with Washington State professionals in the field of Deaf Education.
- Experience contracting with a Washington State agency.

PROPOSAL CONTENTS

Applicants who do not meet these minimum qualifications shall be deemed to be non-responsive, will not be evaluated, and a score will not be assigned.

The proposal is to be brief but should include:

1. Resume;
2. Name, addresses, and telephone numbers of three (3) references;
3. Project Work Plan;
4. Cost proposal; and
5. Contractor Intake Form.

Proposals will be evaluated by PESB based on the response to the information requested above. All items above must be addressed for the proposal to be considered responsive. **The deadline for submission of responses is 4:30 PM, on Monday, June 17, 2013.**

All proposals shall be submitted electronically via email to the OSPI Coordinator noted below (accepting proposals on behalf of PESB). Attachments to email shall be on Microsoft Office software and/or PDF format. OSPI does not assume responsibility for any problems in the email submission or delays caused by any delivery service. The Coordinator will respond with a confirmation email upon receipt of proposals.

LATE PROPOSALS WILL NOT BE ACCEPTED AND WILL BE AUTOMATICALLY DISQUALIFIED FROM FURTHER CONSIDERATION. TIME EXTENSIONS WILL NOT BE GRANTED.

Proposals are to be emailed to:

Office of Superintendent of Public Instruction
Contracts Office

Coordinator: Kyla Ballentine

Email: contracts@k12.wa.us

EVALUATION

The following weights will be assigned for bid evaluation purposes:

Experience/Staff Qualifications	50 points
Project Work Plan	50 points
References	50 points
Cost	50 points
Total Points Possible	200 points

OSPI/PESB reserves the right at its sole discretion to reject any or all proposals for any reason whatsoever prior to the execution of a contract. This solicitation does not obligate OSPI/PESB to contract for the services specified herein. The final selection, if any, will be the proposal, which in the opinion of OSPI/PESB best meets the requirements set forth in this solicitation, and is in the best interest of the State of Washington. OSPI/PESB is not obligated to select the lowest priced proposal. OSPI/PESB shall not be responsible for any costs associated with a Consultant's preparation of a proposal in response to this solicitation.

The Contractor selected to perform the duties as outlined in this solicitation shall be required to sign a personal service contract, including General Terms and Conditions. Consultants shall not propose their own standard contract, or terms and conditions in response to this solicitation.

Statewide Vendor Payment Registration: Individuals awarded contracts as a result of this solicitation are **required** to register as a Statewide Vendor (SWV). The SWV file is a central vendor file maintained by the Office of Financial Management for use by Washington State agencies in processing vendor payments. This allows you, as a vendor, to receive payments from all participating state agencies by direct deposit, the State's preferred method of payment. For online registration, visit:

<http://des.wa.gov/services/ContractingPurchasing/Business/VendorPay/Pages/default.aspx>

Any requests for information about this project are to be directed to Coordinator named above. Any other communication will be considered unofficial and non-binding on OSPI/PESB. Consultants are to rely on written statements issued by the Coordinator. Communication directed to parties other than the OSPI Coordinator may result in disqualification of the Consultant.

APPENDIX D-1: Community Focus Group Data and Responses

Summary:

Focus groups were conducted in 9 different languages using two interpreters and a note taker for each group. There were a total of 99 families participating in the nine focus groups. The families represented the following language groups: Chinese, Tigrigna, Korean, Vietnamese, Somali, Arabic, Spanish, Amharic and Russian.

The 99 families represent 215 school age students. Of these, 150 receive general education services only, 61 also receive special education services, and 4 are in advanced learning programs.

The majority of the families who participated in the focus groups have been in the US for over 5 years. According to research on language acquisition – it is “generally accepted that it takes from 5-7 years to go from not knowing any English at all to being able to accomplish most communication” tasks necessary using English. (Excerpt taken from Center for Adult English Language Acquisition)

LEP Families Focus Group Summary

Data by Question

1) Has your child's school ever let you know or explained to you your right to an interpreter?

Enrollment appears to be the key process by which families learn about interpreter services, if they ever do. LEP families report across language groups, with few exceptions, that they are not usually informed about their rights to interpreters.

The few exceptions noted were for Tigrinya-speaking, as well as Chinese-speaking-speaking families. Tigrinya-speaking families have experienced interpreters as a default part of the enrollment process; during enrollment, the interpreters explain these rights to families in their home language. Chinese-speaking families reported being told about interpreters, but noted that it was not usually framed in terms of rights, but rather about availability. Amharic-speaking families were equally divided about whether or not they were informed about these rights, but one family, for example, noted that it was framed as available on a limited basis.

As noted, it is more common for families to not be informed about their rights to interpreters than for them to be and to have them present by default. Spanish-speaking families overwhelmingly reported, for example, that they aren't usually informed about these rights, and that when any conversation about interpretation happens, it is in English. Arabic-speaking and Korean-speaking-speaking families concurred. Vietnamese-speaking families report learning about the services, if they ever do, through their children in English. Somali-speaking families report that they do not learn about these services at all from the school.

Dialect is a key issue for proper interpretation. Families usually assume the onus of letting schools know which dialect they speak, with mixed results. They share this information orally and through enrollment, largely.

2) *Have you ever asked for an interpreter?*

With the exception of Chinese-speaking, Korean-speaking, and Tigrinya-speaking families, overwhelmingly LEP families in the focus groups reported having asked for interpreters by reaching out to a mix of teachers, office staff, and school administrators. The Chinese, Korean, and Tigrinya-speaking families were less likely to ask for interpreters. Most families, with the exception of Amharic speakers, report that immediate phone interpretation is never or rarely offered. In-person interpretation is often provided after families request these services.

Even though Spanish is the most common language among LEP families in Washington schools, these families struggle to get services just as other LEP families do. Spanish-speaking families overwhelmingly reported asking for interpreters by reaching out to teachers, office staff, and principals, but they noted that the schools denied these requests for their general education students. They experience many situations where they are pressured to sign important school documents and agree to IEPs where no interpreters have been provided, even though they have made the requests. Schools have either denied these families interpreters or simply not provided them at the meetings. One family reported having immediate access to a phone interpreter.

Less than half of Korean-speaking families have asked for interpretation. Chinese-speaking families are almost equally split on whether they have asked for interpretation, and when it has been provided, it has been ineffective—such as uncertified teachers or janitors who spoke different languages than the family. Chinese-speaking families reported a particularly high demand on the system given that some important school events mean that one interpreter will have to serve 8-10 parents at any time.

Most Tigrinya-speaking families have not asked for interpreters, but when they do, interpreters are usually provided. Sometimes, however, these interpreters do not speak the same dialect as the families. For two families, the school offered phone interpretation immediately, but by that, the families meant that they received voicemail in their native language.

All of the Somali-speaking families asked for interpreters, and overwhelmingly, they were denied interpreters. Only two families reported having immediate access to phone interpreters when they asked for assistance.

- 3) *Have you ever been provided with your own interpreter to communicate with the school? Was this interpreter paid? Who did you bring to the school to interpret for you if you brought your own?*

With the exception of Tigrinya-speaking, Chinese-speaking, and Korean-speaking families, LEP families are generally providing their own interpreters most of the time to communicate with schools. These informal interpreters are always unpaid family members, friends, and community advocates—including, on a regular basis, other children in the family and the students themselves. The reasons why families are providing their own interpreters is that they have never been told about these services, they are denied these services, interpreters are not trained in educational terms, interpreters have limited English or native language skills, interpreters fail to show up at meetings, LEP families anticipate great delays in communicating with schools about urgent matters, and schools themselves have the expectations that families will communicate through their English-speaking children.

- 4) *What was your experience using an interpreter?*

Generally, LEP families need to ask for interpreters to have them provided. LEP families are sometimes unsure of who is providing the interpreter services and what the background and credentials of the interpreters are. Interpreters are generally either para-educators or district-paid interpreters, though families still experience pressure to provide their own interpreters or to use their own children for the task. Amharic-speaking families reported that teachers often filled this interpretation role. Even when schools request interpreters, they often fail to show up for the meetings where they are needed.

Families are most concerned about getting access to skilled interpreters in a prompt fashion. Delays of one to two weeks are common. Often, interpreters do not speak the correct language or dialect, cannot explain the conversation fully, have difficulties conveying the meaning of the conversation to parents, struggle with educational terms, or summarize the conversation and lose valuable content. Interpreters often struggle with complex educational terms, and some are not proficient in both the LEP family's language and English. LEP families struggle with trusting district-provided interpreters and have had negative experiences surrounding interpreters treating them with disrespect. Families are concerned that they do not understand what is happening and that not enough time is allotted to allow for both interpretation and effective meetings.

For example, Arabic-speaking families noted that schools and districts seem unresponsive to critical feedback about interpreters that are not effective and seem reluctant to change them. Those families, like Somali-speaking families, have experienced problems with the schools providing interpreters who speak a different language than the LEP families.

Chinese-speaking and Tigrinya-speaking families noted that interpreters were generally provided without the families asking, but that they still had some negative experiences with the interpreters because of a lack of qualifications or appropriate language skills.

5) Do you believe that better interpretation services should be made available to you so that you can communicate better with your school about your child?

LEP families across all language groups resoundingly agreed that they need better interpretation services. Their visions for these services included making the following improvements:

- Have an interpreter on staff and present at the school at set times to address emerging and urgent issues.
- Create a pool of interpreters at the school district level that can become experts in educational terms.
- Have parent liaisons with backgrounds in the languages represented in the school.
- Hire teachers with shared language and cultural backgrounds.
- Avoid the use of children/students as interpreters because of their own self-interest in conveying incorrect information and the effect that it has of infantilizing parents.
- Hold interpreters responsible for improving their understanding of special education and related terminology.
- Make better use of phone interpretation services, particularly in urgent situations.
- Reimburse interpreters brought by parents to fill the gap.
- Schools should contract with additional agencies and individuals to expand their interpreter pools and gain access to qualified interpreters.
- Educate schools about the differences in language and dialects to avoid situations where the wrong interpreter is sent for the job.
- Encourage parents to identify their specific dialects when requesting interpreters.
- Have schools make regular practices of sending important notes and other critical information in the home languages of the families.
- Train interpreters in ethics and respect.
- Provide multiple interpreters in group situations where families all have language needs.
- Rely on certifications for interpreters to verify that they indeed understand education terminology, particularly in special education.
- Make sure that interpreters can communicate well in both the family's home language and English.

6) Do you feel that using a phone interpreter works as well as using a human interpreter?

Most LEP families were largely distrustful of phone interpretation services. Amharic-speaking families had particular experience with phone interpretation, for example, but were universally dissatisfied with it. They preferred in-person interpreters, but sometimes saw the need for using the phone system in urgent situations. Arabic-speaking families seemed supportive of phone interpretation, as long as interpreters spoke the same dialect. Interestingly, most families had not experienced phone interpretation in a school setting. Those families that had used it noted that the sound was often not clear enough, phone conversations lacked the visual cues of body language, non-native interpreters

were often used on phone interpretation lines, and that phone interpretation is difficult to keep up with, especially for longer conversations.

7) *Have you ever used a videoconference to get interpretation services?*

Overwhelmingly, families have not used video-conferencing for interpretation in educational settings. Some families noted that they had used it for medical services. In that setting, their concerns were that phone interpreters could actually be better because video call quality can be poor.

8) *If all schools interpreters are required to receive training, what training content or requirements would you suggest to include in this interpreter training program?*

LEP families emphasized that the following requirements would be helpful for interpreters to have:

- Knowledge about schools and educational terminology and laws, particularly in special education and transition matters
- Knowledge of disability and medical terms
- Knowledge about the families' cultures
- Fluency in both English and the home language
- Understanding of differences in dialects
- Training in confidentiality and privacy
- Continuing education requirements
- Honesty and candor about the limitations of his/her interpretation and skills
- Patience
- Professionalism
- Commitment to the parents' input and intended message, rather than exerting undue influence and speaking for the parents
- An interpreter code of conduct, ethics, and etiquette

Families also were interested in having more time for meetings that required interpretation, as well as having interpreters establish a connection with the families to understand who they were serving and what the needs were.

9) *Other thoughts and experiences that families shared . . .*

LEP families shared the following concerns:

- Interpreters should have a commitment to word-for-word interpretation because it is important for parents to understand what is happening.
- Schools need a survey to evaluate the services that were provided and should be responsive to eliminating poor interpreters from their ranks. A grievance/complaint process would be useful.
- On-staff interpreters are needed where larger ethnic populations exist.

- Parents often have questions or urgent needs and could use an interpreter line to call for communication with the school.
- Schools should make a regular practice of informing parents about where and how to use both by-phone and in-person interpretation.
- The need for interpretation is not just in special education, but also in general education.
- Parents desire to access all aspects of education confidently and knowledgeably. Interpreters play valuable roles in assisting with that goal, when they are trained, patient, and respectful.
- Parents also need translation of vital school documents and information.
- Schools and districts should focus on the quality of interpretation.
- Schools should have back-up plans when interpreters fail to attend meetings.
- By not requiring that interpreters be certified professionals, schools allow interpreters a free pass if there is miscommunication. Without certifications, interpreters are not held to a standard of accountability.
- Interpreters can serve valuable roles as parent advocates, but are often interested in just wrapping up meetings or pushing parents to sign paperwork.
- Greater funding and support is needed for interpreter services to be expanded effectively.
- Interpreters must stand ready to develop trusting relationships that are reinforced by their competence in the field.
- Not all language groups are being served equally.

Summary

LEP families were rarely informed about their rights to interpreters. The families that participated in the focus groups shared similar concerns about the lack of access to qualified interpreters in their respective languages. They have had many negative experiences, ranging from interpreters being denied to them to having very poor interpretation that has left them confused about their children's futures. The emerging consensus among families was that interpreters in Washington schools need: a better understanding of educational terminology and the school system; a commitment to ethically interpreting families' questions and concerns; dedication to interpreting clearly and accurately; and proficiency in both English and the language/dialect of the family.

Impressions

The length of time families have been in the US often determines the communication expectations they have for the school.

Families who have just arrived in the US or who have been here longer but who don't yet speak English reported that they are not as likely to request interpretation.

Schools are more likely to provide interpretation for families whose language groups represent a larger number of families in their school.

Parents participating in the focus groups reported that a bilingual person is often present during IEP meetings but s/he is not typically a trained interpreter – more often s/he is an unpaid family member or

friend, or a bilingual para educator who may not be well enough versed in the technical language necessary to explain the details to the family.

Interpreters in our schools need to:

1. Understand educational terminology
2. Understand the ethics of interpretation
3. Interpret clearly
4. Speak the language and dialect of the parent

There aren't enough trained interpreters available in our schools and none are trained in education terminology.

Some families who did not have formal education in their home countries would like both:

1. Word for word interpretation and
2. Help navigating and understanding the education system

Focus Group Data:

Over half (54/92) – families reported that they were not notified of their right to an interpreter.

The majority of the families have never been notified of their right to an interpreter.

Just over a third (33/92) – reported never having asked for an interpreter while 59/92 said that they have asked for an interpreter.

A little over half of the families have ever requested interpreter services.

47/92 families reported that they were provided with an in person interpreter.

Just over half the families were provided with an in person interpreter while half weren't.

Just over 40% (26/63) of the focus group families reported that they were offered interpreter services without asking.

Just over 60% (37/63) of the focus group families reported that they were offered interpreter services when asked.

Interpreter services were more frequently offered when the request was made for an interpreter.

Over half (42/73) – interpreters did not do a good job according to families.

Over half (33/56) – had a difficult time communicating through the interpreter.

Over half the families who worked with interpreters felt the interpreters did not do a good job.

Many families provided their own volunteer interpreters, and 20% brought their children to provide language support.

The majority of parents (68/78) do not feel phone interpreters work as well as in person interpreters.

The majority of families participating in the focus groups confirmed the following challenges in working with the interpreters that were provided by their children's schools:

- The interpreter did not speak my correct language or dialect
- The interpreter did not help me understand what was being said
- I don't feel the interpreter was interpreting word for word
- I didn't feel the interpreter fully communicated what I was saying
- The interpreter did not have an adequate vocabulary
- There were some words or phrases I didn't understand
- I did not trust the interpreter

Focus Group Participants Reported:

Russian: Spanish speaking families seem to get priority. It is unfair if schools just focus on providing language support [only] to Spanish speaking parents. Please consider other language needs."

