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# City of Providence Language Access Toolkit

July 2019





Providence Human  
Relations Commission

Hon. Jorge O. Elorza  
Mayor

Sabina Matos  
Council President

Sol Taubin  
Director

Providence City Hall  
25 Dorrance Street Suite  
201, Providence RI  
02903

[www.providenceri.gov/  
hr-commission](http://www.providenceri.gov/hr-commission)

401-680-5740

## Expanding Language Access City-wide

### *A Note from the Mayor, Council President & Director of the Providence Human Relations Commission*

July 31, 2019

Providence is an inclusive, diverse city, with over 47% of residents speaking a language other than English at home. Our community members come from all over the globe, and make Providence the resilient, vibrant city that it is. We believe that language access is a critical component in building inclusive and thriving communities, ensuring our immigrant and refugee residents can fully participate in social, civic, and economic life. We also believe city services should be innovative, efficient, transparent and accessible for all residents and visitors.

In line with these values, we have had multiple conversations over the last year, aimed at reviewing how we currently provide services for persons with limited English proficiency. We have briefed directors, surveyed departments, and refined our procurement processes. We have built out a community interpretation framework, purchased simultaneous interpretation equipment, and developed this toolkit -- a resource guide for departments to ensure they are doing everything in their power to expand language access and serve residents whose primary language is not English.

While we are thrilled to launch these initiatives, the work does not end here, and we look forward to continuing the conversation in community and making strides together to continue to expand language access city-wide. We give thanks to the City of Seattle for the technical assistance provided for this project, as well as the Rhode Island Department of Human Services and AMOR RI for their continued partnership, and look forward to updating this toolkit with additional resources in the coming months.

Yours in service,

Hon. Jorge O. Elorza  
Mayor  
City of Providence

Sabina Matos  
Council President  
City of Providence

Sol Taubin  
Director  
Providence Human  
Relations Commission



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# Language Access Toolkit Overview

This toolkit was developed by the Providence Human Relations Commission, in consultation with other city departments, member organizations of the Rhode Island Department of Human Services' Refugee Resettlement Support Network, the City of Seattle's Office of Immigrant and Refugee Affairs, and AMOR RI. As a whole, it outlines the resources available for departments to successfully integrate language access into their program and budget planning. Departments have been surveyed to better understand what level of translation and interpretation is currently being provided, interpretation equipment has been purchased for city-wide use, and a blanket contract for translation and interpretation services is in process, following a Request for Information issued in 2018. In addition, a variety of complementary resources are available to departments, among them, a community interpretation framework to support institutionalized language access investments. A list of these resources, as well as their terms of use, project-planning guides, and relevant terms and definitions, can be found in this document. If your question is not covered by this toolkit, the following directors are available to provide technical assistance.

**For general language access inquiries:**

Sol Taubin  
Director of the Providence Human Relations Commission  
[staubin@providenceri.gov](mailto:staubin@providenceri.gov)

Leonela Felix  
Deputy Director of Policy  
[lfelix@providenceri.gov](mailto:lfelix@providenceri.gov)

**For procurement inquiries:**

Molly Hannon  
Associate Director of Purchasing  
[mhannon@providenceri.gov](mailto:mhannon@providenceri.gov)

**For in-language media inquiries:**

Victor Morente  
Press Secretary  
[vmorente@providenceri.gov](mailto:vmorente@providenceri.gov)

**For multilingual staff inquiries:**

Emmanuel Echevarria  
Director of Human Resources  
[eechevarria@providenceri.gov](mailto:eechevarria@providenceri.gov)

# Definitions

## Language Access Terms

**Interpretation:** transmission of a verbal message from one language to another.

- **Simultaneous interpretation:** interpretation in real-time, typically through headsets or other technologies, best suited for larger events.
- **Consecutive interpretation:** interpretation that follows an original statement broken into pieces, typically through a speaker stopping in short intervals to allow for interpretation to take place.
- **Summary interpretation:** interpretation following an original statement in summary.

**Emergent Language:** a language group with rising incidence within a particular community.

**Limited English Proficiency (LEP):** for the purposes of this document, speaking English “less than very well,” as per the American Community Survey administered by the U.S. Census Bureau.

