1 GOAL AND REQUIREMENTS

1.1 INTRODUCTION
The City of Austin is committed to open government and the provision of quality customer services. This includes making reasonable efforts to ensure that City services and information about those services are provided in a manner that is accessible, relevant and timely to residents although they may be limited in their English proficiency (LEP).

1.2 GOAL
It is the goal of the Aviation Department to provide meaningful access to its services, information, activities, and programs irrespective of the linguistic status of Austin residents. This plan outlines current resources and planned steps toward achieving that goal. This plan was prepared by Ramonika Carr and update completed on May 31, 2019.

1.3 FEDERAL REQUIREMENTS
On August 11, 2000, the President signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order is designed to better implement Title VI of the Civil Rights Act of 1964 which prohibits recipients of federal financial assistance from discriminating based on national origin by, among other things, failing to provide meaningful access to individuals with limited English proficiency. This requirement applies to any entity who is a recipient or sub-recipient of federal funds including grants, training, or use of equipment.

1.4 CITY OF AUSTIN
The City of Austin has demonstrated its commitment to meaningful access to its services through City Council Resolution No. 20161103-052 and Administrative Bulletin 14-04. Resolution No. 20161103-052, passed on November 3, 2016 directs the City Manager to develop “Language Access Procedures,” as described by the Department of Justice, for each City department that interacts with the public. The procedures should specify steps for staff to follow to provide language access, gather data, and deliver services to LEP individuals, with special consideration for how City departments can begin collecting LEP-relevant data from the residents they serve and to whether City departments should designate language access coordinators to ensure effective services are provided.

Administrative Bulletin 14-04, approved by the City Manager on August 1, 2014 established a “Translation and Interpretation Policy.” Per the Policy, the Communications and Public Information Office shall establish and maintain web infrastructure, equipment and translators and interpreters. All Departments shall provide relevant information and translate critical information into other languages as outlined in the Policy (see “References” section of this document).
2 Key Definitions

**ASL.** American Sign Language. ASL is used by a large population in Austin due to the presence of the Texas School for the Deaf.

**BILINGUAL FLUENCY.** The ability to speak and understand two languages easily and accurately.

**CRITICAL INFORMATION.** This information may have life and death implications, such as emergency response messages, or may be essential to effective operation of City services. Critical information can appear in written or oral form.

**INTERPRETATION.** Interpretation is the oral rendition of a spoken message from one language to another, preserving the content and meaning of the original message. Interpretation is often called “translation.” However, “translation” refers to written documents, while “interpretation” refers to oral messages.

Interpreting is a different skill than being bilingually fluent and able to communicate in more than one language. Interpretation requires specialized knowledge and ethics training in topics such as impartiality and accuracy.

Certain categories of persons, such as friends, family members, and minors should not be relied upon for interpretation services according to Department of Justice guidance.

**LANGUAGE ACCESS POINT OF CONTACT.** The division or office that serves as the point of contact for the maintenance, monitoring, and implementation of the Language Access Plan.

**LANGUAGE LINE**
A Language Line is a commercial interpretation service accessed through the telephone.

**LIMITED ENGLISH PROFICIENCY (LEP).** According to the City’s Translation and Interpretation Policy, a person with limited English proficiency is unable to speak, read, write or understand the English language at a level that permits him or her to interact effectively with the City. Individuals who communicate through American Sign Language are included in this definition.

On Census data, a person with LEP is someone who self-assesses as speaking English less than “very well.”

Over-the-phone Interpretation (OPI). Over-the-phone interpretation (OPI) is a commercial interpretation service accessed through the telephone (also called “language line services”).

**PRIMARY LANGUAGES**
Primary languages are languages other than English spoken at home by the largest number of people who live in the city of Austin is based on current US Census Bureau data. Spanish is the most spoken language in Austin. Spanish translations should be culturally appropriate to the predominant form of the language spoken in Central Texas.