Spanish: training necessary for interpreters should include education terms associated with all different disabilities, confidentiality and privacy....translations should be available for IEP, written notices, evaluations, or ask for interpreters before those meetings. Parents of general ed. students should have access to interpretation too!

Arabic: Train interpreters for IEPs and special terminology. Interpreter certification must have higher standards and include continuing education requirements. Interpreters should have knowledge of the field or discipline in which they are interpreting..."Now that I know my rights – I'll bring someone who is more competent in interpretation rather than using someone who does not have enough skills and knowledge to interpret for me" Still – bringing own interpreter rather than using the school's interpreter.

Somali: Interpreters need better education, they need to understand Somali and special education language. There is a lack of consistency among interpretation – no one explained the families' rights to the families. Interpreters should advocate as well as interpret. Instead of pushing parents to sign the IEPs, interpreters need to explain them as well as explain the child's disability.

Vietnamese: Interpreters should be trained in a code of conduct, ethics and etiquette, they should have professional knowledge in the field they are discussing, have knowledge about school programs, and be able to explain to parents some of the acronyms used in school. Word for word interpretation is important and professionalism should be monitored through surveys that keep qualified interpreters in the job.

Korean: interpreters should be familiar with all special education terminology, and should have basic knowledge about developmental disabilities. There should be a certification process. Interpreters should remain impartial. Parents of general education students should be provided with interpretation too.

Tigrigna: interpreters should be trained to understand the school system, and the culture. They must speak Tigrigna and English fluently, and speak the right dialects. They must understand confidentiality, and other rules about interpreting. The community needs more information about how education works and needs more resources for parents with special needs children. Some families are not literate and did not have formal education in Eritrea so need guidance about how to understand and navigate the school system – especially as it relates to special education services.

Chinese: special education regulations and terminology, respectful and honest communication – with a high level of patience. Interpreters should be trained in different subjects such as special education and transition. Interpreters shouldn't include their opinions as they interpret. High quality interpreters should be provided by the school. Simultaneous interpretation is better than summarized interpretation. Important documents should be translated. To ensure quality interpreter services, there should be a grievance process.

Summary of Focus Group impressions:

- LEP parents of general education students must have access to interpretation just as LEP parents of sped students do.
- Interpreters need to be trained in educational terminology including special education terminology, acronyms, and should be knowledgeable about school programs. They need to have a code of conduct regarding ethics, etiquette and be knowledgeable about the field in which they practice.
- LEP parents with formal education in their home countries told us that they are interested in word for word interpretation by an impartial interpreter.
- LEP parents without formal education and who are not literate in their primary language told us that they want their interpreters to advocate as well as to interpret for them. They want their interpreters to provide guidance about how to understand and navigate the school system, and to explain their children's disabilities and their IEPs to them.

Overview of Data results: The majority of the families reported that they have never been notified of their right to an interpreter. A little over half of the families have ever requested interpreter services. Interpreter services were more frequently offered when the request was made for an interpreter. Over half the families who worked with interpreters felt the interpreters did not do a good job. The majority of parents do not feel phone interpreters work as well as in person interpreters.

Recommendations based on focus group impressions & data results:

1. **Families** must be informed of their right to interpreter services, and it must be clear how they can request such services. Interpreters in schools must be trained and certified.
2. **All Educators** must be trained in how to work effectively with LEP families using telephonic and in person interpreters.
 - a. Schools must make LEP families the focus of special outreach efforts – particularly with newly arriving families – in an effort to help families learn how they can request such services.
 - b. Every educator must be informed about how to access interpreters for any LEP family (including families from minority language groups) – and to discern whether the family could benefit from and when to offer interpretation services.
 - c. Educators must take the time necessary to work with interpreters to:
 - i. help families understand and navigate the school system
 - ii. help families understand their children’s disabilities
 - iii. help families understand their children’s IEPs
3. **Interpreters** must be trained to:
 - a. Be aware of and knowledgeable about school programs
 - b. Understand educational terminology (including special education and discipline) and acronyms
 - c. Understand and abide by a code of ethics of interpretation
 - d. Interpret word for word
 - e. Speak the necessary language and dialect of the parent

Quotes from Focus Group Participants

Breakdown in communication between educators and family

“It would be most helpful if interpreters [whether in school or elsewhere] didn’t just interpret but also advocated for families because as an immigrant you don’t even know what questions to ask.” – **Russian speaking parent**

“a teacher told her child something that was considered culturally inappropriate and the mother went back to talk to the teacher and the principal. The principal refused to provide interpreters. The mother said that her husband did not want to repeat the words to the school that were said by the teacher and the issues were not solved.” – **Amharic speaking parent**

“This community needs more information about how education works and needs to have more resources for parents, particular those with special needs children. Some of our parents are not aware of what’s going on in schools and don’t know how to get involved with their children’s education.” – **Tigrigna speaking parent**

“Sometimes when school buses are late to pick up or drop off our children we can’t call for the issue since there is not interpretation service at transportation department.” – **Chinese speaking parent**

One ethnically Chinese parent said that she moved to the US from a South American country where her primary language was Spanish. Because of her look, however, schools always assume she only knows Chinese and they provide her with Chinese interpreters without even asking her of her primary language! – **Spanish & Chinese speaking parent**

Need for interpreter training in the ethics of interpretation and in educational terminology

“An interpreter said ‘I am here interpreting for a boy who is retarded.’” – **Spanish speaking parent**

“The interpreter keeps pushing us to sign the IEP but the IEP was never explained and no one ever explained my child’s disability to us. We keep signing the IEP year after year.” – **Somali speaking parent**

One parent had a meeting with the school and they were waiting for the interpreter. The interpreter didn’t show up so the meeting was cancelled. – **Korean speaking parent**

Inconsistency between schools within same district

“I have two kids and I get language support sometimes for one of my kids but I have so many questions but no one to interpret at the other school?” – **Somali speaking parent**

Serious nature of some of the concerns parents must be able to communicate about

“My child came home with bruises and some bites on his hand. I talked to schools about my concerns. Schools said that they would handle the situation but they did not respond. Can I move my child to another school?” – **Arabic speaking parent**

“One [of my] students [who has an IEP] was suspended for 60 days without a paper explanation. Every time I request an interpreter I am told no one is available. My student has to interpret for these meetings. I don’t know how to get my son back into school.” – **Somali parent**

“I saw two kids who broke their teeth by accident at school. One kid was from main stream culture and the other from minority culture. The main stream culture family communicated with school without any problem and got the compensation for the damages but the other family couldn’t get any compensation because of communication failure. Being able to communicate is that important!” – **Korean speaking parent**

One parent was not aware that her daughter was receiving special education services until further conversation with the facilitator at the focus group meeting. The school only told her that her daughter did not talk well and have a teacher from outside of school to teach her to talk. In fact, she was not aware that they were referring her to an SLP services as a part of her IEP. After having more conversation and checking in with her, the facilitator was able to explain to this mother what Special Ed was about. The mother then realized that she had been signing IEPs that she had no understanding of. – **Chinese speaking parent**

When the student is asked to interpret

“Using a child to interpret the issue for the parents will create more problems. They only say things that benefit themselves and even lie or change words to avoid fault to them. Children undermine the parent’s authority by making the situation seem smaller than it is.” – **Vietnamese speaking parent**

Questions

1. Which ESD are you in?
2. What is your job title?
3. To the best of your knowledge, which of the following are home languages for students in your school/District?
4. How do you become aware of families who need foreign language oral interpreting / written translation services to participate in school services?
5. How many oral or written requests for oral interpreting / written translation services have you received during the last 24 months?
6. How are parents informed of the availability of oral interpreting / written translation services?
7. In what language are LEP parents informed of the availability of oral interpreting / written translation services?
8. When are oral interpreters COMMONLY made available?
9. When are written translations COMMONLY made available?
10. How have you provided foreign language oral interpreting / written translation services for families?
11. Please rank the services from most frequently used (1) to least frequently used (5): para-educator or educational assistant; classified staff member (e.g., school or district receptionist, family liaison); certified staff member (e.g., bilingual teach
12. Do you feel you have adequate access to interpreters to meet the needs of all of your limited-English speaking families?
13. Does your school/District require specific qualifications of oral interpreters / written translators?
14. If yes, what are the qualifications?
15. How can access to foreign language oral interpreting / written translation services be improved?
16. Has your District adopted a Family Language Access Policy?
17. If yes, please provide a link to the policy or email it to: Rosenfeld@seattleu.edu

1. Which ESD are you in?	2. What is your job title?	3. To the best of your knowledge, which of the following are home languages for students in your school/District?
113	Supt.	Spanish, English
189	Principal	Spanish, Russian
123	Federal Programs Bilingual Programs Secretary	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Amharic
121	Director of Student Services	Spanish
113	principal	Spanish, Russian, Vietnamese, Chinese (all), Korean, Cambodian, Croation
105	assistant superintendent	Spanish
171	Bilingual Program Director	Spanish
171	ELL Coordinator	Spanish
189	Principal	Spanish
121	Principal	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Tagalog, Cambodian, Marshallese, Somoan
121	Director of ELL	Spanish, Vietnamese, Somali, Chinese (all), Tagalog, Arabic, Cambodian, Marshallese, Amharic, Tigrinya, Oromo
113	Superintendent	Spanish
114	State and Federal Grants Manager	Spanish, Vietnamese, Ukranian, Chinese (all), Tagalog, Japanese
121	ELL Instructor	Spanish, Russian, Ukranian, Tagalog
113	ELL Program Coordinator	Spanish, Russian, Vietnamese, Somali, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Somoan, Amharic, Telugu, Japanese, Nepali, Filipino, Romanian
121	ELL teacher/coordinator	Spanish, Russian, Chinese (all), Korean, Arabic, Japanese, French, Farsi, Hebrew, German, Danish, Finnish, Swedish, Armenian, Tigrinya, Tamil, Tegulu, Malayalam,
189	Director for Instructional Support Programs	Spanish, Russian, Vietnamese, Ukranian, Chinese (all), Arabic
112	Administrator Special Services	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Arabic, Punjabi, Cambodian, Marshallese, Somoan, Chuukese
112	Principal	Spanish, Russian, Vietnamese, Chinese (all), Marshallese, chuukese
123	Bilingual Coordinator	Spanish, Russian, Vietnamese, Somali, Ukranian, Tagalog, Arabic, Marshallese, Amharic
113	Superintendent	None
113	Principal	Spanish
123	ELL Teacher	Spanish, Russian, Vietnamese, Chinese (all), Punjabi, Amharic, Nepali, Japanese, Thai
123	Federal Program Director	Spanish, Russian
171	Principal	Spanish, Russian, Vietnamese, Ukranian, Chinese (all)
113	Director of Diversity, Languages, Arts & Discipline	Spanish, Russian, Vietnamese, Somali, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Somoan, Amharic
101	Elementary Principal & TBIP Administrator	Russian, Ukranian
112	Principal	Spanish, Russian
112	Superintendent	Spanish, Russian, treki
171	Director of State and Federal Programs	Spanish, Russian, Cambodian, Italian
105	Principal	Spanish, Ukranian, Chinese (all), Korean
189	Special Services Director	Spanish
112	Principal	Spanish
105	Principal	Spanish
121	Principal	Spanish, English
113	principal	Spanish, Cambodian
112	Principal	Spanish, Russian, Ukranian, Arabic
105	Principal	Spanish
112	Special Services Director	Spanish, Russian, French
101	ELL coordinator	Spanish, Russian
113	Principal	Spanish
189	Superintendent	Spanish, Russian, Ukranian, Chinese (all)
189	Superintendent	Spanish, Russian, Ukranian, Chinese (all)
189	Elementary Principal	Spanish, Vietnamese
105	Superintendent/Principal	Spanish
112	principal	Spanish
189	Principal	Spanish, Tagalog
112	Principal	Spanish, Tagalog
112	ELL/Bilingual Specialist	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Amharic, Eritrian, Chuukese, and 60 other languages
105	Federal Programs Director	Spanish

189	ELL Teacher	Spanish, Russian, Korean, Indonesian
113	Superintendent	Spanish, Cambodian
113	Principal	Spanish
113	Principal	Spanish
112	Elementary principal	Spanish, Russian
171	supt	Spanish, Russian, Ukranian
189	Principal	Spanish, Ukranian, Kurdish
121	Superintendent	None
112	superintendent	Russian
189	principal/sped director	Spanish
105	assistant superintendent	Spanish
121	Assistant Director, Special Services	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Somoan, French, German
123	Business Manager	Spanish
112	Principal	Spanish
121	Secretary to the Director of Student Support Services	Spanish, Russian, Ukranian, Chinese (all), Punjabi, Japanese, Urdu
171	Superintendent	Spanish
101	Sped Director	Chinese (all), Tagalog
123	Principal	Spanish, Punjabi
189	Director	Spanish, Russian, Ukranian, Chinese (all), Tagalog, Punjabi
112	Superintendent	Spanish, Somoan
189	Special Services Director	Spanish, Russian, Vietnamese, Ukranian, Chinese (all), Korean, Tagalog, Arabic, Somoan, Amharic
171	Exec Director	Spanish, Russian, Vietnamese, Ukranian, Chinese (all)
101	Superintendent	Spanish, Russian, Ukranian
114	Assistant Superintendent	Spanish
113	Principal	Spanish, Chinese (all)
114	Instructional Specialist	Spanish, Vietnamese, Chinese (all), Korean, Tagalog, Somoan, Amharic, We have seven different languages not listed here. ,
105	Director of Special Education and Migrant Programs	Spanish
189	Migrant Bilingual Lead	Spanish, Russian, Ukranian, Chinese (all), Korean, Tagalog, Punjabi, Marshallese, Amharic
113	Superintendent	Spanish
105	Principal	Spanish
113	Superintendent	Spanish, Russian
105	IT Support Specialist	Spanish, mixteco
113	Superintendent/Principal	Spanish
113	Program Manager	Spanish, Vietnamese, Chinese (all), Korean, Cambodian
112	superintendent	Spanish
171	Special Services Director	Spanish
112	Assistant Superintendent	Spanish, Russian
113	Principal	Spanish
171	Superintendnet	Spanish
121	Director, Assessment and NCLB	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Somoan, Amharic, too many to list here
121	Director of Learing Services	Spanish, Russian, Vietnamese, Chinese (all), Korean, Arabic, German, Swedish, French, Italian
189	Director Special Programs	Spanish, Russian, Vietnamese, Ukranian, Chinese (all), Tagalog, Punjabi, Marshallese
101	superintendent	Spanish
101	superintendent	Spanish
121	Director of Instructional Leadership	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Punjabi, Cambodian, Somoan
189	Principal	Spanish, Russian, Mixteco, Trique
101	Principal	Russian
101	principal	Spanish, Russian, Chinese (all), Arabic, Marshallese
105	Special Services Director	Spanish
171	ELL INSTRUCTIONAL COACH	Spanish, Russian, Ukranian, Punjabi
189	ELL and Special Programs	Spanish, Russian, Vietnamese, Ukranian, Korean, Tagalog, Punjabi, Mixtec, Trique, Hindi, Japanese, Swahili
105	Elementary Principal	Spanish, Sahatin Yakama Language
121	Director of ELL, Title I, LAP and Highly Capable Programs	Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Amharic, 60 other languages (70+ total)
105	Compliance Officer	Spanish, Russian, Vietnamese, Chinese (all), Arabic, Punjabi, Cambodian, Somoan, Ilokano, Japanese, Korean, Middle Eastern, Phillippine Language, Urdu
113	Superintendent	Spanish
112	Curriculum Director	Spanish, Russian, Ukranian, Korean, Arabic, Thai
105	Principal	Spanish

