

# 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*

*Prepared by:*

**CITY OF SUNNYVALE HOUSING DIVISION  
COMMUNITY DEVELOPMENT DEPARTMENT  
456 W. OLIVE AVE. SUNNYVALE, CA 94086  
(408) 730-7250    [Housing.InSunnyvale.com](http://Housing.InSunnyvale.com)**

## 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
<b>Total</b>	<b>5,586</b>

*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 provided in Cantonese, Hindi, Korean, Mandarin, Spanish, Tagalog, and Vietnamese at

## **City of Sunnyvale Language Access Plan**

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 (HRCDD).
- Complete analysis, incorporate HRCDD 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
-----------	----------	------------

FIN

Chong, Angela	730-7393	Therese Balbo
---------------	----------	---------------

DPS

Lu, Binh	730-7149	Vince Chetcuti
----------	----------	----------------

Chinese - Mandarin

CDD

Lee, Anne	730-7642	Hanson Hom
-----------	----------	------------

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
-----------	----------	------------

DPS

Chen, Spencer		Kim Bianconi
Chia, Marie	730-2101	Pamela Messier
Lee, Andrew	730-7296	Ron Staricha

Vietnamese

DED

Le, Ngoc	730-7648	
----------	----------	--

LIB

Hua, Van	730-7303	Ellen Giarrizzo
----------	----------	-----------------

Tagalog

DED

Doctolero, Jorge	730-7651	Cindy Stahl
------------------	----------	-------------

LIB

Nolasco, Leticia	730-7309	Ellen Giarrizzo
------------------	----------	-----------------

DCS

Stein, Myrna	730-2758	Gerard Manuel
--------------	----------	---------------

Russian

LIB

Dynin, Felix	730-7327	Marsha Pollak
German, Yelena	730-7324	Marsha Pollak
Shifrin, Maria		Ellen Giarrizzo

Hebrew

LIB

Kama, Rachel	730-7326	Marsha Pollak
--------------	----------	---------------

Farsi

LIB

Madjd-Sadjadi, Soraya	730-7313	Ellen Giarrizzo
-----------------------	----------	-----------------

DPS

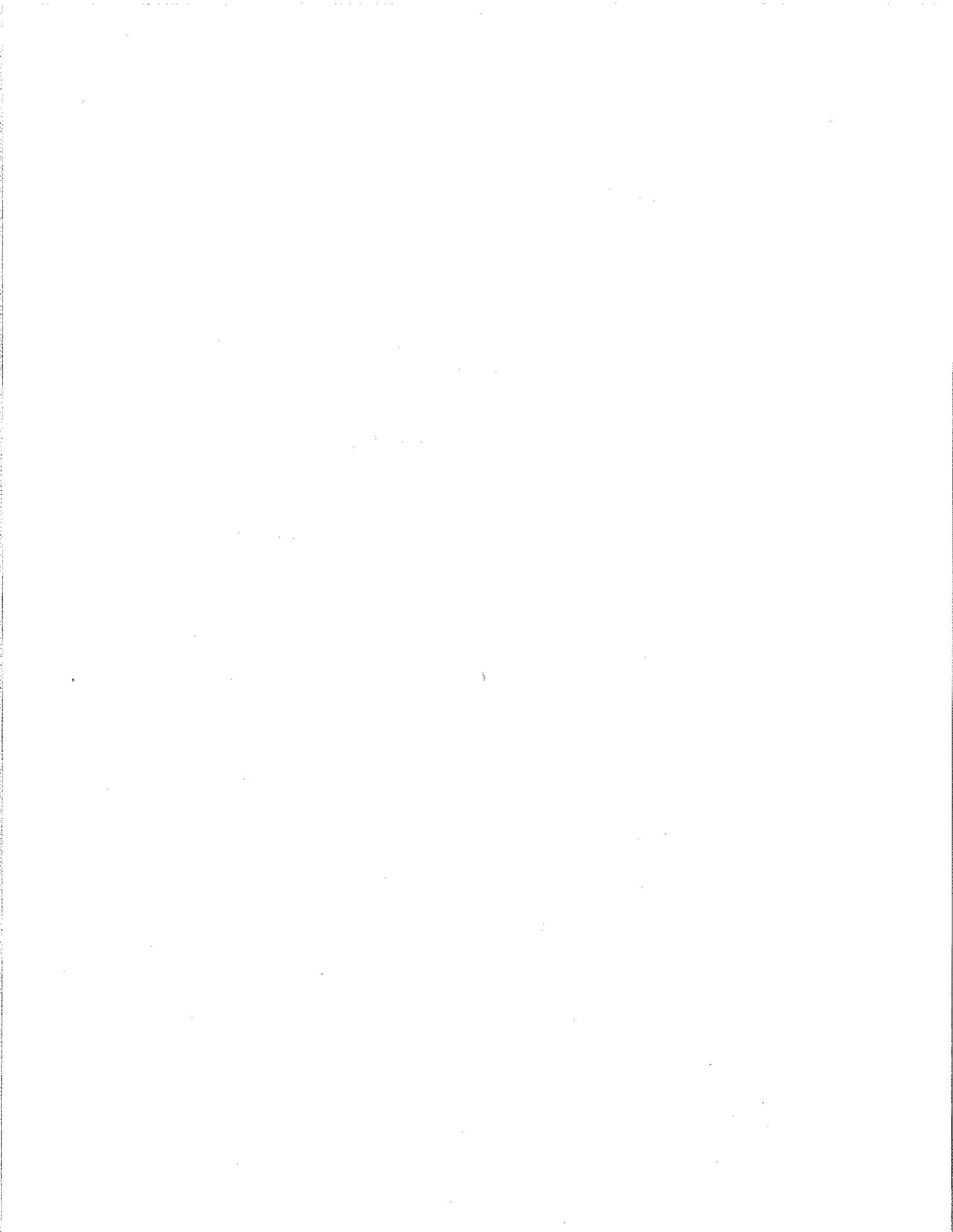
Momtaheni, Idean	730-71001	James Boone
------------------	-----------	-------------

