

Principles and Procedures for Providing Interpretation and Translation Services to Parents and Guardians who have limited English proficiency (LEP)

Introduction: Holyoke Public Schools (HPS) is committed to ensuring that all parents and guardians are able to meaningfully participate in their child's education through, among other things, effective communication with school staff. HPS will provide the translation and interpretation services described below to parents and guardians who do not speak, understand, read or write English proficiently (LEP). The substantial majority of HPS parents and guardians who are LEP speak Spanish and such Spanish-speaking parents and guardians make up a substantial part of the HPS community. Consistent with HPS' Turnaround Plan, and in order to help build relationships with families and encourage and support families to be active partners in students' learning, these principles and procedures reflect HPS' efforts to provide bilingual (Spanish/English) written and oral communication for district and school documents and events generally related to HPS students or intended for HPS parents and guardians. In addition, these principles and procedures include provisions relating to interpretation and translation services for parents and guardians who are LEP and speak a language other than Spanish or English (referred to as a "low incidence language").

I. Determining language needs of all parents and guardians who are LEP

Principle: HPS will use a home language survey to identify the language needs of parents and guardians of HPS students, and will update the information annually.

Procedure:

1. When parents and guardians first enroll their child in the HPS, the Student Enrollment and Family Empowerment Center will administer, with appropriate translations, the Family Language Preference Survey (FLPS), which is attached to these Principles and Procedures.
2. The FLPS will provide parents and guardians the opportunity to inform HPS whether they require written information from their child's school (including district-wide information) in their primary or preferred language. Once LEP parents designate the language in which they want written information communicated, such designation will remain in place for the duration of the student's enrollment at HPS, unless affirmatively changed by LEP parents/guardians in writing or in responses to subsequent language surveys. HPS staff will accept a parent/guardian's assessment of his/her own need for translation or interpretation.
3. The FLPS will provide parents and guardians the opportunity to inform HPS whether they require an interpreter at parent-teacher meetings, or other scheduled school meetings between parents and school staff. Once LEP parents request an interpreter, such a request will remain in place for the duration of the student's enrollment at HPS, unless affirmatively changed by LEP parents/guardians in writing or in responses to subsequent language surveys. HPS staff will accept a parent/guardian's assessment of his/her own need for translation or interpretation.

4. Upon enrollment, the Student Enrollment and Family Empowerment Center will enter information regarding interpretation and translation needs from the FLPS into SchoolBrains, or successor systems (“SB”), which will be accessible to all principals and teachers.
5. Teachers and school staff who have access to SB shall consult the list of parents and guardians of students in their classrooms who need translation or interpretation services maintained in SB.
6. In addition to using the FLPS for new enrollees, HPS will conduct a survey of all parents and guardians at the beginning of each school year using the FLPS. LEP parents who did not respond to the FLPS may request translation and/or interpretation services by notifying HPS at any time. That information will be updated in SB. A parent/guardian’s failure to confirm a continued need on a yearly survey will not result in the loss of such services, or their removal from the list; only express confirmation that there is no longer such a need, on the survey or otherwise, will result in ending translation/interpretation services.
7. HPS will make a copy of these principles and procedures available to all HPS staff, as part of any other personnel procedures available or distributed to staff. HPS will require all appropriate staff (which shall not include staff such as food service, janitorial, and maintenance workers) to attend training on these principles and procedures, as early in the school year as possible. The Superintendent/Receiver will identify personnel responsible for developing and presenting such training, which may be part of any other orientation, training, or professional development required of staff.

II. Translating essential educational documents into Spanish

Principle: Documents posted on the HPS website relating to education programs, opportunities, services, HPS sponsored or produced school activities, and any events to which persons in the community are invited (whether or not HPS sponsored) will be posted in English and Spanish. (For untranslated documents obtained from, or produced by, other sources, the website will provide a link to those sources.) In addition, HPS will provide LEP parents and guardians accurate and timely translations of HPS-produced documents in Spanish to the same extent as those documents are provided to English-speaking parents/guardians. Should third parties ask HPS to distribute documents, HPS will request that they translate such documents into Spanish prior to distribution.

Procedure:

1. Documents posted in English and Spanish shall include:
 - Registration and enrollment in school and school programs
 - Language assistance programs and notices of nondiscrimination
 - Student discipline policies and procedures

