



**COMMUNITY DEVELOPMENT DEPARTMENT
HOUSING DIVISION**

MEMORANDUM

DATE: April 21, 2011
TO: Housing and Human Services Commission
FROM: Suzanne Isé, Housing Officer
RE: Draft Language Access Plan (LAP)

Attached for your review is the draft Language Access Plan (LAP) and some background information on the topic provided by the U.S. Department of Housing and Urban Development (HUD). The LAP is required by HUD to demonstrate that its grantees, including the City, are in compliance with the language access requirements of Title VI of the Civil Rights Act of 1964 (7 Code of Federal Regulations (CFR) § 273; 42 CFR § 435). The Draft LAP describes the City of Sunnyvale's commitment and approach to providing meaningful access to the City's federally-funded programs and housing programs for persons with Limited English Proficiency (LEP).

The first draft of the LAP was presented to the City's Advisory Committee on Multi-Cultural Issues and Diversity earlier this year for their review and comment. The Committee members were very enthusiastic about the LAP and its goals. The primary change recommended by that Committee was to add Hindi to the City's list of languages in which written notices would be provided to inform the public that language assistance is available upon request. Staff has incorporated this suggestion by adding Hindi to the list in the attached Draft LAP.

One of the committee members who speaks Hindi noted that, although most South Asians¹ in the South Bay are somewhat proficient or very proficient in English, some may not understand housing program outreach materials and forms in English as well as they might in their native language, which may be Hindi, Urdu, or one of many Hindi-related languages. Although the City cannot provide notices in hundreds of languages, Hindi is widely understood by many residents of South Asian origin or heritage, and these residents may be better served with Hindi outreach efforts than with English alone.

While this document does not require formal approval by the Commission, staff seeks input from Commissioners and/or the public on the LAP. Staff will incorporate input received at this meeting into the final draft, which will be forwarded to HUD for approval in May along with the 2011 Action Plan.

Staff Recommendation:

- 1) Hold a public hearing to receive comments from the public on the LAP; and
- 2) Provide Commissioner comments on the LAP.

¹ South Asia generally refers to seven core countries: India, Pakistan, Bangladesh, Sri Lanka, Bhutan, Nepal, and the Maldives. Hindi outreach is less likely to serve residents from some of these countries, such as Bangladesh, who generally speak non-Hindic languages.

DRAFT

CITY OF SUNNYVALE



LANGUAGE ACCESS PLAN

Developed to ensure meaningful access to federally-funded City services for people with limited proficiency in English, in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166

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City of Sunnyvale Language Access Plan

INTRODUCTION

This Language Access Plan (LAP) was prepared to ensure the City's compliance with Title VI of the Civil Rights Act of 1964; 7 CFR 273 et seq.; and 42 CFR 435 et seq. related to equal opportunity and non-discrimination with limited proficiency in English. The purpose of this plan is to provide a framework for the provision of timely and reasonable language assistance to residents, community members and others with limited English proficiency ("LEP people") who may be interested in programs, services and public participation opportunities offered by the City of Sunnyvale. The LAP demonstrates the City's commitment to providing meaningful access to City services and public participation opportunities to all Sunnyvale residents and other City clientele and stakeholders.

LANGUAGE ACCESS POLICY:

It is the policy of the City of Sunnyvale to take reasonable steps to provide meaningful access to "Limited English Proficient" (LEP) persons interested in participating in housing and community development programs and/or other federally-funded City programs and facilities. The intent of this policy is to ensure that potential language barriers will not prevent staff from communicating effectively with LEP persons, and that limited English proficiency will not prevent LEP persons from accessing important program information, understanding eligibility criteria, and participating in affordable housing and community development programs.

The Housing Division of the Community Development Department of the City of Sunnyvale is responsible for implementing this Language Access Policy and Plan, as part of its administration of the City's CDBG and HOME entitlement grants. The specific procedures proposed to be used by staff to implement this policy are described further in **Attachment E: Language Assistance Procedures.**

BACKGROUND

Title VI of the Civil Rights Act of 1964 requires any organization or individual that receives federal funds, either directly or indirectly, through a grant, contract or subcontract, to comply with federal civil rights laws regarding discrimination. Title VI prohibits discrimination on the basis of race, color, religion, national origin and sex in the delivery of services.

On August 11, 2000, then-President Clinton issued Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," which directed all federal agencies to ensure that their programs and activities are accessible to all people, including those with limited English proficiency, and to develop guidance for recipients of federal funds that outlines their legal obligations under Title IV of the Civil Rights Act of 1964. This Order also directed recipients of federal funds to take steps to make sure LEP people can meaningfully access their federally funded services.

City of Sunnyvale Language Access Plan

Executive Order 13166 defined LEP people as those who speak a language other than English as their primary language, and have limited ability to read, speak, write or understand English, to the extent that these limitations would deny or limit their meaningful access to programs and services provided by an agency that receives federal funds, such as the City of Sunnyvale.

To help agencies that receive federal funding comply with this Order, in 2007 the Department of Housing and Urban Development (HUD) issued Final Guidance describing the minimum *Language Access Plan* (LAP) requirements for HUD grantees. This guidance requires grantees to take “**reasonable** steps to ensure that LEP persons have meaningful access to their respective programs and services.”

This LAP addresses the City's obligations as a recipient of federal financial assistance related to the needs of LEP individuals. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Recipients of Community Development Block Grant (CDBG) and HOME funds, including the City and its sub-recipients, are required to take reasonable steps to ensure meaningful access to federally funded programs and activities by LEP people. The LAP addresses the following issues:

- How to identify a person who may need language assistance;
- The ways in which assistance may be provided;
- Staff training that may be required; and
- How to notify the public that language assistance is available if needed.