Portuguese

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 (TFLTS). 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

*Use or disclosure of the data on this page or screen is subject to the restrictions on the title page or opening view screen of this proposal document or file.*



Languages	Languages	Languages	Languages
Arabic	Ga	Lithuanian	Sicilian
Armenian	Gaddang	Luganda	Sinhalese
Assyrian	Gaelic	Luxembourgeois	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.

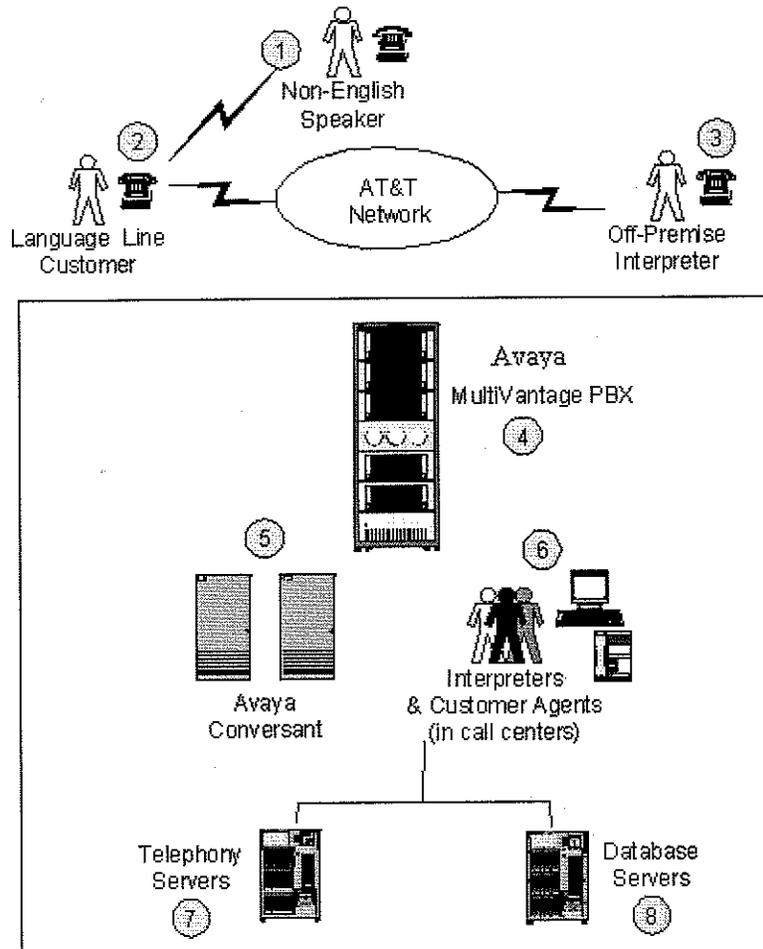


Figure 11.3.1-1. Language Line Call Flow



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:

<b>Certified Medical Interpreters</b>	
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:

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



<b>Certified Court Interpreter</b>	
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**





Search

- Residential
- Products & Services
- Customer Center
- Assistance

Calling Plans   Internet Services   Bundled Services   Phones & Accessories

AT&T USADirect Access Numbers | Choose A Country:

## Language Assistance

AT&T USADirect® Service connects to a variety of language assistance programs, such as translation services and "in-language" operators.

