

LANGUAGE ASSISTANCE PLAN

Wake County Public School System

Consistent with the Voluntary Resolution Agreement executed by the Wake County Public School System ("WCPSS" or the "District") on November 14, 2012, the District hereby submits for review and approval by the United States Department of Education, Office for Civil Rights ("OCR") this Language Assistance Plan (the "Plan") for the benefit of Limited English Proficiency ("LEP") parents.

As discussed by counsel for the District and for OCR, the Wake County Board of Education (the "Board") has authorized the Superintendent to develop and adopt this Plan without further approval from the Board, provided that the Board retains final authority over all budgetary decisions related to Plan implementation. If, due to funding constraints, any portion of this Plan cannot be implemented prior to the issuance of the closure letter described on Page 4 of the Voluntary Resolution Agreement, the District will promptly notify OCR of this fact, along with any alternative steps the District will take to meet the goals of the Resolution Agreement.

Based on the foregoing, the District agrees to implement the following components of its Language Assistance Plan:

- a. **A process for notifying LEP parents of the availability of free language assistance services with respect to certain information about school programs and activities. The notification will include information about how to access the services and identify a District contact person who can answer any questions regarding parental communication and assist parents in accessing interpreter services or translated documents. To the extent feasible, written notifications will be provided in the language understood by the LEP parents. Such written notice will, at a minimum, be published on the District's website, in student and parent handbooks, and in any District-wide or school-wide newsletters.**

1. A Language Assistance Notice, printed in English as well as the top seven foreign languages believed to be spoken by LEP parents in the District (hereinafter, the "Top Seven Languages")¹, will be prominently displayed on the English-language District website. The notice will read as follows: *"Attention parents: If you do not speak English or need free translation/interpretation services to understand school processes, please call (919) 431-7703."* By the end of the 2012-2013 school year, this same notice will be posted on each individual school website.

¹ The District does not currently maintain data on foreign languages spoken by limited English proficiency ("LEP") parents, as opposed to LEP students. Based on data from the Consolidated Federal Data Collection ("CFDC"), which is maintained by the North Carolina Department of Public Instruction ("NCDPI") and tracks foreign languages spoken by students in the District identified as LEP, the Top Seven Languages for LEP students in the District are, in rank order: (1) Spanish, (2) Arabic, (3) Chinese, (4) Vietnamese, (5) French, (6) Korean, and (7) Hindi/Urdu. Based on the most recent CFDC data, these languages together account for 89.66% of the total population of 11,245 identified LEP students in the District, with Spanish accounting for 77.24% and no individual language that is *not* among the top seven accounting for so much as 1% of that population. More information about these Top Seven Languages is provided in the attached Exhibit 1. On an annual basis, the District will review data collected pursuant to section b of this Plan on the languages spoken by LEP parents and will make appropriate adjustments, as needed and based on data then available, to ensure that this notice appears on the WCPSS website in languages believed to be spoken by a substantial majority of LEP parents. Throughout this document, all references to translations into "Chinese" should be understood to be translations into "Simplified Chinese" to promote comprehension by speakers of different Chinese dialects. It should also be noted that Hindi and Urdu are combined into one category for purposes of the CFDC, likely because they are regarded as mutually intelligible.

2. A slightly different version of the Language Assistance Notice described above, printed in English and the Top Seven Languages, will be prominently displayed in the English-language versions of the following documents: (1) Student/Parent Handbook, (2) Student Due Process Policies & Procedures (aka the “Red Book”), (3) Procedural Safeguards: Handbook on Parents Rights (for special education services), (4) Special Education Pre K-12 Supplemental Handbook (for special education services), and (5) all English-language District-wide and School-wide newsletters distributed to parents. The notice will include the following statement printed in English as well as the top seven languages: *“Attention parents: If you do not speak English or need translation/interpretation services to understand this document or other school processes, please call (919) 431-7703.”*
3. The same notice described immediately above, in Spanish only, will be prominently displayed on the Spanish-language District website² and in the Spanish-language versions of the Student/Parent Handbook and Red Book.
4. Language Assistance posters will be prominently displayed in the front office of every school, in the District’s Office of Student Assignment, and in the District’s Center for International Enrollment. Each poster will include the following statement printed in English and each of the Top Seven Languages: *“Attention parents: If you do not speak English or need free translation or interpretation services to understand school processes, please notify the front office or call (919) 431-7703.”*
5. Parents who present themselves at the District’s central offices in Cary, North Carolina, and appear to have language-related difficulties understanding documents or processes associated with school enrollment or other matters will be directed to the District’s Center for International Enrollment, which is staffed with fluent English-Spanish speakers. If the parent’s native language is Spanish, staff in the Center for International Enrollment will explain the process for seeking language assistance and provide parents in need of such services with a written copy of the Language Assistance Notice described immediately above, printed in English as well as the Top Seven Languages. If unable to communicate effectively with the parents in English or Spanish, staff in the Center for International Enrollment will contact the centralized number for obtaining language assistance and will make arrangements to inform the parent telephonically, through a qualified interpreter, about how he or she can request language assistance. The process for obtaining telephonic interpretation services is described in more detail in Section h of this Plan.
6. Because of the size of the District, a single point of contact may not be able to field all calls from staff and parents related to provision of language services. Accordingly, Language Assistance notices will not name any individual, but will list a centralized phone number for Language Assistance Services (“LAS”). All staff members who answer calls at this number will be trained in the procedures described in this Plan and will be able to provide or coordinate the provision of any required services.

