Mission and Background

The Department of Education (DOE) provides primary and secondary education to over 1 million pre-kindergarten to grade 12 students in 1,500+ schools, and employs approximately 79,000 teachers. The DOE prepares students to meet grade level standards in reading, writing and math, and prepares high school students to pass Regents exams and to meet graduation requirements.

To this end, the DOE also believes that when parents are involved in their children’s education, schools and students benefit. This is why supporting families is one of the Department of Education’s top priorities. In 2002, the Mayor and Chancellor hired a Parent Coordinator in every school to ensure that there was someone in each school directly responsible for supporting families. The Parent Coordinator is the first person families should contact with questions or concerns about their child’s school. Parent Coordinators are part of the administrative teams working for school principals, and many principals include Parent Coordinators on their senior advisory teams. They work closely with school staff, school leadership teams, parent associations, community groups, and parent advisory councils to engage families and involve them in school activities.

To further support Parent Coordinators, and the DOE as a whole, the Chancellor took a first step in addressing language access in 2004 when he called for the establishment of the Translation and Interpretation Unit. The goal of the Unit was to provide the Department of Education’s schools and offices with an internal resource for accessing written translation and oral interpretation services. Comprised of a full-time staff, the Unit has become a cornerstone of the Department’s language access initiative which aims to enhance the organization’s ability to communicate with and better engage limited English proficient parents of New York City schoolchildren.

Language Access Goals

In 2006, the Department of Education implemented Chancellor’s Regulation A-663 which establishes procedures for ensuring that limited English proficient parents are provided with a meaningful opportunity to participate in and have access to programs and services critical to their child’s education. In summary, the regulation sets forth requirements for:

- Translating documents containing critical information regarding a student’s education in each of the covered languages
- Making available translation and interpretation services for parents
- Collecting data regarding the primary language spoken by the parent of each child enrolled in school and whether such parent requires language assistance to communicate with the DOE
- Developing school-based languages access plans
- Increasing parental awareness regarding their right to and the availability of language services
- Maintaining records regarding the provision of language assistance services in order to monitor progress
This regulation is periodically reviewed and updated, when necessary.

In 2007, the Translation and Interpretation Unit became a part of the Office for Family Engagement and Advocacy (OFEA) to further enhance these efforts. Specifically, the move accomplished the following strategic goals:

- To ensure that language access was a key element in all parental engagement initiatives and communications.
- To allow direct access to the District Family Advocate and Parent Coordinator networks to provide support and increase awareness.
- To monitor the Department of Education’s compliance with A-663 (and now Executive Order 120).

Compliance with Chancellor’s Regulation A-663 and Executive Order 120 is an important component in all of the initiatives spearheaded by OFEA. OFEA’s staff supplements its language access initiatives by conducting spot checks on schools throughout the year to ensure that appropriate translated signage is visibly available to parents who visit the school.

**LEP Population Assessment**

**Demographic Analysis**

The following data shows the proportion of limited English proficient persons eligible in the services population. This data is from January 2009.

<table>
<thead>
<tr>
<th>Home Language</th>
<th>Description</th>
<th>Count</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO</td>
<td>ENGLISH</td>
<td>621,096</td>
<td>58.74%</td>
</tr>
<tr>
<td>SP</td>
<td>SPANISH</td>
<td>265,247</td>
<td>25.08%</td>
</tr>
<tr>
<td>CN</td>
<td>CHINESE</td>
<td>54,573</td>
<td>5.16%</td>
</tr>
<tr>
<td>BG</td>
<td>BENGALI</td>
<td>16,329</td>
<td>1.54%</td>
</tr>
<tr>
<td>RU</td>
<td>RUSSIAN</td>
<td>16,221</td>
<td>1.53%</td>
</tr>
<tr>
<td>AR</td>
<td>ARABIC</td>
<td>10,245</td>
<td>0.97%</td>
</tr>
<tr>
<td>UD</td>
<td>URDU</td>
<td>9,341</td>
<td>0.88%</td>
</tr>
<tr>
<td>KO</td>
<td>KOREAN</td>
<td>7,167</td>
<td>0.68%</td>
</tr>
<tr>
<td>HA</td>
<td>HAITIAN CREOLE</td>
<td>7,035</td>
<td>0.67%</td>
</tr>
<tr>
<td>AL</td>
<td>ALBANIAN</td>
<td>5,134</td>
<td>0.49%</td>
</tr>
<tr>
<td>PL</td>
<td>POLISH</td>
<td>4,848</td>
<td>0.46%</td>
</tr>
<tr>
<td>PJ</td>
<td>PUNJABI</td>
<td>3,978</td>
<td>0.38%</td>
</tr>
<tr>
<td>FR</td>
<td>FRENCH</td>
<td>3,743</td>
<td>0.35%</td>
</tr>
<tr>
<td>HI</td>
<td>HINDI</td>
<td>1,954</td>
<td>0.18%</td>
</tr>
</tbody>
</table>
PI | TAGALOG | 1,859 | 0.18%  
169 OTHER LANGUAGES | 28,663 | 2.71%  

