

**Administrative Procedures for Supporting Language Accessibility for Parents and Guardians Whose Primary Language is Not English
(Attachment for Policy No. 139)**

PURPOSE

The Board of Education (“Board”) is committed to promoting access to School District of Philadelphia (“District”) language accessibility services and activities for parents and guardians whose primary language is not English. These parents and guardians are sometimes referred to as Limited English Proficient (LEP), or Deaf or Hard of Hearing (DHOH). DHOH parents and guardians might communicate using American Sign Language (ASL) or some other system of visual communication. The District strongly supports and encourages the meaningful participation of all parents/guardians in the education of their child. Translation and interpretation services allow parents/guardians of other language backgrounds to be active participants in the school community and communicate effectively with staff, regardless of the language they speak at home.

The purpose of this administrative procedure is to: (1) provide written guidance for staff regarding how and when to access interpretation (spoken) and translation (written) services; and (2) explain the resources and support available from schools and/or the District to deliver translation and interpretation services to parents/guardians whom need them.

DEFINITIONS

For purposes of this policy, terms are defined as follows:

- **American Sign Language (ASL):** a visual-gesture language created for Deaf or Hard of Hearing (DHOH) individuals of all ages.
- **Limited English proficiency (“LEP”):** refers to individuals who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English.
- **LEP parent(s):** refers to the parent(s) or guardian(s) of a student or students enrolled in the District whose primary language is other than English and who have limited English proficiency in one of the four domains of language proficiency (speaking, listening, reading, or writing).
- **Primary Language:** means the primary language spoken by a student’s parent or guardian, or the predominant language spoken in the student’s home. Parents may have more than one primary language and/or dialect.
- **Interpretation:** relies on the spoken word. It refers to the process of orally rendering communication from one language into another language among speakers of different languages.
 - **Consecutive Interpretation:** Method of interpretation in which the speaker speaks a few sentences and then pauses to allow the interpreter to repeat them in the other language.
 - **Simultaneous Interpretation:** Method of interpreting in which the interpreter interprets the speaker’s message at the same time as the speaker is talking.
- **Translation:** relies on the written word. It refers to the process of converting the written word from one language into another language in a way that is culturally and linguistically appropriate so it can be understood by its intended audience.
- **Home Language Survey (“HLS”):** a survey completed for all students as part of the enrollment process. The survey indicates the language(s) spoken in the home.
- **Top Languages:** the most common primary languages other than English spoken by LEP parents enrolled in the District as identified by the home language survey.

- **Language Access Services** – oral and written language services needed to assist LEP parents to communicate effectively with staff, and to provide LEP parents with access to, and an opportunity to participate fully in, the services, activities, or other programs administered by the District.
- **Qualified Translator or Interpreter:** an in-house or contracted translator or interpreter who has demonstrated their competence to interpret or translate through testing, or certification by a qualified entity, or is authorized to do so by contract.
- **Sight Translation:** oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.
- **Languages of lesser diffusion:** refers to languages for which there are not many speakers.

PROCEDURES

I. The Translation and Interpretation Unit

The Translation and Interpretation Unit is responsible for coordinating all efforts related to language access within the District. It operates within the Office of Family and Community Engagement (FACE) to promote language access as a key consideration in all family engagement initiatives and communications. The Unit:

- Collects and analyzes data every two (2) years to identify and update a list of primary languages spoken by the parent of each child enrolled in school and whether such parent requires language assistance to communicate with the District. Such information will help to enable the provision of appropriate language access services and assist the District in effectively planning and budgeting for services necessary to communicate with parents;
- Provides and coordinates interpretation and translation services to schools and central office teams;
- Serves as primary contact for schools and central office staff for ongoing guidance and support with language access services;
- Provides input regarding appropriate budget allocations for translation and interpretation services;
- Develops and provides language access training for school staff;
- Maintains outside language services vendor contracts; and
- Oversees and monitors the provision of language assistance services provided by FACE to LEP parents including, but not limited to:
 - the number of distinct documents that it translates into the covered languages and the general nature of such documents;
 - the number of meetings at which it provides interpretation services and the languages for which it provides such services;
 - the number of Department employees who provide language access services; and
 - the number of times interpretation services are provided by the District's telephonic service vendor, and the language in which such services are provided.