² The Spanish-language website can be accessed via the “Español” link at the top of the main page of the District website at <http://www.wcpss.net/> or directly via <http://www.wcpss.net/espanol/>.

7. All parents identified by the District as LEP parents in need of interpretation and/or translation services (see section b, below) will receive a written copy of the Language Assistance Notice printed in English and each of the Top Seven Languages.
- b. A process for identifying LEP parents who may need language assistance, including, at a minimum, asking parents in a language they understand (in writing and/or orally, as appropriate) if they need written translations or oral interpretation of communications and, if so, to specify the language.**
1. Using data maintained in the CFDC, the District will identify all parents and legal guardians who have previously indicated, in connection with District efforts to identify LEP students, that they or their children speak a language other than English in the home.³ All parents and legal guardians so identified will be sent a letter asking if they need translation services to understand school documents and/or interpretation services for meetings relating to their children's education and the language they speak. This letter will be translated into each of the Top Seven Languages, and any parents who have indicated that one of these languages is spoken in the home will receive the letter printed in that language. Parents who have identified a language other than one of the Top Seven Languages will receive an English-language version of this letter that will also include the following statement, printed in the the top fifteen foreign languages believed to be spoken by LEP parents in the District (hereinafter, the "Top Fifteen Languages")⁴: *"For language assistance, please call (919) 431-7703."*
 2. The Home Language Survey has been revised to allow for more targeted collection of data on the language assistance needs of LEP parents. Beginning January 7, 2013, the survey asks the following questions, in addition to the three questions that have been asked historically: *"Do you need translation services to understand WCPSS school records? If yes, which language?"* and *"Do you need an interpreter for school system meetings involving your child's education? If yes, what language?"* This survey will

³ This database is also housed in the CFDC but is different than the database described in footnote 1 and Exhibit 1 to this Plan, which concerns identified LEP students in the District. It has been compiled over the years by means of a Home Language Survey given to all new students to identify *potential* LEP students. Historically, the three questions asked in this Home Language Survey have been (1) "What language does your son/daughter most frequently use to communicate?", (2) "What language do you most frequently speak to your son/daughter?", and (3) "What language did your son/daughter learn when he/she first began to talk?" It is important to note that many parents who list foreign languages in response to one or more of these questions do not need language assistance to understand school documents and communicate with school officials. Nevertheless, parents or guardians who have answered "yes" to any of these questions will be contacted with information about the availability of language assistance services. As explained immediately below, the questions included in the District's Home Language Survey have been revised to allow more targeted data collection regarding parents' needs for translation and interpretation services going forward.

⁴ Based on data from the Consolidated Federal Data Collection ("CFDC"), which is maintained by the North Carolina Department of Public Instruction ("NCDPI") and tracks foreign languages spoken by students in the District identified as LEP, the Top Fifteen Languages for LEP students in the District are, in rank order: (1) Spanish, (2) Arabic, (3) Chinese, (4) Vietnamese, (5) French, (6) Korean, (7) Hindi/Urdu, (8) Telugu, (9) Russian, (10) Nepali, (11) Gujarati/Guarathi, (12) Japanese, (13) Tamil, (14) German, and (15) Tagalog/Filipino. Based on the most recent CFDC data, these languages together account for 93.29% of the total population of 11,245 identified LEP students in the District, with Spanish accounting for 77.24% and no individual language that is *not* among the top seven accounting for so much as 1% of that population. More information about these Top Fifteen Languages is provided in the attached Exhibit 2. On an annual basis, the District will review data collected pursuant to section b of this Plan on the languages spoken by LEP parents and will make appropriate adjustments, as needed and based on data then available, to ensure that this notice is translated into languages believed to be spoken by a substantial majority of LEP parents.

continue to be given to all new families as part of the registration process. Each school will have copies of, or the ability to print copies of, the survey in English and each of the Top Seven Languages. If parents/guardians are not able to understand the survey in any of these languages, school staff will make arrangements to collect the information through a qualified interpreter in accordance with this Plan. Whenever feasible, these initial interpretation services will be provided on the spot so that accurate information about parents' need for language assistance can be promptly entered into the new database described in sections d through f of this Plan. The process for obtaining telephonic interpretation services is described in more detail in Section h of the Plan.