### AT&T USADirect® In-Language Service

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)
<a href="#">Argentina</a>	Spanish	0-800-288-5288
<a href="#">Bolivia</a>	Spanish	800-101-111
<a href="#">Chile</a>	Spanish	800 360 312
	Spanish	171 00 312
	Spanish	120 00 288
	Spanish	800-800-312
<a href="#">China</a>	Mandarin	108-10
<a href="#">Colombia</a>	Spanish	01-800-911-0011
<a href="#">The Dominican Republic</a>	Spanish	11-22
<a href="#">Ecuador</a>	Spanish	1-800-999-119
<a href="#">El Salvador</a>	Spanish	800-1785
<a href="#">Gabon</a>	French	00^ -002
<a href="#">Guatemala</a>	Spanish	999-9190
	Spanish	138-120
<a href="#">Haiti</a>	French Creole	181
<a href="#">Honduras</a>	Spanish	800-0123
<a href="#">Ivory Coast</a>	French	00-111-12
<a href="#">Mexico</a>	Spanish	001-800-658-5454 (or)
	Spanish	01-800-112-2020
<a href="#">Nicaragua</a>	Spanish	1-800-0164
<a href="#">Panama</a>	Spanish	800-2288
<a href="#">Peru</a>	Spanish	0-800-50-000
<a href="#">The Philippines</a>	Tagalog	105-12
<a href="#">Senegal</a>	French	3073
<a href="#">The United States</a>	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
<a href="#">Venezuela</a>	Spanish	0-800-552-6288

**Note:** ^ indicates that you should wait for a second dial tone before dialing the next number.

### My Itinerary

Get AT&T USADirect® access numbers for every country on your journey.

### AT&T USADirect® Service Advisor

Save time and money with helpful ideas based on your calling needs.

### You Make The Call!

Our interactive demo shows you how easy it is to use AT&T USADirect Service.

#### Traveler Home

#### What's New

#### AT&T USADirect Access Numbers

- [Tips & Timesavers](#)
- [Easy Payment Options](#)
- [Special Features](#)
- [Language Assistance](#)
- [AT&T USADirect Service Advisor](#)

#### My Itinerary

#### Dialing Demo

#### Plans & Services

#### Calling Tools

#### Travel Resources

#### Assistance



 [Back to Top](#)

### Language Line Services

Get over-the-phone translation service in 140 languages-whenver and wherever you need it.

- Follow the AT&T USADirect® Service dialing instructions for the country you're calling from
- When an AT&T operator or voice prompt asks you for the number you're calling, dial 831-648-7582
- After the tone, dial your credit card or AT&T Calling Card number
- Follow the English-language voice prompt or stay on the line to reach a professional interpreter.

Calls can be billed to your calling card or any major credit card. For pricing and additional information, call **831-648-7582**.

 [Back to Top](#)