**Native Speaker:** an individual who learned the language in question from early childhood.

**Translation:** transmission of a written message from one language to another; not always word for word.

**Vital Document:** documents that are essential to accessing basic city services and benefits.

## Vital Documents

As per the U.S. Department of Justice, a document is considered vital if it contains information that is critical for obtaining services or benefits, or is required by law. Vital documents are to be translated when a significant number or percentage of the population eligible to be served or likely to be directly affected by a program or activity, needs services or information in a language other than English to communicate effectively. Longer documents can be translated via summaries of their most important content, and it is best practice to advertise available translations on all versions of a document. Examples of vital documents include applications forms, consent forms, and complaint forms; notices of rights and disciplinary action; notices advising persons of free language assistance; tests that assess competency for a license, job, or skill for which English is not required; and letters or notices that require a response from the recipient.

### VITAL DOCUMENT EXAMPLES

Application, consent, and complaint forms

**Notices of rights; eligibility criteria; denial, loss, or decreases in benefits or services**

Explanations of departments' functions

Key documents related to a department's functions and services

**Letters that require a response from a customer who is LEP**

Notices of language assistance

Lists of critical contacts

## Safe-harbor & Emergent Languages

As per the U.S. Census Bureau's latest American Community Survey, the total number of limited English proficient individuals in Providence is 35,277, out of a total population of 178,042. The Department of Housing and Urban Development (HUD) has established guidance with respect to determining when a language group reaches safe-harbor status, requiring provisions for written language assistance. Vital documents must be translated if a language group consists of 1,000 or more eligible individuals in a serviced area, if there are more than 1,000 current eligible beneficiaries of a program, or if a language group makes up more than 5% of the eligible population and numbers more than 50 individuals. If a language group makes up more than 5% of the eligible population and numbers less than 50, a written notice translated into the language is required, advising of the right to receive free oral interpretation of documents.

TOTAL LIMITED ENGLISH PROFICIENT POPULATION: 35,277			
Spanish/Spanish Creole	27,347	Mon-Khmer/Cambodian	1,546
Chinese	1,134	Portuguese/Portuguese Creole	1,073
French Creole	787	Laotian	477
African Languages	391	Other Asian Languages	309
Other Indic Languages	296	Italian	282
Korean	253	Vietnamese	233
Russian	181	Arabic	151
Hmong	139	Tagalog	128
French (incl. Patois, Cajun)	85	Urdu	69
Other Pacific Island Languages	64	Thai	60
German	42	Serbo-Croatian	37
Hebrew	30	Hungarian	24
Other/Unspecified Languages	22	Hindi	22
Persian	17	Other Slavic Languages	15
Other West Germanic Languages	12	Japanese	12
Armenian	9	Polish	8
Scandinavian Languages	7	Gujarati	7
Other Indo-European Languages	6	Yiddish	5

# Language Access Guides

## Department Roles Overview

PHRC	PURCHASING	COMMUNICATIONS	DEPARTMENT
<b>IN-LANGUAGE OUTREACH</b>			
<p>Connect department to community leaders &amp; organizations</p> <p>Propose solutions to resolve challenges</p>	<p>Manage blanket contract for translation &amp; interpretation</p> <p>Provide preferred vendor &amp; community interpreter lists</p>	<p>Advise and support development of in-language media strategies</p>	<p>Schedule meetings with community leaders &amp; organizations</p> <p>Discuss &amp; agree on terms of partnership -- expectations, goals, and scope of work</p> <p>Manage contracts &amp; delivery of services</p>
<b>EVENT INTERPRETATION</b>			
<p>Support development of language access strategies</p> <p>Propose solutions to resolve challenges</p> <p>Provide staff training as needed</p>	<p>Manage blanket contract for translation &amp; interpretation</p> <p>Provide preferred vendor &amp; community interpreter lists</p>	<p>Provide language bank documents to selected translator or interpreter, as available</p>	<p>Connect directly with interpreters to set up and manage one-off contracts</p> <p>Send language bank documents</p> <p>Manage contracts &amp; delivery of services</p>
<b>DOCUMENT TRANSLATION</b>			
<p>Support development of language access strategies</p> <p>Propose solutions to resolve challenges</p> <p>Provide staff training as needed</p>	<p>Manage blanket contract for translation &amp; interpretation</p> <p>Provide preferred vendor &amp; community interpreter lists</p>	<p>Provide language bank documents to selected translator or interpreter, as available</p>	<p>Connect directly with translators to set up and manage one-off contracts</p> <p>Send materials to be translated &amp; language bank documents</p> <p>Manage contracts &amp; delivery of services</p>