3. Designated administrators and/or front office staff at every school will also be provided with and have access to a document translating the phrase "*I speak [name of language]*" into at least the Top Fifteen Languages. This document will help enable staff to overcome language barriers by asking parents to point to the language they speak, so that this information can be logged into the database described in sections d through f and relayed to appropriate staff in connection with requests for interpretation or translation services.
4. A memorandum regarding the identification of LEP parents needing language assistance will be sent to all District staff who routinely interact with parents.⁵ The memorandum will explain the process by which staff may notify the District of LEP parents they believe may need language assistance who are not already identified as needing language assistance in the database described in sections d through f of this Plan, as well as the procedures for requesting language assistance. Parents identified by staff as likely to need language assistance will be contacted to ensure that they are aware of the process for requesting language assistance. If necessary, this information will be relayed telephonically with the assistance of a qualified interpreter.
5. When parents call the designated phone number to request language assistance, staff will check the database described in sections d through f of the Plan to see if they are already identified as in need of language assistance. If not, staff fielding the call will attempt to discern and record that information in the database, with the assistance of a qualified interpreter if necessary.
6. Information gained through all of the procedures described above will be used to populate the new database system for tracking language assistance to parents, as described in sections d through f of this Plan.
7. A new central office position known as "Director of Translation Services" has been created and posted but not yet filled.⁶ Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.

c. A statement that, generally, the District will accept a parent's assertion that he or she needs language assistance without requiring additional corroboration.

⁵ This will include, at a minimum, teachers, school-based administrators, school registrars, guidance counselors, and social workers.

⁶ The position will be full-time and will include dedicated secretarial support.

1. The District affirms that, generally, it will accept a parent's assertion that he or she needs language assistance without requiring additional corroboration. The District reserves the right to deny language assistance to any particular parent in the unlikely event that it reasonably determines the parent has no legitimate need for the services requested. Any parents whose request for language assistance is denied will have the opportunity to appeal that decision through the District's parent/student grievance policy, with language assistance consistent with this Plan provided throughout the course of the appeal.
- d. A process that ensures that each school building has a centralized list of LEP parents identified as needing language assistance services, the type of language assistance services that they need, and a log of the language assistance services provided to them by date of service, type of service (e.g., translation or interpreter services for special education, disciplinary proceedings), and service provider (including name, position, and qualifications). The process will ensure that the list is available to all staff in the building that may interact with LEP parents, as well as to the central administration, so long as the persons given access have legitimate educational interests in the information. Staff for purposes of this Agreement will include all relevant administrators, teachers, counselors, and support staff.**
1. The District's Technology Department has built a database application known as Online Access to Student Information Systems ("OASIS") to record all of the information described above. Authorized staff at each school, as well as authorized central office staff, will be able to access this database to run reports, review information about the language needs and services provided to particular parents, and to add or supplement information. Screen shots of the OASIS application are attached to this Plan as Exhibit 3. Prequalified language service providers will appear in a drop-down menu and will meet the requirements described in section i of this Plan.
 2. A new central office position known as "Director of Translation Services" has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.
- e. A process that ensures that the central administration maintains a District-wide list of LEP parents identified by each building as needing language assistance services, the type of language assistance services that they need, and a log of the language assistance services provided to them by the central office by date, type of service, and service provider.**
1. See directly above. All authorized users will be able to access the same OASIS database from anywhere in the District.
 2. A new central office position known as "Director of Translation Services" has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.

f. A process to ensure that, when the children of LEP parents transfer from one building to another within the District, information regarding the language assistance needs of the parents is transferred to the building to which their children transfer.

1. See above. All authorized users will be able to access and update the same OASIS database from anywhere in the District. All relevant information recorded in OASIS will therefore automatically follow parents as their children move from one school to another.
2. A new central office position known as “Director of Translation Services” has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.

g. A process by which District staff that are likely to interact with an identified LEP parent and that have legitimate educational interests in the information are advised of the parent's potential need for language assistance services, the circumstances under which they may need assistance, the type of language assistance that they may need (translation services or interpreter services), the means by which they may timely obtain such assistance for the parent, and the availability of translated documents.

1. The OASIS system will allow administrators and data managers with legitimate educational interests to access detailed information about individual parents' language needs, including interpretation and translation services that have been requested and provided in the past. At the beginning of each academic quarter, data managers at each school will use the OASIS system to provide each teacher and teacher assistant with written notification of the identified LEP parents of students in their respective classes. When new students enroll between academic quarters, data managers will notify their teachers and teacher assistants if the parents of such students are identified in OASIS as LEP. Teachers and teacher assistants will also be able to request a current list of identified LEP parents for students in their classes at any time. Through memoranda and other forms of training, staff who are likely to interact with LEP parents on a regular basis will receive instruction on the means by which they may request language assistance for a parent, as well as how to locate documents that have been pre-translated or that include notifications about how to request language assistance services.
2. A new central office position known as “Director of Translation Services” has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.

h. A process by which District staff may obtain in a timely manner appropriate, qualified translators or interpreters as needed (this could include the use of various services such as onsite translators/interpreters, telephonic translators/interpreters services, and translation programs); the District's means to provide the services must be well-publicized and accessible to staff.