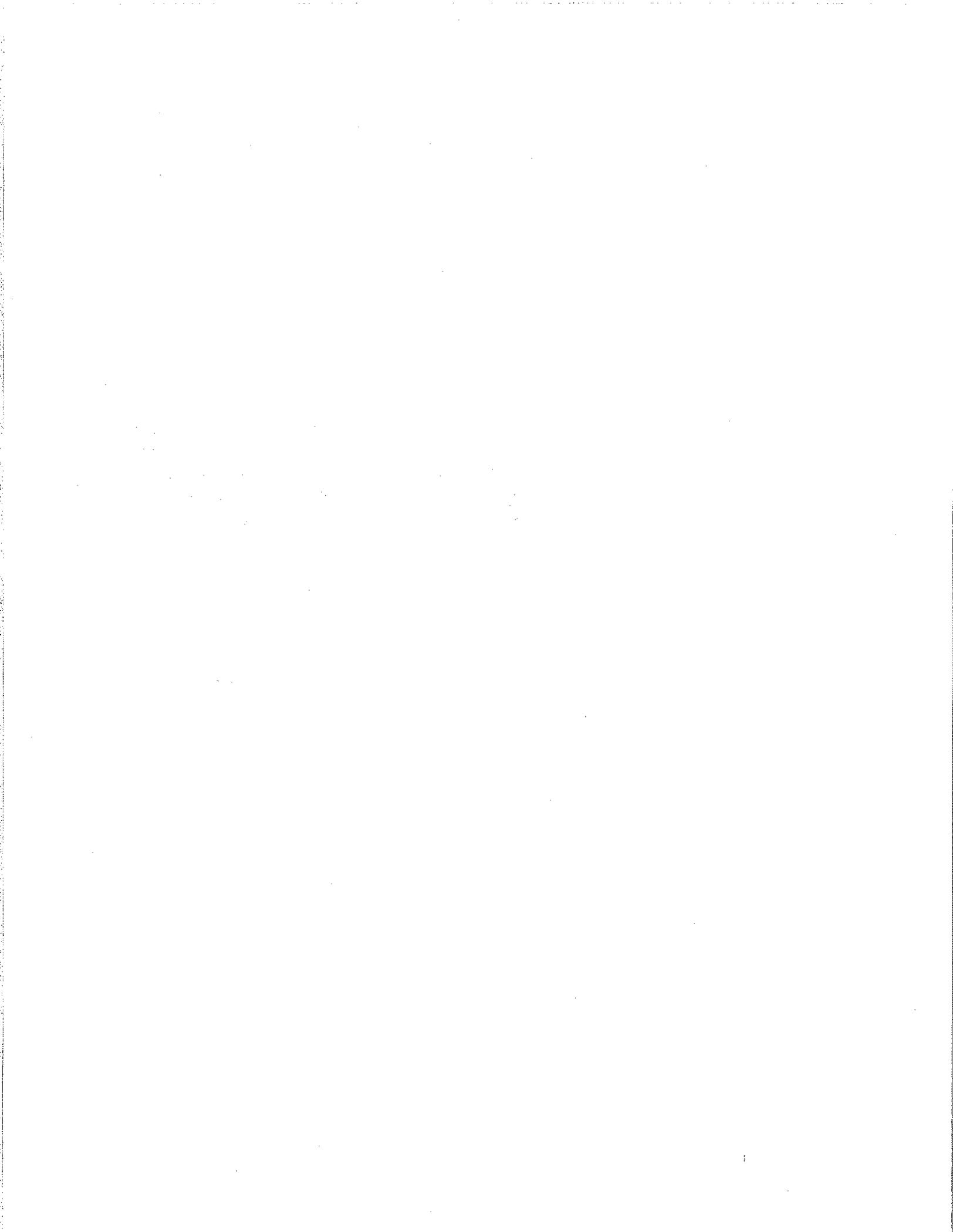
© 2010 AT&T Intellectual Property. All rights reserved. [Terms and Conditions](#). [Privacy Policy](#). [Contact Us](#).





# **ATTACHMENT D**

## **SAFE HARBORS FOR WRITTEN AND ORAL INTERPRETATION**



## SAFE HARBORS FOR WRITTEN INTERPRETATION

The table below sets forth safe harbors for written translations.

<b>Size of Language Group</b>	<b>Recommended Provision of Written Language Assistance (Safe Harbor)</b>	<b>Language identified in Census Data</b>
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.	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



