COMMUNICATING
with **SPANISH SPEAKERS**
DURING TIMES OF DISASTER

A toolkit for
inclusive disaster communications
in Napa County

ACKNOWLEDGEMENTS

napavalleycoad.org

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INTRODUCTION

Formed in 2016, the Napa Valley Community Organizations Active in Disaster (COAD) is on a mission to develop and enhance partnerships for coordination, communication, and capacity-building amongst the whole community including non-profit and faith-based organizations, government agencies and the private sector during all phases of disaster. The COAD has strong multi-sectoral membership and support with over 45 partner organizations and 17 local county and city government departments actively involved.

In the October 2017 Napa Fire Complex, some of the fastest moving and most destructive fires in California history, the COAD was activated and engaged approximately 50 agencies during the response and immediate relief period. During and after this overwhelming disaster, communication was critical. Yet, there were significant gaps in information and directed support to Napa County's Hispanic/Latino communities, which make up 34% of the population. Official communication was slow, and at times not accurate or culturally competent, fueling rumors that prevented people from accessing critical services and seeking emergency assistance. There was a similar experience after the 2014 South Napa earthquake when community members called attention to the lack of bilingual local officials provide response and recovery information at the Local Assistance Center

% of Overall Population that are Native Spanish speakers
(Source: American Community Survey 5-Year Estimate, US Census Bureau, 2015)

Napa County	26.8%
Calistoga	42.3%
Napa (City)	31.3%
St. Helena	29.3%
American Canyon	20.9%
Yountville	7.56%

In response to these communication challenges during the fires, the COAD formed a Latino Outreach Subcommittee (LOS) that supported and coordinated message translation, reviewed information to ensure it was culturally sensitive and appropriate, and organized information distribution to the Latino community. In collaboration with the COAD Public Information & Outreach (PI&O) Subcommittee, the LOS worked through COAD agencies and coordinated with the Napa County Emergency Operations Center (EOC) to get correct and culturally appropriate information out in Spanish. In the aftermath of the fires, the LOS merged with the PI&O Subcommittee in recognition that efforts to communicate with Spanish-speaking populations should reflect best practices for public information and engagement with all communities and groups in Napa County.

Napa County is now in a unique position to take lessons learned from the fires to improve the provision of accurate, culturally competent disaster-related communication to the Latino community. Local government and non-profit organizations have acknowledged the problems experienced during the wildfire, and must now work together to improve disaster communications and outreach in the future. The COAD has committed to developing strategies and tools which can translate into concrete application and practices to improve communication and emergency preparedness, response, relief and recovery efforts.

ABOUT THIS GUIDE

This disaster communications and outreach guide is designed to assist local government, agencies, non-profit organizations, school districts, and other key stakeholders in Napa County in three focus areas: 1) facilitating coordination, 2) improving communication, and 3) enhancing bilingual communicationscapacity. The guide includes a number of case studies and resources from other counties that can be replicated or adapted in Napa, in addition to tools and best practices put forth by the federal government to inform programs that serve limited English proficient (LEP) populations.

While this guide focuses on Latino Spanish-speaking communities, the knowledge gained from the fires has broader application to other vulnerable subpopulations or groups that may face barriers to communication during disaster. Language access is a civil right, as mandated by the U.S. Department of Justice. The ability to participate in an information ecosystem is a matter of justice, equity, and inclusivity for all groups within a community. Going forward, the COAD and its subcommittees intend to expand this resource to serve other subpopulations or groups that may be vulnerable to exclusion from the emergency and disaster communications ecosystem (e.g. disabled, seniors, children, hard of hearing, visually impaired, individuals speaking languages other than Spanish or English).

METHODOLOGY

This guide was written by the COAD PI&O subcommittee, comprised of leaders from the community who work with Spanish-speaking populations daily, in collaboration with an external communications and learning consultant. Inputs for the design, approach, and outline for the guide were gathered during a working-group session in October 2018 that included non-profit leaders; city, county, and community responders; and representatives from the Spanish-speaking community in Napa. The content builds upon Internews' information ecosystem assessment of Napa and Sonoma, **Desconectado: How Emergency Information Got Lost in Translation During the Northern California Wildfires**, particularly key insights on the information needs and preferences of Napa Valley's Spanish-speaking community and recommendations to improve disaster communications in the future. The guide also references multiple case studies, tools, resources, and best practices from beyond Napa County on communications with LEP and other vulnerable populations during emergencies.

The guide was vetted by a group of bicultural/bilingual community stakeholders including Preparados Napa, a COAD member community group, which prepares the Latino community in Napa for disasters.

ACRONYMS

CBO - Community Based Organization

COAD - Community Organizations Active in Disaster

CDSS - California Department of Social Services

EOC - Emergency Operations Center

EDD - Employment Development Department

FEMA - Federal Emergency Management Agency

HUD - U.S. Department of Housing and Urban Development

LAC - Local Assistance Center

LAP - Language Access Plan

LEP - Limited English Proficient

LOS - Latino Outreach Subcommittee

MOU - Memorandum of Understanding

NCOE - Napa County Office of Education

NVUSD - Napa Valley Unified School District

PI&O - Public Information & Outreach

PIO - Public Information Officer

QBS - Qualified Bilingual Staff

SMS - Short Message Service

VOAD - Voluntary Organizations Active in Disaster

COORDINATION:
ROLES & RESPONSIBILITIES FOR COMMUNICATING WITH SPANISH SPEAKERS

Purpose of this section:

- Provide a brief history of how the COAD PI&O subcommittee

- Describe the COAD's Latino outreach efforts during the 2017 fires

- Promote awareness among Public Information Officers (PIOs), city and county emergency responders, school districts, and others on how to utilize COAD to get information out to the Latino community

- Inform discussions about coordinating communication to Latino communities between the COAD, EOC, non-profits, school districts and other stakeholders in Napa County

COAD LATINO OUTREACH 2017 WILDFIRES

During the 2017 Napa Fire Complex, the COAD was a critical channel for collecting and sharing up-to-date information and coordinating response activities between the COAD agencies, local government and the community. COAD activated its COAD Liaison position within the Napa County EOC on October 9, the day before the fires were declared a federal disaster. The COAD Liaison remained active throughout the Emergency and Recovery Operations phases of the disaster, providing a point of contact for COAD members, ensuring COAD members were provided with information and situational awareness from the EOC, and keeping the EOC Director informed of services that COAD agencies were providing during the incident.

Recognizing the information needs of the Spanish-speaking population during the fires, the COAD formed a Latino Outreach Subcommittee (LOS), which worked alongside the Public Information & Outreach (PI&O) Subcommittee through COAD agencies and the Napa

County EOC to get correct and culturally appropriate information out in Spanish simultaneously with English messaging. The PI&O and LOS Subcommittees took information from vetted official sources and COAD meetings, translated messages into Spanish, put messages through a formal filter for cultural competence, then disseminated the information to a variety of community and media partners. The creation of streamlined messages in English and Spanish was achieved through a daily review process to translate and filter messages for accuracy of translation, comprehension of message, and cultural competency. This system is illustrated in the following graphic:

LOCAL (Napa County)
- Health & Human Services + Respective Departments
- Cities: Pope Valley, Howell Mountain, Calistoga, St. Helena, Napa
- School Districts
- Office of Education (NCOE)

FEDERAL
- Dept. of Homeland Security
- FEMA
- Dept. CYF
- HUD
- EDD
- Social Security
- Dept. of Agriculture

STATE
- CA Dept of Social Services (CDSS)

FOREIGN
- Mexican Consulate

Vetted Sources of Information

EOC - COAD Liaison

COAD Meetings
real-time information sharing

COAD PI&O / LO Subcommittees
- Translation
- Cultural Relevance
- Timing
- Streamlines Messages

Creation of stramlined messages in English + translated in Spanish

Formal filter for cultural competence

FEEDBACK

Key Leaders & PIOs
In-person dissemination to forums, community meetings, and other gatherings

Local Assistance Center
A facility where individuals, families and businesses can access available disaster assistance programs and services

English & Spanish Media
Radio, TV, Social Media, Print

Local\Regional Organizations
- Non-profits / CBOs
- Faith-based groups
- Private sector organizations
- Local Government (city and county)
- Churches

In the aftermath of the fires, the LOS merged with the PI&O Subcommittee in recognition that efforts to communicate with Spanish-speaking populations should align with best practices for public information and engagement with all communities.