112	Special Services Secretary	Spanish, Russian, Arabic, MID
121	ELL teacher	Spanish, Russian, Vietnamese, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Somoan, Amharic, Tigrinya
171	superintendent	Spanish
101	Curriculum & Instruction	Spanish, Russian, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Marshallese, Amharic
171	Bilingual Para Profesional	Spanish, Punjabi
112	Principal	Spanish, Russian
113	para educator	Spanish, Arabic
113	Migrant/Bilingual Director	Spanish, Russian, Ukrainian, Tagalog
189	ELL Secretary	Spanish, Russian, Vietnamese, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese
123	Executive Director for Teaching & Learning	Spanish, Vietnamese, Chinese (all), Punjabi, Amharic, Japanese
113	ELL Coordinator	Spanish, Russian, Vietnamese, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Somoan, Amharic, Ga, Hindi, Telegu, more
189	Principal	Spanish, Russian, Vietnamese, Chinese (all), Tagalog, Arabic, Punjabi
113	Administrative Assistant	Spanish, Russian, Vietnamese, Korean, Arabic
105	Director of Student Services	Spanish
189	Director of Categorical Programs	Spanish, Russian, Vietnamese, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Somoan, Amharic, Too many others to list
189	Director of Categorical Programs	Spanish, Russian, Vietnamese, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Somoan, Amharic, Too many others to list
105	Grants Manager	Spanish
113	Assistant Superintendent	Spanish
171	Business Manager	Spanish
105	Federal Program Director	Spanish, Punjabi
189	Director of Special Programs	Spanish, Russian, Ukrainian, Punjabi
121	ELL Specialist	Spanish, Russian, Vietnamese, Ukrainian, Korean, Tagalog, Cambodian, Somoan
113	ESL program coordinator	Spanish, Russian, Tagalog
105	Superintendent	Spanish
171	Special Programs Director	Spanish
171	Special Program Director	Spanish
105	ELL Teacher, Reading Teacher, and Bilingual Coordinator	Spanish, Chinese (all)
101	ELD Program Assistant	Spanish, Russian, Vietnamese, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Cambodian, Marshallese, Somoan, Amharic, Karen, Bosnian, Moldavian, Nepali, Swahili, Burmese, Tigrinya, Chuukese
171	Superintendent	Spanish
114	Admin Asst	Spanish, English
189	ELL TOSA COACH	Spanish, Russian, Vietnamese, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Marshallese
101	ELL Coordinator	Spanish, Russian, Vietnamese, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Somoan, Amharic
114	Director of Student Services	Spanish, Vietnamese, Chinese (all), Korean, Tagalog
114	Superintendent	English
114	ELL coordinator	Spanish, Russian, Vietnamese, Chinese (all), Korean, Tagalog, Somoan, Mam and Chuukese
171	Principal	Spanish
105	Superintendent	Spanish
189	Special Programs Director	Spanish, Russian, Ukrainian
112	Federal Program Director	Spanish
101	Director of Special Programs	Spanish, Russian, Vietnamese, Ukrainian, Chinese (all), Arabic, Punjabi, Marshallese, Hmong, Cebuano, French
113	Executive Director of Special Services	Spanish, English
105	Superintendent	Spanish
105	Executive Director State and Federal Programs	Spanish, Vietnamese, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Somoan, American Sign Language
121	Ex. Dir. ISS	Spanish, Vietnamese, Chinese (all), Arabic, French, Congolese

4. How do you become aware of families who need foreign language oral interpreting / written translation services to participate in school services?	5. How many oral or written requests for oral interpreting / written translation services have you received during the last 24 months?	6. How are parents informed of the availability of oral interpreting / written translation services?
Enrollment/ registration , Family/ community night , Teacher feedback , Family request	1-15	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request	16-35	Written notice when we become aware of need , Oral notification by special education personnel , Newsletters, autodialer, phone calls
Home language survey , Teacher feedback , Family request	36-50	Migrant/Bilingual Staff
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback	More than 50	Written notice when we become aware of need , Oral notification by special education personnel
Enrollment/ registration	1-15	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification from ESL personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback	More than 50	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family request , Home Visitor and Student Advocate	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , PAC meetings
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request , Community partners	More than 50	Oral notification by home room teachers , Oral notification by special education personnel , School leaders and staff via email, translation and interpretation protocol sent to all staff, website
Enrollment/ registration , Family/ community night , Teacher feedback	None	Written notice when we become aware of need
Enrollment/ registration , Home language survey , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Oral notification by home room teachers , Web pages for all schools
Enrollment/ registration , Home language survey	1-15	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request	16-35	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , District Newsletter
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	16-35	Oral notification by home room teachers , Oral notification by special education personnel , website notice in English and three languages, oral notification by school secretary or counselor
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Interpreters routinely provided for all school wide parent meetings, discipline meetings, parent-teacher conferences, etc. District and school wide documents routinely translated without waiting to be asked.

Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request , Community contacts,	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , website
Enrollment/ registration , Family/ community night , Teacher feedback , Family request	More than 50	Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback , Family request	36-50	Oral notification by special education personnel , Secretary at each school has access to Language Link
Enrollment/ registration , Family/ community night , Teacher feedback , Family request	None	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Family request	16-35	Annual written school notices to all parents , Written notice when we become aware of need
Enrollment/ registration , Home language survey , Teacher feedback	1-15	Oral communication with ELL staff
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	16-35	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel , Parent Meetings
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Oral notification by home room teachers , Oral and/or written communication by bilingual staff member.
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	1-15	Oral notification by home room teachers , Oral notification by special education personnel
Family request	1-15	Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback , Family request	More than 50	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by special education personnel , website
Enrollment/ registration , Home language survey , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request , Our interpreter calls and meets with each family and assesses the needs.	36-50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , Also Word of mouth by other community members. We live in a small community.
Enrollment/ registration	None	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	None	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , Variety of means.
Enrollment/ registration	None	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request	16-35	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	1-15	Annual written school notices to all parents , oral notification by an interpreter
Enrollment/ registration	More than 50	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	More than 50	Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback	1-15	Written notice when we become aware of need

Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request , Students tell us.	More than 50	Annual written school notices to all parents , Notification at conferences. We tell them when someone calls and asks for Espanol. We tell them when they come in to register, as well. Often Spanish is provided at parent events and parents are informed in verbal (auto dialed translation) and written form.
Enrollment/ registration , Family/ community night , Teacher feedback , School Counselor	16-35	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by special education personnel , Oral notification by school office staff
Enrollment/ registration , Family/ community night , Teacher feedback , School Counselor	16-35	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by special education personnel , Oral notification by school office staff
Enrollment/ registration , Home language survey , Family request	1-15	Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Teacher feedback , Family request	None	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Home language survey , Family request	1-15	Annual written school notices to all parents
Enrollment/ registration , Home language survey	None	Oral through the office
Enrollment/ registration , Home language survey , Teacher feedback	1-15	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request , District Interpreter/Translators and community parentners	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , oral notification by interpreter/translators
Enrollment/ registration , Home language survey , Teacher feedback	1-15	Annual written school notices to all parents , Written notice when we become aware of need
Home language survey	None	Oral notification by home room teachers , ELL program staff
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	16-35	Annual written school notices to all parents , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback , Family request	None	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Family request	1-15	Written notice when we become aware of need
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback	1-15	Annual written school notices to all parents , ELL para contacts
Enrollment/ registration , Family/ community night , Teacher feedback , Family request	None	Oral notification by home room teachers , Oral notification by special education personnel , school secretary
Enrollment/ registration , Home language survey , Teacher feedback , Family request	36-50	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration	None	Written notice when we become aware of need
Enrollment/ registration	None	Annual written school notices to all parents
Enrollment/ registration , Home language survey	36-50	we communicated it to them through our bilingual staff
Enrollment/ registration , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	16-35	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration	None	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Teacher feedback , Family request , ELL Instructor	More than 50	Oral notification by home room teachers , ELL Instructor in direct contact with families
Enrollment/ registration , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need

Teacher feedback , Family request	None	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Teacher feedback	None	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Teacher feedback	1-15	Annual written school notices to all parents
Enrollment/ registration , Teacher feedback	None	Written notice when we become aware of need
Enrollment/ registration , Home language survey , Teacher feedback , Family request	16-35	Oral notification by home room teachers , Oral notification by special education personnel , written notices to building secretaries and administrators
Enrollment/ registration , Home language survey , Teacher feedback	More than 50	Oral notification by home room teachers , Oral notification by special education personnel , Oral notification from office staff.
Enrollment/ registration , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Oral notification by special education personnel
Enrollment/ registration , Home language survey	36-50	Oral notification by special education personnel , Notification by office staff
Enrollment/ registration	1-15	Written notice when we become aware of need
Home language survey , Teacher feedback , Family request	More than 50	Written notice when we become aware of need
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	1-15	Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family request	More than 50	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need
Enrollment/ registration , Home language survey	1-15	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Home language survey , Teacher feedback , Family request	More than 50	Oral notification by home room teachers , Oral notification by special education personnel , interpreters
Enrollment/ registration , Family/ community night , Teacher feedback , Family request	16-35	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback	1-15	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request	None	Annual written school notices to all parents
Enrollment/ registration , Teacher feedback , Family request	1-15	Oral notification by home room teachers , Oral notification by special education personnel , Oral notification by guidance counselor
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	16-35	Annual written school notices to all parents , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel

Enrollment/ registration , Home language survey , Teacher feedback , Family request , ELL Coordinator	1-15	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration	1-15	Annual written school notices to all parents
Enrollment/ registration	1-15	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need
Enrollment/ registration , Teacher feedback	1-15	Written notice when we become aware of need
Enrollment/ registration , Teacher feedback , Family request	1-15	Annual written school notices to all parents
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	1-15	Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	16-35	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	16-35	Oral notification by home room teachers
Home language survey	1-15	Annual written school notices to all parents
Enrollment/ registration	16-35	Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback , Family request	More than 50	Oral notification by home room teachers , Oral notification by special education personnel , Language Line signs in school office
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request , Parent Meetings/Public Meetings	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Teacher feedback , Family request	None	Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback	16-35	Annual written school notices to all parents , Written notice when we become aware of need
Enrollment/ registration , Family/ community night , Teacher feedback , Family request	1-15	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Family/ community night , Teacher feedback , Family request	1-15	Oral notification by home room teachers , Oral notification by all staff
Enrollment/ registration , Home language survey , Teacher feedback	1-15	Written notice when we become aware of need
Enrollment/ registration , Home language survey , Family request	1-15	Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback	36-50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel , Notification by ELD staff
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	36-50	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	None	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request , through the children	More than 50	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , word of mouth
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel

Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	1-15	Written notice when we become aware of need , Oral notification by home room teachers
Home language survey , Family request	16-35	Oral notification by home room teachers , communication with ELL teachers
Enrollment/ registration , Home language survey , Teacher feedback	1-15	Annual written school notices to all parents
Enrollment/ registration	36-50	Written notice when we become aware of need
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Community colleges
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Community colleges
Enrollment/ registration , Home language survey , Family request	None	Annual written school notices to all parents , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by ELL teacher
Enrollment/ registration , Teacher feedback , Family request	1-15	Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family request	More than 50	Written notice when we become aware of need , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	16-35	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback	16-35	Annual written school notices to all parents , Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	1-15	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by support staff
Enrollment/ registration , Home language survey , Teacher feedback	None	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Teacher feedback , Family request	More than 50	Secretary or Translator
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	36-50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by special education personnel
Home language survey , Family/ community night , Family request	More than 50	Written notice when we become aware of need , Oral notification by home room teachers , during registration at the Family Registration & Orientation Center
Enrollment/ registration , Home language survey , Family/ community night , Family request	1-15	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel

Home language survey	16-35	Written notice when we become aware of need , Oral notification by special education personnel , Oral Notification District Employee
Home language survey , Family/ community night , Teacher feedback , Family request	16-35	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , Newsletters
Enrollment/ registration , Home language survey , Teacher feedback	More than 50	Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel , website
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	36-50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	None	At registration
Enrollment/ registration , Home language survey , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	More than 50	Written notice when we become aware of need
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	More than 50	Annual written school notices to all parents , Written notice when we become aware of need , Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request	1-15	Oral notification by special education personnel
Enrollment/ registration , Home language survey	More than 50	Oral notification by home room teachers , Oral notification by special education personnel , bilingual staff
Enrollment/ registration , Home language survey , Teacher feedback , Family request	36-50	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback , Family request , Other staff request (e.g. McKinney-Vento, ELL)	1-15	Annual written school notices to all parents , Oral notification by home room teachers , Oral notification by special education personnel , Oral notification by ELL staff
Home language survey , Family/ community night , Parent Teacher Conferences	More than 50	Oral notification by home room teachers
Enrollment/ registration , Home language survey , Family/ community night , Teacher feedback	More than 50	Oral notification by home room teachers , Oral notification by special education personnel
Enrollment/ registration , Home language survey	1-15	Oral notification by any district personnel

7. In what language are LEP parents informed of the availability of oral interpreting / written translation services?	8. When are oral interpreters COMMONLY made available?	9. When are written translations COMMONLY made available?
Spanish, English	After school, but also as needed during the day	After school, IEP meetings, as needed during the school day
Spanish, Russian	Conferences Arena conference night	Autodialer messages Some district documents - school calendar
Spanish	Conferences, Parent meetings, hearings, I.E.P. Meetings.	conference notification, notices to parents,
Spanish, Russian	Special education meetings, school conferences	registration materials, special education paperwork, key announcements
Spanish, Chinese (all)	Conferences, ESL Meetings	ESL yearly reports
Spanish	Parent Teacher Conferences IEP/MDT Meetings Parent/Family Nights PTO Meetings Parent/Principal Meetings Student Hearings/Discipline Meetings	All parent communication sent home is translated Student Hearings IEP's
Spanish	Parent conferences, registration. We have staff available at all times.	Parent notes, IEPs, lunch packet, registration, etc.
Spanish	Parent/ Teacher Conferences, Parent Nights, Student Led Conferences, and Discipline Conferences, and each building office has bilingual secretaries available for all parent needs.	As a matter of practice ALL written communication is sent out in Spanish and English.
Spanish	Any parent meetings, parent gatherings, etc.	All legal and important documents and announcements.
Spanish, Russian, Vietnamese, Somali, Korean	Most often at student conferences	Report cards, important school notices, conference notes
Spanish, Vietnamese, Somali, Chinese (all), Tagalog, Arabic, Amharic, Tigrinya and Oromo	IEPs, parent/teacher conferences, discipline hearings, school events, district events.	IEPs, principal requests, notification of students in or exiting ELL services. Parts of school newsletters, urgent school safety notices
Spanish	Meetings regarding special education and discipline. Parent/teacher conferences. Parent meetings. Family nights.	Almost all communications from school are translated prior to being sent. All standard forms are provided in Spanish.
Spanish, Chinese (all), Japanese	During fall school conferences For Special Education conferences and final IEP meetings For important meetings re: behavior or progress of student	IEP's Notification of placement in ELL services Notification of state (WELPA) testing results Select parts of the district enrollment packet including Home Language Surveys and Homeless information Conference Invitations
Spanish, Russian, Ukranian	Parent conference IEP meetings Registration	When requested
Spanish	Parent-teacher conferences, telephone interpreters used as needed	All critical documents have been translated into Spanish. Legal documents and requested docs are translated upon request.
Spanish, Chinese (all), Korean	parent teacher conferences, ELL parent meetings	Only translations provided by OSPI are used
Spanish, Russian, Ukranian	Interpreters are routinely provided for all school wide parent meetings, discipline meetings, parent-teacher conferences, special ed meetings, etc. District and school wide documents are routinely translated without waiting to be asked.	District and school wide documents are routinely translated.