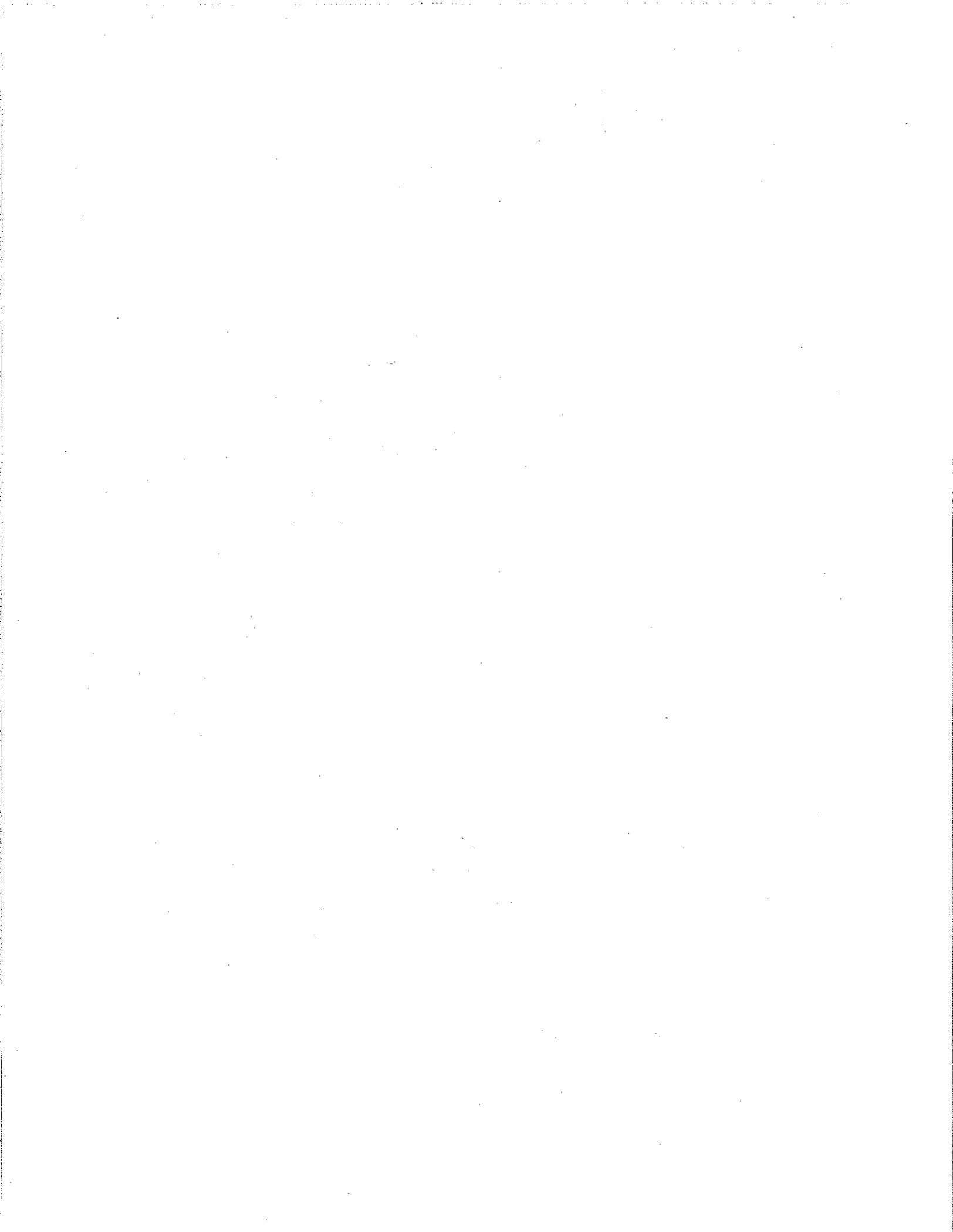
## SAFE HARBORS FOR ORAL INTERPRETATION

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**

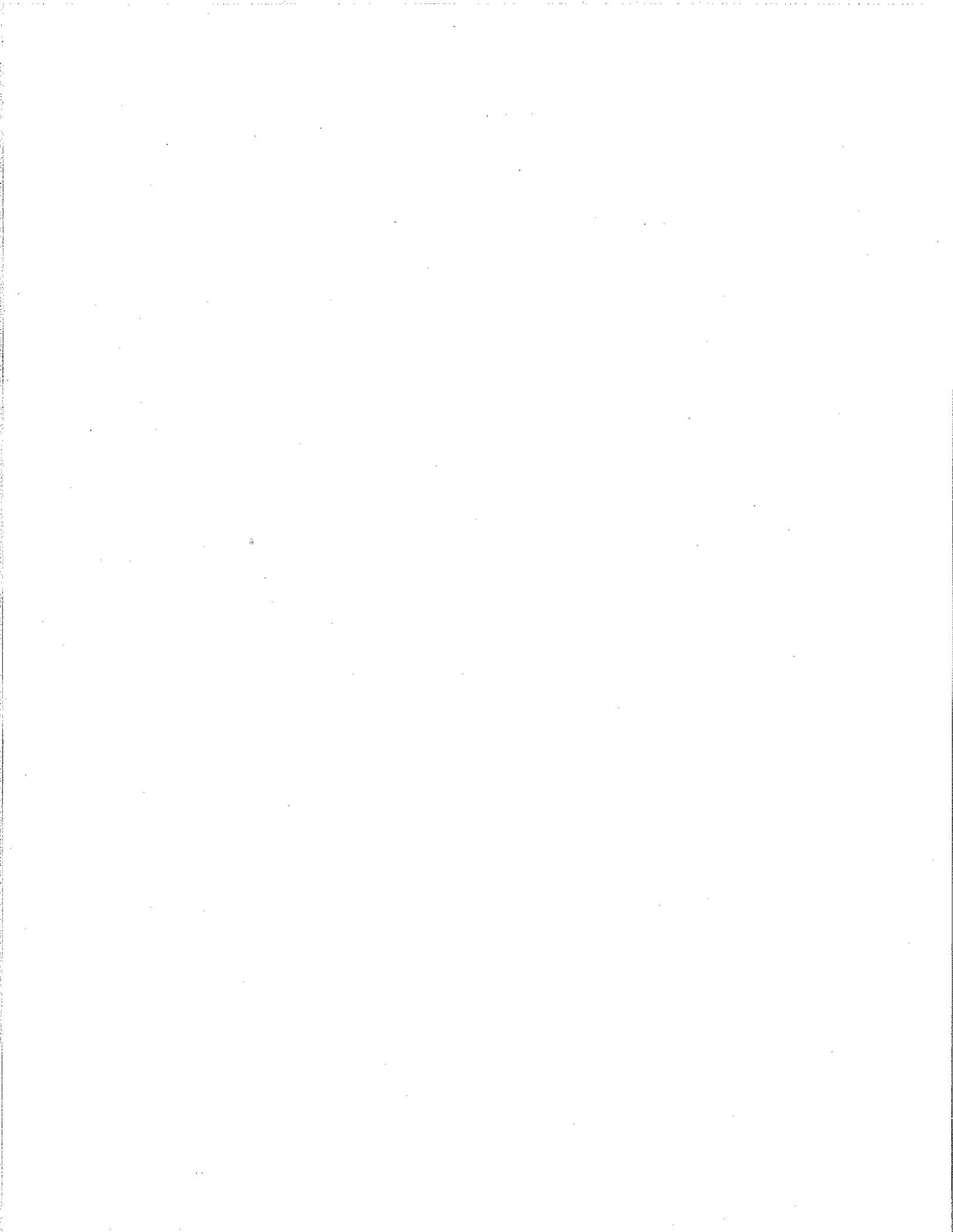
California has both the largest number and percent of foreign-born persons. This large number of foreign-born persons in California correlates with California having the largest non-English speaking population of foreign-born persons. The City of Sunnyvale also has a very large percentage (42.8%) of 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/](http://www.ddtp.org/california_relay_service/)): Provides Spanish language interpretation services for telephone conferencing
  - Language Line (<http://www.language.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.