LOOKING AHEAD: COAD'S ROLE IN PUBLIC INFORMATION & OUTREACH

The purpose of the PI&O Subcommittee is to collaborate and partner with key stakeholders in providing accurate, timely, accessible and vetted information that is disseminated broadly and quickly throughout Napa County. With regard to Latino outreach, the group works to ensure information is accessible, accurately translated and culturally relevant for the Latino community.

As the PI&O Subcommittee plans for the future, it commits to the following objectives:

1. Identify vulnerable populations and their unique needs and preferences for receiving information focused on emergency preparedness, during and post disaster.

  a. Promote awareness of the challenges faced by vulnerable populations and share effective communication practices with cities, county, school districts, non-profits, and churches

2. Create comprehensive communication plans to address vulnerable populations (using multiple channels of communication to increase and spread access to information).

  a. Work with community to pre-select existing and trusted means of communication and promote these channels during emergencies or disasters (e.g. Napa County Facebook site, KBBF or the Vine, Nixle, Family Resource Centers, faith-based organizations, school districts, phone numbers and websites, etc.)

  b. Coordinate and promote culturally competent and relevant translation and interpretation services, including feedback loops to enable learning and improvement

  c. Collaborate with Napa County to develop one comprehensive Language Access Plan (LAP)

3. Actively seek outreach and training opportunities related to mission and functions of COAD

  a. Partner with cities, county, and school districts to train individuals who have outreach and engagement roles during emergencies or disasters to streamline services and develop effective working relationships to maximize capacity, specifically around language accessibility

LANGUAGE ACCESS PLAN FOR NAPA COUNTY

Recipients of federal funds and federal agencies are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (see the Appendix for more information). Federally assisted programs do not have to submit written language access plans to the Department of Justice, but in certain circumstances, such as in complaint investigations or compliance reviews, recipients may be required to provide to federal agencies a copy of any plan created by the recipient.

While each agency or organization's approach to ensuring effective communication will differ, the Department of Justice has developed a "**Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs**." Napa County should have a language access plan that addresses compliance with federal, state and local laws, outlines interpretation access and translation access, describes notification of language access services, and provides for staff training to build awareness of language access policies and procedures. This would be significant step in promoting language justice, equity and inclusivity for all groups in the County, not just Spanish-speakers.

RECOMMENDATIONS:
COAD'S COORDINATION WITH NAPA COUNTY STAKEHOLDERS

Coordination among responders and service providers at the community, city, county level is a challenge in any disaster, irrespective of language barriers. Working together effectively is the only way to maximize capacity and offer high-quality services to the community. This requires some clarity in the individual and collective responsibilities for communicating with Spanish speakers.

COAD is not a service provider. **The role of the COAD is to coordinate non-profits, faith-based groups and private sector members in supporting in the mitigation, preparedness, response and recovery from disasters.** COAD members bring a myriad of resources to serve a diverse array of populations, particularly those who are most vulnerable. In all phases of disaster, COAD provides capacity building and dialogue that strengthen our community's preparedness and resilience. This also includes advocating for the creation of or support in improving Napa County's emergency and disaster-related policies.

During disasters, local government cannot meet needs alone, and must rely upon many providers to help meet the needs of community populations most at risk for devastation. During disasters and recovery, specifically COAD's role includes:

- Requesting that cities, county, and school districts develop a plan or protocol for how they may interact and coordinate with COAD in a disaster or emergency

- Coordinating directly with the EOC through the COAD Liaison seat in the EOC, following the Incident Command Structure (ICS) and participating in briefings, coordinating meetings, sharing information, identifying priorities, resources needed within the EOC

- Providing vetted information and/or requests directly from the EOC to COAD members for further distribution to the community, particularly vulnerable populations

- Coordinating the non-profit, faith-based and private sector member response and support to community needs and report to the EOC

- Convening planning meetings and forums with COAD members to coordinate response

- Creating committees to address incident specific needs – this can include communicating with Spanish speakers

- Promoting existing and trusted communications channels so that the community can access accurate and current information during or post-disaster

- Working with local government to coordinate Local Assistance Center services

As a way to develop a coordinated response system, COAD has the following recommendations:

- Activate a bilingual/bicultural PIO in a disaster; consider cross-train / education and a system for working with nonprofits

- Develop a Language Access Plan (LAP) in coordination with Napa County, cities and school districts

- Napa County EOC to work with COAD in developing a structure in which COAD has an opportunity to support in the communication and dissemination of information

- COAD to work closely with PIOs in the development of communication plans

- Creation of an MOU or formal working agreement within the COAD/GOV/PIOs to ensure cultural competence and dissemination strategy as well as clearly described roles and responsibilities before, during, and after an emergency

The following Case Study illustrates how the San Mateo County Health Department formalized the relationship between CBOs and County agencies in advance of emergency to ensure that vulnerable populations receive emergency information. This example highlights the value of stakeholder engagement and reaching consensus on roles and responsibilities through the development of MOUs in order to improve access to information and services.

CASE STUDY: San Mateo County Health Department Partnership with CBOs to Provide Emergency Public Health Information to Vulnerable Populations

In recognition that vulnerable populations could not be reached effectively with public health emergency information through mainstream communication channels, the San Mateo County Health Department established a mutually beneficial partnership with community-based organizations that serve special populations (e.g. seniors, the mentally and physically disabled, the homeless, undocumented immigrants, non-English/limited-English speakers, and rural populations).

The Health Department administered a survey to CBOs on service provision and organized three community forums in order to identify opportunities for collaboration in delivering messages during a public health emergency. Memoranda of Understanding (MOUs) were then established between the Health Department and CBOs that clearly described roles and responsibilities before, during, and after a health emergency. The MOUs served as an official agreement that CBOs held with the County, giving the CBOs greater familiarity with risk-communication plans as well as opportunities to receive funding from local, state and federal emergency response agencies. The MOUs also provided clear access to emergency response resources, as CBOs were able to leverage training and have a clear way of receiving updates during emergencies.

TOOLS:

- After-Action Report on Community Forums - **DOWNLOAD PDF**

- MOU with Community-Based Organizations - **DOWNLOAD DOC**

- Project Overview Presentation - **DOWNLOAD PPT**

- Survey of Special Populations - **DOWNLOAD DOC**

COMMUNICATION:
LESSONS LEARNED, BEST PRACTICES, AND COMMUNICATIONS TOOLS

Purpose of this section:

- Highlight key lessons learned from the 2017 fires about timely, accurate, and impactful communication with the Latino community

- Present best practices and recommendations for Spanish-language communications and outreach from COAD and the federal government

- Offer collaborative tools to aid planning for future communications and dissemination strategies

LESSONS LEARNED

In 2018, Internews conducted an information ecosystem assessment of the Spanish-speaking population in Sonoma and Napa Counties in order to assist local government and the non-profit sector in understanding the challenges faced in accessing information, reasons for the lack of information, and consequences of not having information in Spanish. Among the key findings:

**MEETING POINT
PUNTO DE REUNION**

- The largest concern was about **where to go to get information** that was trustworthy, reliable, timely, and accessible from wherever they were – at home, in their car, or at a shelter (with or without power and/or wifi).

