



## Translation and Interpretation Services Plan

### Table of Contents

- **Purpose & Overview**
- **Federal Law**
- **Identification of Household Communication Preferences**
- **Notification of Translation & Interpretation Services**
- **Translation & Interpretation Resources**
- **Quality Assurance & Training**
- **Evaluation & Monitoring**

### Purpose & Overview

The Cherokee County School District (CCSD) recognizes the importance of effective and meaningful communication with parents/guardians with limited English proficiency. Our goal of engaging and involving families in their children's education and ensuring that they have equal access to information is a continued priority.

For the purposes of this plan, *translation* is defined as a written version of a document provided in a different language than the original version of the document. *Interpretation* is defined as spoken information provided in another language.

In order to support multilingual families, CCSD will:

- Develop and annually update (by September 1<sup>st</sup> of each year) a district plan for translation and interpretation services;
- Provide families the opportunity to request written and/or oral communications in a language other than English, and inform families of the availability of these services at no cost to them;
- Identify families who have requested written and/or oral communications in a language other than English and maintain this information in a manner that is easily accessible to district and school staff (see page 3);

- Increase the availability and accessibility of interpreters and translators, and maximize available resources by providing guidance on determining the mode of communication that best serves families in any given situation;
- Improve the quality of the translation and interpretation services provided by the district;
- Monitor usage of requests from schools or families to ensure families are receiving communications in the language they have requested.

## **Federal Law**

Under relevant statutory and case law, in order to avoid discrimination on the basis of national origin against persons with limited English proficiency, recipients of federal assistance from the U.S. Department of Education must take appropriate steps to ensure that persons with limited English proficiency receive the language assistance necessary to allow meaningful access to services, free of charge.

The Office for Civil Rights (OCR) of the U.S. Department of Education relies on Title VI of the Civil Rights Act and a May 25, 1970 memorandum created by the Office for Civil Rights entitled “Identification of Discrimination and Denial of Services on the Basis of National Origin” (“The May 25th Memorandum”) as its guidance in providing appropriate services to persons with limited English proficiency.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin. Under Title VI, “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.”

The May 25th Memorandum lists a number of “major areas of concern” relating to compliance with Title VI. Among them is the “responsibility of school districts to adequately notify national origin-minority group parents of school activities called to the attention of other parents.” These notices, the 1970 memo adds, “may have to be provided in a language other than English” in order to be adequate. It is important to note that in the May 25th Memorandum has never been withdrawn. In fact the United States Supreme Court upheld its provisions in a landmark 1974 decision, [*Lau v. Nichols*, 414 U.S. 563 (1974)].

References, by date:

[OCR Dear Colleague Letter, English Learner Students and Limited English Proficient Parents \(01/7/2015\)](#)

[OCR Fact Sheet, Information for Limited English Proficient Parents and for Schools and School Districts that Communicate with Them \(Jan. 2015\)](#)

[Lau v. Nichols, 414 U.S. 563 \(1974\)](#)

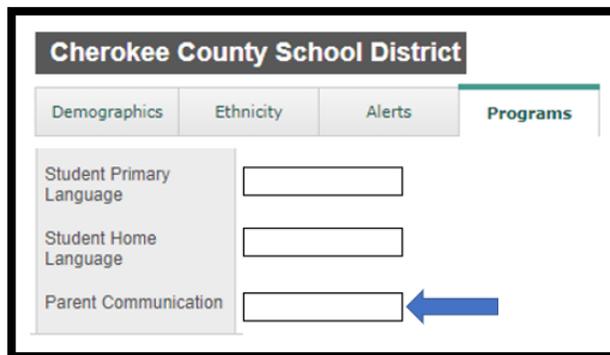
[OCR May 25, 1970 Memorandum, "Identification of Discrimination and Denial of Services on the Basis of National Origin"](#)

[Title VI of the Civil Rights Act of 1964 42 U.S.C. § 2000d et seq](#)

### Identification of Household Communication Preferences

During the student registration process, all parents/guardians indicate a household language preference for written and oral communications by answering questions included in the online registration process. Families may also make changes to these preferences at any time by notifying district or school staff.

Parent communication language preferences are recorded on the *Programs tab* in the district's student information system. This area is easily accessible and prominently visible to student information system users.



### Notification of Translation & Interpretation Services

Families with a household communication language preference other than English are informed by CCSD registration staff upon enrollment of the availability of translation and interpreting services at no cost to them. Families are also provided with an experience survey link and the contact information for the Coordinator of Federal Programs should they need assistance accessing translation or interpretation services. This information is also posted on the district website and linked on school websites.

Furthermore, all school sites, program sites, and district offices will display multilingual signage informing parents of the availability of interpretation services in a location visible to families.

### Translation & Interpretation Resources

Cherokee County School District engages the Request for Proposals (RFQ) process annually to solicit proposals from language service vendors who are qualified and approved to serve as

translators and interpreters. This contact list is maintained and accessible at all times at the district level. Requests for language support services (translation and interpretation) are made on the behalf of families by school and district staff using the request platform found on the district's intranet. Entries are processed and services are secured and communicated back to the requestor to plan accordingly.

The use of family members, children (including students), and friends for the provision of language assistance is not acceptable. The use of such individuals raises issues of confidentiality, privacy, or conflict of interest. Furthermore, in many circumstances, such persons are not competent to provide quality, accurate interpretations or translations. CCSD will not rely on such individuals to provide families with meaningful access to important information. Even when families choose to provide their own interpreter or translator, a district-approved source for translation/interpretation must be provided in order to meet the district's obligation to ensure that translation and interpretation are accurate.

The use of minor children as interpreters and/or translators also raises particular concerns about competency, quality, and accuracy. Additionally, children under the age of 18 years old cannot be bound to confidentiality regulations under FERPA. It is also not advisable to rely on children to convey information about their own education and/or complex situations. Accordingly, minor children can never fulfill the requirement for adequate interpretation or translation for communication purposes between families and district or school staff.

### **Quality Assurances & Training**

The Federal Programs Department provides guidance, training, and technical assistance to staff on the process of ascertaining the need and the best means for providing translations and/or interpretations. In general, written materials routinely provided to parents/guardians in English will be provided in high frequency preferred household communication languages. Current district demographics necessitate Spanish translations as a routine practice in schools with high incidence of English Learners. A document is considered of particularly vital importance when it contains information that is critical for obtaining educational benefits or is required by law.

In addition, when determining the priority of a particular document for translation, the district will consider the importance of the program, information, encounter, or service involved and the consequence to the family if the information in question is not provided accurately or in a timely manner. In live settings, such as parent workshops, conferences, or other face-to-face encounters, a district-approved source for oral interpretation will be provided to parents who have requested oral communication in a language other than English.

The district will budget annually for translation and interpretation expenses in the general fund and, as allowable, in applicable Federal funds for activities related to those programs.

## **Evaluation & Monitoring**

The Federal Programs Department monitors household data maintained in the student information system, translation and interpretation requests, and family feedback in order to ensure effective and meaningful parent communication practices. Professional translation and interpretation companies contracting with CCSD are responsible for ensuring the quality of their translators and interpreters as well as providing any necessary ongoing training and professional learning opportunities.