1. A summary of the following process by which District staff may obtain the services of qualified translators and interpreters will be posted on the District's Intranet (accessible to all staff) and relayed to staff through memoranda and other forms of training:
2. Staff will be able to ask general questions about the nature and availability of language services by calling Language Assistant Services ("LAS") staff at 919-431-7703. In keeping with current practice, formal requests for interpretation or language services will be submitted to LAS staff by authorized school-based or central office staff on forms delivered via e-mail to a dedicated email address.⁷ All such requests will be logged into OASIS to ensure accurate record-keeping.
3. LAS staff include both District employees and independent contractors who meet the qualifications described in Section i of this Plan to provide interpretation and translation services in several languages.⁸ Interpretation services may be provided in person or telephonically, as needed. When feasible, interpretation and translation services will be provided by qualified LAS staff.
4. For interpretation services in languages other than the Top Seven Languages, or in any case where it is not feasible for LAS staff to timely provide interpretation services, the District will enlist the assistance of qualified interpreters, via telephone, from outside vendors who provide such services, such as Language Fon.⁹ All outside vendors will be vetted by supervisory LAS staff employed directly by the District before being asked to provide services. Only vendors who can provide adequate assurances that their interpreters meet the District's qualifications will be offered contracts.
5. For translation services in languages other than the Top Seven Languages, or in any case where it is not feasible for LAS staff to timely provide translation services, the District will enlist the assistance of qualified translators from outside vendors who provide such services, such as VIA Language Services.¹⁰ All outside vendors will be vetted by supervisory LAS staff employed directly by the District before being asked to provide services. Only vendors who can provide adequate assurances that their interpreters meet the District's qualifications will be offered contracts.
6. Interpretation services will be provided in real time. Because of the additional time required to prepare accurate translations, and depending on the length and difficulty of particular translations, requests for translations often take five school days or more to process. Every reasonable effort will be made to obtain translations in ten school days or fewer. If necessary to convey critical information to parents in a timely manner, documents may be orally "translated" by an interpreter, either in person or

⁷ In the future, the District may explore the possibility of processing such requests online through OASIS instead.

⁸ LAS staff can currently provide language services on-site in the following languages: Spanish, Arabic, Simplified Chinese, Vietnamese, French, and Korean. The District is currently exploring the feasibility of acquiring the services of a qualified, on-site Hindi interpreter as well.

⁹ While the District may decide to contract with other entities in the future, the District currently contracts with Language Fon for telephonic interpretation that cannot be provided by LAS staff.

¹⁰ While the District may decide to contract with other entities in the future, the District currently contracts with VIA Language Services for translations that cannot be provided by LAS staff.

telephonically, as an alternative or prelude to written translations. See Section k of this Plan for more details about translation services.

7. A new central office position known as “Director of Translation Services” has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.
- i. **A process by which the District ensures that the interpreters and translators it uses are proficient in the languages spoken by students and parents in the District and competent to provide interpretation and translation services. The District will also ensure that all interpreters and translators are trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.**
 1. The following guidelines for governing District interpreters and translators will be published on the District Intranet, summarized in periodic staff trainings, and otherwise made available to designated interpreters and translators.
 2. Minimum Requirements for District Employees Serving as Official Interpreters and Translators:
 - A. At least two years of higher education.
 - B. A combination of education, training, an experience equivalent to a bachelor’s degree in education, languages or language arts, sociology, social work, or a related field.
 - C. A high degree of proficiency, oral and written, in the target language.
 - D. A high degree of proficiency, oral and written, in English.
 - E. Knowledge of the culture and customs of countries where the target language is spoken.
 - F. At least some knowledge of school services in countries where the target language is spoken.
 - G. At least some knowledge of public education processes in the United States.
 - H. Excellent writing and editing skills (for translators).
 - I. A high degree of professionalism and integrity.
 - J. Successful completion of all background checks required generally of District employees.
 - K. Successful completion of an interview and written exam administered by LAS.¹¹
 3. Minimum Requirements for Outside Contractors Serving as Official Interpreters and Translators:
 - A. Outside vendors must be under contract with the District.

¹¹ Applicants are interviewed in both English and the target language to explore oral proficiency in both languages. Interpreters are given sample texts including educational jargon for sight translation. Dictionaries are not permitted. Translators are given sample texts including educational jargon and are asked to translate from English to the target language as well as from the target language to English. The test is timed, and dictionaries are permitted. All applicants are evaluated based on their ability to complete interpretations/translations in a timely manner, use proper grammar and diction in both English and the target language, interpret or translate fairly and accurately, express themselves clearly, and understand and use educational jargon appropriately in both English and the target language, among other factors.