**TRANSLATION.** Translation is the conversion of written message from one language to another in a written form.

**VITAL PUBLIC INFORMATION.** Vital public information is any information developed or used that is necessary for obtaining access to services or benefits that are federally funded, or required by law. Examples include applications; consent and complaint forms; notices of rights; notices of activities; and notices advising persons of the availability of free language assistance.
3 AVIATION’S SERVICES AND INTERACTION WITH THE PUBLIC

3.1 AVIATION DEPARTMENT
The table below provides a description of the Aviation Department’s services and how the public accesses those services.

3.1.1 Service Assessment Table

<table>
<thead>
<tr>
<th>Service</th>
<th>Location</th>
<th>How does public access the service (include specific point of encounter)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Service</td>
<td>Barbara Jordan Terminal</td>
<td>Information Desk/Podiums</td>
</tr>
<tr>
<td>Communications</td>
<td>Communication Center</td>
<td>Public Contact Number</td>
</tr>
<tr>
<td>Security</td>
<td>Barbara Jordan Terminal</td>
<td>Walk-up in/outside Terminal</td>
</tr>
<tr>
<td>Landside Operations</td>
<td>Barbara Jordan Terminal/Garage Entrance</td>
<td>Walk-up in/outside Terminal</td>
</tr>
</tbody>
</table>

4 FOUR FACTOR ASSESSMENT: DEMOGRAPHY, FREQUENCY, IMPORTANCE, RESOURCES

The Federal guidance outlines four factors an entity should consider to determine the extent and types of language assistance that should be provided. The Department of Justice uses these factors in evaluating whether an entity or program complies with Title VI.

This Language Access Plan contains Aviation’s data analysis conducted to support an assessment of progress in providing language access to persons with LEP. This LAP follows federal guidance, which outlines four factors an entity should consider to determine the extent and types of language assistance that should be provided:

4.1 DEMOGRAPHY

Demography, the number and/or percentage of LEP persons who are limited English proficient in the legal service area. The greater the number or proportion of persons who are limited English proficient; the more likely language services are needed.

4.1.1 City of Austin Service Area
Austin is the 11th-most populous city in the U.S. and the fourth-most populous city in Texas. The Austin metropolitan area is the fastest growing of the largest 50 U.S. cities. The Aviation Department is a dynamic organization that serves this diverse and evolving city of 926,426 residents.

<table>
<thead>
<tr>
<th>Geographic Entity</th>
<th>Population</th>
<th>Square Miles</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Austin</td>
<td>656,562</td>
<td>790,390</td>
</tr>
</tbody>
</table>

Source: http://www.austintexas.gov/demographics
4.1.2 Austin-Bergstrom International Service Area

Austin-Bergstrom International Airport is a medium hub airport serving 15.8 million passengers in 2018. Currently with twenty (20) airlines, seventy-two (72) nonstop markets, sixty-one (61) domestic and nine (9) international (London Heathrow, London Gatwick, Frankfurt, Toronto, Calgary Alberta, Mexico City, Punta Cana, San Jose Del Cabo, Stockholm, and Cancun).

The City of Austin Aviation Department owns and operates the airport and is powered by more than 400 employees. In 2018, 550,185 visitors used the services of the Visitor Information Centers and Podiums located in the Barbara Jordan Terminal.

AUS Has Nonstop Service to 72 Destinations From 20 Carriers

9 New Airlines Have Begun or Announced Service in the Last 3 Years

4.1.3 Linguistic Diversity in the City of Austin

The table below shows the many languages spoken in Austin broken down by household. After English, Spanish is the most common language spoken in Austin. According to the City of Austin’s Demographic Data library, 1 in 10 members of the public are likely to use Spanish as their language of preference, due to limited English proficiency.

Asian Americans represent the fastest growing demographic group in greater Austin, doubling every ten years. Austin’s Asian-American community includes speakers of Chinese (including, but not limited to, Mandarin and Cantonese), Korean, Tagalog, Vietnamese, and Urdu.