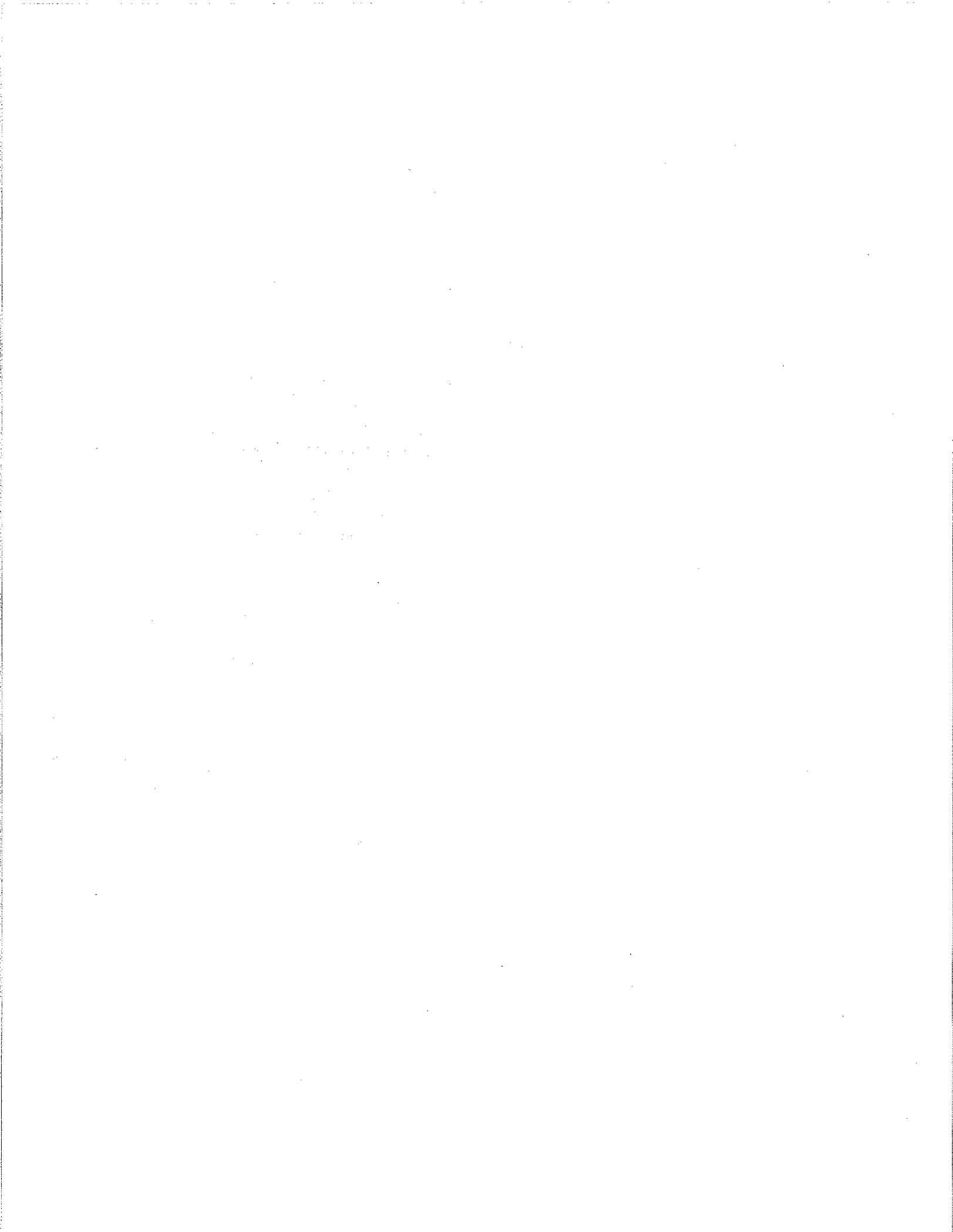
- In general, when interpretation is needed, telephone interpretation services are most appropriate for brief encounters, situations in which no qualified in-person interpreter is available, while awaiting a qualified in-person interpreter, and during telephone conversations with LEP persons.