Spanish, Russian, Vietnamese, Ukranian, Chuukese	Conferences, family nights, discipline conferences, pushed out through phone service, emergencies, legal meetings, IEP meetings	All emergencies, legal meetings, most district wide notices in Russian and Spanish and as often as possible Chuukese.
Spanish, Russian, Vietnamese	parent nights, IEP meetings, parent meetings for discipline	emergency documents, IEPs, important notifications
We use Language Link for oral interpreting	Enrollment, discipline issues such as hearings & expulsions, parent/ teacher conferences. We have interpreters that speak Spanish & use interpreters from World Relief Tri-Cities or Language Link.	The district only provides written translation is Spanish because of availability of qualified staff. We have been told the best way to communicate with our Somali & Burmese families is orally. We use Language Link or interpreters that speak Somali, Karen, & Arabic, from World Relief Tri-Cities.
N/A at this time.	We do not currently have any families who do not use English as their primary language in the home so we do not have any oral interpreter use.	We have state forms such as special education rights and responsibilities available in translation but have not had to make them available.
Spanish	Conferences and when parents need one.	When parents need it.
Spanish, Vietnamese, Chinese (all), Punjabi, Japanese, Thai, Nepali	Parent/Teacher Conferences, IEP Meetings, and communication with our Spanish speaking parents throughout the year to explain anything they have a question on or that the school needs them to know about.	Annual/Placement WELPA scores, elementary class newsletters
Spanish	We frequently provide interpreters for meetings occurring before, during, and after school. Rarely, we will need interpreters for emergency situations. More commonly we need interpreters for phone call queries from parents. Those occur several times daily.	The bulk of our written translation requests come around the beginning of the school year. The occasional form or letter will come up throughout the rest of the year occasionally.
Spanish	As needed throughout the school day. If parents enter the office or call at anytime during (including 30 min before and after) school, then an interpreter is made available in person or via phone.	Rarely
Spanish, Vietnamese, Somali, Chinese (all), Korean, Cambodian	Parent-teacher conferences; meetings at schools regarding pupil discipline, credits, scheduling; information meetings for parents at the school such as Open House, registration events, school-wide family events, Community Cafe parent input meetings; ESL parent/family nights; IEP meetings.	Enrollment and lunch documents; TBIP documents, SPED documents; parent surveys; school and district forms; district and school website information.
English and through their children	For IEP meetings and conferences	N/A
Spanish, Russian	When asked	When they ask
Spanish, Russian	P/T conferences, IEP meetings, student discipline	same.... currently in process of having all student handbooks translated to spanish.
Spanish	at the building for ongoing communication; conferences	All of our documents are provided in english and spanish
Spanish	Parent Conferences	Parent Conferences Registration forms Athletic Forms
Spanish	Appointments are made with the family when all parties that need to be involved can meet.	We have copies of translated items. Usually everything runs through our interpreter.
Spanish	After school hours	As requested
Spanish	At all times.	At all times.
Spanish	Parent/teacher conferences, IEP meetings, routine parent communication regarding an injury to a child or a behavior problem.	Key publications are available in Spanish.
Spanish	Conferences and registration	Report cards
Spanish, Russian	Open Houses, Informational Nights, school meetings regarding student progress.	District information, State testing information, important letters or notifications from the school

Spanish	During meetings, phone calls and conferences	Special Education Meetings
Spanish, Russian, French	IEP meetings Conferences Parent nights	Newsletters Student Handbooks All website information all forms sent home
Spanish, Russian	parent/teacher conferences; IEP meetings	newsletters; home communications
Spanish	5th Grade Orientation/Parent Night Open House Conferences Incoming Phone Calls Outgoing Phone Calls LAP/SPED Information Nights Special Parent Classes ("How to Help Your Middle Schooler Succeed" and "How to Interpret Progress Reports")	The Following Flyers: 5th Grade Parent Night Open House Conferences LAP/SPED Information Night Special Parent Classes Sports Packets Also, any discipline notices.
Spanish, Russian, Ukranian	Upon request by either family or school official.	Upon request by either family or school official.
Spanish, Russian, Ukranian	Upon request by either family or school official.	Upon request by either family or school official.
Spanish, Vietnamese	Parent Teacher Conferences; IEP Meetings; School Messages	Newsletters; Progress Reports; IEPs;
English (oops!)	We have not had any interpreters this year.	We have not needed any written translations this year.
Spanish, Russian	Parent conferences. Pbone notification of of academic or behavior concerns.	registration forms Healthy youth survey notification Discipline forms
English	None	We use ospi website
Spanish, Tagalog	IEP meetings/evaluation meetings	IEP/eval
Spanish, Russian, Vietnamese, Ukranian, Many other languages per state translated documents	During the school day Before and after school at times convenient for parents Evening and after school events Infrequent Saturdays when we've had parent involvement events	Year round for most district disseminated notifications, letters and forms
Spanish	When they enter our buildings and go to the front office; all offices have at least one Spanish speaking secretary. They are also made available at all family activities including student-led conferences.	Whenever any written notification is sent home or posted on our website it is written in Spanish as well.
Spanish	parent teacher conferences back to school night ELL Family Nights	math homework other homework when possible important communications from school office
Spanish, Cambodian	Parent/teacher conferences. SpEd meetings.	Anything mailed out.
Spanish	We have a paraeducator that is made available when necessary, Her schedule allows her to come to the office when needed, She also has office hours, where she makes phone calls to parents and translates written information for families.	Will almost all correspondence that is done whole school. Newsletters, letters, forms.
Spanish	Conferences or if a parent comes in and requests.	We usually send home written communication in Spanish.
Spanish	Special education evaluations and IEP meetings Parent teacher conferences	I don't know.
Spanish, Russian, Ukranian	during special back to school events (student led conferences)	when special letter are sent to parent (discipline notices)
Spanish	Parent conferences, IEP meetings	Only for large district notifications to parents (such as registration materials, notification of incident at the school or in district, etc.)
None at this time	Carbonado has never needed an interpreter.	Carbonado has never needed written translations.
Russian	The one family that we have is bilingual, and does not want an interpreter.	The family prefers written communications in English

Spanish	parent conferences, evening events, meetings with staff, IEP meetings, as needed (we call them with info about field trips, etc.)	for everything we send home
Spanish	discipline issues parent conferences building activities categorical program meetings	discipline issues district newsletters student handbook parent conferences categorical program meetings
Spanish, Russian	Conferences, meetings, parent nights	Conferences, report cards, procedural safeguards, newsletters
Spanish	Parent conferences, IEPs, and ESL meetings	When requested
Spanish	Just when needed - very seldom if ever.	Same as above.
Spanish, As needed by district ELL Instructor	Parent / Teacher conferences Parent meetings as needed throughout the year. SPED or 504 meetings - all Discipline meetings Phone interpretation service available for all as needed	Enrollment forms, health documents / notifications Standardized school activity notices SPED / 504 documents as required Attendance letters, discipline notices Others as requested by buildings
Spanish	Meetings between teachers, administrators, and parents.	All formal documents and school and public announcements sent home with students.
english	have not needed to do so yet	NA
Spanish	There was not a need for an interpreter for the families to my knowledge. Students and parents are able to communicate in English.	Most documents are sent out in English. If there was a need for translation, our ECEAP teacher was able to assist with that.
Spanish, Russian, Ukranian, Chinese (all), Tagalog, Punjabi	IEP mtg	ELL test results
Spanish	During conferences and grading periods.	During conferences and grading periods.
Spanish	conferences IEP meetings parent nights student support team meetings disciplinary actions	Registration forms SPED forms
Spanish	For Spanish - as needed/requested. For other languages - none.	For Spanish - as needed/requested. For other languages - none.
Spanish, Russian, Ukranian	Parent Teacher Conferences	Annual Reports
Spanish	IEP meetings, Parent/Teacher conferences, Family Night, PAC meetings.	Weekly Newsletter that goes home with kids. Newsletter is translated in both English and Spanish. Title I Notifications, etc. We have staff members that are bilingual and typically do the translation or interpreting. We do contract for services when necessary.
Spanish, Chinese (all)	When requested by our ESL Coordinator	When requested by our ESL Coordinator
English	For parent conferences	upon request. We have had no requests for written translation services in the last 24 months. Our office personnel are trained to use Transact for state and Federal forms. Additionally, our web page can be translated in a number of different languages.
Spanish	At all special education meetings were an interpreter is needed.	Parents are orally informed and also provided a letter in their home language indicating if they would like documentation translated they can request for it to be translated and they are provided with the interpreters office number.
Spanish	on parent request - Spanish only	district notices - Spanish only
Spanish	When requested by the family or teacher.	When requested by the family or teacher.
Spanish	Conferences, IEPs, staffing meetings, discipline meetings.	Discipline, IEPs, notifications and invitations.
Spanish	Daily. We have a Spanish speaking paraeducator on staff.	Daily. See above.
Spanish	at all times they are needed	most required times

Spanish	During parent conferences, meetings, teacher requests	For handbooks, parent letters, etc.
interpreters	conferences, special education meetings, home visits, school activities	by request of parent/teacher
Spanish	1. IEP meetings 2. Care Team Meetings 3. Discipline or attendance meetings 4. Parent Teacher Conferences	1. Letters from district office 2. Field trip information 3. Other important communication
Spanish	Enrollment, School Conferences, Telephone communications, IEP meetings, School meetings	School/Home classroom teacher communications, School Notices
Spanish, Russian	Upon request, usually for student/parent/teacher conferences	Sent to known homes for ELL students
Spanish	We have one on site 4 hours a day and available at notice	When needed
Spanish	Conferences, community events, meetings	Parent letters, discipline letters, website, handbooks
Spanish, Russian, Vietnamese, Somali, Ukranian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Samoan, Amharic	All parent/teacher conferences, IEP meetings, case study, teacher concerns, district/building announcements (early dismissal, late start etc), discipline	grades, strategic plan, parent rights and responsibility, disciplinary action, kindergarten handbook, pathways for college/career, assessment results
Korean	Conferences	New family letters
Spanish, Russian, Ukranian, Chinese (all), Tagalog	Teacher conferences, Special Education meetings, 504 meetings.	Initial letter from the Superintendent Notifications of testing AMAO letter Placement letters Parent's Rights Handbook Procedural Safeguards
Spanish, Russian, Chinese (all)	IEP meeting, parent/teacher conferences	IEP notifications
Spanish, Russian, Chinese (all)	IEP meeting, parent/teacher conferences	IEP notifications
Spanish	Conferences and other meetings	website translation, special request
Spanish	Parent meetings, parent nights, graduation	Emails, letters home, IEP meeting notices
Englis	None at this time	None at this time
Spanish, Russian, Chinese (all), Marshallese	parent teacher conferences	parent teacher conferences
Spanish	Any parent interaction with teachers or office staff Conferences IEP's Parent nights	When information is specific to the family Bilingual program letters Highly Capable nominations Special education information
Spanish, Russian, Ukranian	Any time during the school day.	As-needed
Spanish	All school events, in Spanish. Auto dialer College prep events Open House Parent Conferences	All school notices, in Spanish. PSAT sign up STEM club sign up Parent newsletters
Spanish	Home visits Conferences Parent Meetings Office staff	News letters Letters home Hand books
Spanish	Curriculum Nights, Parent Conferences, IEP meetings, SST meetings	Rights and Responsibilities, enrollment forms, truancy letters, field trip forms
Spanish	Parent-teacher conferences, special education meetings, and meetings regarding student discipline.	Program information and applications, discipline notices, consent forms, complaint forms, notices of rights, and letters or notices that require a response.
Spanish	Registration, parent conferences	Registration forms and any materials that are sent home
Spanish, Russian, Thai	Back to school nights, conference weeks, discipline issues	Discipline issues, report cards

Spanish	Conferences, IEP meetings, Discipline referrals	Attendance letters, other school news and information letters.
Spanish, Russian	Conference, school programs, any meeting between staff and parents.	Russian, Spanish
Spanish, Russian, Vietnamese, Somali, Ukrainian, Chinese (all), Korean, Tagalog, Arabic, Punjabi, Cambodian, Marshallese, Samoan, Amharic	parent teacher conferences	they are not
Spanish	Conferences	Report Cards
Spanish, Russian, Ukrainian, Chinese (all), Korean, Tagalog, Arabic	Parent Teacher conferences, Special Education Conferences with parents, conferences concerning school issues around student progress.	Critical documents for school business
Spanish	During parent/teacher conferences, parent meetings etc.	Important, new information about events, permission slips for field trips, no school days etc.
Spanish, Russian	Conferences	Legal notices
Spanish	Registration Phone calls home Open House Parent / Teacher Conferences IEP and all meetings	Registration letters sent home IEP meetings
Spanish	Twice yearly during parent/teacher conferences. Frequently at all-school parent/student events (math night, science fair). At any ad hoc parent conference to discuss discipline, academics, etc. when requested by parent. At IEP meetings when needed. We have a dedicated phone line in Spanish, where parents can speak to a bilingual assistant four hours daily M/F or school staff can have messages relayed to parents.	School handbooks Early release notices Conference invitations Field trip notices Test results ESL program notifications At teacher request - We contract with a local vendor for translations.
Spanish, Russian, Ukrainian	School conferences, IEP meetings, family nights, parent concerns	as needed for school registration and transcripts for secondary level
Spanish	During parent conferences	In Spanish for all commonly used forms (2nd most common language in our area). Others upon request by parent or school staff.
English	Parent/Teacher conferences	upon request
Spanish, Russian, Tagalog	During conferences or school events that invite parents.	When information needs to get out to parents about curriculum night, or FAFSA night .
Spanish, Russian, Vietnamese, Korean, Arabic	school conferences	student testing
Spanish	Regularly scheduled parent-teacher conferences; family nights; some assemblies	District required notices are translated, registration and related forms, all or portions of school newsletters, website, special education evaluation and IEPs
Spanish, Russian, Vietnamese, Ukrainian, Korean	Parent/family nights, Welcome to school meetings, all Title 1 and ELL meetings, conferences, graduation	Spanish is available in all written newsletters from our high population schools, many of our reader boards also have written information in Spanish. Report Cards are translated, all Title 1 and ELL information is translated into the top 5 languages; Spanish, Russian, Ukrainian, Vietnamese and Korean. Other less frequent written documents may be translated into one or more languages depending upon student population at the buildings.

Spanish, Russian, Vietnamese, Ukranian, Korean	Parent/family nights, Welcome to school meetings, all Title 1 and ELL meetings, conferences, graduation	Spanish is available in all written newsletters from our high population schools, many of our reader boards also have written information in Spanish. Report Cards are translated, all Title 1 and ELL information is translated into the top 5 languages; Spanish, Russian, Ukranian, Vietnamese and Korean. Other less frequent written documents may be translated into one or more languages depending upon student population at the buildings.
Spanish	teacher parent confernces, Family Nights, Assemblies, We always have someone on staff if a parent need a interpreters. robo calls	all correspondences going home are in spanish and english.
Spanish	Conferences, when requested,	ELL classroom teacher sends home newsletter in English and Spanish, when requested
Spanish	When requested.	When any correspondence needs to go to the household.
Spanish	Parent/teacher conferences Family Nights During Registration of student IEP meetings Discipline issues Latchkey (childcare) At any time when language is a barrier to us, we pull an employee to translate.	At all times! No item goes home without translation provided. Newsletters Notices Web page Parent/ Student Handbook Just to name a few
Spanish	family/community nights at school where the expectation is that all parents, including LEP, have access to information report card/conferencing meetings where meaningful access to their child's education is discussed (two-way communication) LEP or Migrant specific meetings where the need for interpreting is an obvious need (or failure to provide makes meaningful participation moot) IEP's or 504's where the parent's language/interpretation of information is vital to the outcome of the meeting	 enrollment/immunization paperwork/forms all report cards/grading information IEP's/504's notifications district-level communications to families (ie, District NCLB notices, Title 1, etc)
Spanish, Russian, Vietnamese, Ukranian, Korean, Tagalog, Cambodian, Samoan	Student Conferences, Open House, Parent/Student Orientation, if a non-English family need to talk to a teacher they will let the office know and in turn we will provide an interpreter either in-house if possible or the language bank the district contracts with Also, our phone messages are in languages	ELL notifications, events, etc but also general ed info (memos, events,) online grades and district/school info is translated via technology
Spanish	Thirty minutes before school, during the school day and thirty minutes after school daily. At parent-teacher conferences. At IEP meetings. At disciplinary meetings. After hours, we access a telephone based oral interpreter.	All kindergarten weekly newsletters. Half of the school district's buildings have their monthly newsletters translated. All report card comments. All online grade books. All permission slips. All program (ESL, IEP, Title I, LAP ...) notifications.
Spanish	Anytime during the school day; During student-led conferences; parent/family nights	all documents from schools/district are sent out in English and Spanish
Spanish	All building offices have bilingual staff to answer the phone and greet parents. Bilingual staff and students are at parent nights, conferences, and other events. Bilingual staff are at IEP's if needed.	All notices go home in English and Spanish.
Spanish	7:30 - 8:30am 3:00 - 4:00pm	Designated a certain number of minutes each day per building for written translation