- People trust people and rely on community organizations; if information doesn't come from a **trusted source**, it is unlikely to be effective. In addition to channeling communication through media outlets and official government entities, information must pass through schools, non-profits, faith-based groups, and family members in order to reach Latino communities.

- Many Spanish-speakers did not have access to information technology during the fires; therefore **word-of-mouth** between friends, family, and neighbors was a vital way of receiving information.

- Not only was there a lack of Spanish-language information, the provision of incorrect and confusing machine-translated information added to the problem. Simply translating information into Spanish is not enough - communications must be **culturally relevant** and adapted to the context and preferences of the community. (See Best Practice No. 5 below)

- Residents feel **unprepared for future disasters**; many are concerned that they still don't know what to do or where to go should another disaster hit. Residents still have key unanswered questions, such as how to prepare their family for an emergency, how to prevent fires, and where to seek resources and information pre, during and post-disaster.

BEST PRACTICES

The 2017 fires highlighted a number of opportunities to improve communication with Spanish-speaking populations before, during, and after disasters. The following recommendations were formulated by the COAD and align with guidance put forth by the Department of Justice, Latino non-profit advocacy organizations like UnidosUS (formerly the National Council of La Raza), California state and disaster communications best practices from the public and non-profit sector.

1) Release official notices, warnings, and media summaries in English and Spanish simultaneously

State and local governments must include explicit procedures within their emergency operating plans to distribute emergency-related communications in languages other than English. These procedures should identify the person(s) responsible for distribution, the relevant languages, and the full range of media outlets to be targeted. Community meetings should be held bilingually, or an interpreter and headsets should be made available.

2) **Have public, proactive bilingual messaging coming from multiple official sources and familiar community resource representatives**

Agencies and media outlets should have multiple Spanish-language communication channels available, such as text alerts, social media, radio broadcasts, fliers, and Spanish-speaking public safety officers. All stakeholders should engage in a proactive effort to involve media outlets in disseminating information about disasters.

3) **Have bilingual signage at shelters**

These signs should indicate that all are welcome, and that no one will be asked about their immigration status. Signs should clearly include critical information. Agencies should also keep in mind that people in uniforms may deter people from using shelters due to fears and rumors about immigration enforcement.

4) **Direct Latinos to trusted and vetted sources of information**

Bilingual radio and TV stations and community leaders were all hubs of information and resources during the fires. Popular community Facebook pages also became dynamic sources of emergency information. County officials, police, fire and community organizations should proactively seek out Spanish-language media, including social media, trusted Facebook pages, community bloggers and other influencers to establish relationships before the next disaster hits. The community can be educated about these trusted sources in advance so that they know where to turn to for information. The COAD should also be considered a source of vetted and trusted information for all phases of disaster particularly for members agencies that are working to better prepare vulnerable populations for disasters.

5) **Provide culturally competent translations**

While proper, accurate interpretation and translation is critical during a disaster, it is not sufficient. Culturally competent communication that takes into account linguistic differences among Spanish speakers, literacy and education levels, demographics, perceptions, beliefs, and past experiences is critical for information to be comprehended and impactful. Understanding communication preferences and habits also helps to tailor content and format. For instance, many Latino immigrants may be used to a more tabloid culture of news with images and illustrations.

Revised: 02-25-2019

COAD's definition of **cultural competence**:

1. Content
   a. Consider **political climate**, especially immigration
   b. Consider different **learning styles** (visual, written, verbal) in developing content
   c. Focus on the **main message** and only include necessary information (least amount of content as possible)
   d. Consider **literacy levels** of audience (3rd grade reading level)

2. Branding and layout
   a. Consider different **learning styles** (visual, written, verbal) in developing layout
   b, Use **branded standard templates** with dates
   c. Use **images and vibrant colors** to attract audience

3. Distribution
   a. At **key** gathering places (comprehensive list **here**)

Example: The Napa Valley Unified School District (NVUSD) produced two videos, one in English and one in Spanish, to update the community on school closures and the factors that needed to be considered as they looked to reopen campuses.

Links:

English: **https://www.facebook.com/NVUSD/videos/718642588333156/**

Spanish: **https://www.facebook.com/NVUSD/videos/718645781666170/**

6) Invest in preparedness outreach

Many residents still feel unprepared for future disasters, and are seeking information such as: what to take (blankets, important documents, water, clothing), how to obtain resources for up to date information (what number to call, Facebook page to follow, text messaging platform), how to register for Nixle, etc. Community organizations can partner with cities and counties to host workshops and community events to share resources about crisis preparation and fire prevention. Preparados Napa, a community-based group that works to prepare the Latino community in Napa Country through education, training, and volunteer service for any kind of emergency or natural disaster, will be a key ally for the COAD and local officials.

COMMUNICATION TOOLS

TOOL: [Latino Communications Planning Chart](#)

This is a sample for outlining plans for developing Latino-focused emergency communications materials. It can be used to identify most-needed materials with partner agencies and community organizations (as well as materials that already exist and/or those that need to be adapted), specifying the kinds of information you want to communicate, the communication formats you want to use, and appropriate media and/or messengers to deliver it. Adapted from the National Council of La Raza's Emergency Managers Tool Kit.

TOOL: [Napa Valley Latino Outreach Media & Social Media Contacts List](#)

This resource should be regularly updated to include Spanish-language media, social media, trusted Facebook pages, community bloggers, and others that can continually disseminate information about disaster preparedness response, and recovery. It can be shared among county officials, first-responders, and community organizations for joint collaboration.

CAPACITY:

ENHANCING BILINGUAL COMMUNICATIONS CAPACITY IN NAPA COUNTY

Purpose of this section:

- Suggest a range of recommendations for strengthening and expanding bilingual communications capacity in Napa County

- Share insights from the health sector, particularly medical interpreting, about expanding information access to LEP communities

- Provide tools and case studies about bilingual programs and linguistic services to inform language needs assessments, identification of resources, and decision making in Napa County

An **interpreter** listens to a communication in one language and orally converts to another language while retaining the same meaning.

A **live/simultaneous interpreter** converts the source language as quickly into the target language as they can formulate it, while a consecutive interpreter converts into the target language after the source language speaker has finished speaking. Someone who is qualified to do consecutive interpretation may not be able to do live interpretation.

A **translator** replaces written text from one language into an equivalent written text in another language.

Bilingual individuals have the ability to use two languages. A bilingual person can learn to become a translator or an interpreter, but is not automatically so qualified by virtue of his or her language abilities.

Bicultural individuals identify with the cultural attitudes and customs of two nations or ethnic groups. People can be bilingual without being bicultural, and bicultural without being bilingual. A bicultural person has the capacity to promote culturally relevant translations and the use of common words that are used by a group.

The lack of trusted, trained bilingual communicators combined with a lack of coordinated response was a major barrier to providing the Spanish-speaking community with timely, accurate information during the 2017 fires. Emergency shelters did not have enough translators and interpreters to keep up with the demand for information in Spanish. In some cases, staff who could speak Spanish were not fully bilingual, lacking familiarity with disaster and emergency terminology. The reliance on computer translation, such as Google Translate, resulted in confusing and inaccurate information being fed through Nixle and other official information platforms.

In preparation for the next disaster, responders, service providers, and community organizations must prioritize strengthening and expanding bilingual communications capacity, including by hiring bilingual and bicultural Public Information Officers and emergency personnel in outreach positions. Spanish-speaking staff who are both familiar with and experienced in dealing with the Latino population in Napa County should be available for press conferences and media appearances, as well as to monitor and correct any misinformation in the press. Communications materials should be simultaneously produced and released in both Spanish and English. These objectives require a broad, intentional investment in bilingual recruitment and training so that trusted, skilled individuals can aid in disaster preparedness and be mobilized during an emergency. All stakeholders can maximize bilingual capacity by cooperating, collaborating, and sharing resources.