COMPONENTS OF THE LAP

- A. Conduct Four-Factor Analysis
- B. Develop a Comprehensive Written Policy
- C. Provide a Directory of Language Assistance Resources
- D. Provide Outreach to Potential LEP Clientele
- E. Conduct Annual Assessment

In order to prepare this plan, the City of Sunnyvale followed the HUD guidance to address the components listed above. Staff conducted the four-factor LEP analysis described below to help determine when language services are needed:

1. Estimate or quantify the number or percentage of clients served or encountered through City programs who require language assistance.
2. Determine the frequency with which LEP people come into contact with City programs.
3. Evaluate the nature and importance of the program, activity or service.
4. Identify resources available and cost to the City to provide language assistance.

City of Sunnyvale Language Access Plan

A. FOUR-FACTOR ANALYSIS

FACTOR 1: Number or proportion of LEP people served or encountered through City operations

Staff determined the number of LEP people served, or likely to be served who need language assistance to access services, using the following sources or other relevant information:

- Data from the U.S. Census American Community Survey (ACS) and other relevant Census data;
- If detailed census data is not available, use the Safe Harbor numbers of 5% or 1,000 residents of foreign national origin (by language spoken) to determine LEP needs;
- Information in the City's 2006 Analysis of Impediments (AI) (update currently in process);
- "Outreach to Multi-Cultural Populations With Limited or No English Language Skills," a study completed in September 2003 for the City by McNutt & Company, Inc.

The Census Bureau's 2009 American Community Survey identified the following languages as the most commonly spoken by LEP residents of California (listed in alphabetical order):

- Cantonese
- Korean
- Mandarin
- Spanish
- Tagalog
- Vietnamese

Similar, recent data on individual languages spoken by LEP persons is not yet available at the City level, however the staff used this list as a starting point, as there are many residents speaking these languages within the City. The City's Advisory Committee on Human Relations and Cultural Diversity recommended adding Hindi to this list, in order to provide better outreach to the City's sizeable South Asian community. Staff has added Hindi to the list provided in the Language Access Procedures (**Attachment E**).

Estimates from the 2000 Census indicated that 5,586 or 11% of the City's 52,610 households were "linguistically isolated" in 2000. This number may have changed since 2000, however more recent data is not yet available at this level of detail. The Census defines linguistically isolated households as those in which no family member aged 14 or older speaks English "very well." The Census does not specify which languages are spoken by these households, however the primary groups of languages they speak are shown below:

City of Sunnyvale Language Access Plan

Language Spoken (by major language group)	Linguistically Isolated Households
Spanish	1,081
Asian and Pacific Island languages	3,514
Other Indo-European languages	870
All other languages	121
Total	5,586

Source: 2000 Decennial Census, Summary File 3 - Sample Data, US Census Bureau

FACTOR 2: Frequency of contact with City programs

Staff has made an initial assessment of the frequency with which LEP persons are contacted or encountered. The more frequent the contact with a particular language group, the more likely that enhanced language services in that language are needed.

- Staff has indicated that Spanish is the language spoken by those most frequently encountered with limited English proficiency, based on daily contact with LEP clients of the following federally-funded programs:
 - Housing Programs
 - Human Services Programs
 - Other community development programs
- Staff requires the City’s HUD sub-recipients to provide annual client data on language access needs and agency capacity, and an LAP if one has been developed.

FACTOR 3: Importance of service, information, and program

Staff has reviewed the importance of the services offered to determine if denial or delay of the services would jeopardize the LEP person’s “day-to-day existence” and has identified points of contact and the essential written documents to be translated.

- Key HUD-funded programs providing essential assistance:
 - Home Improvement Program
 - CDBG-funded Human Services
 - First Time Homebuyer Program
 - Tenant-Based Rental Assistance
 - Fair Housing Information

FACTOR 4: Resources available and cost to the City

The City currently makes the following resources available at no cost to LEP individuals and families in order to provide meaningful access to the City’s federally-funded programs and services:

City of Sunnyvale Language Access Plan

Oral Interpretation:

Assistance may take the form of bilingual staff interpreters, volunteers, and telephone/electronic language assistance services:

- The City maintains a current list of bilingual staff who can provide interpretation and/or translation services in a variety of languages upon request. (Attachment A)
- AT&T Toll Free Language Translation Service. (Attachment B)
- Telephone Interpretation Service Agencies. (Attachment C)

Written Translation:

- Key program documents (brochures, application forms) shall be translated by bilingual staff and/or outside translators as needed (see Attachment D for Safe Harbors for Written Interpretation).
- All City and sub-recipient website content may be translated at internet user's option using free online tools such as "Google Translate" (available at: <http://translate.google.com/#>) or similar translation services.

Cost

CDBG administrative and/or activity delivery funds can pay for written translations of vital documents when needed.

- Vital documents are documents that convey information that critically affects the ability of the program recipient to make decisions about his or her participation in the program. Examples of vital documents include applications, public notices, letters containing important information regarding participation in a program, eligibility rules, and key information brochures.
- Qualified bilingual City staff may translate such documents to the extent possible, while outside contractors can be used if needed, within funding limitations.

C. PROVIDE A DIRECTORY OF LANGUAGE ASSISTANCE RESOURCES

The City's existing language assistance directory will be circulated annually for review to ensure that the most up-to-date information is provided. Any new information will be added and made available to all city departments and to the City's sub-recipients. Resources will include: bilingual staff, community volunteers, commercial interpretation and translation services, and telephone or internet translation services.