Spanish, English, parent is English teacher in China	Open House Parent Conferences ELL Nights Monthly Family Fun Nights 5th Grade Open House Night-parents/students become familiar with middle school	Open House Parent Conferences ELL Nights Monthly Family Fun Nights 5th Grade Open House Night-parents/students become familiar with middle school
Spanish, Russian, Vietnamese, Ukranian, Chinese (all), Korean, Arabic, Marshallese, Amharic, Karen, Burmese, Nepali, Bosnian, Moldavian, Swahili	Oral interpreters are commonly available during the school work day and by appointment after school. Additionally, oral interpreters are available for parent/teacher conferences twice yearly.	Written translations are commonly available when the ELD program needs to communicate any information to parents, when conferences need to be scheduled twice yearly, and whenever a program needs to have something translated and requests translation services.
Spanish	When they are requested or during our bilingual parent meetings	Then our monthly newsletter and special notices that are sent home
Spanish, English	School Conferences Special Education Meetings	Special Education Notices Parent information sent home by the school district
Spanish, Russian	IEP meetings, parent/teacher conferences, SPED referral, discipline, upon teacher request.	District wide forms.
Spanish	family nights, conferences	parent handbooks, key important letters
Spanish, Chinese (all)	Parent Conferences, IEP Conferences, all school events	District Safety Guidelines District Rights and Responsibilities Many of our school forms--we use TransAct for these
N/A	Upon request	When requested
Spanish, Russian, Vietnamese, Chinese (all), Korean, Tagalog, Chukeese	Enrollment Parent conferences Daily access to ELL interpreter via district cell phone	Placement Program description Continued enrollment Exit from program Beca bill Enrollment form Health forms Field trip forms
Spanish	At all times.	Whenever needed
Spanish	Conferences Student discipline Parent night PAC and various meetings	On our district website All correspondence sent home with students Student discipline Meeting announcements Meeting agendas
Spanish	They are made available for team meetings and evening events, when requested	They are provided for federal documents that are linked to timelines and services.
Spanish	during school day, before and after school, evening events, parent conferences	before school, after school, summer
English	Conferences, IEP meetings, ELL Parent Info nights	Annual Parent Notification letters (via OSPI). Others requested by administrators, i.e. Becca Bill, Special Ed notices, attendance issues.
Spanish	Parent-teacher conferences, PTO meetings, family nights (incl Title I nights), other meetings between a family and school staff (e.g. IEPs, student learning plans), auto-dialer messages for school or district events	Standard district forms and notices (e.g. enrollment packets and the beginning of the year notices, ChildFind, Homeless), flyers for family events including family nights and conferences, IEPs (including notices and safeguards), school newsletters
Spanish	Parent Teacher Conferences, Bilingual Parent Meetings	Parent Teacher confernces
Spanish	Parent/Teacher Conferences School Board Meetings IEP Meetings Parent Nights District and Building Level PAC Meetings	Parent/Teacher Conferences IEP Meetings Parent Nights District and Building Level PAC Meetings
Spanish, Vietnamese, Chinese (all), Arabic, French, Congolese	Student conferences, IEP meetings, 504 meetings and when requested	IEP meetings, 504 meetings and when needed

10. How have you provided foreign language oral interpreting / written translation services for families?	11. Please rank the services from most frequently used (1) to least frequently used (5) [Para-educator or educational assistant]	11. Please rank the services from most frequently used (1) to least frequently used (5) [Classified staff member (e.g., school or district receptionist, family liaison)]	11. Please rank the services from most frequently used (1) to least frequently used (5) [Certified staff member (e.g., bilingual teacher, building administrator)]	11. Please rank the services from most frequently used (1) to least frequently used (5) [Phone interpreter line]	11. Please rank the services from most frequently used (1) to least frequently used (5) [District contracted interpreter]	11. Please rank the services from most frequently used (1) to least frequently used (5) [Community volunteer]	11. Please rank the services from most frequently used (1) to least frequently used (5) [Bilingual student]	11. Please rank the services from most frequently used (1) to least frequently used (5) [Other]	comments:
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	1	1	Not Used	Not Used	Not Used	5	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	Not Used	Not Used	2	Not Used	1	Not Used	3	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	5	5	3	3	5	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	5	Not Used	5	Not Used	5	Not Used	Not Used	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator)	2	3	1	Not Used	Not Used	4	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	1	2	3	Not Used	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	1	1	1	Not Used	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Community volunteer	2	1	5	2	5	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Community volunteer	2	3	4	4	5	2	1	Not Used	
Phone interpreter line, District contracted interpreter, Bilingual student	Not Used	Not Used	Not Used	3	2	5	2	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), We have 160 IAs who speak our top 9 district languages and they provide the services, often after contracted day.	1	2	4	Not Used	Not Used	3	Not Used	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer, Bilingual student	1	Not Used	1	Not Used	Not Used	4	3	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, Bilingual student	1	Not Used	2	4	Not Used	Not Used	5	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator)	Not Used	Not Used	1	Not Used	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Bilingual student	5	Not Used	4	3	1	5	5	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Community volunteer	3	Not Used	1	Not Used	4	3	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	3	1	3	4	1	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	1	1	2	Not Used	1	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	5	4	4	Not Used	4	Not Used	2	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, World Relief staff	3	2	1	4	5	Not Used	Not Used	Not Used	
N/A at this time	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	If we do have a need for interpreters in the future, I feel we will have to use a phone interpreter line due to our remote and rural location. I don't think we could get interpreters to come here easily.
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Bilingual student	1	2	Not Used	Not Used	Not Used	5	4	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	5	Not Used	2	Not Used	1	Not Used	Not Used	Not Used	At this time our only oral interpretation is for Spanish. Our other languages are either from forms on OSPI or through an on-line translation service that is offered for free.
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	3	4	5	Not Used	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	2	3	Not Used	Not Used	Not Used	4	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Bilingual student	4	4	4	4	1	5	4	5	We try not to use bilingual students as interpreters; this is not an appropriate practice.

District contracted interpreter, Bilingual student	Not Used	Not Used	Not Used	Not Used	1	2	5	Not Used	
Phone interpreter line	4	4	4	1	4	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, Community volunteer, Bilingual student	1	Not Used	3	1	Not Used	3	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	3	5	5	1	1	1	1	1	
Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	Not Used	Not Used	1	2	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant	1	1	3	Not Used	Not Used	Not Used	5	5	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer	Not Used	3	3	Not Used	3	3	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer, Bilingual student	3	5	4	4	Not Used	3	2	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison)	5	5	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	We have very few limited English speaking families and those we do have do not often request interpreters.
District contracted interpreter, Bilingual student	Not Used	Not Used	Not Used	Not Used	4	Not Used	2	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, student of family	3	Not Used	2	Not Used	1	Not Used	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student, Social Worker	1	1	4	Not Used	5	Not Used	4	1	We had a Social Worker connected to the school for the last two years. She served as our communications liaison
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	5	5	5	5	5	Not Used	Not Used	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	Not Used	Not Used	1	Not Used	2	Not Used	3	Not Used	
									We use students to guide tours and answer questions in situations where English-speaking students would also be used. Example: Tour guides for 5th graders and parents.
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, Community volunteer, Bilingual student	1	Not Used	4	5	Not Used	3	2	Not Used	
District contracted interpreter, Bilingual student	Not Used	5	4	Not Used	1	3	2	Not Used	
District contracted interpreter, Bilingual student	Not Used	5	4	Not Used	1	3	2	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Bilingual student	1	4	4	1	4	1	3	1	
None this year	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Bilingual student	Not Used	Not Used	1	4	3	Not Used	2	Not Used	
									We only have 8 identified families and they all have at least one parent that speaks English fluently.
District contracted interpreter	Not Used	Not Used	Not Used	Not Used	1	Not Used	Not Used	Not Used	
Phone interpreter line, District contracted interpreter	Not Used	Not Used	Not Used	1	1	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, District Interpreter/Translators	1	1	3	Not Used	3	Not Used	Not Used	1	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	4	5	3	Not Used	Not Used	Not Used	2	1	
District contracted interpreter, Community volunteer, school counselor	Not Used	Not Used	3	Not Used	1	3	4	5	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	3	Not Used	1	Not Used	Not Used	Not Used	4	Not Used	
									We prefer not to use students in any communication with families.
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	2	Not Used	1	Not Used	Not Used	Not Used	3	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator)	1	Not Used	2	Not Used	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	2	2	3	Not Used	Not Used	Not Used	Not Used	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), District contracted interpreter	Not Used	1	Not Used	4	1	Not Used	Not Used	Not Used	
None	3	4	5	Not Used	Not Used	2	Not Used	1	
Bilingual student	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	1	Not Used	

Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Phone interpreter line	5	3	Not Used	2	Not Used	Not Used	Not Used	Not Used	We are losing our interpreter position for the upcoming year due to budget cuts. We will be relying on contract work and our phone interpreter line.
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	1	1	3	Not Used	5	Not Used	Not Used	Not Used	We need funding for interpretation and translation, as it cannot be covered under ELL/TBIP
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Bilingual student	4	5	3	2	1	Not Used	5	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer, Bilingual student	Not Used	4	1	Not Used	Not Used	5	4	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator)	Not Used	Not Used	5	Not Used	Not Used	Not Used	Not Used	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Interpreting agency used for all oral interpreting. A contracted individual for Spanish written interpretation	Not Used	Not Used	3	1	1	Not Used	Not Used	Not Used	We use an interpreting agency for all oral interpretation needs with the exception of phone need. For phone calling we use the State Contracted CTS Language Link. Last year was our first. It was a bit of a slow start but this year it has caught on and was used at an increasing rate through out the year. I expect that trend to continue. We have a former para who contracts with us and does all of our written (Spanish) interpretation.
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator)	1	1	4	3	Not Used	Not Used	5	Not Used	
english	Not Used	Not Used	5	Not Used	Not Used	5	5	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	Not Used	Not Used	1	Not Used	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Community volunteer, Bilingual student	1	1	Not Used	Not Used	5	3	4	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	2	1	3	Not Used	Not Used	Not Used	3	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Bilingual student	Not Used	Not Used	1	Not Used	1	Not Used	3	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Bilingual student	2	1	3	Not Used	5	Not Used	4	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	3	3	3	Not Used	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Bilingual student	3	1	2	Not Used	4	Not Used	5	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Community volunteer	Not Used	Not Used	5	Not Used	5	5	Not Used	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), District contracted interpreter, Bilingual student	Not Used	2	4	Not Used	1	4	3	Not Used	We use a trusted interpreting service for parent conferences and meetings between parents and school personnel. building office personnel are trained to use the Transact translation tools for state and federal forms.
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line	3	1	2	Not Used	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), District contracted interpreter	1	1	4	Not Used	5	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Community volunteer, Bilingual student	1	Not Used	Not Used	Not Used	Not Used	3	3	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Bilingual student	4	4	3	Not Used	5	Not Used	2	Not Used	
Para-educator or educational assistant	1	3	3	Not Used	Not Used	Not Used	3	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison)	1	1	3	Not Used	Not Used	Not Used	Not Used	Not Used	
District contracted interpreter	Not Used	Not Used	Not Used	Not Used	5	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	4	Not Used	3	3	1	Not Used	Not Used	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	4	4	1	Not Used	Not Used	3	3	Not Used	

Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator)	1	1	2	Not Used	Not Used	Not Used	5	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	Not Used	4	5	Not Used	2	3	1	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer, Bilingual student	1	2	2	Not Used	Not Used	4	2	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	3	2	Not Used	Not Used	3	2	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	3	3	3	3	5	Not Used	Not Used	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer	Not Used	4	2	Not Used	Not Used	1	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Community volunteer, Bilingual student	3	3	2	Not Used	1	3	5	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Community volunteer	4	5	4	3	4	5	3	1	
Classified staff member (e.g., school or district receptionist, family liaison), Community volunteer	4	5	4	3	4	5	3	1	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Phone interpreter line, District contracted interpreter, Community volunteer	1	2	2	2	1	5	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	3	1	3	Not Used	Not Used	5	3	Not Used	
Para-educator or educational assistant	3	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Phone interpreter line	1	1	1	1	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer, Bilingual student	1	1	2	Not Used	Not Used	3	4	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator)	1	3	4	Not Used	Not Used	Not Used	Not Used	Not Used	
									This question was a bit confusing, because normally surveys assign "1" as the least and "5" as the most. Your data may be skewed if people don't read the directions. We have a very hard time finding interpreters for Mixtec and Trique. To our knowledge, these are not written languages, so we do not provide translation into these languages.
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	1	1	1	1	5	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, Community volunteer, Bilingual student	5	5	4	5	1	4	5	4	
Phone interpreter line, District contracted interpreter, Interpreting agencies when we do not have capacity with district hired interpreters	Not Used	Not Used	4	1	2	Not Used	5	3	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	2	1	3	5	4	Not Used	Not Used	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Community volunteer	5	1	2	Not Used	Not Used	3	4	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, Web-based company for written translation services	2	2	3	4	Not Used	Not Used	Not Used	4	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	2	Not Used	2	2	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	5	5	5	1	1	Not Used	Not Used	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Bilingual student	3	3	2	3	2	Not Used	3	Not Used	
Community volunteer, Bilingual student	Not Used	Not Used	3	5	4	1	1	Not Used	
Para-educator or educational assistant, Phone interpreter line, District contracted interpreter	3	2	2	3	5	Not Used	1	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Phone interpreter line, District contracted interpreter, Bilingual student	1	1	1	1	1	Not Used	1	Not Used	
Community volunteer, Bilingual student	Not Used	Not Used	Not Used	5	5	2	2	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	1	3	Not Used	Not Used	5	3	5	

Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Bilingual student	1	Not Used	3	1	1	Not Used	4	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Community volunteer	2	1	1	1	1	3	Not Used	Not Used	
Para-educator or educational assistant, District contracted interpreter	1	Not Used	3	Not Used	5	Not Used	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	5	3	2	2	2	Not Used	Not Used	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter	Not Used	Not Used	2	Not Used	1	Not Used	3	Not Used	
District contracted interpreter	Not Used	Not Used	Not Used	Not Used	1	Not Used	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	5	5	3	Not Used	Not Used	1	2	1	For the most part we are able to provide enough staff for translations except when the entire district is doing conferences and then we need to get creative with scheduling and sharing resources
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	5	4	3	3	1	5	5	Not Used	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	5	4	3	3	1	5	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line	4	5	4	5	1	1	1	1	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator)	1	1	1	Not Used	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	3	1	3	Not Used	Not Used	Not Used	4	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line	1	1	3	1	Not Used	Not Used	5	Not Used	It is our standard operating procedure to provide all communication with parents in Spanish & English
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Community volunteer	1	2	3	Not Used	4	5	Not Used	1	form kept coming up with "error" until I clicked on "other"....didn't have an "other" but thought I'd try this option to get the survey acceptable for "submit" button
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	4	4	4	2	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line	5	1	1	1	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	1	1	Not Used	Not Used	3	3	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	1	2	Not Used	Not Used	Not Used	2	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	1	1	2	Not Used	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Bilingual student	3	2	2	Not Used	1	4	3	Not Used	

Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Community volunteer	1	3	3	3	4	5	Not Used	5	We hire Bilingual Specialists specifically to help meet the communication needs of our families. The classified staff commonly consists of our ELD Program Specialists, one who speaks Hmong, Thai, Laos, and the other speaks Spanish.
Para-educator or educational assistant, Superintendent	1	2	3	4	5	5	3	3	
Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	4	1	1	Not Used	1	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, Community volunteer, Bilingual student	2	2	2	5	2	2	1	1	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Bilingual student	1	3	5	2	4	Not Used	5	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter, Bilingual student	3	3	3	4	5	1	1	1	
Certified staff member (e.g., bilingual teacher, building administrator)	1	1	5	1	1	1	1	1	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	1	3	1	1	1	4	4	4	N/a
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator)	1	2	2	Not Used	Not Used	Not Used	4	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	1	3	Not Used	Not Used	Not Used	2	Not Used	
Para-educator or educational assistant, District contracted interpreter	4	4	Not Used	Not Used	3	Not Used	Not Used	Not Used	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Bilingual student	1	3	2	Not Used	Not Used	Not Used	4	5	
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Phone interpreter line, District contracted interpreter, Bilingual student	2	3	5	1	1	Not Used	2	Not Used	
Para-educator or educational assistant	1	Not Used	Not Used	Not Used	4	4	4	Not Used	
Para-educator or educational assistant, Certified staff member (e.g., bilingual teacher, building administrator), District contracted interpreter, Bilingual student	2	1	3	Not Used	5	Not Used	4	Not Used	We utilize Junior and Senior High School Students during parent teacher conferences. We meet with them prior and discuss our expectations of them in how they translate. We also ask them to sign a confidentiality waiver.
Para-educator or educational assistant, Classified staff member (e.g., school or district receptionist, family liaison), Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	1	1	2	1	2	Not Used	5	Not Used	
Certified staff member (e.g., bilingual teacher, building administrator), Phone interpreter line, District contracted interpreter	Not Used	Not Used	5	4	3	Not Used	Not Used	Not Used	