This section suggests an action plan for achieving this aim, starting with efforts that leverage existing resources and staff, to initiatives that would require larger investments in training and building expertise. As new policies or programs are formulated, it is critical to keep in mind the risk of perpetuating inequity by giving unfair burdens to bilingual staff, especially during an emergency when time and urgency put additional pressure on resources. Ensuring fair labor and working conditions for bilingual and bicultural staff, in particular proper compensation for additional work, is fundamental to providing high-quality services to the community.

RECOMMENDATIONS

1 Leverage Bilingual Staff and Volunteers

During the 2017 fires, some observers mentioned that there was "untapped potential" in the community--bilingual individuals who could have helped to fill the information gap, yet lacked a process to engage or volunteer. Cities, counties, and community organizations should compile rosters of bilingual staff and volunteers who are willing and able to fill communications and outreach roles during a disaster. Each organization can identify a point of contact for coordination purposes.

Familiar faces from the community are best-suited for bilingual outreach roles since trust is critical in the Latino community. Volunteers can be given basic training in emergency response procedures and how to access Spanish-language information to serve as bridges between government representatives, first responders, and residents. Mapping the bilingual capacity available within the community, and identifying ways to mobilize this surge capacity when needed, helps everyone pool language access resources across different areas and levels of the response.

A critical component of this will be articulating the linguistic qualifications that apply for different roles. While a bilingual person may be fluent and able to have direct monolingual conversations (e.g. Spanish to Spanish and English to English), they may not be skilled at converting conversations from one language to another. However, those who are not fully bilingual may still be helpful in situations where a less-accurate conversation does not have significant consequences, such as outreach activities, providing simple directions, and basic conversation to set people at ease. Volunteers could be asked to demonstrate bilingual fluency by passing a test. For example, the State of California states that language skills in the areas of listening and speaking equivalent to "2" on the Federal Interagency Language Roundtable's ILR scale establishes fluency certification. Tasks that require greater training and language skills expertise can be given to professional interpreters/translators.

2 Recruit and Train More Bilingual Staff

The county and disaster response organizations should support the hiring of more bilingual staff to help at all stages of disaster. Bilingual pay incentive programs are one way to make progress, where staff who pass a proficiency exam and are willing to provide communication services receive a bonus or salary differential. These individuals can serve on Language Access Teams, interacting with the public in times of emergency, and even monitoring fears and rumors among the community to feed back to service providers. While Napa County already im-

plements these programs, constituent cities and non-profits could also do so, while ensuring that bilingual training programs specifically incorporate disaster preparedness.

However, keep in mind that bilingual staff and community members often do not have the expertise of professional interpreters and translators, who have gone through rigorous training in cultural brokerage, boundaries and ethics, codes of conduct, and specialized terminology. To determine whether the specialized skills of interpreters or translators are required, reflect on the services provided by your organization, the skills of current bilingual staff, and the complexity of communication required. As needs require, bilingual staff should be given access to professional development and training in interpretation, translation, and language skills that will help them fulfill communication tasks more accurately.

The following Case Study on Kaiser Permanente's Qualified Bilingual Staff provides an example of how to use the internal workforce as a practical, cost-effective solution to interpretation and language needs. This could serve as a model for other organizations looking to identify the capacity and skill set of their employees.

CASE STUDY: Kaiser Permanente's Qualified Bilingual Staff Model Uses Internal Workforce to Ensure Access to Linguistic Services

Kaiser Permanente developed the Qualified Bilingual Staff (QBS) Model to identify, qualify, educate/enhance, mobilize and monitor an internal workforce as a key strategy to meet increasing language service demand in the absence of adequate numbers of onsite qualified health care interpreters. The QBS Model identifies internal workforce capacity, provides assessment and training for different levels of linguistic competency, mobilizes QBS within the care system, and monitors services to track quality and patient safety. It enhances bilingual communication within each staff member's scope of practice or clinical specialty.

Employees can attain QBS Level 1 (conversational ability - ability to give directions), or QBS Level 2 (conversational ability plus medical terminology). The QBS model includes an internally-developed training curriculum, resources, and materials. It is open to all members of the workforce, and is available in Spanish, Chinese (Mandarin and Cantonese), Vietnamese, Tagalog, Russian, Hmong, Punjabi, and American Sign Language. It has been implemented in the Northern California region since 2003.

Qualified Bilingual Staff Definitions

(Source: Policy: Qualified Interpreter Services for Limited English Proficient Persons, Kaiser Permanente)

Qualified Bilingual Staff/Status (QBS) Level 1	An eligible employee who has demonstrated basic conversational proficiency in English and the target language. A QBS Level 1 employee uses his or her language skills within two distinct roles: • Performs his or her regular duties in a language other than English in a non-clinical role (for example, a Spanish speaking receptionist in the Ob/GYN department who performs his or her job in Spanish). • May be called upon to provide language assistance for someone else in customer service related encounters (non-clinical) where understanding of healthcare / medical terminology/concepts is not required (for example, a Spanish-speaking receptionist in the Ob/GYN department who is called to provide language assistance for a patient at the reception desk in the Pediatrics department). • Demonstrates interpreter ethics, conduct, and confidentiality that adopt and apply, in full, the standards of practice promulgated by the California Healthcare Interpreters Association, the National Council on Interpreting in Healthcare, or the RID Code of Ethics.
Qualified Bilingual Staff/Status (QBS) Level 2	An eligible employee who has demonstrated intermediate to advanced conversational proficiency in English and the target language, including health care/medical terminology. A QBS Level 2 employee uses his or her language skills within two distinct roles: • Performs his/her regular duties in a language other than English (for example, a Spanish-speaking medical assistant in the Ob/GYN department who performs his or her job in Spanish). • May be called upon to provide language assistance for someone else in clinical encounters where understanding of health care/medical terminology / concepts is required (for example, a Spanish-speaking medical assistant in the Ob/GYN department who is called to provide language assistance for a patient in the Pediatrics department). • Demonstrates confidentiality and adheres in full to the standards developed by the California Healthcare Interpreters Association, the National Council on Interpreting in Healthcare, or the RID Code of Ethics.

Links:

• **Qualified Bilingual Staff Assessment Tool**, developed by Kaiser Permanente and administered by ALTA Language Services

• **Labor Management Partnership Bilingual Employee Program**, Kaiser Permanente

• **Policy: Qualified Interpreter Services for Limited English Proficient Persons**, Kaiser Permanente

• **Kaiser Permanente: Qualified Bilingual Staff Model**, Robert Wood Johnson Foundation

From the Department of Justice's Translation and Interpretation Procurement Series, the following tool on "Building an Effective Staff Language Program" offers tips for recruiting, hiring, assessing, and retaining staff linguists.

TOOL: **TIPS on Building an Effective Staff Language Service Program**
Department of Justice, Translation and Interpretation Procurement Series
https://www.justice.gov/crt/file/923341/download

TIPS ON BUILDING AN EFFECTIVE STAFF LANGUAGE SERVICE PROGRAM

ARE YOU PLANNING TO USE STAFF TO PROVIDE LANGUAGE SERVICES?

KNOW YOUR LANGUAGE SERVICE NEEDS:

→ Does your organization interact directly with LEP individuals?

→ If so, in what capacity? In person? Online? By phone?

→ What are the most common languages spoken by limited English proficient (LEP) individuals in your community? To find out, check out the Language Map App at www.lep.gov/maps

BEFORE USING MULTILINGUAL PERSONNEL:

→ Do not assume that being a native speaker qualifies someone to interpret conversations or translate written documents. Interpretation, translation, and other in-language tasks often require the use of industry-specific terminology, specialized skills, and experience.