D. CONDUCT EDUCATION OUTREACH

LEP Population

The City and its sub-recipients shall make reasonable efforts to notify the LEP population of affirmative efforts it will make to bridge any language barriers. Such efforts may include written notices, radio and cable TV public service announcements, presentations, flyers, websites, and/or brochures in the identified languages. At a minimum, written notices of the availability of language access assistance shall be

City of Sunnyvale Language Access Plan

provided in Cantonese, Hindi, Korean, Mandarin, Spanish, Tagalog, and Vietnamese at facilities where the City's and its sub-recipients' HUD-funded programs operate, and on program-related websites.

City Staff Training

The following training will be provided to appropriate City staff:

- Information on the Title VI Policy and LEP responsibilities
- Description of language assistance services offered to the public
- Use of the "I Speak" cards (Attachment F)
- Documentation of language assistance requests
- How to handle a potential Title VI/LEP complaint

E. CONDUCT ANNUAL ASSESSMENT

The LAP will be monitored annually. The review will consist of at least the following steps:

- Identification of any significant changes in the composition or language needs of the population using relevant new data from the U.S. Census or other appropriate sources;
- A review to determine if additional vital documents require translation;
- A review of any issues or problems related to serving LEP people which may have emerged during the past year; and
- Identification of any recommended actions to provide more responsive and effective language services;
- The number of documented LEP person contacts encountered annually;
- Determination as to whether the need for translation services has changed;
- Determine whether local language assistance programs have been effective and sufficient to meet the need;
- Determine whether the City's financial resources are sufficient to fund language assistance resources needed;
- Determine whether the City fully complies with the goals of this LAP; and
- Determine whether complaints have been received concerning the City's failure to meet the needs of LEP individuals.

F. COMPLETION AND DISSEMINATION OF THE CITY OF SUNNYVALE LAP

Initial Review:

- Administrative review and comment on Preliminary Draft by the Staff Advisory Committee on Human Relations and Cultural Diversity (HRCD).
- Complete analysis, incorporate HRCD comments and draft written policies and final LAP as described above.
- Public review and comment on Final Draft by the Housing and Human Services Commission and the public.

City of Sunnyvale Language Access Plan

Following Completion of LAP:

- Post signs at City Hall notifying the public of the LAP and how to access language assistance services.
- State on Housing Division public notices and meeting agendas related to federally-funded activities that language assistance is available upon request.
- Implement Plan and any additional outreach measures determined necessary by the City.

G. ATTACHMENTS

Attachment A – Directory of Bilingual Staff

Attachment B – AT&T Toll Free Language Translation Service

Attachment C – Telephone Interpretation Services Agencies

Attachment D – Safe Harbors for Written Interpretation

Attachment E – Language Assistance Procedures

Attachment F – “I Speak” Cards

H. ADDITIONAL DOCUMENTS

Appendix I – Documenting LEP Interaction

Appendix II – Vital Forms and Documents

ATTACHMENT A

DIRECTORY OF BI-LINGUAL STAFF

Bilingual Listing

If you are in need of an employee to serve as a translator in order to communicate with a citizen, please follow the directions noted below. If you are interested in providing similar services, please contact Human Resources (x7496).

NOTE: In order to utilize these employees' bilingual skills, a department must follow the procedures designated below:

1. Obtain prior approval from the employee's supervisor and schedule the employee's time through the supervisor.
2. Request that the supervisor notify the employee of the time and place where their services will be needed.
3. Provide the supervisor with an estimate of the time you'll need his/her bilingual employee and the charge code number to which the time worked should be recorded.

<u>Spanish</u>	<u>Phone</u>	<u>Supervisor</u>
CDD		
Alanis-Richelle, Edith	730-7254	Ernie DeFrenchi
Martinez, Jorge	730-7581	Brice McQueen
Rodriguez, Lorena	730-7581	Brice McQueen
DED		
Diaz, Aracely	730-7251	Winter Renwick
LIB		
Barajas, Sandra	730-7314	Lisa Rosenblum
Koff, Wendy		Susan Kaplan
Williams, Kristen-Marie		Ellen Giarrizzo
FIN		
Castro, Juan	730-7656	Therese Balbo
Shearer, Silvia	730-7329	Jan Broussard
DCS		
Rangel, Jose		Nancy Steward
Veloz, MaryLou	730-7753	Nancy Steward
Cadenas, Geraldo	523-8150	Angela Chan
Gutierrez, Monica	523-8150	Angela Chan

DPS

Alvarez, Mariana	730-7117	Marty Dale
Brooks, Rosalie	730-7161	Don Johnson
Cortez, Ruben	730-7110	
Cruz, Catalina	730-7181	
Jones, Orval Lee	730-7223	
Maldonado, Zorie	730-7154	Jim Bouziane
Mata, Vinicio	730-7110	
Monge, Fabian		
Moreno, Mario	730-7226	
Portillo, Lupe	730-7115	
Rullan, Robert	730-7110	Kim Bianconi

DPW

Barajas, Jerardo	730-7510	Tony Pineda
Barron, Gloria	730-7390	Mike Chan
Lopez, Luis	730-7510	Tony Pineda
Lopez, Ruben	730-7510	Tony Pineda
Moralez, Frances Mary	730-7390	Christina Uribe

Chinese – Cantonese

CDD

Lee, Anne	730-7642	Hanson Hom
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FIN

Chong, Angela	730-7393	Therese Balbo
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DPS

Lu, Binh	730-7149	Vince Chetcuti
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Chinese - Mandarin

CDD

Lee, Anne	730-7642	Hanson Hom
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FIN