12. Do you feel you have adequate access to interpreters to meet the needs of all of your limited-English speaking families?	13. Does your school/District require specific qualifications of oral interpreters / written translators?	14. If yes, what are the qualifications?	15. How can access to foreign language oral interpreting / written translation services be improved?	16. Has your District adopted a Family Language Access Policy?	17. If yes, please provide a link to the policy or email it to: Rosenfeld@seattleu.edu
Yes	No		More funding for services , don't make this too complicated!	No	
No	No		More trained interpreters , More funding for services	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , Better information from families , More funding for services	No	
No	No		More trained interpreters , More funding for services	No	
No	Yes	Volunteer approval	More trained interpreters , Better information from families	No	
No	No		More trained interpreters , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services	No	
Yes	No		More trained interpreters , More funding for services	No	
No	Yes		More trained interpreters , Better access to a phone language line , More funding for services	No	
No	Yes	I don't know specifics	More trained interpreters , More funding for services , family liaison in building full time	Yes	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, 75 college credits	More funding for services , I would appreciate funding for a phone language line since it can't be payed out of title III	No	
No	Yes	Fluency in language other than English	More trained interpreters , More funding for services	No	

No	No		Better information from families , More funding for services , Need for interpretation made more promptly. We have it with enough lead time	No	
No	No		More trained interpreters	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services , Greater language variety	No	
Yes	No		Better information from families	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Must successfully complete the district's interpreter interview process	More trained interpreters , Better access to a phone language line , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services , MONEY!!!!	No	
Yes	Yes	Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services	No	
Yes	No		We currently do not use these services.	No	
No	Yes	Demonstrated ability in oral interpretation/written translation, Completion of oral interpreter/written translation course	More trained interpreters , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	Better access to a phone language line , More funding for services	No	

No	No		More trained interpreters , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
No	No		More trained interpreters , Better access to a phone language line , More funding for services , Access to interpreting for less commonly spoken languages	No	
No	No		More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
No	No	Demonstrated ability in oral interpretation/written translation	More trained interpreters , Better information from families , More funding for services	No	
No	No		More trained interpreters , More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	Better access to a phone language line	No	
No	Yes	Demonstrated ability in oral interpretation/written translation, Completion of oral interpreter/written translation course	Better information from families	No	
Yes	Yes	Demonstrated ability in oral interpretation/written translation, Completion of oral interpreter/written translation course	More funding for services	No	
Yes	No		Better information from families	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More funding for services	No	
Yes	No		More funding for services	No	

No	Yes	Demonstrated ability in oral interpretation/written translation	More trained interpreters , Better information from families , More funding for services	No	
No	Yes		More trained interpreters , More funding for services , less turn around time for translating informational documents	No	
No	No		More trained interpreters , More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More funding for services	No	
No	No		More trained interpreters	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services	Yes	
Yes	No		More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
Yes	No		More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
Yes	No		N/A	No	
Yes	No		Better information from families	No	
Yes	Yes	Previous experience as interpreter/translator	Better access to a phone language line	No	
Yes	No		More trained interpreters , Better access to a phone language line	No	

No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology, Certificate from an accredited college , Demonstrated ability in district screening process	More trained interpreters , More funding for services , ??Not sure what you mean by "Family Language Access Policy" in question 16	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	A test for demonstrating oral and/or written competency in both English and Spanish	No	
No	No		More funding for services	No	
Yes	No		Insist parents learn English.	No	
Yes	Yes	Fluency in language other than English , Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services	No	
No	No		More trained interpreters , More funding for services	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services	No	
No	Yes	Fluency in language other than English , Knowledge/familiarity with educational system and terminology	More trained interpreters , Better access to a phone language line , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters , Better information from families , More funding for services , Use people in community and pay them	No	
Yes	No		None needed at this time	No	
Yes	No		Better information from families	No	

No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More funding for services	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services	No	
No	No		More trained interpreters , Better access to a phone language line , More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , Better information from families , More funding for services	No	
Yes	No		More trained interpreters	No	
Yes	Yes	Non-Disclosure commitment in place and the assurance of skill required by the agency we use	Continue to develop staff comfort with using the phone interpretation line	No	
Yes	No		Better access to a phone language line	No	
No	No		More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
No	No		Better access to a phone language line , Better information from families	No	

No	No		More trained interpreters , More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	Better access to a phone language line , Better information from families	No	
Yes	Yes	Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, contract company requirements	More funding for services	No	
No	No		More trained interpreters , Better access to a phone language line , More funding for services	No	
Yes	No		Better information from families	No	
No	Yes	Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services	No	
Yes	No		More trained interpreters , Better information from families	No	
Yes	Yes	We use a company which has very high standards.	More funding for services	No	
Yes	No		More trained interpreters	No	
Yes	No	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More funding for services	Yes	
No	No		More funding for services	No	
Yes	Yes	Demonstrated ability in oral interpretation/written translation, Completion of oral interpreter/written translation course	More trained interpreters , Better information from families	No	
Yes	No		More trained interpreters	No	

No	Yes	Demonstrated ability in oral interpretation/written translation	More trained interpreters	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	a	Yes	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology, Completion of oral interpreter/written translation course, Certificate from an accredited college	More trained interpreters , More funding for services	No	
Yes	No		More funding for services	No	
Yes	No		More trained interpreters , Better information from families	No	
Yes	No		More trained interpreters , More funding for services	No	
Yes	No		More funding for services	No	
Yes	No		More trained interpreters , Better information from families , More funding for services	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology, Completion of oral interpreter/written translation course, certification from DSHS or military,	More trained interpreters , More funding for services , state should create communications for assessments, graduation etc in more languages	No	
Yes	No		Better access to a phone language line	No	

No	No		More trained interpreters , More funding for services	No	
No	No		More trained interpreters , More funding for services	No	
No	No		More trained interpreters , More funding for services	No	
No	Yes	Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services	No	
No	No		More trained interpreters , Better information from families , More funding for services	No	
No	No		More training	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters , Better access to a phone language line , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More funding for services , OSPI Phone Language line for a reasonable cost (not \$75/hr)	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology, Completion of oral interpreter/written translation course	More trained interpreters	No	

No	Yes	Native speaker of target language or outside certification as an interpreter/translator	More trained interpreters , Better information from families , More funding for services	No	
Yes	No		More trained interpreters , More funding for services	No	
Yes	No		Better information from families , More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Use providers from state approved contract	More funding for services , My district has been using an "off-shore" web based company that I can access native, educated speakers to provide written translation. Having all the WSSDA policies translated and put into one place for districts to access would be very helpful.	No	
Yes	No		Better information from families	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Completion of oral interpreter/written translation course, Certificate from an accredited college	More trained interpreters	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services	No	
No	No		More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
No	Yes	Fluency in language other than English , Knowledge/familiarity with educational system and terminology	Better access to a phone language line , More funding for services	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology, Completion of oral interpreter/written translation course	More trained interpreters , More funding for services	No	
Yes	No		Better access to a phone language line	No	

No	No		Better information from families , More funding for services	No	
No	No		More trained interpreters	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology, Completion of oral interpreter/written translation course	More trained interpreters , More funding for services	No	
No	No		More funding for services	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Knowledge/familiarity with educational system and terminology	Better information from families , More funding for services , better in-district communication	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	Better access to a phone language line , Better information from families , More funding for services	No	
Yes	Yes	Fluency in language other than English , Certificate from an accredited college	More funding for services	No	
No	No		More trained interpreters , Better access to a phone language line , More funding for services	No	
Yes	Yes	Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services , More funding from basic education not tied to ELL or Title 1	No	

Yes	Yes	Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services , More funding from basic education not tied to ELL or Title 1	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services	No	
Yes	No		More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	Hire more bilingual staff members	No	
No	No		More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , More funding for services	Yes	not sure if 16 is correct
Yes	Yes	Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	Better information from families , More funding for services	No	

No	No		More trained interpreters , Better access to a phone language line , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More funding for services	No	
Yes	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters , More funding for services	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology	More trained interpreters , Better access to a phone language line , Better information from families , More funding for services , More funding for services!!!	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation, passage of the English speaking Praxis	More trained interpreters , Better information from families , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More trained interpreters	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Knowledge/familiarity with educational system and terminology	More funding for services	No	
No	Yes	Certificate from an accredited college	More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation	More trained interpreters , Better information from families , More funding for services	No	
Yes	No		More trained interpreters , Better access to a phone language line , Better information from families , More funding for services	No	
Yes	No		Not needed at this time	No	

No	Yes	Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation	More trained interpreters , We need Mam translated materials and oral interpreters. We need Chukeyese interpreters as well	Yes	www.bremertonschools.org
Yes	No		More trained interpreters	No	
No	No		More trained interpreters , Better information from families , More funding for services	No	
No	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation	Better access to a phone language line , More funding for services	No	
No	Yes	Fluency in language other than English , Demonstrated ability in oral interpretation/written translation	More funding for services	No	
No	No		More trained interpreters , Better information from families , More funding for services	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation	Better access to a phone language line	No	
No	No		More trained interpreters , More funding for services	No	
Yes	Yes	Fluency in language other than English , Previous experience as interpreter/translator , Demonstrated ability in oral interpretation/written translation, Knowledge/familiarity with educational system and terminology, Completion of oral interpreter/written translation course	Better information from families , More funding for services	Yes	
No	No		More trained interpreters	No	

APPENDIX E-1: Selected Sources for Spoken Language Interpreter Training, Certification and Ethics¹

Interpreter Certificate Programs

Washington State General

- Bellevue College Continuing Education, Translation and Interpretation Certificate Program
<http://www.bellevuecollege.edu/ce/category/translation-and-interpretation/>
- Pierce Community College, Language Interpreting Certificate Program
<http://www.pierce.ctc.edu/dept/interpreter/>

Washington State Medical (Spanish Only)

- Everett Community College, Spanish Medical Interpreter Certificate Program
<http://www.everettcc.edu/programs/health-safety/health-sciences/medical-spanish?id=6484>
- Walla Walla Community College, Spanish Medical Interpreter Certificate Program
<http://www.wvcc.edu/CMSX/main.php?module=department&collegecode=200&deptcode=HO>

Education

- University of Georgia, Center for Continuing Education Professional Interpreter in Education
<http://www.georgiacenter.uga.edu/courses/teaching-and-education/languages/professional-interpreters-edu>

Interpreter Testing and Certification

General

- US Department of State, Office of Language Services, Interpreter Aptitude Test (56 languages)
<http://www.state.gov/m/a/ols/c56573.htm>

Medical

- National Board of Certification for Medical Interpreters, a division of the International Medical Interpreters Association (all languages) www.certifiedmedicalinterpreters.org
- Certification Commission for Healthcare Interpreters (all languages)
<http://www.cchicertification.org/>
- Washington State Department of Social and Health Services, Language Testing and Certification, Medical Interpreter Certification Exam (all languages) www.dshs.wa.gov/ltc/

Legal

- Federal Court Interpreter Certification Examination (Spanish only)
<http://www.ncsc.org/sitecore/content/microsites/fcice/home>

¹ The following list is not intended to be comprehensive and does not include services for interpreters for the deaf and hard of hearing.

- Washington State Administrative Office of the Courts Interpreter Certification Program (90 languages) http://www.courts.wa.gov/programs_orgs/pos_interpret/index.cfm

Social Services

- Washington State Department of Social and Health Services, Language Testing and Certification, Social Services Interpreter Certification Exam (all languages) www.dshs.wa.gov/ltc/

Ethical Codes for Interpreters

Washington State

- Washington State Court Rule 11.2 Code of Conduct for Court Interpreters http://www.courts.wa.gov/court_rules/?fa=court_rules.display&group=ga&set=GR&ruleid=gagr11.2
- Washington State Department of Social and Health Services (DSHS) Code of Professional Conduct for Spoken Language Interpreters and Translators Washington Administrative Code 388-03-050 <http://apps.leg.wa.gov/WAC/default.aspx?cite=388-03-050>

General

- American Translators Association [Code of Ethics and Professional Practices](#)

Legal

- National Association of Judiciary Interpreters and Translators, Code of Ethics and Professional Responsibility <http://www.najit.org>

Medical

- National Council on Interpreting in Health Care [National Code of Ethics for Interpreters in Health Care](#)

Social Services

- National Advisory Board, "Serving LEP Battered Women" [Code of Professional Responsibility for Interpreters Serving Limited English Proficient Victims of Domestic Violence \(outside of courtroom and judicial settings\)](#)

APPENDIX E-2: Washington State Department of Social and Health Services Code of Ethics/Language Interpreter and Translator Code of Professional Conduct

1. Accuracy

Interpreters/translators shall always thoroughly and faithfully render the source language message, omitting or adding nothing, giving consideration to linguistic variations in both source and target languages, conserving the tone and spirit of the source language message.

2. Cultural Sensitivity - Courtesy

Interpreters/translators shall be culturally competent, sensitive, and respectful of the individual(s) they serve.

3. Confidentiality

Interpreters/translators shall not divulge any information obtained through their assignments, including but not limited to information gained through access to documents or other written material.

4. Disclosure

Interpreters/translators shall not publicly discuss, report, or offer an opinion concerning matters in which they are or have been engaged, even when that information is not privileged by law to be confidential.

5. Proficiency

Interpreters/translators shall meet the minimum proficiency standard set by DSHS by passing the required certification examination or screening evaluation.

6. Compensation

The fee schedule agreed to between the contracted language service providers and the department shall be the maximum compensation accepted. Interpreters/translators shall not accept additional money, compensation, or favor for services reimbursed by the department. Interpreters/translators shall not use for private or others gain or advantage, the department's time, facilities, equipment, or supplies, nor shall they use or attempt to use their position to secure privileges or exemptions.

7. Nondiscrimination

Interpreters/translators shall always be neutral, impartial, and unbiased. Interpreters/translators shall not discriminate on the basis of gender, disability, race, color, national origin, age, socioeconomic or educational status, or religious or political beliefs.

8. Self-evaluation

Interpreters/translators shall accurately and completely represent their certifications, training, and experience.

9. Impartiality - Conflict of Interest

Interpreters/translators shall disclose any real or perceived conflict of interest which would affect their objectivity in the delivery of service. Providing interpreting or translation services for

family members or friends may violate the individual's right to confidentiality, or constitute a conflict of interest.

10. Professional Demeanor

Interpreters and translators shall be punctual, prepared, and dressed in a manner appropriate and not distracting for the situation.

11. Scope of Practice

Interpreters/translators shall not counsel, refer, give advice, or express personal opinions to individuals for whom they are interpreting/translating, or engage in any other activities that may be construed to constitute a service other than interpreting/translating. Interpreters are prohibited from having unsupervised access to clients, including but not limited to phoning clients directly unless requested by DSHS staff.

12. Reporting Obstacles to Practice

Interpreters/translators shall assess at all times their ability to interpret/translate. Should interpreters/translators have any reservations about their competency, they must immediately notify the parties and offer to withdraw without threat of retaliation. Interpreter/translator may remain until more appropriate interpreters/translators can be secured.

13. Ethical Violations

Interpreters/translators shall immediately withdraw from encounters they perceive as violations of this Code. Any violation of the Code of Professional Conduct may cause termination of the contract.

14. Professional Development

Interpreters/translators shall develop their skills and knowledge through professional training, continuing education, and interaction with colleagues and specialists in related fields.