Inquiries pertaining to this procedure should be directed to: Office of Family and Community Engagement, Translation and Interpretation Unit, Telephone: (215) 400-4180, option 4; Email: translation@philasd.org; Website: <https://www.philasd.org/face/multilingual/>

II. Identifying LEP Parents And Their Language

- The District will promptly identify the language and communication needs of parents/guardians whose primary language is not English to help provide consistent and meaningful access to services and activities.
- Upon student enrollment in the District, parents/guardians complete the Home Language Survey (HLS), which informs the District of the primary language spoken by the parent/guardian of each student enrolled. The HLS shall be translated into the top languages spoken in the District and will be included in the enrollment packet provided to all District parents/guardians. In instances in which it is not feasible to provide written translations of the HLS to a LEP parent, such as in the case of languages of lesser diffusion, the school or office will provide telephonic interpretation or another approved source for interpretation to adequately convey the information orally to parents whose communication needs are not met in written format.
- To determine the need for interpretation or translation services, District and school staff should refer to the student information system which will indicate the parent/guardian's primary language as reported on the HLS.

III. Notification Of Available Services

- District staff and parents/guardians will be annually notified of these procedures and the accompanying Board policy, which can be accessed on the FACE website and made available in the top languages spoken by parents in the District.
- Staff will receive written guidance regarding how and when interpretation and translation services should be accessed, and such guidance will be updated as needed to reflect available services.
- Parents/guardians will also be annually notified regarding the process for filing complaints through the District's policy *906 addressing constituent concerns* and *policy 248 harassment and discrimination* if they believe that language assistance services have not been appropriately provided.

IV. Translator And Interpreter Qualifications

- The District will take reasonable steps to utilize interpreters and translators who have demonstrated language proficiency through certification or similar means; or who are employed by a particular vendor or service contracted to provide translation and interpretation services and are similarly qualified.
- Interpreters and translators utilized by the District will at a minimum have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue, and be trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.
- Parents/guardians may voluntarily choose to decline the District's offer of an interpreter and choose instead to rely on an adult friend/companion or relative for language and interpretation services, but staff may not suggest this as an alternative to providing appropriate language and interpretation services.
- Students and other minor children under the age of 18 may not serve as interpreters or translators for school staff and parents except in an emergency, where there is a clear and imminent danger.

V. Language Accessibility Services

Each school and District office will, consistent with this Policy and Administrative Procedure and law, provide free interpretation and translation services to parents/guardians in order to communicate effectively during interactions with District staff. The next section will discuss language assistance services in detail. There are two primary types of language assistance services: oral and written.

Interpretation Services (oral)

The District will provide interpretation services when necessary and feasible to parents and guardians whose primary language is not English to enable participation in school-based as well as District-wide programs and activities, including but not limited to:

- Meetings of the Board of Education for registered speakers to give testimony
- Parent conferences, information meetings and workshops
- Student discipline, including suspension and expulsion, and disciplinary hearings
- Referral, assessment or placement of students for special education
- Other activities pre-approved by the Translation and Interpreting Unit

Such interpretation services may be provided either at the location where the parent is seeking to communicate or by electronic means, such as telephone or video conferencing.

The following interpretation and translation services are currently available in the District:

- **LanguageLine:** The School District of Philadelphia provides free access to telephonic interpretation to schools and District central offices during school hours. LanguageLine offers interpretation services in over 200 languages. Any school employee can use LanguageLine to communicate with parents/guardians of District students.
 - o [Instructions for offices and schools to use the District's Language Line account](#)
 - o Language Line can also be used for "sight" translation. Once connected with the Language Line interpreter, the assigned school staff will read the communication aloud in English and the Language Line interpreter will repeat in the caregiver's preferred language.
- **Language Hotlines:** If families would like to contact the District for any reason in their primary language, they can call one of the language hotlines. They will be directed to leave a voicemail, and a District interpreter will contact them within 24 hours. If a parent/guardian requires interpretation in a language not listed below, they should speak with school staff to obtain a translator or interpreter. The individual phone numbers for each hotline are as follows:
 - o 215-400-8480 – Albanian
 - o 215-400-8481 – Arabic
 - o 215-400-8482 – Chinese
 - o 215-400-5300 – English
 - o 215-400-8483 – French
 - o 215-400-8484 – Khmer
 - o 215-400-8474 – Portuguese
 - o 215-400-8485 – Russian
 - o 215-400-8489 – Spanish
 - o 215-400-8486 – Vietnamese

- **Robocalls:** These relate to school-level and District-wide messages. They go out in English and the other top languages spoken in the District. School-level messages may be disseminated in additional languages.