→ Competency requires more than self-identification as bilingual. The most accurate way to validate language proficiency is through an independently-administered language assessment and periodic reassessment.

→ Consider creating and disseminating standard policies and procedures to assess and track the language proficiency of multilingual personnel. The policy could include who has the authority to access the agency's list of multilingual personnel and who may use multilingual personnel for certain language tasks.

KNOW YOUR LANGUAGE SERVICE RESOURCES:

→ Does your organization employ capable, qualified multilingual personnel?

> → What languages do your multilingual personnel speak?

> → What language tasks do your multilingual personnel perform?

> → Does your organization assess the competency of multilingual personnel?

> → Do your linguists receive additional language-skill training?

> → Does your organization pay or provide bonuses for in-language assistance?

→ Do you hire people who interpret or translate for your organization?

→ How much funding is available for paying interpreters, translators, or multilingual staff?

→ Do you or your staff know where to go if you need language services in an unfamiliar language?

For additional information on the certification and assessment of linguists, see our TIPS tool: **What Does it Mean to be a Certified Linguist?**

For information on the recruitment, hiring, retention, and assessment of linguists, continue on to the next page.

For additional copies or technical assistance in language access matters, contact the Federal Coordination and Compliance Section at LEP@usdoj.gov

RECRUITING, HIRING, AND RETAINING MULTILINGUAL PERSONNEL:

In the process of recruiting, hiring, compensating, and retaining qualified multilingual personnel, consider the following:

RECRUITING MULTILINGUAL PERSONNEL:

→ Could your organization reach out to local language communities in order to solicit suggestions for hiring qualified speakers of that language?

→ Are there recruitment sources and networks your organization can work with to promote your hiring needs and attract qualified linguists?

HIRING AND RETAINING MULTILINGUAL PERSONNEL:

→ Will language proficiency be a requirement or just an ability that would make an applicant more appealing? Does the job analysis support language proficiency and will it be documented in the position description?

→ Will in-house language tasks be part of an employee's performance plan or are they collateral duties?

→ Will staff linguists receive pay differentials, workload adjustments, or other incentives intended to recruit and retain multilingual personnel?

→ A multilingual employee hired for a non-language specific task (e.g., accountant) may be inundated with requests for language assistance. How will management ensure the employee's personal career growth while continuing to be responsive to in-house language requests?

→ Could you exchange, share, and review sample job descriptions with others in your industry to maintain consistency regarding language proficiency skills?

→ Could labor unions or other bargaining units affect your agency's decision to recruit, hire, assess, or retain multilingual employees?

The ILR Scale is a metric for measuring an individual's language proficiency. There is no "ILR test," but several agencies and private organizations have adapted the ILR Scale's skill level descriptions into a proficiency test.

HOW DO I ASSESS THE LANGUAGE SKILLS OF MY MULTILINGUAL PERSONNEL:?

To ensure effective communication between multilingual employees and LEP persons, agencies should assess the oral and/or written proficiencies of multilingual employees. There are many forms of assessment, and many considerations such as time, cost, efficiency, accuracy, and consistency.

STRUCTURED TESTING AND ASSESSMENT:

Effective testing and assessment often involves either (1) an independently administered test, or (2) a structured in-language interview conducted by a linguist qualified to assess language proficiency.

Independent verification is the most accurate way to determine whether a linguist is proficient. Independent assessments also tend to be quite rigorous, independently testing and scoring individual language skills such as reading, speaking, listening, writing, interpreting, and translating. The federal government uses the Interagency Language Roundtable scale as its metric for measuring language skill and proficiency (see, www.govtilr.org).

Periodically reassess your multilingual employees because, if not used, language skills may erode over time.

UNVERIFIABLE ASSESSMENT:

Occasionally, organizations employ other methods to verify linguistic qualifications, for example reviewing translated work samples, administering a self-assessment language questionnaire, or reviewing educational linguistic background or credentials.

It is important to note that these methods may not provide an organization with an independent or verifiable baseline of an employee's language skill.

3 Expand Interpretation and Translation Services

Establishing relationships with professional language services will help to pre-identify a pool of qualified individuals to contact when necessary. Telephonic interpretation services can also support situations when demand is high or immediate interpretation is needed.

Reach out to area interpreters and translators who do not work in the emergency field, such as those who work in the local courts or school districts, or medical interpreters, to determine their interest in volunteering their services during times of emergency. National organizations that may be of assistance in locating volunteer interpreter and translators include:

- American Association of Language Specialists

- American Translators Association

- International Association of Conference Interpreters

- National Center for State Courts

The Department of Justice provides extensive guidance on working with external language vendors, such as tips for assessing vendor and linguist qualifications, hiring and working with telephonic vendors (see the Federal Compliance Section Publications of Major Interest page at **https://www.justice.gov/crt/fcs/fcs-publications-major-interest#TIPS**).

The following tool provides some guiding questions on identifying language needs,
and pitfalls to avoid when procuring language services.

BEFORE YOU HIRE – *ASK YOURSELF*: "WHAT ARE MY PROJECT'S LANGUAGE NEEDS?"

INTERPRETATION (ORAL)

THE PROJECT WILL REQUIRE SOMEONE WHO CAN:
- Listen to a communication in one language and orally convert it to another language (either *simultaneously* or *consecutively*) while retaining the meaning
- Orally communicate in the target language and can convey the meaning of that conversation in English (direct "in-language" communication)
- Listen to English language media and convert audio into spoken target language
- Listen to target language media and convert audio into spoken English

KEY INTERPRETATION ASSESSMENT AND CERTIFICATION BODIES:
- Federal Language Assessments Using the ILR Scale (such as the Defense Language Proficiency Test, Foreign Service Institute Test, or the FBI Language Proficiency Test)
- The Federal Court Interpreter Program (FCIP) Certification
- The American Council for the Teaching of Foreign Languages (ACTFL) and the National Association of Judiciary Interpreters and Translators (NAJIT) have certification programs
- Select state court programs (The Language Access Services Section (LASS) of the National Center for State Courts (NCSC) has drafted the testing materials used by many states) provide certifications
- Select university/college programs certify and/or assess language skills

TRANSLATION (WRITTEN)

THE PROJECT WILL REQUIRE SOMEONE WHO CAN:
- Convert written English language text into written target language
- Convert written target language text into written English
- Listen to the target language media and convert audio into written English text (transcription)
- Listen to the English language media and convert audio into written target language (transcription)
- Review target language text and orally translate meaning into spoken English (sight translation)

KEY TRANSLATION ASSESSMENT AND CERTIFICATION BODIES:
- Federal Language Assessments Using the ILR Scale (such as the Defense Language Proficiency Test, Foreign Service Institute Test, or the FBI Language Proficiency Test)
- The American Translation Association (ATA), the American Council for the Teaching of Foreign Languages (ACTFL), and the National Association of Judiciary Interpreters and Translators (NAJIT) all have certification programs
- Select state court programs (The Language Access Services Section (LASS) of the National Center for State Courts (NCSC) has drafted the testing materials used by many states) provide certifications
- Select university/college programs certify and/or assess language skills

BEWARE – LANGUAGE SERVICE DECISIONS TO AVOID:

- Hiring linguists without verifying their language qualifications

- Hiring linguists who have not had their skills independently assessed by a qualified assessment or certification body (e.g., the linguist is certified in court interpretation by the Federal Court Interpreter Program, or achieved equivalent recognition from a qualified assessment or certification body)

- Hiring a vendor or linguist without establishing a quality control plan and remedies for low quality language service

- Hiring a vendor without inquiring about the formal qualifications or certifications of its linguists

- Hiring linguists without verifying that they can meet your specific language and/or vocabulary needs (e.g., hiring a certified medical interpreter to interpret legal arguments in court)

- Hiring <u>translators</u> to <u>interpret</u>, unless they are qualified to do both

- Hiring <u>interpreters</u> to <u>translate</u>, unless they are qualified to do both

- Using self-identified multilingual staff, who are not otherwise certified or assessed in the target language, to assess the linguistic skill of a professional translator or interpreter

For additional copies or technical assistance in language access matters, contact the Federal Coordination and Compliance Section at LEP@usdoj.gov   May 6, 2014

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4 Train Community Extension Workers in Disaster Outreach (e.g. Health Promoters & Medical Interpreters)

Community health promoters and medical interpreters provide key cultural and linguistic linkages to language minority communities in health settings. While they have the skills necessary to bridge communication gaps between LEP individuals and first-responders and service providers, they remain an untapped resource during emergencies. Emergency response agencies may consider training these and other bilingual community extension workers to fulfill communications and outreach roles during disasters. This would create an integrated, efficient cultural and linguistic response capacity that could be mobilized in both public health and emergency scenarios.