Among each linguistic group, the percentage that self describes as unable to “speak English very well” on the US Census is considered the LEP population.
4.1.4 Languages in the Austin Area, Texas (Metro Area)

<table>
<thead>
<tr>
<th>Language</th>
<th>% of households</th>
<th>Number of households</th>
<th>% that doesn’t speak English “very well”</th>
<th>% that speaks English “very well”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>24.9</td>
<td>194,000</td>
<td>46.9</td>
<td>53.1</td>
</tr>
<tr>
<td>Chinese</td>
<td>1.2</td>
<td>9,690</td>
<td>39.6</td>
<td>60.4</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>.9</td>
<td>7,237</td>
<td>53.2</td>
<td>46.8</td>
</tr>
<tr>
<td>Other Asian</td>
<td>.8</td>
<td>5,946</td>
<td>19.1</td>
<td>80.9</td>
</tr>
<tr>
<td>Hindi</td>
<td>.5</td>
<td>4,055</td>
<td>18.0</td>
<td>82.0</td>
</tr>
<tr>
<td>Korean</td>
<td>.5</td>
<td>3,810</td>
<td>45.5</td>
<td>54.5</td>
</tr>
<tr>
<td>French</td>
<td>.4</td>
<td>3,347</td>
<td>19.7</td>
<td>80.3</td>
</tr>
<tr>
<td>German</td>
<td>.3</td>
<td>2,337</td>
<td>8.6</td>
<td>91.4</td>
</tr>
<tr>
<td>Urdu</td>
<td>.3</td>
<td>2,230</td>
<td>28.3</td>
<td>71.7</td>
</tr>
<tr>
<td>Arabic</td>
<td>.3</td>
<td>2,180</td>
<td>35.5</td>
<td>64.5</td>
</tr>
<tr>
<td>Other Indic</td>
<td>.2</td>
<td>1,945</td>
<td>14.1</td>
<td>85.9</td>
</tr>
<tr>
<td>African</td>
<td>.2</td>
<td>1,408</td>
<td>42.4</td>
<td>57.6</td>
</tr>
<tr>
<td>Portuguese</td>
<td>.2</td>
<td>1,293</td>
<td>23.1</td>
<td>76.9</td>
</tr>
<tr>
<td>Russian</td>
<td>.2</td>
<td>1,275</td>
<td>21.2</td>
<td>71.8</td>
</tr>
<tr>
<td>Gujarati</td>
<td>.2</td>
<td>1,174</td>
<td>31.7</td>
<td>68.3</td>
</tr>
<tr>
<td>Persian</td>
<td>.2</td>
<td>1,172</td>
<td>36.4</td>
<td>63.6</td>
</tr>
<tr>
<td>Japanese</td>
<td>.2</td>
<td>1,109</td>
<td>41.7</td>
<td>58.3</td>
</tr>
<tr>
<td>Tagalog</td>
<td>.1</td>
<td>1,070</td>
<td>19.4</td>
<td>80.6</td>
</tr>
</tbody>
</table>

Source: http://statisticalatlas.com/place/Texas/Austin/Languages

The above report suggests that Spanish, Chinese, Vietnamese, Korean and Hindi are the top five most common languages spoken in Austin.

Approximately 52% of all passengers utilizing Austin-Bergstrom International Airport (ABIA) originate from Austin. Additionally, to better determine ABIA’s passenger demographics, the Aviation Department staff reviewed USDOT flight information statistics to determine typical passenger demographics related to language spoken, whether in-bound or outbound of ABIA. The below chart suggest additionally German, French, Mandarin and Italian from the below originating countries.
4.1.5 Passengers Flying into AUS, Originating Countries

The Aviation Department considers information from multiple sources:

- Department Staff, through their daily customer interactions, are acutely aware of the language access needs of their customers.
- Campbell-Hill Aviation Group, LLC, Monthly Schedule Report, March 2019, Innovata Schedules for the week of March 11 - 17, 2019 (February 1, 2019 Schedule Load)
- ARC/IATA data and U.S. DOT O&D Survey, YE Q3 2018
- Census data regarding languages spoken at home is obtained from the most recent US Census Bureau’s American Fact Finder and the American Community Survey (ACS). http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml http://www.census.gov/programs-surveys/acs/
- Census data regarding languages spoken at home and how well English is spoken is obtained from StatisticalAtlas.com. http://statisticalatlas.com/metro-area/Texas/Austin/Languages

Source: ARC/IATA data and U.S. DOT O&D Survey, YE Q3 2018
4.2 Frequency of Contact with LEP Individuals

Frequency of contact, the frequency with which individuals who are limited English proficient come into contact with the entity’s services. The more frequent the contact with a particular language group, the more likely interpreting or translation services in that language are needed.