- Special education and related services
 - Parent handbooks
 - School and program choice options, including gifted and talented programs
 - Turnaround Plan
 - Information regarding any other educational opportunities and/or HPS sponsored or produced school activities generally available to English-speaking students.
2. If HPS believes it is important to draw the community's attention to copious documents that are produced by other entities and translation is not feasible (e.g. the City budget) the website will provide a link to those sources.
 3. HPS will post the Superintendent/Receiver's regular updates to families on the HPS website in English and Spanish.
 4. HPS will provide any documents directed to all parents and guardians of students in the District or a particular school in both English and Spanish, including the above listed materials, as well as report cards, requests for parent permission for student participation in school activities, and related HPS-produced documents. All translated documents must accurately convey the meaning of the source document, including accurately translating technical vocabulary. HPS may utilize translations provided by other sources, when available. Any document produced by use of Computer Aided Translation software shall be reviewed by a qualified individual for accuracy.
 5. HPS will accurately translate any documents relating to particular students to be provided to LEP parents/guardians. Such documents include, but are not limited to, the above listed materials as well as notices of education-related meetings; proposed educational actions impacting their child or children; testing consent forms; proposed and final individualized education programs ("IEPs"); IEP progress reports; IEP- related evaluations (upon request as provided in Section IV, para.7); disciplinary notices and other documents regarding disciplinary proceedings; notices of education-related events and requests for parent permission for student participation in district/school sponsored programs and activities; authorizations for release of information; health and wellness information; documents concerning extracurricular activities; ELL testing notifications and results; and other educational opportunities and school-related information.
 6. HPS will make its translation resources available to teachers for use in communicating with parents, including trained bilingual staff and Computer Aided Translation software.

7. HPS will maintain a copy of school-wide or class-wide communications to parents and guardians in a central file at the school or classroom, depending on the source and distributor of the communication. A copy of each district-wide communication will be maintained. Copies may be maintained electronically or in hard-copy format.
8. HPS shall only distribute third-party documents that are translated, unless otherwise required by law.

III. Providing interpretation services

Principle: HPS will provide interpretation services to LEP parents and guardians for scheduled parent-teacher conferences and other scheduled meetings or events that HPS sponsors or HPS produces.. (See section IV below regarding interpretation services for special education meetings and section V below regarding low incidence languages.) HPS will use its best efforts to provide interpretation in unscheduled communications, or, if unable, reschedule. Such best efforts may entail the use of an emergency phone translation service. Where bilingual staffs are able to communicate directly with parents, no interpreter will be needed.

Procedure:

1. Prior to any event or meeting involving parents/guardians, school staff will review the list of LEP parents and guardians of students in their school/classroom (including consulting the SB database) who are invited or likely to attend, and who have previously requested interpretation services to ensure access for these LEP parents/guardians.
2. HPS will provide qualified interpreters for HPS-sponsored or HPS-produced meetings, conferences, presentations, and events, including parent-teacher conferences. The qualified interpreters will include adequate numbers of staff members in the Office of Pupil Services who will provide interpretation services on a full-time basis (“Tier 1 interpreters”), primarily for the purposes of facilitating due process meetings/hearings and special education needs. Qualified interpreters will also include two or more bilingual staff members at each school who will be determined qualified for and receive appropriate training in interpretation from a professional interpreter educator or an educational institution (“Tier 2”). Such an interpreter must be capable of interpreting effectively and accurately, both receptively and expressively, and be impartial. Such interpreters must also be aware of and agree to the ethical and confidentiality requirements associated with interpreting and educational records, in general, and special education services, in particular.
3. When Tier 1 or Tier 2 interpreters are not available, additional bilingual staff members (“Tier 3”) may serve as interpreters. Tier 3 staff shall be capable of interpreting effectively and accurately, both receptively and expressively, and be familiar with and committed to comply with ethical and confidentiality requirements involved in interpreting in the educational context. This staff will

receive annual instruction, conducted by a Tier 1 interpreter (who has received “train the trainer” type instruction) or a qualified vendor, on the methodologies, principles and ethics of interpreting in an educational context.

4. When scheduling parent-teacher conferences or other routine meetings with LEP parents and guardians who have previously requested interpretation services, including meetings requested by parents or guardians, teachers and principals will include a designated bilingual staff member at the meeting (unless the participants in the meeting are communicating in the same language). Whenever interpretation services are required, the organizer will seek such services from Tier 2 interpreters, and will only use Tier I interpreters or Tier 3 staff if Tier 2 interpreters are not available.. A list of all such staff, in descending order of priority, will be maintained at each school and the District office. For meetings involving possible disciplinary action, see paragraph 6, below. For special education meetings, see section IV.
5. Other meetings in which school staff members impart information to parents, including community-wide presentations, briefings, information sessions, workshops, etc., will be arranged and planned to ensure effective and accurate Spanish interpretation of the communications at the meeting.
6. HPS will provide a Tier 1 or Tier 2 interpreter at meetings, hearings, or interviews involving investigation or inquiry into a student’s potential violation of school rules, policies or procedures or in which discipline may ultimately result. A Tier 1 or Tier 2 interpreter is described above, and is a person who is capable of interpreting effectively and accurately, both receptively and expressively, is aware of and agrees to comply with ethical and confidentiality requirements, and is not the parents’ child, another student, a sibling, a friend, or a staff member with a direct interest in the particular child’s status, position, assignment, enrollment, behavior or involvement with the matter at issue.
7. For unscheduled communications when no staff interpreter is available, HPS staff may set a meeting or conference call for another time or use a phone translation service. If the matter is time-sensitive, the latter option should be employed.

IV. Providing interpretation and translation services to parents or guardians who are LEP and have students with disabilities.

Principle: In addition to the Principles and Procedures of general applicability, HPS will provide interpretation and translation services to parents or guardians who are LEP and have students with disabilities consistent with special education requirements.