Translation Services (Written)

Translation of District Documents

- When at least 5 percent of the District's parent/guardian population or 1,000 persons (whichever is less) speak a primary language other than English, all notices, reports, statements, or records sent to the parents/guardians will, in addition to being written in English, be translated in the top nine primary languages. Central office departments are responsible for arranging translation.
- The Translation and Interpretation Unit staff and qualified contracted vendors are responsible for translating the majority of these documents.
- When the Translation and Interpretation Unit, a school, or office is temporarily unable to translate a document due to resource limitations or if a small number of families require the information in a language other than English such that document translation is not feasible, the Translation and Interpretation Unit, a school, or office will still provide the information to parents/guardians in a language they can understand, such as through competent oral interpretation.

Translation of School Documents

- The principal or designee is responsible for arranging translation of student-level and school-wide documents when necessary and feasible through the school's bilingual counseling assistant (BCA) or the Translation Unit. Examples of school-wide documents to be translated could include: announcements of school-wide programs, school improvement plans, and school-wide family engagement activities.

The following translation services are currently available in the District:

- **Bilingual Counseling Assistant (BCAs):** BCAs serve as a cultural broker and linguistic bridge between school staff, students, families, and community members. BCAs are responsible for translating documents for communication purposes for non-English speaking families at all assigned schools, as well as interpreting the spoken word between school staff, students, and parents/guardians as necessary and feasible.
- **Website translation:** The District's website integrates with Google Translate and aids non-English speaking families with navigating the District's online resources. The website has a translate tab at the top of our webpages. This tab accesses Google Translate to convert our website copy into any language selected. Please note, however, that automated translations are not intended to replace human translators and are provided as a service to users of the District's website, through Google Translate. The District cannot guarantee the accuracy, reliability, or correctness of this software for translations made from English into any other language. Some content (such as images, videos, Flash, etc.) may not be accurately translated due to the limitations of the translation software.
- **Language Web Pages:** Webpages in top primary languages that direct multilingual families to the most pertinent topics for families.
- **TransAct Parent Notices:** The Pennsylvania Department of Education (PDE) provides access to TransAct, an online school document translation service that allows every district, every school, and *every educator* in Pennsylvania with professional multilingual parent notifications to effectively meet the parent communication requirements mandated by federal law. ([PDE's Educating English Learners Webpage](#))

- o The [TransAct Staff Quick Start Guide](#) explains how to (1) register for an account, (2) add parents that will receive the notices, (3) add students associated with parents, (4) find documents and fill-in details, and (5) print or email the notices in up to 22 languages.

VI. Procedures for Requesting Services

District Employee Requests

- Schools and District departments are responsible, as described above, for communicating effectively with parents and guardians whose primary language is not English, and that they obtain qualified interpreters and/or translators for this purpose.
- Employees should follow the procedures outlined on the Translation and Interpretation Unit website in order to meet the requirements set forth in this procedure, visit:
<https://www.philasd.org/face/multilingual/>

Parent/Guardian Requests

- Parents/guardians needing translation or interpretation services should contact their student's school at any time by notifying the office staff, principal, or teacher at their child's school.
- Parents needing translation or interpretation services to access district level services should call the language hotline for their respective primary language, as provided above.

VII. Accommodations for Deaf and Hard of Hearing

All Deaf and Hard of Hearing parents and guardians have a legal right to services and accommodations provided by the District through enhanced communications.

Sign Language Interpretation Services

Parents/guardians can access sign language interpreting services for such activities, including but not limited to report card conferences, IEP meetings, extra-curricular school functions, and Board of Education public meetings. Services are available by completion of the request form located at <https://www.philasd.org/accommodations/sign-language-request-form/> or via email at signlanguagerequest@philasd.org.

Telephone Communications

A telecommunications relay service (TRS) acts as an intermediary between the person who is deaf or hard-of-hearing and the person who uses a standard telephone. All rely on a 'communications assistant' (CA) who either relays the communications via text telephone or, if qualified, sign interprets the hearing participant's communications to the deaf or hard-of-hearing participant's video monitor equipment. In Pennsylvania, a text telephone TRS is available free-of-charge through the Pennsylvania Relay Center Service at: 1-800-654-5988.

VIII. Special Education Requests:

- Consistent with special education requirements, the District will provide translation and interpretation services to parents/guardians with limited English proficiency who have students with disabilities. A request for the translation or interpretation services should be sent to the

school's special education compliance monitor (SPECM) who will coordinate document translation.

IX. Staff Training

All District staff shall be advised at least annually of:

- How to access, or help parents and guardians access, translation and interpretation services;
- Resources and supports available from the school and/or the District for language access services for parents and guardians whose primary language is not English; and
- Training for appropriate school-based and district-level personnel on the procedures and best practices with respect to the District and school's roles in facilitating the provision of services;
- And other information deemed necessary to implement these procedures.