K-12 Language Access Sample Policy and Administrative Handbook

Note: this Sample Policy and Administrative Handbook was developed by a task force co-convened by the Office of the Education Ombudsman and the Washington State Coalition for Language Access (WASCLA), which included Directors, Managers and representatives of:

- Bellevue College
- Human Rights Commission
- Northwest Justice Project
- Office of Civil Rights (OCR)
- OSPI Bilingual/Migrant Department
- OSPI Center for the Improvement of Student Learning
- OSPI Office of Equity and Civil Rights
- Pierce College
- Professional Interpreters/translators
- Puget Sound ESD
- Puget Sound Skill Center
- School Districts including: Seattle, Yakima, Spokane, Central Valley, Tukwila
- Seattle University
- T & I Institute
- WSSDA (Washington State School Director's Association)
- WEA

Language Access

The board believes that parents/guardians are a critical part of student success and should be included in the education process. Part of this inclusion involves being provided with accessible information that allows them to make informed choices regarding their children's education. As such, the School District will attempt to meet the communication needs of limited-English Proficient (LEP) parents/guardians by ensuring documents, activities, and meetings are accessible to them, regardless of the language(s) they speak.^{1 2 3}

I. Identification

1. The School District will (*define a timeline – recommended no less frequently than annually*) identify individuals within its service area that are in need of language services in order to inform resource allocation for interpretation and translation. Individuals and/or families may be identified as LEP through one, or a combination of, the following methods:
 - a. Demographic Analysis
 - b. Self-Identification⁴
 - c. School Personnel Identification

This information will be collected and maintained in a central database (as described in Section IV).

II. Interpreter/Translator Training and Qualifications

1. All School District staff and community volunteers will be regularly trained in:
 - a. the School District's adopted language access policy and procedures and how to ensure provision of language access to LEP persons
 - b. how to access interpreters (telephonically and in person)
 - c. how to work with interpreters and translators (including ethics, mechanics, and role)
2. In-person interpreters may be trained multilingual staff⁵, contracted interpreters, trained community volunteers, or trained students (only in limited capacities and settings). Any person

¹ "The district and its staff shall: A. Communicate, whenever feasible, with parents of English language learners in a language they can understand;" 2110, *WSSDA Policy Reference Manual*

² "The Board recognizes the cultural diversity of students, staff, parents and community members of our School District and acknowledges the educational importance of valuing the diversity of all people in our pluralistic society. Diversity includes but is not limited to: race, religion, gender, culture, age, physically challenged and all other perceived differences." 2133, *WSSDA Policy Reference Manual*

³ "Each school improvement plan or process shall be based on a building self-review that includes the active participation and input of building staff, students, parents and community members." 2005, *WSSDA Policy Reference Manual*

⁴ This information is already required of the child upon registration – "the parents/guardians of each student shall be asked to complete a home language survey which identifies the child's primary language." 2110p, *WSSDA Policy Reference Manual*

⁵ The *WSSDA Policy Reference Manual* (Policy 5050) references "Paraprofessionals who are hired primary as translator."

interpreting or translating within the school setting (including multilingual staff working as interpreters and/or translators) will

- a. be trained in interpretation and translation ethics, mechanics, and role
 - b. have their language proficiency independently tested or evaluated.
3. Students who have successfully completed an interpretation training program may interpret for social events. At no time will students, trained or otherwise, be used as interpreters for confidential, high-stakes, or legal matters.
4. The School District will make interpreter services available in-person and over-the-phone (telephonic).
5. All translation work that is produced by the School District will go through a comprehensive quality control process that includes a mechanism to ensure that provided translations are accurate and appropriate for the context for which they are developed.

III. Interpretation and Translation Services

1. The School District will ensure LEP families have meaningful access to the School District's programs and services. The School District will develop and implement a process and procedure for providing language resources and services for parents/guardians who are in need of interpretation and/or translation.⁶
2. The School District will provide a qualified interpreter for LEP parents/guardians at district or school sponsored events and activities when information is being communicated regarding academic, administrative, or legal issues.
3. The School District shall maintain a list of Core Documents (to be reviewed and updated annually) that are translated into the most common languages in the School District catchment area and are in the following category of services:
 - a. Academic
 - b. Administrative
 - c. Legal
 - d. Periodical
4. If a document is not available in translated form, SD must inform the family of the process to receive an oral interpretation of the information, in a language that is understood by them.⁷

⁶"Keep families informed of the objectives of district educational programs as well as of their child's participation and progress with these programs. (This could be accomplished through newsletters, the district website, translated materials, school and district reader boards, etc.)" 4129p, WSSDA Policy Reference Manual

⁷ As it directly related to Special Education, "Prior written notice and the notice of procedural safeguards must be provided in the native language of the parent or other mode of communication used by the parent unless it is clearly not feasible to do so. If the native language or other mode of communication of the parent is not a written language, the district will take steps to ensure that the notice is translated orally or by other means to the parent. This may involve: Arranging for an interpreter if English is not the native language of the parent or if the parent has a hearing impairment; or Providing notice orally if the written language is not a native language." 2161p, WSSDA Policy Reference Manual

5. The School District shall provide translated documents in all languages regardless of the level of population in that language for situations involving:
 - a. Special Education^{8 9 10 11}
 - b. Section 504
 - c. Disciplinary Proceedings^{12 13 14}
6. At least on an annual basis the School District shall provide notice to all LEP students and parents/guardians in a language they can understand that interpreter services are available to them at no cost and are confidential.¹⁵
 - a. This notice must be distributed in translated form for all predominant languages in the SD to all parent(s)/guardians identified in the LEP database as preferring to communicate in a language other than English.
 - b. For non-predominant languages, SD staff must communicate this information to the parent/guardian through an interpreter if a translated version is not distributed.

⁸ “The district shall take whatever action is necessary to ensure that the parent understands the proceedings of the IEP team meeting, including arranging for an interpreter for parents with deafness or whose native language is other than English.” 2161p, *WSSDA Policy Reference Manual*

⁹ “After the reevaluation is completed, the district will both invite parents to the eligibility meeting and will provide prior written notice of the results of reevaluation to parents in their primary language.” 2161p, *WSSDA Policy Reference Manual*

¹⁰ “Parents are members of the IEP team and shall have the opportunity to fully participate. The district will make sure that the parents understand the proceedings, including arranging for an interpreter for parents who are deaf or whose native language is other than English. The district will also ensure that meeting locations are accessible. The special education department (*or name appropriate personnel*) is responsible for coordinating interpreters and making arrangements for the meeting location.” 2161p, *WSSDA Policy Reference Manual*

¹¹ In regards to receiving informed consent from the parent or adult student, “Has been fully informed of all information that is relevant to the activity for which the district is asking consent, and that the information is provided in his or her native language or other mode of communication.” 2161p, *WSSDA Policy Reference Manual*

¹² “Prior to suspension or expulsion, the parent shall be notified in writing in his/her primary language that the student has unexcused absences.” 3122, *WSSDA Policy Reference Manual*

¹³ “Each unexcused absence shall be followed by a warning letter to the parent of the student. Each notice shall be in writing in English or in the primary language of the parent.” 2122p, *WSSDA Policy Reference Manual*

¹⁴ “A long-term suspension or expulsion may be imposed by the principal only after a fair hearing is made available to the affected student and parent. Written notice of the hearing shall be delivered to the parent and student by certified mail or in person. The notice shall be in the parent’s primary language and shall supply (1) the alleged misconduct and the school rules alleged to have been violated, (2) the recommended corrective action or punishment, (3) the right to a hearing, (4) the notice that if a written request for a hearing is not received by the staff member named in the notice within 3 school business days after the notice is received, the hearing shall be waived and the recommended corrective action or punishment shall take effect, and (5) the date by which the request for a hearing must be received.” 3241, *WSSDA Policy Reference Manual*

¹⁵ “Parent/Guardian Notification: Communication with parents/guardians should be provided, when feasible, in the parents’ primary language.” 2110p, *WSSDA Policy Reference Manual*

IV. Training

1. The SD shall train all employees and volunteers working with students and families on the language access plan, procedures for providing an interpreter, and the skills necessary to work effectively with an interpreter. The training program shall include annual updates for all staff as well as procedures for training new staff on the language access plan policy and procedure throughout the year as new employees start working.

V. Recordkeeping/Data Collection

1. The SD shall maintain records of all of the language assistance services it provides, including, but not limited to:¹⁶
 - a. Number of students and parent(s)/guardian(s) identified as LEP.
 - b. Number of students and parent(s)/guardian(s) who accessed interpreter and translator services.
 - c. A list of translated documents by category, purpose, and language (e.g. Disciplinary, Notice of short term suspension, Spanish, Somali, etc.).
 - d. Yearly total of the number of meetings at which interpretation services were provided, broken down by purpose and language.
 - e. The annual budget for language assistance services.
 - f. The number of Department employees whose full time job is to provide such language assistance services.
 - g. The number of Department employees who were utilized as interpreters in addition to their primary employment.
 - h. Annual attendance of all staff in language access trainings.
 - i. Number of trained/certified interpreters and translators available.
 - j. Number of newly trained/certified interpreters and translators.

The School District will include this language access data within its annual reports.¹⁷

2. The School District will maintain a central database that includes:
 - a. a list of interpreters/translators available at each school within the district and the languages they speak
3. Each school shall designate a person (or a committee of persons) who is in charge of the information gathered in Section 1 and maintained in a central database. At minimum, this LEP list shall contain:
 - a. Name of student
 - b. Name(s) of Parent(s)/Legal Guardian(s)
 - c. Preferred language of the student

¹⁶ “The district will maintain records of eligible students and comply with state reporting requirements. Original documents will be kept in the student cumulative folder and copies in the program folder if applicable. These documents include the home language survey, parent notification letters, parental waiver (if applicable), and language proficiency test assessment data.” 2110p, *WSSDA Policy Reference Manual*

¹⁷ Some of this data is already required in the school improvement plan. “Each school improvement plan or process shall address the following elements: ... Educational equity factors including gender, race, ethnicity, culture, language and physical and mental ability; ... parent and community involvement; and [o]ther factors identified by the school community for inclusion in the plan or process.” 2005, *WSSDA Policy Reference Manual*

- d. Preferred language of the Parent(s)/Legal Guardian(s)
 - e. Name(s) of interpreters against whom the Parent(s)/Legal Guardian(s) have filed any complaints
- 4. Each School in the School District will also maintain a list of interpretation resources. This list will delineate the type of interpreter and may include, but is not limited to, telephonic interpretation options, in-house trained multilingual staff, trained community volunteers, and contract interpreters.
 - a. All staff, including teachers, shall have access to relevant information regarding those students and parents identified as LEP and to available resources through SD.
- 5. All interpreter interactions shall be recorded in a central database by School District staff. The documentation will include:
 - a. Name of interpreter
 - b. Name of student or family member
 - c. Whether the interpreter used was in-person or via telephone

VI. Quality Control, Efficiency and Self-Monitoring

- 1. The School District will conduct periodic audits to verify that LEP students and parents/guardians understand their rights with regard to interpreter/translation services and are satisfactorily receiving them. SD will identify responsible personnel and procedures to take corrective action when necessary
- 2. The School District will ensure that all schools within their jurisdiction are in compliance with this policy by requiring each school to submit verification that procedures are in place to:
 - a. Identify LEP students and parents/guardians
 - b. Ensure core documents are translated, are of high quality, and readily available to schools and parents/guardians.
 - c. Ensure on-site and over-the-phone interpretation services are available and that students and parents/guardians in both predominant and non-predominant languages have been provided notice of their rights.
 - d. Ensure that multi-lingual signs are posted in conspicuous locations or near the primary entrance of each appropriate district facility.
- 3. Each School District shall designate a person who shall be directly responsible to the superintendent for monitoring and coordinating the district's compliance with the language access requirements. This employee shall investigate any complaints communicated to the School District regarding language assistance services.
- 4. At least annually the School District shall publish a notice in a manner that is reasonably calculated to inform all students, students' Parent(s)/Legal Guardian(s), and employees: the name, office address, telephone number of the employee named in section 3.
- 5. SD shall establish a complaint process for LEP parents and legal guardians who believe they are not receiving the interpreter and translator services they need to reasonably access and benefit from school services.

- a. SD will inform parents of the complaint process in a language they can understand.
- b. SD will clearly identify staff and contact information for following the complaint process.

Administrative Handbook

I. Identification

1. The School District will *(define a timeline – recommended no less frequent than annually)* identify individuals within its service area that are in need of language services in order to inform resource allocation for interpretation and translation. Individuals and/or families may be identified as LEP through one, or a combination of, the following methods:
 - a. Demographic Analysis
 - i. **Some of the ways this can be accomplished include:**
 1. **School Race/Ethnicity Survey Data**
 2. **Home Language Survey Data**
 3. **National resources such as census.gov or mla.org**
 - b. Self-Identification
 - i. At the beginning of each school year, all parents will be asked to identify, either verbally or in writing, the preferred language in which they would like to communicate. The SD will ask the question: Which language do you prefer for written and spoken communication with the District?
 - ii. The SD will develop methods for collecting and maintaining this information. The information gathered in this process will be used to determine outreach needs, language appropriate services for individual families and as a tool for determining staffing needs.
 - c. School Personnel Identification
 - i. At times, a parent or legal guardian may not self-identify as limited English proficient. However, the obligation to provide meaningful access to the programs and services offered by schools remains.
 - ii. As such, school personnel have an independent obligation to seek out interpreter services for families where communication barriers are identified, regardless of whether the family requests those services or not. A family may not be aware of the availability of free interpreter services or may feel uncomfortable requesting those services. Either way, school personnel should assure the LEP individual that the services are available and that communication is important.
 - iii. As school personnel meet and work with students and parents and/or guardians, they may identify them as LEP and ask the principal to place the child or parents and/or guardians on the LEP list. This should be confirmed with parents before services are rendered.

This information will be gathered, maintained, and updated in a central database (as described in Section IV).

II. Interpreter/Translator Training and Qualifications

1. In-person interpreters may be trained multilingual staff, contracted interpreters, or trained community volunteers. Any person interpreting or translating within the school setting (including multilingual staff working as interpreters and/or translators) will
 - a. be trained in interpretation and translation ethics, mechanics, and role
 - b. have their language proficiency independently tested or evaluated.
 - i. Interpreting requires a skill set beyond fluency in a second language. SD will establish a mechanism to ensure that interpreters are competent and appropriate for the context for which they are engaged (i.e. interpreters and translators are trained and are knowledgeable of relevant terminology, procedures, and interpreter ethics). SD will create a policy regarding interpreter qualifications that at a minimum will include training on educational terminology, interpreter role and ethics.
2. Students who have successfully completed an interpretation training program may interpret for social events. At no time will students, trained or otherwise, be used as interpreters for confidential, high-stakes, or legal matters.
3. All translation work that is produced by the School District will go through a comprehensive quality control process that includes a mechanism to ensure that provided translations are accurate and appropriate for the context for which they are developed.
 - a. Documents translated by contracted vendors go through quality control measures agreed upon in the contractual agreement. Quality control measures may include, but are not limited to:
 - Translation by a seasoned professional
 - Translation memory software
 - Pre-established bilingual glossaries of SD terminology
 - Pre-established foreign-language style guides.
 - b. This process should also apply to all translated content available on the SD website. Because translations require a special skill set beyond language proficiency, students will not act as translators for documents that will be distributed to LEP families.
 - c. SD will establish a mechanism to ensure that provided translations are accurate and appropriate for the context for which they are developed.

III. Interpretation and Translation Services

1. The School District shall ensure LEP families have meaningful access to the School District's programs and services. The School District will develop and implement a process and procedure for providing language resources and services for students and parents/Legal Guardians who are in need of interpretation and/or translation.
 - a. SD has three primary ways of communicating with LEP families: (1) through the use of interpreter services, (2) through direct communication from multilingual staff, or (3) through the development of translated materials.