The Aviation Department has assessed the frequency with which individuals who have limited English proficiency come into contact with the entity’s services.

The Aviation Department monitors the frequency using the following sources:

1. Records of requests for over-the-phone interpretation
2. Records of requests for interpretation at the Visitor Information Centers/Podiums
3. Records of requests for ASL interpretation
4. Other records

4.3 Importance of Service to LEP Individuals

Importance of the services, information or interactions with customers who are limited in English proficiency. This includes the consequences of lack of language services or inadequate interpretations or translations. The more important the service, information, or program, the more likely language access services are needed.

The Aviation Department serves individuals throughout the City and individuals from outside of the city, state and country. Interaction with aviation employees, passengers, and other users of ABIA can range from directional information within the terminal and city of Austin to life-and-death emergency response. Divisions within the Aviation Department will adapt the specific application of the Aviation’s LEP policy to correlate to the urgency of service provision as can be reasonably expected.

The Department’s is committed to ensuring equal access to its services by all customers, regardless of primary language spoken. The Department will collaborate with other City Departments and partner with external resources to ensure the level and quality of language services are effective in providing easy access to department services, materials, programs, and information.

4.4 Resources

The resources available to the departments are limited and the costs of certain language access services, such as translations and interpretations, can be costly. The Federal guidance states that “smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets.”

Given the available resources, the department’s priority is to provide access to “critical” and “essential” information in languages spoken by 5% or more of our residents who also do not speak English “very well,” as reported by the most recent census data. The department will
make every reasonable effort to provide language access services to any customer, as resources are available.

The Aviation Department has identified the resources needed to provide meaningful access to accommodate LEP persons. The department’s resources currently in place include a single point of contact designated to coordinate the Language Access Plan, Aviation Guest Services Manager.

4.4.1 Translation Services and Translated Documents
The Aviation Department may request translation and interpretation services, as needed, through the City of Austin’s Communications and Public Information Office (CPIO). Aviation will utilize CPIO’s Document Bank of translated publications shared amongst City Departments. If an assistive-listening device for live interpretation is needed, Aviation may obtain one from CPIO, as available.

4.4.2 Interpretation Services
Aviation’s HR Division maintains a list of employees who communicate in languages other than English. Where feasible, Aviation Department staff will be deployed within a reasonable time period to communicate with LEP individuals in their native languages and assist them in answering questions regarding aviation services. Spanish is the non-English language spoken most frequently by eligible persons served by the Aviation Department. The Aviation Department has a number of employees who are bilingual with Spanish and English. Employees are compensated for their language skills through the City of Austin’s Bilingual Employee Program and are screened for language proficiency upon hire. Thirteen (13) employees in the Aviation Department are compensated to use Spanish as part of the everyday job, including assisting passengers or other customers in the terminal. A list of employees, their language, their work shift/days and their contact number can be located on the Intranet under “Employee Service”. The Aviation Department's employs staff members who also speak Korean, Arabic, French and Thai.

Additionally, telephone translation is available through a language line service, Voiance. When bilingual employees are unavailable the Voiance language line will be the primary resource. Sign language interpreters may be requested from the City of Austin’s ADA Office.

4.4.3 “I Speak” Material
The Aviation Department makes available the CRCL “I Speak” materials to be used especially at the information center to assist representatives in identifying languages spoken by customers encountered. Such cards, for instance, might say, “I speak Spanish” in both Spanish and English. LEP persons will view the cards and identify their language needs to staff.

4.4.4 Public Address Announcements
The Aviation Department broadcasts security messages in both English and Spanish to ensure the public address announcements reach the largest audience. The PA announcements consist of curbside, screening, and security information throughout the 700,000 sq. ft. Barbara Jordan Terminal. The announcements are played approximately every 15 to 30 minutes depending on placement in the queue.
4.4.5 Bilingual International Signs
Signs in the international customs area are in Spanish and English. Universal symbols are used throughout the passenger terminal and airport footprint from parking to curb to gate.