Resource: The Centers for Disease Control and Prevention provides **Crisis and Emergency Risk Communication (CERC)** training to help responders and public health professionals prepare to communicate in an emergency. CERC trainings are based on lessons learned during public health emergencies, evidence-based practices from the fields of risk and crisis communication, and psychology. The CERC program offers training in online, webinar, and in-person formats.

The following case studies from Montgomery County, MD and Orange County, NC provide examples of programs that trained community health workers (promotoras) to educate the Latino community about emergency preparedness.

CASE STUDY: Emergency Preparedness Education for the Latino Community Conducted by Health Promoters in Montgomery County, Maryland

The Montgomery County Advanced Practice Center (APC) collaborated with the Latino Health Initiative (LHI) and its health promoter program Vias de la Salud to integrate emergency preparedness training into its existing outreach to the Latino/Hispanic community. The country developed a training curriculum for Spanish-speaking and culturally knowledgeable health promoters that would enable them to deliver emergency preparedness information in a concise, thorough, and interactive format in community education sessions. The training for promoters uses a pictorial, engaging format to provide easy-to-understand information on emergency preparedness.

The following tools include a detailed report on the project (description of the outreach initiative, results, feasibility of replication, and estimated costs), and all of the materials (training curriculum for promoters, Spanish educational materials, answers to emergency preparedness questions, and pre- and post- tests). An appendix covers a range of basic questions that promoters may receive from their audiences and suggested simple answers.

TOOLS:

- Pilot Project Final Report - **DOWNLOAD PDF**

- Promotoras Training Curriculum (Spanish) - **DOWNLOAD PDF**

- Promotoras Training Curriculum - **DOWNLOAD PDF**

- Simple Answers to Basic Questions (Spanish) - **DOWNLOAD PDF**

- Simple Answers to Basic Questions - **DOWNLOAD PDF**

CASE STUDY: Immigrant Emergency Communications Program in Orange County, North Carolina following 2003 Ice Storms

In 2002, severe ice storms in Orange County caused serious power outages and dangerous freezing conditions. While shelters were open to house the affected, the large immigrant community stayed away due to a lack of information (i.e. they did not know there were shelters open or where they were located) and a lack of trust in the government to protect them from immigration authorities. As a result, a significant number of Latinos relied on generators and cooking grills inside their homes to stay warm, and many ended up in the hospital or died as a result of carbon monoxide poisoning.

In response to this tragedy, the Office of Emergency Management and a number of public health and social service agencies formed the Immigrant Emergency Communications Program. A variety of mechanisms for incorporating immigrant communities into emergency planning, preparedness, and response systems emerged, including focused efforts to build bilingual capacity:

- **Enhancing Spanish language capabilities at the local health department.** The Orange County Health Department created an internal policy to increase bilingual staff, and created staffing positions to respond to health agency calls in Spanish.

- **Training community emergency preparedness teams**. In addition to increasing bilingual county staff, the agency also recruited and trained community health workers (promotoras) to conduct educational campaigns within neighborhoods.

Other activities included:

- Forming an Immigrant Emergency Communication Committee, which meets quarterly and includes the Office of Emergency Management, the Health Department, school system, the American red Cross, social service agencies, the Chapel Hill Institute for Cultural and Language Education, community groups, hospitals and health clinics, churches, police, and fire departments.

- Mapping neighborhoods with high numbers of immigrant households, including community centers, to facilitate face-to-face information dissemination during emergencies.

- Partnering with local Spanish-language media and Latino community organizations to create a public education and outreach campaign, including a Spanish-language emergency preparedness publication, posters, and radio spots to increase awareness of and preparedness for emergencies.

- Organizing a "call-down" tree network, where committee members call other service providers and community leaders, who in turn call other contacts, and so on, so that urgent information is disseminated to immigrant communities from trusted sources.

- Encouraging social service providers to create and use multilingual voicemail messages during emergency closures.

- Sending bilingual risk communication messages via voicemail and cell phones through the Health Department's alert system.

During another major ice storm in Orange County, over 300 Latinos sought refuge in shelters. The program was able to provide enough trained multilingual volunteers to the American Red Cross to serve all immigrants who asked for assistance.

5 Professionalize Bilingual Disaster Communication

Community health promoters and medical interpreters provide key cultural and linguistic lThe field of medical interpretation is formalized and professionalized, with a variety of degree-granting academic programs, online curriculums, certificates, and professional associations available. For example, the **National Board of Certification for Medical Interpreters** offers an entry-level certification for medical interpreters who meet industry-standard educational requirements and pass a written and oral examination. These exams test adequate knowledge of the medical interpreting profession, including ethics, standards of practice, role boundaries and medical terminology, among other important competencies. The National Board currently offers the CMI (Certified Medical Interpreter) credential in six languages: Spanish, Cantonese, Mandarin, Russian, Korean, and Vietnamese.

A similar approach to professionalizing disaster interpreting and translation is feasible. Stakeholders representing the city, county, and non-profits could define core competencies and work in collaboration with linguistic experts to design a curriculum for bilingual disaster/emergency communications certification, or a training module that could be offered to bilingual staff. This resource would have utility beyond Napa County. For reference, the **California Healthcare Interpreting Association (CHIA)** provides a list of training programs that illustrate the range of topics, learning objectives, and learning outcomes that college programs and private providers in California offer in the healthcare interpreting field.

6 Utilize visual and video communication tools

Pictorial tools, videos, and other visual media can help to bridge the communication gap between non-English speaking populations, children, people with disabilities (i.e. those who cannot speak or hear, or who have a developmental disability), as well as those impacted by a traumatic event. These simple, low-tech tools can supplement or even stand-in when other bilingual services are not available. Beyond their utility for Spanish-speakers, such tools are critical in ensuring equity and inclusion for all members of the community in the disaster communications information ecosystem.

TOOL: **Identifying Language Resources to Help You Meet Your Needs**

(Excerpted from "Limited English Proficiency Resource Document: Tips and Tools from the Field," U.S. Department of Justice, Civil Rights Division)

When selecting services, consider the strengths and limitations of various language service providers.

- For instance, a **bilingual** person may be fluent and well-suited to having direct monolingual conversations (e.g., Spanish to Spanish and English to English conversations) in more than one language, but may not be skilled at converting those conversations from one language to another.

- In addition, some of your staff may be less than fully bilingual. However, their language skills may still be helpful for limited purposes such as outreach activities and basic conversation to set people at ease or to provide simple directions in ways that do not have significant consequences if accuracy is not perfect.

- By contrast, **professional interpreters and translators** are generally required to have undergone rigorous and specialized training.