Chong, Angela	730-7393	Therese Balbo
Oei, Jamie	730-7377	Therese Balbo

LIB

Hsu, Hui-Ming	730-7319	Marsha Pollak
Liang, Caryll	730-7303	Ellen Giarrizzo

DPW

Chu, Judy	730-7413	Hira Raina
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DPS	Chen, Spencer		Kim Bianconi
	Chia, Marie	730-2101	Pamela Messier
	Lee, Andrew	730-7296	Ron Staricha
<u>Vietnamese</u>			
DED	Le, Ngoc	730-7648	
LIB	Hua, Van	730-7303	Ellen Giarrizzo
<u>Tagalog</u>			
DED	Doctolero, Jorge	730-7651	Cindy Stahl
LIB	Nolasco, Leticia	730-7309	Ellen Giarrizzo
DCS	Stein, Myrna	730-2758	Gerard Manuel
<u>Russian</u>			
LIB	Dynin, Felix	730-7327	Marsha Pollak
	German, Yelena	730-7324	Marsha Pollak
	Shifrin, Maria		Ellen Giarrizzo
<u>Hebrew</u>			
LIB	Kama, Rachel	730-7326	Marsha Pollak
<u>Farsi</u>			
LIB	Madjd-Sadjadi, Soraya	730-7313	Ellen Giarrizzo
DPS	Momtaheni, Idean	730-71001	James Boone
<u>Portuguese</u>			
LIB	Januario, Fernanda	730-7310	Ellen Giarrizzo

As of 1/21/10

ATTACHMENT B

AT&T TOLL FREE LANGUAGE TRANSLATION SERVICE



11 Toll Free Language Translation Service

11.1 Background

On August 11, 2000, President Clinton signed Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency. This Order was designed to enforce and implement the obligations of the Government under Title VI of the Civil Rights Act of 1964, which “prohibits recipients of federal financial assistance from discriminating based on national origin by, among other things, failing to provide meaningful access to individuals who are Limited English Proficient (LEP).” It also requires that federal agencies meet those same standards.

In a memorandum by Assistant Attorney General Ralph F. Boyd on July, 8, 2002, the Administration reaffirmed its commitment to Executive Order 13166, and urged federal agencies to create or update their plans for implementation of the Order. The U.S. Department of Justice is responsible to provide guidance to federal agencies under the order. Their opinion is that assistance with oral communication is part of the obligation of federal agencies, and assistance could include “contracting with qualified outside in-person or telephonic interpreter services.” It is estimated that 47 million Americans have limited or no English ability.

11.2 Summary

To assist agencies in meeting their obligation for telephone access for LEP individuals, AT&T will provide Toll Free Language Translation Service (TFLT). Combining the capabilities of AT&T Toll Free Service with the translation services of our partner, Language Line® Services, the AT&T offer will meet the needs of agencies to provide over the phone translation in compliance with Executive Order 13166.

AT&T’s partner, Language Line Services (LLS), is the largest provider of language translation services, and has been leading the industry for over [REDACTED]. They maintain a staff of 1,500 interpreters who are scheduled to be available on a 24x7 basis supporting translation for over 150 languages. Interpreters are located in five call centers and from coast to coast in the continental United States as well as in Hawaii, Canada, Puerto Rico, the United Kingdom and Latin America. To ensure call confidentiality, all LLS interpreters are bonded, sign a strict confidentiality agreement and abide by the LLS Code of Professional Ethics. **Table 11.2-1** lists the languages for which services are provided. LLS monitors translation requests continually, adding or deleting languages based on customer need.

Table 11.2-1. Languages Supported by Language Line

Languages	Languages	Languages	Languages
Acholi	French	Kurmanji	Russian
Afrikaans	French Canadian	Lakota	Samoan
Akan	Fukienese	Laotian	Sango
Albanian	Fula	Latvian	Serbian
Amharic	Fuzhou	Lingala	Shanghai

<i>Languages</i>	<i>Languages</i>	<i>Languages</i>	<i>Languages</i>
Arabic	Ga	Lithuanian	Sicilian
Armenian	Gaddang	Luganda	Sinhalese
Assyrian	Gaelic	Luxembourgese	Sindhi
Azerbaijani	Georgian	Macedonian	Slovak
Bahnar	German	Malay	Slovenian
Bambara	Greek	Malagasy	Somali
Basque	Gujarati	Malayalam	Sorani
Belorussian	Haitian Creole	Maltese	Spanish
Bengali	Hakka	Mandarin	Swahili
Berber	Hausa	Mandinka	Swedish
Bosnian	Hebrew	Mankon	Szechuan
Bulgarian	Hindi	Marathi	Tagalog
Burmese	Hmong	Mien	Taiwanese
Cakchiquel	Hubei	Mixteco	Tamil
Cantonese	Hungarian	Mongolian	Telugu
Catalan	Hunanese	Navajo	Thai
Chaldean	Ibanag	Neapolitan	Tibetan
Chao-Chow	Ibo	Nepali	Tigre
Chavacano	Icelandic	Nigerian Pidgin English	Tigrinya
Cherokee	Igbo	Norwegian	Toishanese
Croatian	Ilocano	Nuer	Tongan
Czech	Indonesian	Oromo	Toucouleur
Dakota	Italian	Pampangan	Tshiluba
Danish	Jakartanese	Pangasinan	Turkish
Dari	Japanese	Papiamento	Ukrainian
Dinka	Jarai	Pashto	Urdu
Dutch	Javanese	Pidgin English	Vietnamese
Estonian	Kanjobal	Polish	Visayan
Ewe	Kashmiri	Portuguese	Welsh
Farsi	Khmer (Cambodian)	Portuguese Creole	Wolof
Fijian	Korean	Punjabi	Yiddish
Finnish	Krio	Rhade	Yoruba
Flemish	Kurdish	Romanian	Yupik

11.3 Description of Service

11.3.1 Toll Free Language Translation for Call Centers

For agencies receiving calls via Toll Free Service, Toll Free Language Translation Service may be accessed by contacting Language Line Services using the Call Redirection (2.2.3.2.2.1 [q]) Conference and Transfer option. The call center agent utilizes a toll free number specific to their agency for this purpose. The use of agency-specific toll free access numbers ensures billing to the correct organization.