# Pre-Project Planning Guide

## PRELIMINARY QUESTIONS

Who is your audience?	<p>Is this a city-wide project or for a specific community?</p> <p>What language(s) does your audience speak?</p>	<p>Is your initiative focused on an immigrant or refugee population?</p> <p>What is the best means of communication for this group?</p>
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## BUDGET

What is the project budget?	How much is allocated for translation, interpretation, and community outreach?	Who will monitor record-keeping processes?
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## TIMELINES, PROCESS & ROLES

<p>What is the timeline for the project?</p> <p>How will information be distributed?</p>	What capacity exists to answer in-language calls, emails, and other constituent communication?	Who will manage contracts and services, including translation, interpretation & outreach?
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# Interpretation Overview

## IN-PERSON INTERPRETATION

Interpreter Average Rate: \$45-\$50 per hour for consecutive interpretation and \$85-\$100 per hour for simultaneous interpretation for events during the workday

Sign out City interpretation equipment through Department of Public Property

Provide relevant language-bank, if available, through Mayor's Office of Communications

## PHONE INTERPRETATION

Interpreter Average Rate: \$45-\$50 per hour

Provide relevant language-bank, if available, through Mayor's Office of Communications

## INTERPRETATION PROCESS

### 1-2 months before the event

- Plan translation & interpretation needs throughout program or service, identifying funding allocation and in-department point person to support language access work
- Submit a work order request to the Department of Public Property to secure the City's simultaneous interpretation equipment for your event
- Identify a vendor with the support of the Purchasing Department, whether through the City's blanket contract, or preferred vendor list



- Connect directly with vendor to ensure availability and confirm cost and payment timelines. Request a quote, sharing a W-9 form if it is the vendor's first time working with the City
- Submit requisition to Purchasing Department upon receipt of quote
- Share Purchase Order with vendor as an assurance, when it becomes available

**2-3 weeks before the event**

- Communicate what interpretation style is to be used, sharing City language bank, pertinent documents, and event agenda with interpreter prior to event. Confirm time and location of event, including any pertinent details with respect to building access/parking

**Prior to event**

- Sign out simultaneous interpretation equipment from Department of Public Property
- Remind interpreter of time and location, printing relevant materials for interpreter

**During event**

- Acknowledge interpreters, informing the audience that in-language interpretation is available.
- Remind audience and speakers that interpretation is happening, and to speak clearly and at a moderate speed

**Following event**

- Thank interpreter and ask for feedback regarding event logistics
- Share any necessary updates to City language bank with Mayor's Office of Communications
- Ensure interpretation equipment is returned to Department of Public Property in full
- Receive on vendor invoice

Please note: if complications arise with a vendor, please notify the Department of Purchasing. If a community member has a complaint about interpretation services provided, please inform the Providence Human Relations Commission as soon as possible and no later than 48 business hours following submission of the complaint.

## Translation Overview

### SIMPLE TRANSLATION

Translation Average Rate: ~0.20c per word, \$50/hr certified translator

Documents of length one page or less, e.g. press releases, flyers, basic application forms, notices of rights, notices of language access services, etc.