- Reflect on the importance of your services to the LEP community, the skill level and training of your bilingual staff, and the complexity of the communication, to determine whether the **specialized skills of an interpreter or translator** are required.

Identify bilingual staff.

- In-house multilingual staffing is a **cost-effective way** to provide language services to LEP individuals.

- Where needs dictate, consider bilingual ability as a **compensable hiring criterion** for certain positions.
    - » Some organizations and departments have instituted **bilingual pay incentive programs**. Employees who pass a proficiency exam and are willing to provide language services receive a bonus or salary differential.

    - » Keep in mind that bilingual staff who are often called upon to facilitate communication with LEP individuals may find themselves routinely diverted from their normal work assignments.

- Create a **directory of bilingual staff** and their contact information. If appropriate for your agency's needs, bilingual staff and/or interpreters having contact with the public can wear badges indicating the languages they speak so that LEP individuals can easily identify such employees.
    - » When bilingual staff provide or review written translations, they can often benefit from collaborating with others listed in the directory.

- Test and train bilingual staff **providing language services on a regular basis.**
    - » Untrained bilingual staff may not be versed in the standards of the interpreting profession (e.g., role, code of conduct, modes of interpretation, specialized terminology, etc.), resulting in compromised accuracy and statements with potentially limited evidentiary value. Both the agency providing services, as well as the LEP individual, have administrative, safety, and enforcement interests in accurately-rendered interpretation and translation services.

    - » Enable bilingual staff to access interpreter training courses and translation and language skills training. Such access benefits both your organization and the communities you serve.
        - o See also Section on "Ensuring Quality Control" below.

- Even when bilingual staff are used to provide direct services in a non-English language (rather than to provide interpretation), be sure to **institute quality control measures and provide professional development opportunities** to ensure that communication is effective and accurate.

Identify situations requiring the services of a professional interpreter or translator.

- **Establishing relationships** with professional interpreters, translators, and other users of professional language services can help you to tap into a pool of qualified individuals to contact when necessary.

- **Professional interpreters are trained** to convey meanings accurately, avoid conflicts of interest, and maintain confidentiality, impartiality, and accuracy in the course of performing their professional duties.

- Interactions involving a possible deprivation of liberty, such as interrogations, should involve a **fully-trained professional**. Untrained bilingual staffers or informal communication techniques should be used only as a stop-gap measure to stabilize an emergency situation until a professional interpreter (telephonic or in-person) becomes available to assist.

- In situations with legal implications in general, and criminal implications in particular, the stakes can be very high. For example, the terms of a temporary restraining order in a domestic violence case should be accurately conveyed, both to an accused batterer and to the alleged victim. Failure to do so may result in **unintended consequences**, e.g., compromised safety and/or misunderstandings leading to criminal liability.

- Professional interpretation and translation services are available in most cities. U.S. Attorneys' offices, state and federal courts, and FBI regional offices often contract with such local interpretation and translation companies. **Contact such entities for lists of potential individuals or companies.** National, regional, and state interpreter and translator associations also post lists of members by language and geographical location.

    » For information on interpreter and translator associations, go to the interpretation/translation section of **LEP.gov**.

- **Monitor quality** of interpretation and translation services. See Section on Ensuring Quality Control below.

Telephonic interpretation services can ensure resources when in-house demand is high or immediate interpretation is needed.

- Telephonic interpretation is particularly useful for officers in the field, during 911 calls, or in other instances in which a range of languages could be encountered and swift response is necessary. Telephonic interpretation can be conducted utilizing a commercial telephonic interpretation service, professional interpreter, or trained bilingual staffer who cannot be available onsite (e.g., a police call at 3:00 a.m.).

- Commercial telephonic interpretation services are helpful where in-house language capacity is insufficient or unavailable. Telephone interpretation services are immediately available when crisis management is required in a range of languages. Such services can provide a per-minute rate in a broad range of languages.

- Monitor quality. Ensure that the provider you choose understands the context in which you operate and can accurately interpret or translate specialized terms you use, such as Miranda warnings. Other relevant information may include the connection time necessary for telephonic interpretation, and whether it is swift enough for your purposes.

ENSURING QUALITY CONTROL

- Bilingual staff and community members often do not have the training and expertise of professional interpreters and translators. **Provide staff and others with training** or arrange for bilingual employees or community members to attend interpreter training courses and to participate in opportunities to improve their language skills. **Incorporate interpreter certification and evaluation exams into your LEP plan** for those staff used as interpreters. In addition, evaluate and monitor language skills of bilingual staff used to provide direct service in a non-English language or to translate documents.

- **Do not make assumptions about the language skills** of your bilingual staff person, or even your interpreter/translator, regardless of apparent qualifications.

  » When obtaining translations, strongly consider having a "second-check" system.

    ✓ It is more expensive to go back and fix a published document than to expend the resources to get it right the first time. Even excellent translators can benefit from the input of others.

    ✓ Where time allows, consider having representatives of LEP groups also look at professional translations to ensure that they are "readable."

    ✓ Before going to the presses, be sure to note the direction in which the language reads.

    ✓ Put the name of the language, in English, somewhere on the document for ready identification.

  » Learn more about your interpreter or translator's background before deciding to use that person's services, if time permits.

- Some background questions you **might consider asking** anyone providing language assistance include:

  » Are you a practicing interpreter or translator?

  » Where did you obtain your language skills (both English and the other language)?

  » Will you be able to understand and be understood by the LEP person, who is from _____, or might there be a dialect or geography-based language barrier?
    Example: A Spanish-speaker from Latin America may have some difficulty understanding some vocabulary or pronunciation of a Spanish-speaker from Spain and vice versa.
    Example: A person who speaks "White" Hmong may have some difficulty understanding "Green/Blue" Hmong.

  » How long have you been a practicing interpreter/translator?

  » If not a practicing interpreter/translator, have you interpreted/translated before and, if so, in what situations?

  » What specialized training have you received, or are you self-taught?

  » Are you certified by and/or an active member of any interpreter/translator association?

  » *[For spoken interpretation only]* Are you able to perform simultaneous interpretation (technique where the interpreter interprets at the same time as the speaker)? Are you able to do consecutive interpretation (where there is a pause between language conversions)?

  » Do you know (the LEP individual)? Have you ever seen him or her before?

  » What will you do if you don't understand something that [the LEP individual] has said/written?

  » What will you do if you believe you have interpreted/translated something inaccurately?

  » Do you receive continuing education?

  » Do you specialize in law enforcement, medical, educational, or some other type of interpretation (oral) or translation (written)?

  » Do you have any background issues I should know about? (Be sure to check!)

- If appropriate, give the individual providing language assistance **relevant background information**. For instance, consider providing:
    - » The LEP individual's name and native country and town;
    - » The LEP individual's educational level, if known;
    - » The LEP individual's ability to read and write, if relevant;
    - » Any speech or other particularities, including the LEP individual's use of slang words, names, or other common words;
    - » Information necessary to check for potential conflicts that the interpreter may have, as appropriate.

- Make sure that the person providing language services understands his/her **ethical obligations**.
    - » Professional interpreters are required to adhere to a code of ethics emphasizing confidentiality; impartiality; accuracy; avoidance of a conflict of interest; abstinence from communication with the LEP person beyond that which is necessary to carry out professional duties; and no adding to, editing, summarizing, or embellishing the LEP person's statement.

- Ensure that the parties **understand each other**.
    - » For instance, does the individual providing language services understand the LEP person and vice versa? Do you and the individual providing language services understand each other?

    - » You might consider asking a question that requires more than a "yes" or "no" answer and, as appropriate, one to which you know the answer, so that you can determine if effective communication is going on.

- Make sure that the **LEP individual is comfortable** with the person providing language services.
    - » Do the interpreter and the LEP individual seem to know each other?