4.4.6 Persons with Disabilities who are also limited in English Proficiency
We recognize that our customers who do not speak English very well, may also have diverse abilities. In addition to language access services, the DEPARTMENT complies with all requirements applicable to persons with disabilities, such as the American with Disabilities Act Amendment Act (ADAAA).

4.4.7 Partner Resources
Partners serving Austin-Bergstrom International Airport also have the ability to provide language interpretations.

- Southwest Airlines, with 38% of Austin-Bergstrom International Airport travelers, reports using onsite staff if available and, if not available, staff contact Southwest Airlines corporate reservations to request a native language speaker for the passenger for phone assistance. Their carrier’s service supports a number of different

- JetBlue uses skilled onsite staff if available, and if not JetBlue staff contacts the carrier’s 24 hour language line.

- Alaska Airlines utilizes onsite staff if available, and, if not Alaska staff contacts the carrier’s 24 hour language line.

- Aeromexico reports they have bilingual staff from 8:00 am – 4:30 pm at the airport and 10:30 am – 12:57 pm outside at the ticket counters. They also have a 24 hour reservation number posted at the counter that offers assistance in English and Spanish.

- British Airways reports using Spanish or internet.

- Westjet reports they see if anyone local (GAT team) can assist, then secondly we would have our local team call our frontline support line (dedicated line for escalated issues). Request the specific language, a request will be sent out to the leaders and an agent will call you back as soon as possible.

- Delaware North Companies, Inc. reports using onsite staff if available and, if not available, staff contacts airlines then aviation staff for assistance in translating.

- Paradies reports that they have several Spanish Speaking associates in each store, and if they cannot find one of them, they ask for help from Aviation.

- Vino Volo reports that their staff members are fluent in Spanish and American Sign Language. They also have access to online translation services.

- Huntleigh USA reports fluent Spanish/English onsite staff 0300-0030 to assist.
Prospect reports that they try to hire agents for their customer service that are bilingual who their front line employees are when in contact to the passengers they serve. For their Passenger Service Agents (PSA) they also have app programmed on all their tablets. Their PSAs also have a card that is attached to their lanyards with little pictures of destination or assistance they might need.

Hertz reports they has an agreement with a translation service to provide translation services in over 150 languages, 24 hours a day.

Prevost Consulting Group, LLC dba James Avery AUS reports they use onsite staff if available; if unavailable they will use web-based translation services.

SP Plus Corporation reports they have staff that speak many other languages; if unavailable the company utilizes language services on the internet.

Other key airport tenants have not reported/confirmed specific methodology used to assist passengers with limited English. Aviation staff will continue to gather this information.

4.4.8 Essential Public Information
The Aviation Department will provide language access services, specifically interpretation and translations, of essential information that is presented or publicized through direct customer service, information service points, customer feedback forms and announcements and alerts.

4.4.9 Additional Language Activities Being Reviewed
- The Aviation Department will examine whether the use of contracted ASL video should be incorporated in the plan.
- The Aviation Department will explore the feasibility of implementing a visual paging system in the terminal.
- The Aviation Department will explore the possibility of communicating emergency/alert messaging on digital media in the terminal.

5 AVIATION’S LANGUAGE ACCESS IMPLEMENTATION PLAN

5.1 GOALS
The Aviation Department’s goals include the improvement of already existing language access activities for critical and vital functions. The Aviation Department will provide translation and interpretation services of vital information in accordance with City of Austin policies and procedures. Further, the Aviation Department will consider information from multiple sources, including staff observations and customer feedback to evaluate its Language Access Plan.

The Aviation Department used the resource of the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) to prepare this Language Assistance Plan (LAP). This plan defines the actions to be taken by the Aviation Department to ensure Title VI compliance for LEP persons. The Aviation Department will
periodically review and update this LAP in order to ensure continued responsiveness to community needs and compliance with Title VI.

5.2 PLANNING

5.2.1 Identification of Persons with LEP
The Aviation Department will consider the following information from multiple sources, including inquiries through AirportInfo@austintexas.gov, inquiries to the airport contact number 512-530-2242, staff observations and customer feedback to identify persons with LEP.