Once the call is terminated in the Voice Response Unit at LLS, the agent is prompted for the language requested: 1 for Spanish, 2 for all others. For languages other than Spanish, the language requested is determined through the use of Speech Recognition. The agent will then be connected with the appropriate translator. **Figure 11.3.1-1** represents the call flow of calls into Language Line.

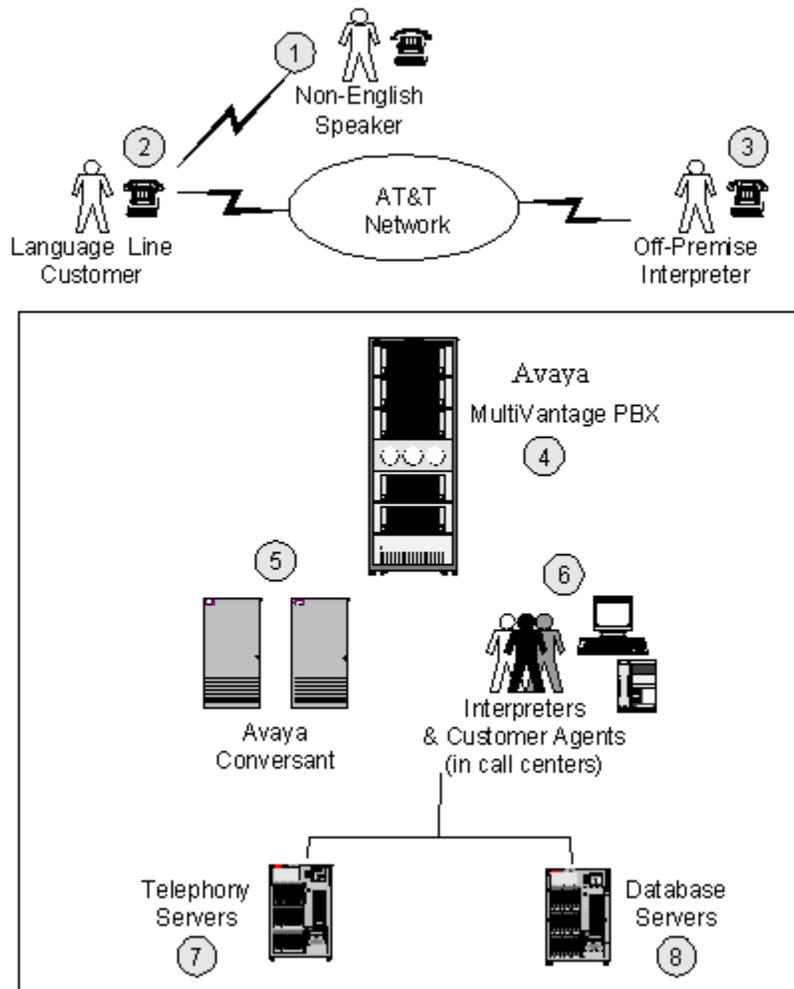


Figure 11.3.1-1. Language Line Call Flow



In a typical call, a Limited English Proficient (LEP) caller (1) originates the call to an existing toll free number of a subscribing agency (2). The agency, with the LEP caller on the line, utilizing the Transfer Connect Conference and Transfer option, places a call to their designated toll free number at Language Line in Monterey, California or Skokie, Illinois. The incoming call is routed by the Language Line PBX (4) to an Automated Platform on Language Line's Voice Response Unit (VRU) (5).

Telephone Servers (7) deliver call specifics from the PBX (4) and agency data from Database Servers (8) to the VRU (5). The VRU collects language and account information from the agency caller to process the request for an Interpreter. This information is collected by the Database Servers (8) to generate a transaction record.

The VRU (5) requests the Telephony Servers (7) to instruct the PBX (4) to place a call to the next available Interpreter. This call is sent over Language Line's private network if the selected interpreter is located in one of Language Line's call centers (6), or via the AT&T network to an Off-Premise Interpreter (3). The Telephony Servers (7) are used to conference the Interpreter (3)/(6) and the agency (2) with the LEP caller (1). The conferenced call is monitored briefly for language match and connection clarity, and then the VRU disconnects and is available for another call.

11.4 Toll Free Language Translation for Walk-In Centers

In addition to receiving calls from the public via toll free numbers, many agencies also interact with LEP individuals in person. These offices may also require the assistance of language translation service, especially for languages whose usage is not widespread.

In the walk-in environment, the agency representative places a call to the agency specific toll free number in order to reach the Language Line translator. This may be the same number as the agency uses for their call center translations, or a different number could be provided. Once the call is received by the Language Line VRU, the process for call flow is the same as for call centers.

11.4.1 Features

11.4.1.1 Language Line Phone

To facilitate calls to Language Line from walk-in locations, agencies may utilize the Language Line Phone. This telephone, which is compatible with most analog telephone jacks, has two handsets to allow secure, clear 3-way conversation, without having to pass the handset back and forth. The phone is pre-programmed to dial the appropriate Language Line toll free number. The Language Line Phone offers more privacy than use of a speaker phone, and is more efficient than passing a single handset back and forth.