Please note, turn-around time affects rate

### COMPLEX TRANSLATION

Translation Average Rate: ~0.20c per word, \$50/hr certified translator

Documents of length two pages or more, e.g. complex application forms, guides, department scope of work and services, compliance forms

Please note, turn-around time affects rate

## TRANSLATION PROCESS

**At outset of project**

- Plan translation & interpretation needs throughout program or service, identifying funding allocation and in-department point person to support language access work

- Identify a vendor with the support of the Purchasing Department, whether through the City's blanket contract, or preferred vendor list
- Connect directly with vendor to ensure availability and confirm cost and payment timelines. Request a quote, sharing a W-9 form if it is the vendor's first time working with the City

**Upon confirmation of cost & timelines**

- Submit a requisition to the Purchasing Department upon receipt of quote.
- Share Purchase Order with vendor as an assurance, when it becomes available
- Share documents to be translated in Word, along with relevant City language bank
  - Keep information simple and concise. Avoid metaphors, idioms, colloquialisms, euphemisms and other forms of language that require U.S. cultural experience
  - Check documents for readability before sharing. Online tools like [readable.io](https://readable.io) can help
  - Highlight organization names, programs, and proper nouns that may already be in the City's language banks, or may need to be added following translation
  - For help converting from PDF to Word formats, contact the Office of Information Technology

**Upon receipt of translated documents**

- Have translated documents reviewed by native speaker, potentially a City employee trained in community interpretation. Reach out to the Department of Human Resources for support. Reconcile any changes or concerns with translator

**Upon confirmation of approved translation**

- Thank translator and ask for feedback regarding process
- Share any necessary updates to City language bank with Mayor's Office of Communications
- Receive on vendor invoice

Please note: if complications arise with a vendor, please notify the Department of Purchasing. If a community member has a complaint about interpretation services provided, please inform the Providence Human Relations Commission as soon as possible and no later than 48 business hours following submission of the complaint.



# Shared City Resources

## Interpretation Equipment

The Providence Human Relations Commission recently purchased simultaneous interpretation equipment to serve as a shared resource for all City departments. To borrow the interpretation equipment for a public-facing event, please submit a work-order request to the Department of Public Property. Please note that any department leasing the equipment agrees to take full responsibility for any damages incurred while in its possession, and agrees to rectify any damages to the Providence Human Relations Commission in full.

## Language Banks

The Mayor's Office of Communications has compiled language banks of preferred translations for key City initiatives, to ensure consistency in communications when working with outside vendors and community interpreters. These documents are iterative, and updated when new services are procured and new initiatives are developed and advertised. To access the latest version of the language banks, please reach out to the Mayor's Office of Communications. Please note that any department working with an outside vendor or community interpreter is to provide the appropriate language bank to the partner in advance of a project or event.

## Blanket Contract & Preferred Vendor Lists

The Department of Purchasing has assembled preferred vendor lists for in-language community outreach, translation, and interpretation. In addition, a blanket contract is in process to ensure vital documents are made available in safe-harbor languages City-wide. To access the latest versions of the vendor lists, or to inquire about participating in the blanket contract, please reach out to the Department of Purchasing. Please note, procurement of services must follow all relevant state law, City Ordinance, and guidelines set forth by the Board of Contract and Supply.

## Community Interpretation Workshops

The Providence Human Relations Commission has partnered with [AMOR](#)'s language justice team to provide a series of community interpretation workshops for City of Providence employees and department directors, equipping multilingual staff with the fundamentals of interpretation based in principles of language justice, and supporting public-facing departments in working with constituents using community

interpreters. To access the directory of multilingual staff who have been trained in community interpretation, please contact the Department of Human Resources. A guide is also in development for departments working with constituents using community interpreters. To access this guide, please contact the Providence Human Relations Commission.