TOTALS | 1,057,433 | 100.00%

**DOE Languages**

Chancellor’s Regulation A-663 requires language services in the top eight most common languages other than English. Based on the data above, these languages are: Arabic, Bengali, Chinese, Haitian Creole, Korean, Russian, Spanish and Urdu (hereinafter referred to as the “covered languages”). These languages, including English, account for over 95% of family household serviced by the Department of Education. Support in additional languages is also available through contracted vendors.

**Importance of Services**

Being that current and future generations of New York City students will face unprecedented challenges—competing with well-educated students from across the globe and living in an increasingly diverse, multicultural, and, in many ways, divided world—it became evident, more than ever, that success depended on a high-quality education that involved all interested parties. Studies show that when parents are involved in education, their children are more likely to succeed.

**Allocated Resources**

The DOE has allocated approximately $10.5 million to address language access and engage limited English proficient parents so that they could be informed and involved in their children’s education. This funding served to support the operational functions of the central Translation and Interpretation Unit and provided schools with earmarked funding to address their specific translation/interpretation needs.

**Implementation Plan Logistics**

The requirements set forth by Executive Order 120 and Chancellor’s Regulation A-663 have been fully implemented and will continue to be monitored by the Office for Family Engagement and Advocacy and the Translation and Interpretation Unit. This includes the scheduling of continuous training sessions on both policies. These efforts will be headed by the Chief Family Engagement Officer (also the designated Language Access Coordinator for the DOE) and the Director of the Translation and Interpretation Unit.
Service Provision Plan

Interpretation

Chancellor’s Regulation A-663 requires that the DOE provide interpretation services, to the maximum extent practicable, during regular business hours to parents whose primary language is a covered language and who request such services in order to communicate with the Department regarding critical information about their child’s education. It also requires that interpretation services be provided at the following citywide meetings:

- Panel for Educational Policy meetings
- Citywide ELL parent meetings
- Citywide/Community Education Counsel meetings
- Other citywide parent meetings organized by central offices

These events are conducted throughout the City and are typically covered with interpreters from a contracted vendor. Languages to be provided are pre-identified by either:

- Analyzing Home Language Identification Data or census data for the location of the event.
- Responding to specific language requests made by expected attendees or the organizers of the event.
- Analyzing data from previous events held at the location.

Over-the-phone interpretation services are also available to all schools and offices during regular business hours in over 150 languages. These services can be accessed by contacting the central Unit but are provided by a contracted vendor. Language identification is done by either:

- A DOE staff person identifying the language
- The limited English proficient parent identifying their language from a Language Identification Card
- The vendor identifying the language with the use of specialized linguists over the phone

The following table shows the number of requests received by the Translation and Interpretation Unit for both on-site and over-the-phone interpretation services. This data will be used to forecast future demand.

<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>On-site Requests</td>
<td>1,014</td>
<td>1,206</td>
<td>595</td>
</tr>
<tr>
<td>Over-the-phone Requests</td>
<td>3,214</td>
<td>6,201</td>
<td>4,062</td>
</tr>
</tbody>
</table>
Translation

Chancellor’s Regulation A-663 requires that documents produced by central DOE offices and schools which contain critical information regarding a child’s education must be translated into the covered languages. Documents containing critical information that are translated include, but are not limited to, the following areas:

- Registration, application and selection
- Standards and performance
- Conduct and discipline
- Safety and health
- Special education and related services
- Entitlement to public education or placement in any special education, English language learner or non-standard academic program
- Transfer and discharge
- Legal or disciplinary matters

The majority of these documents are translated into the covered languages by the staff of the Translation and Interpretation Unit. Translation services into non-covered languages are obtained from qualified contracted vendors.