11.4.1.2 Certified Interpreter

For agencies that require an interpreter with highly specialized training in translating for medical and legal applications, AT&T will offer certified interpreters.



Agencies could utilize Certified Medical Interpreters for such applications as Medicare claims, wellness education and medical counseling. Certified Medical Interpreters must complete extensive training, including:

- Pass the Interpreter Skills Assessment Test
- Complete intensive medical interpreting training
- Pass the Medical Certification Test
- Demonstrate ongoing competence in accurate, impartial and culturally sensitive interpreting
- Interpret an average of 500 hours in a healthcare setting
- Interpret for healthcare organizations for at least six months

Certified Medical Interpreters are available in the following languages:

Certified Medical Interpreters	
Arabic	Bosnian
Cantonese	Croatian
Farsi	French
German	Haitian Creole
H'mong	Italian
Japanese	Khmer
Korean	Mandarin
Polish	Portuguese
Russian	Serbian
Somali	Spanish
Tagalog	Vietnamese

Agencies that require translation from interpreters familiar with legal applications may request Court Certified Interpreters. These interpreters have passed an examination testing simultaneous, consecutive and/or sight translation administered by one of the following entities:

- United States Administrative Office of the Courts
- California Judicial Council
- Consortium for State Court Interpreter Certification
- New York State Unified Court System.

Certified Court Interpreter are available in the following languages:

Certified Court Interpreter	
Arabic	Cantonese
French	Haitian Creole
H'mong	Japanese
Khmer	Korean
Mandarin	Polish



Certified Court Interpreter	
Portuguese	Russian
Spanish	Tagalog
Vietnamese	

Agencies may set up their accounts initially to automatically route calls to Certified Interpreters, or they may request a Certified Interpreter at call set-up. AT&T cannot guarantee that a Certified Interpreter will be available at all times. There is no additional charge for utilizing a Certified Interpreter.

11.5 Performance

The Service Level Objective for Language Line Service is for calls to be connected to an interpreter providing the appropriate language in less than 35 seconds on average from the time the call is requested in the VRU.

ATTACHMENT C

TELEPHONE INTERPRETATION SERVICES AGENCIES

Telephone Interpretation Service Agencies

California Relay Service

Phone: 711

Description: Provides Spanish language interpretation services for telephone conferencing

Website:

http://www.ddtp.org/california_relay_service/

Language Line

Phone: 1.877.886.3885

Description: Provides telephone interpretation services for telephone conferencing and in-person LEP persons

Website: <http://www.language.com/>

Telephone/In-Person Translation and Interpretation Service Agencies³

Aoki USA

Phone: (415) 731-8100

2587 21st Avenue

San Francisco, CA 94116-3014

Web: <http://www.aoki-usa.com>

International Contact

Phone: (510) 836-1180

351 15th Street

Oakland, CA 94612-3303

Web: <http://www.intlcontact.com>

Asian Health Services: Language and Cultural Access Program

Phone: (510) 986-1153

818 Webster Street

Oakland, CA 94607-4220

Web:

<http://www.ahschc.org/language.htm>

ION Translations

Phone: (510) 841-5000; (800) 841-9690

2030 Addison Street, Suite 102

Berkeley, CA 94704-1182

Web: <http://www.iontranslations.com>

Atlas Interpreters

Phone: (800) 835-0339

3150 Almaden Expressway, Suite 241

San Jose, CA 95118

Web: <http://www.atlasinterpreters.com>

Iverson Language Associates

Phone: 800.261.1144

1661 N. Farwell Avenue

Milwaukee, WI 53202

Web: <http://iversonlang.com>

Avantext

Phone: (510) 644-3490

2991 Shattuck Avenue, Ste. 200

Berkeley, CA 94705-1871

Web: <http://www.avantext-usa.com>

JLS Language Corporation

Phone: (650) 321-9832

135 Willow Road

Menlo Park, CA 94025-2709

Web: <http://www.jls.com>

Avid Translation

Phone: (800) 858-1146 (client line);

P.O. Box 4423

Foster City, CA 94404-0423

www.avidtrans.net

Lan Do & Associates, LLC

Phone: (415) 978-2788

970 Harrison Street

San Francisco, CA 94107-1009

Web: <http://landoassociates.com>

³ Northern California Translators Association (NCTA). <http://www.ncta.org/>.



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Access Numbers

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Your non-English-speaking friends and relatives living abroad can reach you using AT&T Operators who speak their language.

When they call you collect or with an AT&T Calling Card, they simply dial the AT&T USADirect® In-Language access number for their country and ask the operator to put their call through.

AT&T USADirect® In-Language Access Numbers

Country	Language	Code(s)
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Bolivia	Spanish	800-101-111
Chile	Spanish	800 360 312
	Spanish	171 00 312
	Spanish	120 00 288
	Spanish	800-800-312
China	Mandarin	108-10
Colombia	Spanish	01-800-911-0011
The Dominican Republic	Spanish	11-22
Ecuador	Spanish	1-800-999-119
El Salvador	Spanish	800-1785
Gabon	French	00^-002
Guatemala	Spanish	999-9190
	Spanish	138-120
Haiti	French Creole	181
Honduras	Spanish	800-0123
Ivory Coast	French	00-111-12
Mexico	Spanish	001-800-658-5454 (or)
	Spanish	01-800-112-2020
Nicaragua	Spanish	1-800-0164
Panama	Spanish	800-2288
Peru	Spanish	0-800-50-000
The Philippines	Tagalog	105-12
Senegal	French	3073
The United States	Cantonese	1 800 833-1288
	Hindi	1 800 233-7003
	Japanese	1 800 233-8006
	Korean	1 800 233-8923
	Mandarin	1 800 233-1823
	Polish	1 800 233-8622
	Russian	1 800 233-2394
	Spanish	1 800 233-9008
	Tagalog	1 800 233-9118
	Vietnamese	1 800 233-1388
Venezuela	Spanish	0-800-552-6288

Note: ^ indicates that you should wait for a second dial tone before

Traveler Home

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- When an AT&T operator or voice prompt asks you for the number you're calling, dial 831-648-7582
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- Follow the English-language voice prompt or stay on the line to reach a professional interpreter.