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

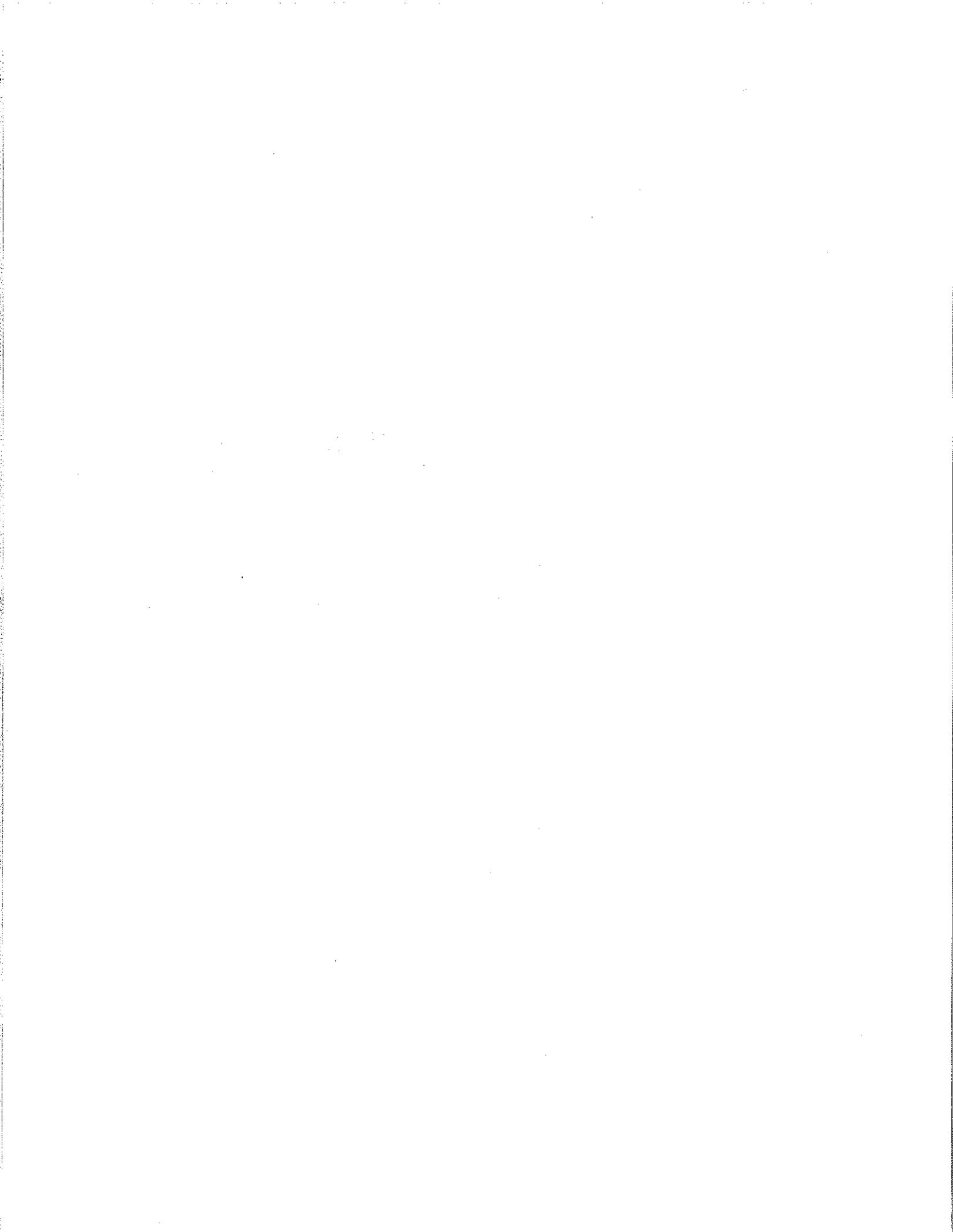
**C. PREPARING FOR LANGUAGE NEEDS ASSISTANCE**