- B. As a prerequisite to being awarded a contract, vendors must demonstrate to the satisfaction of LAS administrators that individuals who may be called upon to provide interpretation or translation services possess all of the qualifications described above with the exception of successful completion of an interview and written exam administered by LAS.

4. Ethical and Professional Guidelines for all Interpreters and Translators:

- A. The role of an interpreter or translator is to convey oral or written messages delivered in one language into other languages fully, clearly, and accurately.
- B. Interpreters and translators should not view themselves as advocates for any person or institution and should not offer editorial comments or inject personal opinions on substantive matters.
- C. Questions directed to interpreters should be re-directed to meeting participants in the appropriate language(s).
- D. Interpreters and translators should not engage with parents independently of school personnel.
- E. Interpreters should ask meeting participants to repeat anything they are not sure they heard correctly.
- F. Interpreters should ask meeting participants to clarify anything they are not sure they understood.
- G. Interpreters and translators must understand and agree to preserve the confidentiality of all matters related to individual students consistent with all applicable laws and policies.

5. Glossary of Educational Terms:

- A. Interpreters and translators will be given access to a Glossary of Terms listing Spanish translations for hundreds of terms that arise frequently in the context of public education.
6. A new central office position known as “Director of Translation Services” has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making refinements to this process and/or recommendations for supplemental procedures to implement this aspect of the Plan.
- j. **A process for notifying relevant District staff, on an annual basis, that the use of family members and friends as the sole means for the provision of language assistance is generally not encouraged. The notice shall state that the use of such individuals may raise issues of confidentiality, privacy, or conflict of interest, and that, such persons may not be competent, in some circumstances, to provide quality, accurate interpretations. The process will also include notification to relevant District staff that they should not rely on such individuals to provide LEP parents meaningful access to important programs and activities and a caution that, even when LEP parents have voluntarily chosen to provide their own interpreter or translator, the District may still need, depending upon the circumstances of the encounter, to provide its own interpreter or translator to ensure accurate interpretation or translation of critical information, especially in, but not limited to, situations where the competency of the LEP parents' chosen interpreter is not**

established. Additionally, the notice shall state that the use of minor children raises particular concerns about competency, quality, and accuracy of interpretations and that it is generally inadvisable to rely solely on such children to convey information about their own education and/or complex information.

1. On an annual basis, relevant District staff will receive a written notice substantially similar to the following: *“WCPSS offers interpretation and translation services for parents needing language assistance through qualified district staff and outside contractors. While parents may on occasion bring friends or family with them to meetings to provide language assistance, staff should not rely on those individuals to provide translations or interpretation. Using such individuals to provide language assistance to parents may raise issues of confidentiality, privacy, or conflict of interest, and such persons may not be competent to provide accurate interpretations. The use of minor children, in particular, raises concerns about the competency, quality, and accuracy of interpretations, and children should not be relied upon to convey accurate information to their parents about educational matters. Any questions about the provision of language assistance services should be directed to LAS staff at 919-431-7703.”*
 2. The notice described above will be provided in memoranda and/or the Employee Handbook and will be accessible online via the District’s Intranet. Staff will also be reminded of the content of this guidance at periodic trainings.
 3. A new central office position known as “Director of Translation Services” has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.
- k. A process for identifying and translating, to the extent feasible, written documents that are routinely sent to other parents into the language of each predominant language group, as identified by the District. For languages that are less predominant or where translations are not feasible, the District will ensure that student and parents have been advised, in a language they understand, of whom to contact in the District if they need assistance in understanding notices or communications with staff members. The District will notify staff members that these translations are available.**
1. Based on past experience and reports from departments that have had extensive experience providing written translations for LEP parents, including the Office of Student Due Process (“OSDP”) and Special Education Services (“SES”), the District believes that the overwhelming majority of requests for written translations have been and will continue to come from native Spanish speakers.¹² On the other hand, the District recognizes that improved data collection resulting from the process described in Section b of this Plan could potentially result in the identification of other languages that could reasonably be considered “predominant” among LEP parents in the District.

¹² OSDP, for example, is not aware of any requests for translations of student due process documents into languages other than English and Spanish. SES reports that, of the many interpretations and translations provided during the 2011-2012 school year in connection with the provision of special education services, over 96% were for English-Spanish interpretations or translations.

While translation of the notices described in Section a of this Plan must, at least initially, be based on the best information currently available for assessing the likelihood that parents in various language groups may need interpretation or translation services in connection with their children's education,¹³ the needs of LEP parents in regards to routine translation of substantive documents would be better served by targeting available resources where there is demonstrated need. Accordingly, the District will, for the 2012-2013 school year, routinely translate the documents listed in section k.2, below, into Spanish only, with translations into additional languages provided upon request whenever feasible. If and when documents or document templates are translated into other languages in response to specific requests, the translated versions will be saved for future use, and the appropriate staff will be made aware of the availability of these documents via postings on the Intranet and/or periodic staff trainings. Additionally, the District will continue to gather and evaluate data on the identity and needs of its LEP parents as described in section b of this Plan, and will make annual determinations as to whether any additional languages should be considered alongside Spanish as part of the group of "predominant" languages for purposes of routine translations.¹⁴ This annual determination will be made in light of the number and percentage of LEP parents who cannot adequately understand written documents in English or Spanish as well as the cost and availability of translation services in any particular target language(s). At a minimum, and even if no other language groups are identified by the District as "predominant" for purposes of this section, all LEP parents identified as in need of written translations to understand school documents will be able to request oral "translation" of the documents listed in section k.2, below, by a qualified interpreter.