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ATTACHMENT D

SAFE HARBORS FOR WRITTEN AND ORAL INTERPRETATION

SAFE HARBORS FOR WRITTEN INTERPRETATION

The table below sets forth safe harbors for written translations.

Size of Language Group	Recommended Provision of Written Language Assistance (Safe Harbor)	Language identified in Census Data
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents	Spanish
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents	On a voluntary basis: Chinese (Cantonese and Mandarin), Korean, Hindi, Tagalog, and Vietnamese.
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.	On a voluntary basis: Chinese (Cantonese and Mandarin), Hindi, Korean, Tagalog, and Vietnamese.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required	All other languages

SAFE HARBORS FOR ORAL INTERPRETATION

There are no safe harbors for oral interpretation. In its Final Guidance, HUD clarifies that regardless of how few LEP persons the City of Sunnyvale serves, reasonable oral interpretation services should be made available in some form. Use of the four-factor analysis should be used to determine whether to provide reasonable, timely, oral language assistance free of charge to any LEP person

Identifying LEP Populations who may need Translation/Interpretation Services

California has both the largest number and percent of foreign-born persons. This large number of foreign-born persons in California correlates with California having the largest non-English speaking population of foreign-born persons. The City of Sunnyvale also has a very large percentage (42.8%) of foreign-born persons. Many of these residents speak English well. However, the City has identified six groups who would likely benefit from language access efforts.

- I. Written Services
 - A. Vital Documents Translated
 - Spanish
 - B. Translated Written Notice to Receive Oral Interpretation of Written Documents
 - Chinese (Cantonese and Mandarin)
 - Hindi
 - Korean
 - Tagalog
 - Vietnamese
 - C. No Written Translations
 - French
 - German
 - Slavic languages
 - Other Indo-European languages
 - Other Asian or Pacific Island languages
- II. Oral Services
 - A. Direct Communication or Telephone Oral Interpretation
 - Chinese (Cantonese and Mandarin)
 - Hindi
 - Korean
 - Spanish
 - Tagalog
 - Vietnamese
 - All other languages

ATTACHMENT E

LANGUAGE ASSISTANCE PROCEDURES

**CITY OF SUNNYVALE LANGUAGE ACCESS PLAN
LANGUAGE ASSISTANCE PROCEDURES**

A. WRITTEN DOCUMENTS

1. Overview of Services

- Vital documents will be provided to LEP population groups over 1,000 or more than 5% of the eligible population or beneficiaries *and* more than 50 in number
- Written notice of the right to receive a brief oral interpretation of a document will be provided to LEP population groups of more than 5% of the eligible population or beneficiaries *and* 50 or less in number
- No written documents will be provided to LEP population groups of less than 5% of the eligible population or beneficiaries *and* less than 1,000 in number

2. Procedure

- Identify language group
- Provide documents as needed
 - a. Spanish (on a voluntary basis: Chinese, Korean, Hindi, Tagalog, and Vietnamese)
 - i. Vital documents: provide written translation
 - ii. Non-vital documents: provide translation of a short description of documents
 - b. All other languages
 - i. No written documents provided

3. Vital Forms and Documents

- Translate the vital written materials into languages of frequently-encountered LEP groups
- The City shall determine whether or not a document is vital depending on the importance of the program, information, or service involved, and the consequences to the LEP person if the information isn't communicated accurately and in a way that is accessible
- Vital information from those documents should be interpreted when translations are not available for LEP persons or when oral communication is more effective, such as in the case of LEP persons whose primary language is traditionally oral

Vital Form/Document*

Housing Program Brochures
and Applications

Languages

Spanish

*HUD's recommendation regarding translated legal documents: when documents are translated into languages other than English, the LEP person should only sign the English document. The translated document should be provided to the LEP person marked "for information only."

4. Non-Vital Forms and Documents
 - Provide interpretation of a short description of documents
5. Competence of Translators
 - Competence can often be achieved by use of certified translators
 - If certification or accreditation isn't possible, a particular level of membership in a professional translation association may suffice
 - Back Translation
 - The agency can also have a second independent translator check the work of the primary translator though translating it back into English

B. ORAL LANGUAGE SERVICES

1. Overview of Services
 - When feasible, the City of Sunnyvale, at no cost, will provide interpreter services to LEP persons applying for or participating in City housing programs
 - The interpreter services will be provided in an efficient and timely manner
2. Interpretation Resources
 - Bilingual Employees
 - Trained and qualified who are employed by the Division, but whose primary role is not interpreter
 - See Attachment A
 - Telephone Interpreters
 - California Relay Service (http://www.ddtp.org/california_relay_service/): Provides Spanish language interpretation services for telephone conferencing
 - Language Line (<http://www.languageline.com/>): Provides telephone interpretation services for telephone conferencing and in-person LEP persons
 - Northern California Translators Association (NCTA) (<http://www.ncta.org/>): Provides a database of NCTA members who provide individual or agency translation and interpretation services

