



Rome City Schools Translation and Interpretation Services Plan

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Purpose & Overview

Rome City Schools (RCS) recognizes the importance of effective and meaningful communication with parents/guardians with limited English proficiency in order to support the goal of engaging and involving families further in their children's education and to ensure that they have equal access to information communicated to all parents.

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 linguistically diverse families, RCS will:

- Develop and annually update (by November 1st of each year) a district plan for translation and interpretation as well as school-level parent involvement plans addressing the same at each individual school site;
- 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;
- Ensure 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;
- Ensure the quality of the translation and interpretation services provided by the district;
- Conduct regular audits to assure that 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 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. Any staff member receiving a request for a change in a household communication preference will notify school administration who will then contact the Assessment and Accountability Department at 706-236-5050.

Household communication language preferences are recorded in the district's student information system. This area is restricted to a limited group of student information system users.

Notification of Translation & Interpretation Services

Families with a household communication language preference other than English are informed by RCS registration staff upon enrollment of the availability of translation and interpreting services at no cost to them. 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

The district's recruits, identifies, and maintains a contact list of district employees who are qualified and approved to serve as translators and interpreters as well as outside companies and individuals that provide contracted translation and/or interpretation services. This contact list, maintained and accessible at all times in Google Drive, is shared with all staff via email annually and as updates necessitate.

In the case of low incidence languages for which no in-person interpreter is available or for which written translations are deemed not to be feasible, LanguageLine Solutions® interpreters will be utilized in order to meet the needs of interpretation and sight translation. LanguageLine Solutions® interpreters will also be utilized in any other circumstance in which in-person interpretation is unavailable for any language.

LanguageLine Direct® services are available to all Spanish-speakers in the district allowing them to call a toll-free number, choose the school with which they wish to speak, and be connected to an interpreter who will then assist them by interpreting to English when the school answers the call.

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. RCS 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.

Under no circumstances may an employee of RCS accept any form of payment directly from or on the behalf of any family in exchange for providing interpretation services at/during any school event. Such services are provided for free for every RCS family by the District. An employee who meets the requirements to be included on the BCSS Approved List of Translators and Interpreters will be reimbursed at the established rate for translations/interpretation services that s/he provides, if such services are provided outside of the his/her normal and routine working hours *and* are not considered a part of the job expectations or requirements of the employee.

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.

The district's administration 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 must also be provided in high frequency preferred household communication languages. Current district demographics necessitate Spanish translations as a routine practice. 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 instances in which a translation is not feasible for a particular document or for a given language represented within the intended audience of the document, regardless of number or percentage, LanguageLine Solutions® or another approved source for interpretation must be utilized to adequately convey the information orally to parents whose communication needs are not met in written format. Likewise, in live settings, such as parent workshops, conferences, or other face-to-face encounters, a district-approved source for **oral interpretation** must be provided to parents who have indicated a preferred household oral communication 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. District staff provide guidance to school leadership on budgeting appropriately at the school level for additional school-specific translation and interpretation needs not met through district resources.

Quality Assurance & Training of Translators/Interpreters

The district's administration recruits and trains qualified interpreters and translators to ensure that translation and interpretation services are professional and accurate. The initial approval process for all staff members and independently contracted individuals providing these services to RCS families includes study of the *Standards of Practice for Educational Language Interpreters* and a minimum of two initial observations and/or evaluations of projects. Upon meeting district quality standards, staff members and independently contracted individuals on the approved translator/interpreter list participate in ongoing professional learning relevant to the field of educational translation and interpretation.

Professional translation and interpretation companies contracting with RCS are responsible for ensuring the quality of their translators and interpreters as well as providing any necessary ongoing training and professional learning opportunities.

Evaluation & Monitoring

District administration monitors household data maintained in the student information system, SchoolStatus messages, translation and interpretation requests, LanguageLine Solutions® usage, and family feedback on a monthly basis in order to ensure effective and meaningful parent communication practices. The district Translation and Interpretation Services Plan, district parent surveys, and school Parent Involvement Plans are also reviewed for compliance on an annual basis by district administrators.