    - » Do they come from traditionally adversarial communities? (This should ideally be determined before a face-to-face meeting between the interpreter and the LEP individual.)

    - » Is there any affinity between the interpreter or translator and a party who opposes your LEP individual's interests (e.g., if your LEP individual is a victim of domestic violence, is the interpreter somehow aligned with the batterer)?

- Instruct the person providing language services and the LEP individual to avoid having long dialogues between interpretations.

- When dealing with professional interpretation services (telephonic or in-person), be sure to ask the following **additional questions**, and to include appropriate terms in any contractual agreement regarding the services and qualifications of the interpreters:

   » Is the interpreter familiar with specialized terminology used in your field (e.g., American legal concepts such as Miranda warnings)?

   » Does the interpreter have experience in the particular field (e.g., legal, medical, or other interpreting)? How much experience does he/she have?

   » What is the cost? When entering into a contract with a telephonic interpretation service or professional interpretation/translation company, can the company offer services in a sufficient number of languages to justify the cost?

   » Are the interpreters familiar with both formal language and colloquialisms/street slang?

   » Are the interpreters familiar enough with the community to be able to interpret effectively? People may share a single language, but speak it very differently.

   » What is the connection time necessary for telephonic interpretation? Is it swift enough for your purposes?

- Ensure that the person providing language services answers all questions in the first person, as if he/she were the LEP person.

APPENDIX:

LANGUAGE ACCESS IN U.S. FEDERAL LAW

(Source: https://www.lep.gov/faqs/faqs.html)

RELEVANT LAWS

Federal laws particularly applicable to language access include Title VI of the Civil Rights Act of 1964, and the Title VI regulations, prohibiting discrimination based on race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. Many individual federal programs, states, and localities also have provisions requiring language services for LEP individuals.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," was issued in 2000. The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

RECIPIENTS OF FEDERAL ASSISTANCE

Recipients of federal funds range from state and local agencies, to non-profits and other organizations. A list of the types of recipients and the agencies funding them can be found at **Executive Order 12250 Coordination of Grant-Related Civil Rights Statutes**.

Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Subrecipients are also covered, when federal funds are passed from one recipient to a subrecipient.

Title VI covers a recipient's entire program or activity. This means all parts of a recipient's operations are covered. This is true even if only one part of the recipient receives the federal assistance.

REQUIREMENTS OF RECIPIENTS OF FEDERAL ASSISTANCE

Recipients and federal agencies are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;

2. the frequency with which LEP individuals come in contact with the program;

3. the nature and importance of the program, activity, or service provided by the program to people's lives; and

4. the resources available to the grantee/recipient or agency, and costs. As indicated above, the intent of this guidance is to find a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small business, or small non-profits.

TRANSLATION OF DOCUMENTS

It is important to ensure that written materials routinely provided in English also are provided in regularly encountered languages other than English. It is particularly important to ensure that vital documents are translated into the non-English language of each regularly encountered LEP group eligible to be served or likely to be affected by the program or activity.

A document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits, or is required by law. Vital documents include, for example: applications, consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; prison rulebooks; written tests that do not assess English language competency, but rather competency for a particular license, job, or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client. For instance, if a complaint form is necessary in order to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services. Advertisements of federal agency tours and copies of testimony presented to Congress that are available for information purposes would be considered non-vital information.

Vital documents must be translated when a significant number or percentage of the population eligible to be served, or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively. For many larger documents, translation of vital information contained within the document will suffice and the documents need not be translated in their entirety.

It may sometimes be difficult to draw a distinction between vital and non-vital documents, particularly when considering outreach or other documents designed to raise awareness of rights or services. Though meaningful access to a program requires an awareness of the program's existence, [the federal government] recognizes that it would be impossible, from a practical and cost-based perspective, to translate every piece of outreach material into every language. Title VI does not require this of recipients of federal financial assistance, and EO 13166 does not require it of federal agencies. Nevertheless, because in some circumstances lack of awareness of the existence of a particular program may effectively deny LEP individuals meaningful access, it is important for federal agencies to continually survey/assess the needs of eligible service populations in order to determine whether certain critical outreach materials should be translated into other languages.

REFERENCES:

Center for Infectious Disease Research and Policy, University of Minnesota, "Emergency Preparedness Training Curriculum for Latino Promoters," Source Agency: Montgomery County Advanced Practice Center, Maryland, **http://www.cidrap.umn.edu/practice/emergency-preparedness-training-curriculum-latino-promoters**

Center for Infectious Disease Research and Policy, University of Minnesota, "Multi-format communications program readies Spanish speakers for emergencies," Source Agency: Orange County Health Department, **http://www.cidrap.umn.edu/practice/multi-format-communications-program-readies-spanish-speakers-emergencies-0**

Center for Infectious Disease Research and Policy, University of Minnesota, "Leaving no one behind: communicating with special populations," Source Agency: San Mateo County Health Department, **http://www.cidrap.umn.edu/practice/leaving-no-one-behind-communicating-special-populations**

Internews, "Desconectado: How Emergency Information Got Lost in Translation During the Northern California Wildfires," 2018 **https://www.internews.org/sites/default/files/2018-10/Internews_Information%20Assessment_Northern%20California_Sept2018.pdf**

Kelle Kroll Group, North Bay Fires After Action Report for Napa Valley COAD, February 2018

LEP.gov, Limited English Proficiency (LEP) - A Federal Interagency Website, **https://www.lep.gov/faqs/faqs.html**

National Council of La Raza, "Emergency Managers Toolkit: Meeting the Needs of Latino Communities," 2001, **https://issuu.com/nclr/docs/emergencepreparednesstk_print/9**.

National Health Plan Collaborative, "Toolkit to Reduce Racial & Ethnic Disparaties in Health Care," 2008, **https://www.rwjf.org/content/dam/files/legacy-files/article-files/2/nhpctoolkit.pdf**

Purtle, Jonathan, Nadia J. Siddiqui, Dennis P. Andrulis. "Language Issues and Barriers," Encyclopedia of Disaster Relief. Penuel, K.B. and Statler, M. (Eds.). (2011). **https://www. texashealthinstitute.org/uploads/1/3/5/3/13535548/language_issues_and_barri- ers-purtle.pdf**

Shiu-Thornton, Sharyne et al. "Disaster preparedness for limited English proficient com- munities: medical interpreters as cultural brokers and gatekeepers," *Public health reports (Washington, D.C. : 1974)* vol. 122,4 (2007): 466-71.

U.S. Department of Justice, Civil Rights Division, Executive Order 13166, "Limited English Proficiency Resource Document: Tips and Tools from the Field," 2004, **https://www.lep.gov/guidance/tips_and_tools-9-21-04.htm#2**

U.S. Department of Justice, Civil Rights Division, Federal Coordination and Compliance Section, "Tips and Tools for Reaching Limited English Proficient Communities in Emer- gency Preparedness, Response, and Recovery," 2016, **https://www.justice.gov/crt/ file/885391/download**

U.S. Department of Justice, Civil Rights Division, Federal Coordination and Compliance Section, "Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs," 2011, **https://www.lep.gov/resources/2011_Language_ Access_Assessment_and_Planning_Tool.pdf**

U.S. Department of Justice, Civil Rights Division, Federal Coordination and Compli- ance Section, Translation and Interpretation Procurement Series, "Before you hire - ask yourself: what are my project's language needs?" **https://www.lep.gov/resources/BE- FORE%20YOU%20HIRE%20ASK%20YOURSELF%20_%203-19-14%20_%20508.pdf**

U.S. Department of Justice, Civil Rights Division, Federal Coordination and Compliance Section, Translation and Interpretation Procurement Series, "TIPS on building an effective staff language service program," **https://www.justice.gov/crt/file/923341/download**