3. Direct Communication with LEP Persons by Bilingual Staff
 - a. Procedure
 - Identify language spoken through “I speak” cards (See Appendix A)
 - Bilingual staff member introduction
 - Request for services needed
 - If needed, provide appropriate forms
 - Record the date, language, and service provided
 - b. Assessing Fluency
 - Assess fluency in both languages and in the terminology used by the Department prior to designating a staff member as bilingual. A person may be able to convey simple instructions or hold conversations in an LEP person’s primary language, but not be sufficiently proficient in that language to perform more complicated tasks such as conducting interrogations, taking statements, collecting evidence, or conveying rights or responsibilities. These persons are not yet “bilingual.”
 - c. Staff Training and Oversight
 - Provide initial and periodic training to bilingual employees on their role in direct bilingual communication, code of conduct for bilingual communications, and law enforcement terminology in other languages
 - Maintain a directory of all qualified bilingual employees, including a list of the non-English language(s) they speak and their contact information, assignments, shifts, etc.
 - Consider bilingual capabilities and language assistance needs of the community (or, in the case of a call for assistance, the specific language needed) in assignments and dispatch
4. Direct Communication with LEP Persons by Interpretation Service Agency
 - a. Procedure
 - Drop-In
 - Identify language spoken through “I speak” cards (See Appendix A)
 - Call interpretation service agency (Appendix C) or Language Line
 - Arrange for in-person or telephone conference depending on nature and degree of service needed
 - Record the date, language, and service provided
 - Scheduled Meeting

- In the majority of cases, meetings or conferences with LEP clients will be scheduled in advance, and this will allow City staff to arrange for an interpreter from the list of interpreters attached to this plan
 - Schedule meeting date and time
 - Arrange for interpretation agency to attend
 - Record the date, language, and service provided
 - b. Formal Interpreters
 - At important stages that require one-on-one contact or written translation, interpretation services will be provided consistent with the four-factor analysis
 - Formal interpreters shall be used at the following:
 - Formal hearing for denial of admission to public housing
 - Informal settlement conferences and formal hearing for termination of public housing
 - c. Informal Interpreters
 - City staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication
 - However, in many circumstances informal interpreters, especially children, are *not* competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency or conflict of interest
5. Communication with LEP Persons by Telephone
- a. Procedure
 - Identify language, place LEP person on hold
 - Check bilingual employee list, staff interpreter list, contract interpreter list, and volunteer interpreter list for needed language
 - Otherwise, telephone interpretation service for telephone conference
 - Once the interpreter comes on the line, the call should be conferenced so that the LEP caller is part of a three-way call between City staff, the caller, and the interpreter
 - Record the date, language, and service provided
 - b. Choosing Between Telephone and In-Person Interpretation
 - When interpretation is needed, in-person interpreters may be preferred (Department employees or contract) for lengthy interactions and interactions with significant potential consequences to the LEP person, such as interviews or interrogations.

- In general, when interpretation is needed, telephone interpretation services are most appropriate for brief encounters, situations in which no qualified in-person interpreter is available, while awaiting a qualified in-person interpreter, and during telephone conversations with LEP persons.

6. Order of Preference for oral language assistance

- a. Bilingual employees are to be requested/deployed first for direct monolingual communication with LEP persons in their primary language but must be qualified to do so.
- b. Contract or telephone interpretation services will be used where staff interpreters are unavailable or lack the language capabilities, skills, or rank to be used and/or deployed.
- c. Family members, neighbors, friends, acquaintance, bystanders, and children should not be used for interpretation, especially for communications involving witnesses, victims, and potential suspects, or in investigations, collection of evidence, negotiations, or other sensitive situations, except temporarily in unforeseen, emergency circumstances while awaiting professional interpretation or bilingual officers.

7. Competence of Interpreters

- a. Competence can often be achieved by use of certified translators
 - If certification or accreditation isn't possible, a particular level of membership in a professional translation association may suffice

C. PREPARING FOR LANGUAGE NEEDS ASSISTANCE

1. "I speak" language cards (Attachment F)
2. Translation/Interpretation Services in the Bay Area (Attachment C)

ATTACHMENT F

“I SPEAK” CARDS

- | | |
|---|------------------------|
| <input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p> | 1. Arabic |
| <input type="checkbox"/> <p>Խոսողո՞ւմ ե՞սք նշո՞ւմ կատարե՞ք այս քանակուսու՞մ, եթե խոսո՞ւմ կա՞մ կարո՞ւմ եք հայերեն:</p> | 2. Armenian |
| <input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p> | 3. Bengali |
| <input type="checkbox"/> <p>ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p> | 4. Cambodian |
| <input type="checkbox"/> <p>Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p> | 5. Chamorro |
| <input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p> | 6. Simplified Chinese |
| <input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p> | 7. Traditional Chinese |
| <input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p> | 8. Croatian |
| <input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p> | 9. Czech |
| <input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p> | 10. Dutch |
| <input type="checkbox"/> <p>Mark this box if you read or speak English.</p> | 11. English |
| <input type="checkbox"/> <p>اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنيد.</p> | 12. Farsi |

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérta vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

City of Sunnyvale
Language Access Plan (LAP)

Appendix I
Documenting LEP Interaction

**City of Sunnyvale
Language Access Plan (LAP)**

**Appendix II
Vital Forms and Documents**

Housing Brochures

**Housing Improvement Program
First Time Homebuyer Program
Below Market Rate program
(update as needed)**