- b. SD will determine the appropriate mix of these services to ensure LEP families have meaningful access to their programs and services. SD will develop and implement a process and procedure for providing language resources and services for students and parents who are in need of interpretation and translation
- c. Interpreter and/or translator services may include, but are not limited to the following events:
 - i. Academic
 - 1. Teacher conferences
 - 2. Counselor meetings
 - 3. Entitlement to public education
 - 4. Access to or placement in any academic program
 - 5. Program changes that impact students
 - 6. Tutoring
 - 7. Supplemental services
 - 8. Summer school
 - 9. Transportation
 - 10. Scholarships
 - 11. Special education services
 - ii. Administrative
 - 1. Attendance issues
 - 2. Registration, application, and selection
 - 3. Parent handbooks
 - 4. Extracurricular activities
 - 5. Public meetings
 - 6. Social service programs
 - 7. Policies and procedures
 - 8. Grades and report cards
 - 9. Standards and performance
 - 10. Transfers
 - 11. Discipline
 - 12. Legal
 - iii. Civil rights and non-discrimination policies and procedures
 - 1. Harassment policies and procedures
 - 2. IEP team meetings and assessments
 - 3. 504 team meetings, evaluations, and accommodation plans
 - 4. Student discipline hearings
 - 5. Law enforcement
 - 6. Child protection
 - 7. Free and reduced meals
 - 8. Alternative language education placement
 - 9. Discrimination complaints
 - 10. Student manifestation hearing

11. Right to an interpreter

iv. Health and Safety

1. Health and safety notices

2. Medical emergency

2. The School District will provide a qualified interpreter for LEP students and/or parents/guardians at district or school sponsored events and activities when information is being communicated regarding academic, administrative, or legal issues.
3. The School District will make interpreter services available in-person and over-the-phone (telephonic).
 - a. Use of telephonic interpreter services is an appropriate part of the mix of services that a SD may chose to meet the needs of their LEP students and families. However, telephonic interpreter services may not be appropriate for all school settings.
 - b. Therefore, the SD should develop a policy for the appropriate use of telephonic interpreter services. That policy should contain information regarding the appropriate settings for the use of telephonic interpreters and how to access those services.
 - c. Telephonic interpreter service providers may be available to assist a SD in determining the language needs of a particular LEP individual, should the school personnel be unable to identify the language needs independently in consult with the LEP person.
4. Translation: Translation of school materials is necessary to ensure that LEP families have access to the information they need to make informed choices regarding their children's education. Translation requires a special skill set that is unique from the skill set necessary for interpretation. The SD will develop a policy regarding the skills necessary for appropriate translation, including the steps that will be taken to verify a translation before a document is circulated.
5. The School District shall maintain a list of Core Documents (to be reviewed and updated annually) that are translated into the most common languages in the School District catchment area and are in the following category of services:
 - a. Academic
 - b. Administrative
 - c. Legal
 - d. Periodical
6. If a document is not available in translated form, SD must inform the family of the process to receive an oral interpretation of the information, in a language that is understood by them.
7. The School District will provide translated documents in all languages regardless of the level of student population in that language for situations involving:
 - a. Special Education
 - b. Section 504
 - c. Disciplinary Proceedings
8. At least on an annual basis, the School District shall provide notice to all LEP students and parents/guardians in a language they can understand that interpreter services are available to them at no cost and are confidential.

- a. This notice must be distributed in translated form for all predominant languages in the *SD* as determined by the enrollment of X students and or parent(s)/guardians identified in the LEP database as preferring to communicate in these languages.
- b. For non-predominant languages, *SD* staff must communicate this information to the parent/guardian through an interpreter.

IV. Training

- 1. All School District staff and community volunteers will be regularly trained in:
 - a. the School District's adopted language access policy and procedures and how to ensure provision of language access to LEP persons;
 - b. how to access interpreters (telephonically and in person); and
 - c. how to work with interpreters and translators (including ethics, mechanics, and role [e.g. where to stand, how to address an interpreter])
- 2. All SD employees will be trained annually regarding their responsibilities to:
 - i. Identify and document LEP parents/guardians and their home language.
 - ii. Notify LEP parents/guardians of their language access rights and preferred communication methods and languages for documents.
 - iii. Provide and document services to LEP parents/guardians.

V. Recordkeeping/Data Collection

- 1. The *SD* shall maintain records of all of the language assistance services it provides, including, but not limited to:
 - a. Number of students and parent(s)/guardian(s) identified as LEP.
 - b. Number of students and parent(s)/guardian(s) who accessed interpreter and translator services.
 - c. A list of translated documents by category, purpose, and language (e.g. Disciplinary, Notice of short term suspension, Spanish, Somali, etc.).
 - d. Yearly total of the number of meetings at which interpretation services were provided, broken down by purpose and language.
 - e. The annual budget for language assistance services.
 - f. The number of Department employees whose full time job is to provide such language assistance services.
 - g. The number of Department employees who were utilized as interpreters in addition to their primary employment.
 - h. Annual attendance of all staff in language access trainings.
 - i. Number of trained/certified interpreters and translators available.
 - j. Number of newly trained/certified interpreters and translators.

The School District will include this language access data within its annual reports.

- 2. The School District will maintain a central database that includes:
 - a. a list of interpreters/translators available at each school within the district and the languages they speak

3. Each school shall designate a person (or a committee of persons) who is in charge of the information gathered in Section 1 and maintained in a central database. At minimum, this LEP list shall contain:
 - a. Name of student
 - b. Name(s) of Parent(s)/Legal Guardian(s)
 - c. Preferred language of the student
 - d. Preferred language of the Parent(s)/Legal Guardian(s)
 - i. It may be useful to note English proficiency differences between parents/guardians in multi-parent households.
 - e. Name(s) of interpreters against whom the Parent(s)/Legal Guardian(s) have filed any complaints
 - i. SD staff shall avoid using these interpreters for this student and family in the future.
4. Each School in the School District will also maintain a list of interpretation resources. This list will delineate the type of interpreter and may include, but is not limited to, telephonic interpretation options, in-house trained multilingual staff, trained community volunteers, and contract interpreters.
 - a. All staff, including teachers, shall have access to relevant information regarding those students and parents identified as LEP and to available resources through SD.
5. All interpreter interactions shall be recorded in a central database by School District staff. The documentation will include:
 - a. Name of interpreter
 - b. Name of student or family member
 - c. Whether the interpreter used was in-person or via telephone

VI. Quality Control, Efficiency and Self-Monitoring

1. The School District will conduct periodic audits to verify that LEP students and parents/guardians understand their rights with regard to interpreter/translation services and are satisfactorily receiving them. SD will identify responsible personnel and procedures to take corrective action when necessary.
 - a. SD will, on an ongoing basis, maintain records concerning interpreter/translation job performance and will identify responsible personnel and procedures to take corrective action when necessary.
 - b. Trained/Certified multilingual staff and contracted on-site interpreters will be monitored for quality by via spot-checks from designated SD staff. Additionally, parent surveys are periodically distributed to obtain feedback on the interpretation/translation services provided.
2. The School District will ensure that all schools within their jurisdiction are in compliance with this policy by requiring each school to submit verification that procedures are in place to:
 - a. Identify LEP students and parents/guardians
 - b. Ensure core documents are translated, are of high quality, and readily available to schools and parents/guardians.
 - c. Ensure on-site and over-the-phone interpretation services are available and that students and parents/guardians in both predominant and non-predominant languages have been provided notice of their rights.

- d. Ensure that multi-lingual signs are posted in conspicuous locations or near the primary entrance of each appropriate district facility.
3. Each School District shall designate a person who shall be directly responsible to the superintendent for monitoring and coordinating the district's compliance with the language access requirements. This employee shall investigate any complaints communicated to the School District regarding language assistance services.
4. At least annually the School District shall publish a notice in a manner that is reasonably calculated to inform all students, students' Parent(s)/Legal Guardian(s), and employees: the name, office address, telephone number of the employee named in section 3.
5. SD shall establish a complaint process for LEP parents and legal guardians who believe they are not receiving the interpreter and translator services they need to reasonably access and benefit from school services.
 - a. SD will inform parents of the complaint process in a language they can understand.
 - b. SD will clearly identify staff and contact information for following the complaint process.
 - i. Parents/legal guardians who believe they are not getting the interpreter/translation services they need to reasonably access information regarding school services may request a meeting with the school principal or department head.

All LEP parents/ legal guardians will be notified of the complaint resolution procedure at the beginning of every school year, in a language they understand.

- Complaint resolution procedures should be a core document that is translated for both predominant and non-predominant languages.
- This document should be available to front desk staff as well as community-based organizations and other community partners.
- It should include, but is not limited to, the following:
 - Guide outlining the steps to be taken along with relevant timelines when filing a complaint
 - List of the key resource individuals and their responsibilities within the school or SD that are available to LEP parents/legal guardians
 - Notice of opportunities to meet with specialized personnel, counselors, multilingual teachers e.g. at open houses and curriculum nights, etc.

Sample Complaint Process/Dispute Resolution Procedure:

1. Upon request of the parents/legal guardians, a conference will be scheduled with the principal or department head in an effort to clarify and understand the situation. SD will provide an interpreter and every attempt will be made to resolve the issues/concerns.
2. If the issues/concerns are not resolved through this conference, parents/legal guardians may request a meeting with appropriate designated SD staff member/employee for further review.
3. Appropriate designated SD staff member/employee will make the final decision and notify the parents/legal guardians of that decision.
6. Examples of methods of providing notice include:
 - Post and maintain multi-lingual signs in intake areas and other entry points.
 - State in all outreach documents, both English and translated versions, that language services are available.

- Work with community-based organizations to inform LEP persons of their rights to language access and the methods of language assistance available through the SD.
- Use a telephone voice mail menu in the most common languages encountered.
- Offer an initial interview opportunity to each of the LEP families to share all support services available to their child.
 - Provide front desk staff with a multi-lingual sheet that allows individuals to identify themselves as a speaker of a language other than English.
 - Provide notice to LEP families on non-translated documents that the family can contact SD to receive interpretation of document in a language that they understand

Various forms of communication e.g. telephonic messages, media, CBOs, outreach, etc.

Definitions, References, Etc...

Definitions

Interpreter – is an individual who is fluent in the languages necessary in order to facilitate accurate oral communication between two or more individuals who do not speak the same language and who is trained in the process of interpreting and interpreter ethics.

Translator – is an individual who provides a written communication in a second language having the same meaning as the written communication in a first language, and who has been trained in the skills necessary to render an appropriate translation, under the circumstance.

LEP (Limited English Proficient) Person – is an individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This individual may be entitled to language assistance with respect to a particular type or service, benefit, or encounter.

Support Services – any service not related to regular classroom instruction, i.e. lockers, IEP, section 504, parent/teacher conferences, student discipline, free and reduced lunch, health/medical services, etc.

LEP List – is a list the school maintains and continuously updates in a database that contains the names of all currently enrolled LEP students or their parents/guardians and the preferred language in which they would like to communicate. This list is used to identify individuals in need of reasonable interpreter/translation necessary to gain access to support services.

SD for “School District” - term used throughout this document as a generic term for the entity where it would be appropriate to adopt a policy similar to this model policy.

IX. Legal References

I. Federal and State Assurances

To receive funding from the U.S. Department of Education, the Office of Superintendent of Public Instruction (OSPI) assures that OSPI and its contractors, subcontractors, sub-grantees, and others with whom it arranges to provide services or benefits comply with federal civil rights laws, including Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving Federal financial assistance.¹⁸

As a precondition to receiving any federal or state funding, all School Districts make assurances to OSPI that they will comply with federal and state civil rights statutes and administrative regulations, including Title VI and Washington's Law against Discrimination (RCW 49.60).¹⁹ Compliance with these laws and regulations is a requirement for *SD* to receive any federal or state funding.

II. State and Federal Civil Rights Laws: Title VI of the Civil Rights Act of 1964 and RCW 49.60 (Washington Law Against Discrimination)

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits differential treatment on the basis of race, color, or national origin in any program or activity receiving Federal financial assistance, including public schools.²⁰ Washington's Law against Discrimination (RCW 49.60) and E2SHB 3026 (Laws of 2010, ch. 240) also prohibit discrimination on the basis of national origin in public schools.²¹ Under E2SHB 3026 (Laws of 2010, ch. 240), OSPI has the authority and the responsibility to enforce and monitor *SD* compliance with these laws and regulations and to develop rules and guidelines to eliminate discrimination based on the protected classes.

Title VI requires that individuals with limited English proficiency be given equal access to federally assisted programs.²² *SD* may not deny parents' right to participate in their children's

¹⁸ U.S. Department of Education, Office for Civil Rights, Assurance of Compliance – Civil Rights Certificate, OMB Approval No. 1870-0503.

¹⁹ Office of Superintendent of Public Instruction, iGrants, General Assurances for All Federal and State Programs (2009-10).

²⁰ See 34 C.F.R. §100.3.

²¹ Under RCW 49.60 and E2SHB 3026, "National origin" includes "ancestry."

²² See Exec. Order No. 13166, 69 Fed. Reg. 50121 (Aug. 11, 2000); Federal Interagency Working Group on Limited English Proficiency, *Commonly Asked Questions and Answers Regarding Executive Order 13166*, <http://www.lep.gov/13166/lepqa.htm>

education because of their limited English proficiency.²³ *SD* must ensure meaningful access to all programs and activities by LEP students and parents.²⁴

Under Title VI, *SD* must communicate with and provide public notification materials to LEP parents in a language they can understand.²⁵ *SD* must adequately notify LEP parents of all school activities that are called to the attention of other parents.²⁶ Notification must be sufficient so that parents can make well-informed decisions about the participation of their children in a district's program and services.²⁷

Written materials that are provided in English shall be provided to LEP parents in a language they can understand.²⁸ This is particularly important for vital documents.²⁹ A document is considered vital if it contains information that is critical for obtaining services or benefits, or is required by law.³⁰ Vital documents include, for example: applications, consent and complaint forms, notices of rights, notices of disciplinary action, notices advising LEP persons of the availability of free language assistance, and letters or notices that require a response.³¹

The obligation to provide meaningful access to LEP parents is not limited to written translations; interpretation of oral communications is also necessary.³² *SD* shall supply competent language interpreting services free of cost.³³ In rare emergency situations, *SD* may have to rely on an LEP person's family members or other persons whose language skills and competency in interpreting have not been established.³⁴ Proper planning and implementation by *SD* is necessary to ensure that such situations rarely occur.³⁵

²³ *Id.*

²⁴ *Id.*

²⁵ U.S. Department of Education, Office for Civil Rights, Memorandum Regarding Language Minority Children (May 25, 1970).

²⁶ *Id.*

²⁷ *Id.*

²⁸ Exec. Order No. 13166, 69 Fed. Reg. 50121 (Aug. 11, 2000); See Federal Interagency Working Group on Limited English Proficiency, *Commonly Asked Questions and Answers Regarding Executive Order 13166*, <http://www.lep.gov/13166/lepqa.htm>

²⁹ See *Id.*, Federal Interagency Working Group on Limited English Proficiency, *Commonly Asked Questions and Answers Regarding Executive Order 13166*, <http://www.lep.gov/13166/lepqa.htm>

³⁰ *Id.*

³¹ *Id.*

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ *Id.*

To ensure that all programs and activities are effectively providing LEP parents equal access, *SD* should identify students and parents whose home language is not English.³⁶

III. Elementary and Secondary Education Act (ESEA)

a. ESEA Title I, Part A: Improving the Academic Achievement of the Disadvantaged

ESEA Title I, Part A requires *SD* to implement effective means of outreach to parents of LEP students to inform those parents of how they can be involved in the education of their children and be active participants in assisting their children to attain English proficiency, achieve at high levels in core academic subjects, and meet the state academic standards.³⁷ To be effective, such outreach shall be in a language that parents can understand.

b. ESEA Title I, Part C: Migrant and Bilingual Education

ESEA Title I, Part C requires parental involvement activities to be conducted in a format and language understandable to parents. Communication and public notification materials to LEP parents shall be in a language they can understand.”³⁸

c. ESEA, Title III: Language Instruction for Limited English Proficient and Immigrant Students

SD using funds provided under ESEA Title III are required to implement an effective means of outreach to parents of limited English proficient children to inform such parents of how they can be involved in the education of their children, and be active participants in assisting their children to learn English, to achieve at high levels in core academic subjects, and to meet the state academic standards.³⁹ Effective outreach requires that school-home communication be in a language that parents can understand.

IV. WAC 392-160-010 (Migrant and Bilingual Education)

Under WAC 392-160-010 (Migrant and Bilingual Education), each School District board of directors shall communicate with parents of students in the bilingual program, or alternative instruction program, in a language they can understand.

³⁶ See U.S. Department of Education Office for Civil Rights, *The Provision of an Equal Education Opportunity to Limited-English Proficient Students* (Aug. 2000), <http://www2.ed.gov/print/about/offices/list/ocr/eeolep/index.html>

³⁷ ESEA Title I, Part A, Sec. 1118.

³⁸ See ESEA Title I, Part C, Sec. 1304 (Title I, Part C requires an *SD* to conduct parental involvement activities “in a manner that provides for the same parental involvement as is required for programs and projects under section 1118, unless extraordinary circumstances make such provision impractical”).

³⁹ ESEA, Title III, Sec. 3302(e).