All of the translation work that is produced by the Translation and Interpretation Unit goes through a comprehensive quality control process. All central documents translated by our in-house translators go through two or three levels of proofreading and editing before being returned to the requesting office or school. For documents translated by our contracted vendors, they too must go through a similar process per our contractual agreement. In either case, the document is translated by a seasoned professional and is further aided by translation tools, such as translation memory software, pre-established bilingual glossaries of DOE terminology, and pre-established foreign-language style guides. This process also applies for all translated content available on the DOE website.

Lastly, content prepared centrally complies with the guidelines set forth in the Easy-to-Read NYC guidelines produced by the Mayor’s Office of Adult Education and the Mayor’s Office of Immigrant Affairs. Doing so, allows the DOE to ultimately produce parent friendly materials.

Signage

The Translation and Interpretation Unit distributes multilingual posters to all 1,500+ schools and district offices throughout the City at the beginning of each school year. These posters provide limited English proficient individuals with instruction on where to obtain interpretation services. The Unit also makes available, on its website, additional multilingual signage (including directional signs) that schools and offices can download, print and post.
Outreach and Public Outreach

The DOE makes available to parents the Parent Bill of Rights and the Family Guide in all nine languages. Both documents make parents aware of their rights to languages services. These documents are distributed to parents at the beginning of each school year and can also be accessed on the DOE’s website.

Training

Training of field staff is critical for the success of the Department of Education’s language access initiatives. Training on the requirements of Chancellor’s Regulation A-663 and Executive Order 120, along with the available resources to comply with these requirements, is provided to all Parent Coordinators and District Family Advocates every year during the fall/winter. Training is also provided to all Principals that go through the DOE’s Leadership Academy. This training occurs during the spring/summer.

The training module for both groups also includes information on how to:

- Access translation and over-the-phone interpretation services from the Translation and Interpretation Unit
- Obtain translated signage for posting and Language Identification Cards for identifying parent’s primary language
- Access the school translation funds and options for using these funds

Lastly, training is also provided to future School Safety Agents at the Police Academy. This training is provided to each cohort of recruits prior to their graduation from the academy.

Record Keeping and Evaluation

Monitoring the quality of our language services is critical to ensuring that we are communicating effectively with our limited English proficient communities.

In terms of the interpretation services provided, contracted on-site interpreters are monitored for quality via spot-checks from the Unit’s staff. Additionally, parent surveys are periodically distributed to obtain feedback on the interpretation services provided.

The quality assurance mechanisms for our translation services were previously detailed in this plan.

Monitoring compliance in the field is equally as important. Every fall, District Family Advocates are asked to submit an Attestation of Translation and Interpretation Services to ensure that all schools within their jurisdiction are in compliance with Chancellor’s Regulation A-663 and Executive Order 120. Specifically, the attestation confirms that schools have:
• A procedure in place to ensure that important documents are translated.
• A procedure in place to make on-site or over-the-phone interpretation services available.
• Translated signs posted in a conspicuous location or near the primary entrance of the facility.
• Access to translated versions of the Parent Bill of Rights and/or the Family Guide.

In addition, the Translation and Interpretation Unit maintains records of all of the language assistance services it provides, including, but not limited to:

• The number of distinct documents that it translated into the covered languages and the general nature of such documents.
• The number of meetings at which it provided interpretation services and the languages for which it provided such services.
• Its annual budget for language assistance services.
• The number of Department employees whose full time job is to provide such language assistance services.
• The number of times interpretation services were provided by telephone, and the languages in which such services were provided.

Other factors that are tracked include: awareness of available services at schools, gauging the quality of services provided to schools and evaluating the usage of school-based translation funds.

**Resource Analysis and Planning**

As previously mentioned, the DOE has allocated approximately $10.5 million to support the operational functions of the central Translation and Interpretation Unit and provide schools with earmarked funding to address their specific translation/interpretation needs. This funding, along with the leadership of the Office for Family Engagement and Advocacy, give the DOE the tools necessary to successfully implement an effective language access policy within its schools.