Procedure:

1. When a student is referred for a special education evaluation, HPS will send an informational packet to the parent or guardian in English and Spanish. The packet will include a survey that requests information about the primary language spoken by the student’s parent or guardian (primary language survey). If the student’s

parents/guardians are identified in SB as having a low incidence language, the procedures found in the following section will apply.

2. The Team Leader responsible for managing the student's case will review SB to determine the language needs of the parent each time a new document is created to ensure the appropriate language is used. A record will be kept in each student's file reflecting that the appropriate translations have been provided and appropriate interpretation has been accomplished.
3. HPS will provide Tier 1 interpreters for IEP and other special education related meetings. Tier 1 interpreters are full time staff members in the Office of Pupil Services to provide interpretation services for special education purposes on a full time basis sufficient to discharge duties set forth in these Principles and Procedures. Qualified interpreters will also include two or more Tier 2 interpreters; i.e., bilingual staff members at each school who are sufficiently literate and fluent in Spanish and English to qualify for appropriate training in interpretation. Such an interpreter must be capable of interpreting effectively and accurately, both receptively and expressively, and be impartial. Such interpreters must also be aware of and agree to the ethical and confidentiality requirements associated with interpreting and educational records, in general, and special education services, in particular.
4. HPS will *not* use the following as interpreters for special education meetings: individuals not competent in interpretation; the parents' child; another student; a sibling or a friend; a staff member with a direct interest in the particular child's status, position, assignment, enrollment, or behavior; a staff member who is directly involved in making decisions regarding, or implementing the student's IEP, including members of the IEP Team or any of the student's teachers.
5. When scheduling a team meeting or other special education related meeting with LEP parents/guardians who previously requested interpretation services, the Team Leader will first attempt to include one of the Tier 1 full time interpreters working in the Office of Pupil Services at the meeting. If such interpreter is not available, the Team Leader will schedule one of the Tier 2 interpreters (designated bilingual staff members at the student's school who has been specially trained and qualified for this purpose). The Team Leader will not proceed with a special education meeting with parents or guardians who are LEP unless appropriate interpretation is provided.
6. HPS will translate IEPs for LEP parents and guardians in a timely manner. HPS shall notify parents of students with IEPs that, upon a timely request from the parents, assessments or evaluation reports will be translated and provided to the parents at least two days prior to a Team Meeting. This notification will be included in or will accompany the IEP meeting notice the district sends to parents, or other appropriate notice to parents.

7. Notice as provided in the preceding paragraph will inform parents that they may request copies of translated assessment or evaluation reports at any time, even if they do not request copies prior to the Team Meeting.
8. The Office of Pupil Services will review and monitor the translation of IEPs, IEP progress reports and IEP- related evaluations. Qualified Office of Pupil Services staff will audit IEP documents that are translated by HPS contractors for accuracy of translation.
9. In the event that the Office of Pupil Services determines that a backlog of IEP documents is developing that will threaten the timely provision of translated reports, HPS will engage qualified contractors to provide timely translation of the documents.
10. HPS will not ask any parent or guardian who is LEP to sign an IEP or any other special education-related document unless it has been provided in the language the parent/guardian previously-designated.

V. Providing interpretation and translation for low incidence languages

Principle: HPS will make reasonable efforts to provide interpretation and translation to LEP parents and guardians who speak a foreign language other than Spanish (low incidence languages).

Procedure:

1. All essential education documents provided to LEP parents and guardians who speak low incidence languages will be accompanied by a notice, in the pertinent language, that informs the parent/guardian that a translation of the document into the pertinent language will be provided reasonably following a request for translation, as set forth in paragraph 2, and/or the document will be read to and interpreted for the parent/guardian in the pertinent language reasonably in advance of any meeting pertaining to the document.
2. HPS will provide translation of all district level or school level letters, notices, and documents containing essential educational information, so long as the parent provides HPS with reasonable notice (5 days for up to 2 pages and 2 weeks for longer documents). Essential educational information includes the material described in Section II., par. 4, above.
3. For parents and guardians who are LEP and who speak low incidence languages, HPS will provide interpretation at scheduled meetings between a teacher/principal and the parent, consistent with Section III of these Principles and Procedures.
4. HPS will develop a list or database of the names and contact information for all District employees and contract employees, disaggregated by school, who are competent and available to provide translation and interpretation services in the low incidence languages represented among the HPS' parents/guardians. The District will update the list at least once a year with current information.

5. Parents and guardians who are LEP and who speak a low incidence language may identify their language preference at the time of the child's initial registration upon completion of the home language survey, or by identifying their need for translation or interpretation at their child's school or at the English Language Education department. School and district staff will use the HPS request form located on the Intranet to begin this process. An English Language Education staff member will fulfill the request and make all necessary arrangements to ensure translation/interpretation services are available in a timely manner.
6. Except under circumstances requiring immediate attention and/or affecting health or safety, HPS will not use students, friends, or siblings to translate or interpret for another student, parent or guardian.
7. HPS will ensure that all appropriate school-based personnel are informed about how to access and request the interpretation and translation services required by Section V of these Principles and Procedures.