2. The following documents or document templates,¹⁵ organized by department, have been or will be translated into Spanish by qualified translator(s).¹⁶ For document templates, all stock language has been or will be translated into Spanish, and information unique to individual students or individual records, such as teacher comments included in report cards, will be printed in English. In order to remind parents of the availability of additional language assistance for these portions of the documents, each document template will also include a statement, translated into Spanish, substantially similar to the following: *"For free interpretation or translation services, please call (919) 431-7703."*

A. Academics – General:

- i. Report Cards*

B. Academics -Academically or Intellectually Gifted:

- i. Nomination Results*
- ii. Prior Notice for Evaluation*
- iii. Evaluation Results
- iv. Parent Consent for Services*

¹³ As noted above, the list of languages into which the notices to parents described in section a will be translated, at least initially, was determined by consulting the CFDC for the top languages spoken by LEP students.

¹⁴ The first such determination shall be made by no later than September 1, 2013, and will be included in the evaluation of Plan effectiveness to be provided to OCR on or before that date.

¹⁵ Document templates are indicated with asterisks.

¹⁶ Most of these documents have already been translated and are currently in use.

- v. Parent Observational Checklist Document
- vi. IOWA Assessment Explanation
- vii. IOWA Assessment Result*
- viii. Explorer Information
- ix. Parent Guide/Information
- x. Parent Invitation*

C. English as a Second Language / Center for International Enrollment:

- i. Center for International Enrollment Brochure
- ii. Written Directions for Parent Workshops

D. Testing:

- i. Parent Letter
- ii. Testing Calendar YR
- iii. Testing Calendar Women's Academy
- iv. Testing Calendar STEM
- v. Testing Calendar Traditional
- vi. Testing Calendar Modified
- vii. Testing Calendar Men's Academy
- viii. Testing Calendar Block Schedule
- ix. EOG Retest Parent Information
- x. EOC Level 1 Parent Information

E. Child Nutrition Services:

- i. Instruction for Free/Reduced Lunch Application
- ii. Free/Reduced Application*
- iii. Letter to Parents explaining Free/Reduced Lunch Process
- iv. Lunch Information (i.e., cost, etc.)

F. Counseling and Student Services – Counseling:

- i. Parent Brochure: "What Do I Do if I Believe My Child is Struggling?"
- ii. "Spotlight on Students" Letters

G. Counseling and Student Services – Section 504:

- i. Parental Consent for Evaluation-Assessment*
- ii. Consent for Reevaluation*
- iii. Section 504 Student and Parent Rights
- iv. Consent for Evaluation*
- v. Consent for Reevaluation*
- vi. 504 Eligibility Determination Checklist*
- vii. Parent Invitation to 504 Meeting for Students with Medical Conditions*
- viii. Parent Notice of 504 Meeting*
- ix. "What Are the Section 504 Procedures in WCPSS?"
- x. 504 MDR Prior Notice Letter
- xi. 504 MDR Form*
- xii. 504 Accommodation Determination Worksheet*
- xiii. Request for IEP Team Involvement*
- xiv. 504 Accommodation Plan*
- xv. 504 Meeting Minutes*

xvi. 504 Parent Request for Document Translation*

H. Counseling and Student Services – Second Chance Online Resource for Education (“SCORE”) Program:

- i. Equipment Loan Agreement*
- ii. Getting Started
- iii. Minimum Operating Requirements
- iv. WCPSS Board Policy (6000-6446)
- v. Release of Information*
- vi. SCORE Academic Calendar
- vii. SCORE Community Sites
- viii. SCORE Policies
- ix. SCORE Student Handbook
- x. SCORE Whom to Call
- xi. SPAN Frequently Asked Questions
- xii. Transition Counselors

I. Family and Community Engagement:

- i. Annual WCPSS Parent/Student Handbook
- ii. Significant Portions of Content Available on WCPSS website (see via <http://www.wcpss.net/espanol/>).