This information will be reviewed annually as part of the department’s budget planning process.

5.2.2 Language Access Procedures
The Department of Aviation will establish processes for its staff regarding the following language access services: how to respond to LEP individuals who have in-person contact with your staff, types of language services available, how to respond to LEP callers, how to respond to written communication from persons with LEP, how to access services such as document translation, etc.

5.2.3 Language Access Training
Aviation employees who routinely have direct, substantive interaction with the public (front-line employees) shall be trained in language access policies and procedures that shall include protocols for assisting LEP populations.

The Language Assistance Plan (LAP) is made available to all Aviation staff by posting on the intranet access. Additionally it will be discussed at the New Employee Orientation, the Division Managers meeting and the Management Team Session.

Training will be open to any personnel however the initial training sessions will be targeted toward personnel who routinely have direct, substantive interaction with the public. The following training will be provided to personnel and volunteers working in the airport’s visitors Information Centers, podiums, communications and any personnel participating in the customer services portion of the gainshare program.

- Information on the Title VI Policy and LAP procedures.
- Description of language assistance services offered to the public.
- How to work effectively with in-person and telephone interpreters.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint through the existing Customer Relationship Management System (CRMS) complaint tracking form.

5.2.4 Providing Notice to LEP Persons
Notification is posted at the main Visitors Information Center counter notifying LEP persons of the LAP and how to access the language service. Notification is also included on the airport’s official web site, www.abia.org under ‘Travel Tips section’.
The Aviation Department will work with community-based organizations and other stakeholders to inform LEP individuals of the recipient’s services, including the availability of language assistance services. Additionally 512-530-2242 main number respondents will be trained specifically about the LEP individual available services.

5.2.5 Monitoring and Evaluating the LAP
Ensuring the quality of our language services is critical to communicating effectively with LEP individuals. Each division of Aviation will be required to maintain records of all service requests received for written translation services and over-the-phone interpretation services. This information will be sent to the Aviation Department’s Language Access Coordinator at the end of each quarter. Further, the Aviation Department will consider information from multiple sources, including inquiries through Airportinfo@austintexas.gov, inquiries to the airport contact number 512-530-2242, staff observations and customer feedback to evaluate its Language Access Plan.

On at least an annual basis, the Aviation Department will conduct an evaluation of the LAP to determine overall effectiveness. The evaluation will consider what is working and what is not working and adjustments to the LAP will be made accordingly. The evaluation will also determine whether new languages will be added for translation based on ongoing community needs assessments.

6 REFERENCES
City of Austin Translation and Interpretation Policy
City Council Resolution No. 20161103-052
CITY of AUSTIN Administrative Bulletin

Title: Translation and Interpretation Policy

Administrative Bulletin Number: 14-04

Effective Date: August 1, 2014

Revised: Annually X As Needed

Prepared by: Communications and Public Information Office

Original Date: August 1, 2014

Manager’s Approval

PURPOSE

The City of Austin is committed to open government and the provision of quality customer service. This includes making reasonable efforts to ensure that City services and information about those services are provided in a manner that is accessible, relevant and timely to residents. This policy is designed to establish a citywide translation and interpretation protocol to promote fair and equitable access to City services for individuals with limited English proficiency.

POLICY

The City is committed to using competent, trained and culturally sensitive translators and interpreters. City departments should make all reasonable efforts to apply these policies whenever applicable to their operations:

I) Document Bank

The Communications and Public Information Office (CPIO) shall maintain an intranet resource of existing translated documents, as well as translations of commonly-used terms such as official department and division names, key initiatives, employee titles, and frequently-used departmental terminology. This resource shall be accessible and updatable by individual departments as needed.