## In-Language Media Lists

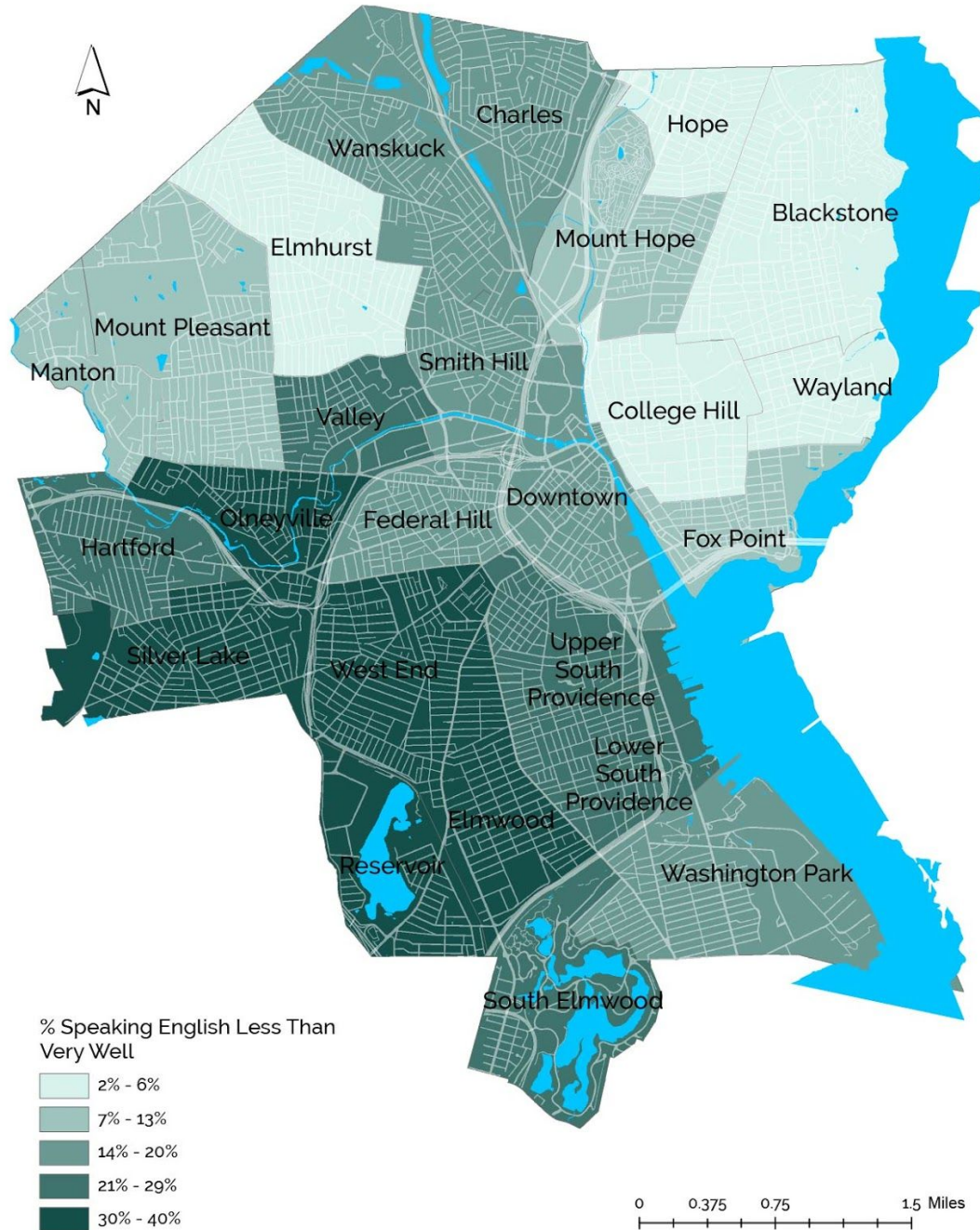
The Mayor's Office of Communications keeps updated lists of in-language media outlets throughout the City, and maintains relationships with many. The Office is available to support your department in identifying in-language media outlets for outreach, developing in-language media strategies, and designing in-language ads. To be connected to in-language media outlets or schedule a conversation about in-language media strategy, please contact the Mayor's Office of Communications.

## City Website

Over the past five years, the City of Providence has worked to ensure that its online presence is accessible to as many residents as possible. The city website, [providenceri.gov](http://providenceri.gov), is available in all safe-harbor languages via an integrated digital translation system powered by Google. The website serves as a portal to the City's key initiatives, news, and services. For questions about digital accessibility, please contact the Office of Information Technology.