J. Health Services:

- i. Parent Information on Head Lice,
- ii. Parent Information on Medication
- iii. Form 1702 - Parent Request and Physician's Order for Medication*
- iv. Retrieval of Unused, Discontinued, or Expired Medication (1302)
- v. End of School Year Medication Pickup - Traditional School (1303)
- vi. End of School Year Medication Pickup - Year-Round School (1303 YR)

K. Intervention Services – Before and After-School Care:

- i. After School Parent Information
- ii. After School Fee Schedule
- iii. After School Student Application*
- iv. Before and After School Behavior Policy
- v. Before School Application*
- vi. Before School Parent Information
- vii. Before Schedule and Fee
- viii. Enrollment Termination
- ix. Payment Schedule (all school calendars)
- x. Safe Arrival and Departure Procedures

L. Intervention Services – Personal Education Plans (“PEPs”):

- i. Conference/Meeting Notice*
- ii. Informational Brochure
- iii. PEP Template*
- iv. Review Summary*

M. Intervention Services – Tier III:

- i. Parent Notification*
- ii. Parent Invitation*
- iii. Intervention Plan*

N. Magnet and Curriculum Enhancement Programs:

- i. Applications

O. Office of Early Learning:

- i. Parent Pre K Title Acceptance Letter *
- ii. Parent Letter – Ineligible for Title 1 Pre K
- iii. Parent Informational Booklet
- iv. Pre K Title 1 Welcome Letter (all calendars)

P. Social Work:

- i. Court Attendance Letter
- ii. Attendance Brochure
- iii. Tardy Brochure
- iv. 3 Day Unexcused Absence Letter (elementary)
- v. 7 Day Unexcused Absence Letter (middle, high)
- vi. 15 Day Absence Letter (middle, high)
- vii. 25 Day Absences Letter (elementary)
- viii. Board Policy on Attendance
- ix. Truancy Diversion Brochure
- x. McKinney Vento Rights
- xi. McKinney Vento Student Status Form (included in enrollment packets)*

Q. Special Education Services:

- i. DEC 1 – Referral Prior Notice*
- ii. DEC 2 – Parental Consent for Evaluation/Reevaluation Prior Notice*
- iii. DEC 3 – Summary of Evaluation/Eligibility for the following areas: Autism, Deaf-Blindness, Deafness/Hearing Impairment, Developmental Delay; Serious Emotional Disability, Intellectual Disability, Multiple Disabilities, Orthopedic Impairment, Other Health Impairment, Specific Learning Disability, Speech or Language Impaired, Traumatic Brain Injury, and Visual Impairment*
- iv. DEC 4 – Individualized Education Program*
- v. DEC 5 – Prior Written Notice*
- vi. DEC 5a – Prior Written Notice/Change of Placement due to Disciplinary Change*
- vii. DEC 6 – Consent for Services*
- viii. DEC 7 – Reevaluation*
- ix. Occupational Course of Study – Parent/Student Notification*
- x. Occupational Course of Study – WCPSS Requirements – Statement of Understanding*
- xi. Invitation to Conference – Parent and Student*
- xii. Parental Permission for Exchange of Information*
- xiii. IEP Progress Report*
- xiv. Request for Excusal from IEP Meeting*
- xv. Social Developmental History*

- xvi. 30 Day Home/Hospital Review*
- xvii. Functional Behavioral Assessment*
- xviii. Behavior Intervention Plan*
- xix. Procedural Safeguards: Handbook on Parents Rights
- xx. Special Education Pre K – 12 Supplemental Handbook
- xxi. Parent Request for Documentation Translation*

R. Student Assignment:

- i. Affidavit of Residence*
- ii. Data Sheet*
- iii. Discipline Status*
- iv. School Enrollment Checklist*
- v. Parent Request Forms (i.e., Non-Routine, Deny Access, etc.)*
- vi. K Health Assessment*
- vii. K Parent Observation Form*
- viii. McKinney-Vento Information*
- ix. Name/Photo/Video Permission*
- x. Records Request Form*
- xi. Joint Custody*
- xii. Non-parental Affidavit*
- xiii. Parental Affidavit*
- xiv. Student Transfer Affidavit*
- xv. Transfer Request*
- xvi. Transfer Appeal*
- xvii. Verification of Child Custody*

S. Student Due Process:

- i. Student Due Process Policies and Procedures (aka the “Red Book”)
- ii. Notice of Suspension*
- iii. Letter from Principal Enclosing Suspension Notice (recommending long-term suspension)
- iv. Letter from Principal Enclosing Suspension Notice (with aggravating factors)
- v. Letter from Principal Enclosing Suspension Notice (with mitigating factors)
- vi. Letter from Principal Enclosing Suspension Notice (recommending 365-day suspension)
- vii. Letter from Principal Enclosing Suspension Notice (recommending expulsion)
- viii. Letter from Principal Enclosing Suspension Notice (with “ACE” alternative to long-term suspension)
- ix. Letter from Principal Enclosing Suspension Notice (recommending long-term suspension, EC)
- x. Letter from Principal Enclosing Suspension Notice (with aggravating factors, EC)
- xi. Letter from Principal Enclosing Suspension Notice (with mitigating factors, EC)
- xii. Letter from Principal Enclosing Suspension Notice (recommending expulsion, EC)