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

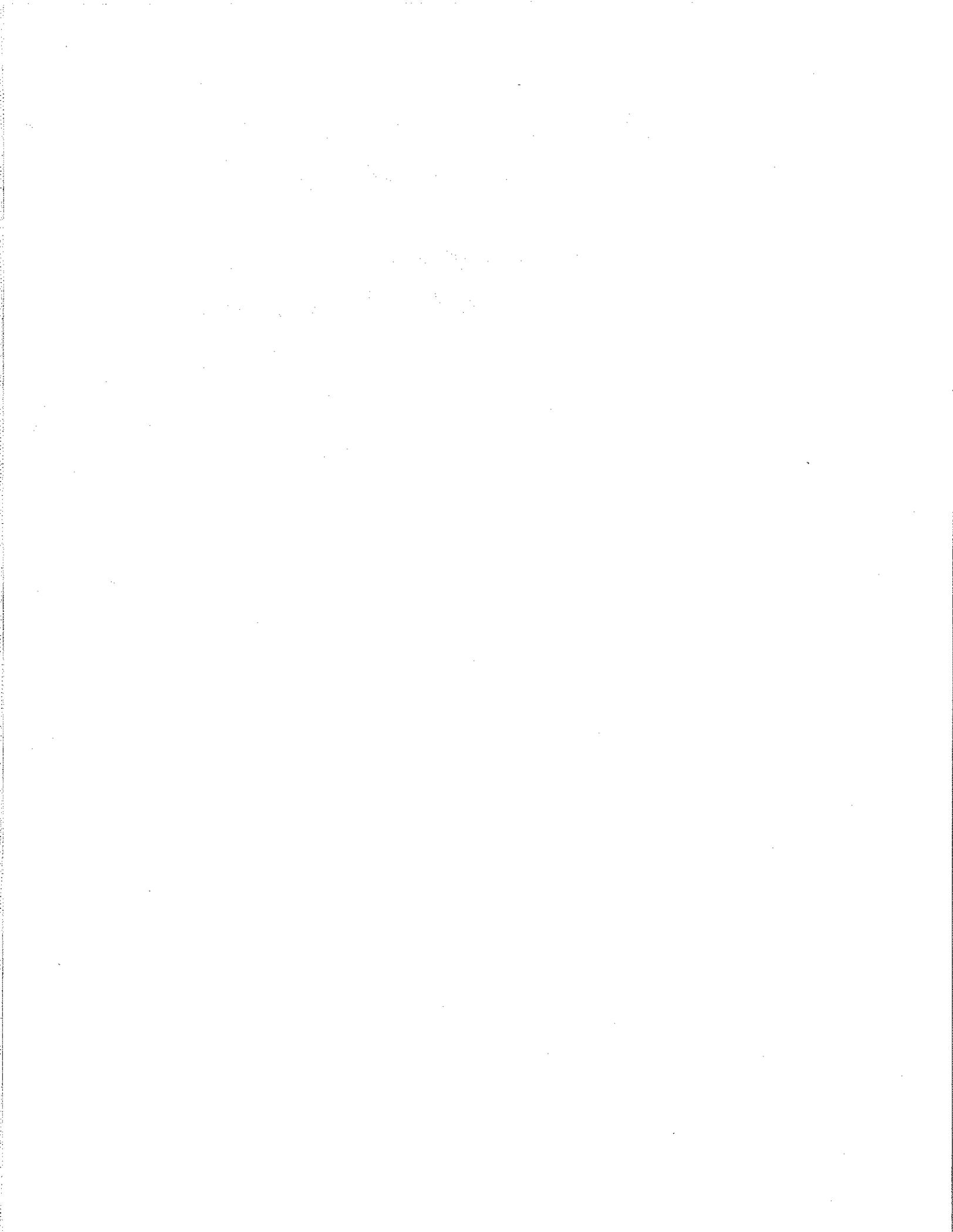
- Cocher ici si vous lisez ou parlez le français. 13. French
- Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. 14. German
- Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. 15. Greek
- Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen. 16. Haitian Creole
- अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ। 17. Hindi
- Kos lub voj no yog koj paub twm thiab hais lus Hmoob. 18. Hmong
- Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet. 19. Hungarian
- Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. 20. Ilocano
- Marchi questa casella se legge o parla italiano. 21. Italian
- 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
- 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. 23. Korean
- ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ. 24. Laotian
- Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. 25. Polish

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