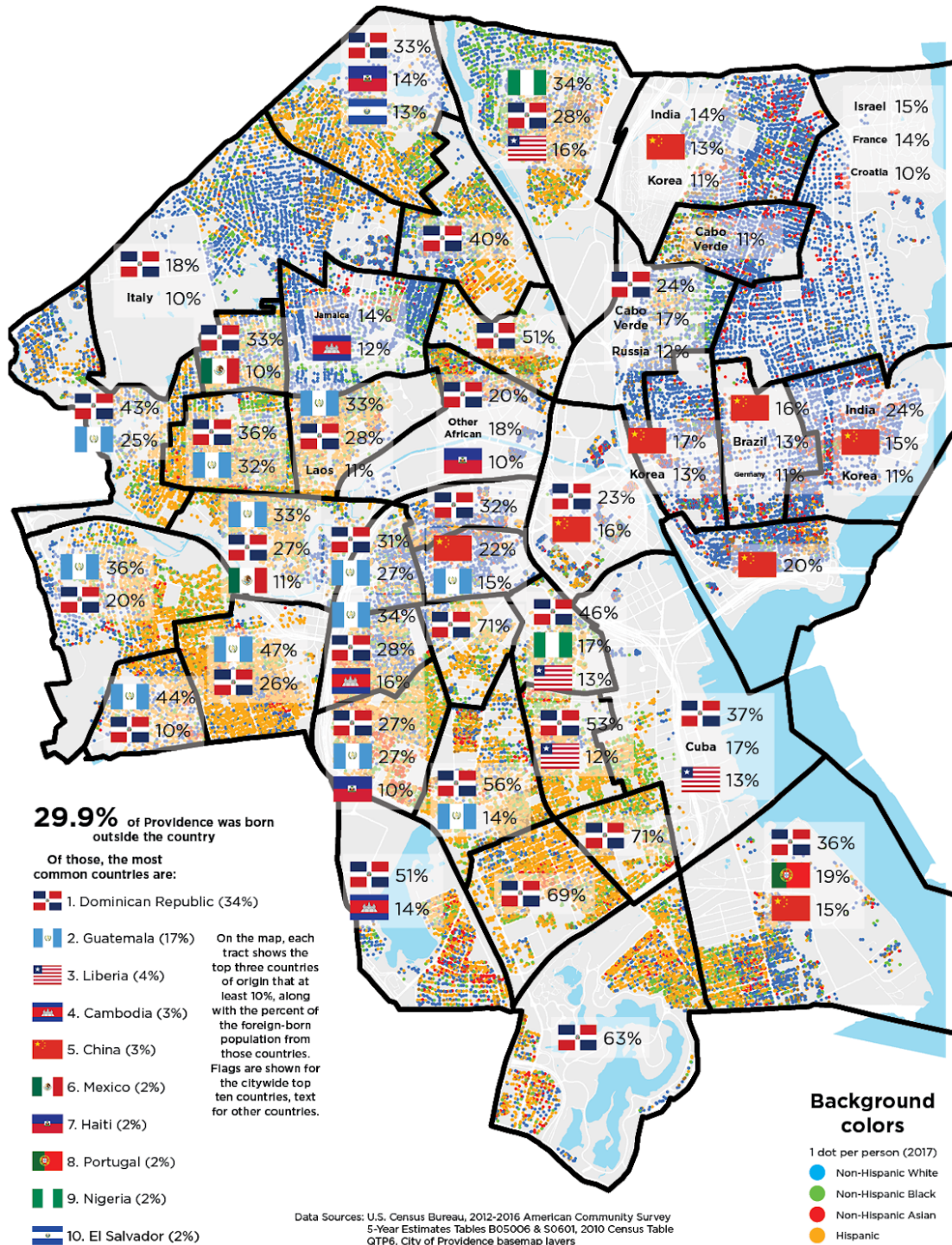
# Appendix A: Maps



**Fig. 1: Neighborhood-level LEP Incidence**

Map of Providence detailing percentage of residents per neighborhood with limited English proficiency, defined here as speaking English less than very well per the latest American Community Survey administered by the U.S. Census Bureau





**Fig. 2: Neighborhood-level Countries of Origin**

Map of Providence detailing most prevalent countries of origin per census tract and city-wide, per the latest American Community Survey administered by the U.S. Census Bureau