II) Emergency Notifications

a) In the event of an emergency where reverse-911 or other call-out systems are implemented, the City will provide a direct option to receive the message in Spanish. The City shall make all reasonable efforts to provide the message in additional languages, or provide call-in instructions by which to receive the full message in additional languages.

b) Critical documents and messages distributed to the public during emergency response, to include those distributed through social media, will be provided in both English and Spanish. If 5% of the population in the affected area consists of another specific language group, then the City will make reasonable efforts to provide the message in that language.
III) Interpretations

a) City Departments organizing community meetings should inform the public in advance that interpreters may be provided at the meeting if the City receives a request five working days prior to the event. Should a request be received, the lead organizing department will make reasonable efforts to secure a qualified interpreter.

b) For requests made less than five days in advance, it will be at the lead department’s discretion to determine if accommodations can be made.

c) If a meeting or event specifically targets a community or population group with a high concentration of foreign-language speakers, the lead organizing department will make reasonable efforts to secure a qualified interpreter in the appropriate language.

d) City Departments, at their own discretion, may provide interpreters more frequently than required in this policy.

IV) Language Line

a) Austin 311 will maintain a contract for language line services. Departments in need of assistance with foreign-language phone inquiries should contact 311 for assistance in fulfilling those needs.

V) Translations

a) CPIO will conduct a prequalification process every two years for translation services, and provide a list of prequalified vendors for those seeking translation services. Prequalification will be based on both professional skill and relevant cultural competency.

b) Translations of a complex, legally-binding and/or technical nature, and translations mandated by applicable law, should be performed by professional translators in any circumstance where a bilingual departmental employee with specific technical knowledge is unavailable or unable to do so.

VI) Partnerships

a) Notwithstanding any of the articles or requirements outlined in this policy, departments may have opportunities to partner with community groups or other agencies for the provision of translation services in specific instances. To the extent that these partnerships meet the requirements for accuracy and cultural competency, departments are not prohibited from seeking such alternative arrangements.

VII) Accountability

a) CPIO shall solicit feedback and comments from staff, the immigrant and refugee communities, and translation and interpretation contractors annually on the effectiveness of this policy.

b) The City shall periodically review this policy and make adjustments, as appropriate, based on changing demographics and other factors.
DEFINITIONS

For the purpose of this policy, the following definitions should apply:

**Limited English Proficiency (LEP)**
A person with limited English proficiency (LEP) cannot speak, read, write or understand the English language at a level that permits him or her to interact effectively with the City.

Individuals who communicate with American Sign Language are covered in this definition, although other Federal laws and regulations such as the Americans with Disabilities Act apply and should be considered separately.

**Translation**
Translation is the conversion of written communication from one language to another in a written form. An accurate translation is one that conveys the intent and essential meaning of the original text.

**Interpretation**
Interpretation is the oral rendition of a spoken message from one language to another, preserving the intent and meaning of the original message.

**Document Bank**
A Document Bank is an internal resource that includes information related to translations and interpretations. A Document Bank is a living document that will evolve with the collaboration of the users.

**Language Line**
A Language Line is a commercial interpretation service accessed through the telephone.

**Critical Information**
This information may have life and death implications, such as emergency response messages, or may be essential to effective operation of City services. Critical information could be presented in writing or orally.

**Primary Languages**
Primary languages are languages other than English spoken at home by the largest number of Austin residents, based upon data from the Federal Census Bureau. In Austin, Spanish is the most spoken language after English. However, there are many other languages spoken in Central Texas. The most common languages (other than English) spoken in Austin are:

- Spanish (25.7%)
- Chinese (1.3%)
- Vietnamese (0.8%)
- Korean (0.5%)
- Hindi (0.5%)

For the purposes of this policy, Spanish translations should be culturally appropriate to the predominant form of the language spoken in Central Texas.

1. 2012 American Community Survey 5-year estimates, Table B16001, US Census Bureau.
ROLES AND RESPONSIBILITIES

- Communications and Public Information Office
  - Establish and maintain the Web infrastructure to host the Document Bank.
  - Establish and maintain a list of pre-qualified professional and court-certified translators and interpretation providers.
  - Provide a limited number of assistive-listening devices for live interpretation, available for checkout to departments.
  - Work with departments, as needed, to seek partnerships for sharing translation and interpretation services.
  - Conduct process for soliciting periodic feedback on policy effectiveness.

- All Departments
  - Provide relevant information for the Document Bank relative to their respective departments, and update the resource as necessary.
  - Translate critical information and other appropriate documents into Spanish and other languages as outlined in this policy.

CORRESPONDING PROCEDURES AND POLICIES

Not applicable.

FORMS

None