- xiii. Letter from Principal Enclosing Suspension Notice (recommending 365-day suspension, EC)
- xiv. Letter from Superintendent Offering Alternative Education (not eligible for “ACE”)
- xv. Letter from Superintendent Offering Alternative Education (not eligible for “ACE”, EC)
- xvi. Letter from Superintendent Offering Alternative Education
- xvii. Letter from Superintendent Offering Alternative Education (EC)
- xviii. Letter from Superintendent Upholding Suspension Reduction Based on Mitigating Factors
- xix. Letter from Superintendent Upholding 365-day Suspension
- xx. Letter from Superintendent Upholding Long-Term Suspension (student enrolled in “ACE”)
- xxi. Letter from Superintendent Upholding Long-Term Suspension
- xxii. Letter from Superintendent Upholding Long-Term Suspension (parent did not appear at appeal)
- xxiii. Letter from Superintendent Imposing Long-Term Suspension for Failure to Meet Requirements of Alternative Education Program
- xxiv. Letter from Superintendent Upholding Long-Term Suspension (student enrolled in Alternative Education Program)
- xxv. Letter from Superintendent Upholding Long-Term Suspension (student did not meet requirements of Alternative Education program, EC, no manifestation)
- xxvi. Letter from Superintendent Providing Notice of Right to Transfer to Victim of Violent Offense
- xxvii. Alternative Counseling/Education (“ACE”) Packet*
- xxviii. Board Hearing Request (for Appeals to Wake County Board of Education)*
- xxix. Confirmation of Hand-Delivery of Suspension Documents to Parent/Guardian*
- xxx. Notice of Request to Appeal Long-Term Suspension Recommendation*
- xxxi. Discipline Status Enrollment Form*

T. Title I:

- i. Letter to Parents re NCLB Waivers
- ii. Family Night Flyer
- iii. Invitation to Family Night
- iv. Letter to Parents re Qualification for Intervention Services / PAC Meeting
- v. Family Involvement Policy – Parental Approval Form
- vi. Focus School Notification Form*
- vii. Summer School Progress Report*
- viii. Schoolwide Model Notification Form
- ix. Student-Parent-Principal Agreement Form
- x. Summer School Notification Form
- xi. Summer School Reminder Form
- xii. Teacher Qualification Request Form
- xiii. Title I Summer School Reminder

3. As additional documents or documents or document templates are translated into Spanish (or into other language groups later identified by the District as “predominant”), they will be added to the list set out above, which, along with the documents themselves, will be made available to District staff who are likely to interact with LEP parents on a regular basis and have legitimate educational reasons to access the documents in question. This information will be disseminated to staff via the Intranet, internal memoranda, and/or periodic staff trainings.
4. At the beginning of each IEP meeting and at the beginning of each meeting relating to eligibility or services under Section 504 of the Rehabilitation Act, parents identified as LEP will be given a form for requesting free translations of documents generated in the course of or as a follow up to the meeting. LEP parents who speak one of the Top Seven Languages will receive the form in their native language. LEP parents who speak another foreign language will receive the form in English but will have the form orally “translated” during the meeting by an interpreter, who will record the parents’ choices. Identified LEP parents whose children are recommended for long-term suspension will receive a similar form along with the Notice of Suspension informing them that they may request and receive free translations of specified documents associated with the student discipline and appeals process. As with the forms used at IEP and 504 meetings, this form will be provided in one of the Top Seven Languages if the parent speaks one of those languages. Otherwise, the form will be provided in English and will include the notice (translated into the Top Fifteen Languages) described in Section b.1 of this plan. LEP parents who have opted for such translations on the aforementioned forms will receive written translations of any and all of the following:
 - A. Any of the 504 documents listed in Section k.2.G of this Plan.
 - B. Any of the special education documents listed in Section k.2.Q of this Plan.
 - C. Any of the student discipline documents listed in Section k.2.S of this Plan.
5. Through memoranda and other forms of training, District staff who are likely to interact with LEP parents on a regular basis will receive instruction on the documents and procedures described directly above.
6. By means of the steps set out in sections a and b of this Plan, LEP parents in need of language assistance will be identified and informed in a language they understand of the ways in which they may use to request language assistance.
7. The lists of documents set out above will be reviewed annually to determine whether additional translations are necessary.
8. A new central office position known as “Director of Translation Services” has been created and posted but not yet filled. Once hired, the Director of Translation Services will oversee all aspects of Plan implementation, including but not limited to making recommendations on supplemental procedures to implement this aspect of the Plan.

By: _____


Stephen Gainey, Ed. D.,

Interim Superintendent

Date: 2/28/13

LIST OF EXHIBITS

1. Top Seven Languages spoken by indentified LEP students in WCPSS as of January 14, 2013.
2. Top Fifteen Languages spoken by identified LEP students in WCPSS as of January 14, 2013.
3. Screen shots from new database known as Online Access to Student Information Systems (“OASIS”).

