

**“The difference between the right word
and the almost right word is really a
large matter – it’s the difference
between lightning and a lightning bug.”
– Mark Twain**

LANGUAGE ACCESS PLAN

TRANSLATION & INTERPRETATION SERVICES

**Prepared by: Maria D. Burgos
Director of Equity and Inclusion**



PRINCE WILLIAM
Equity and Inclusion

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Introduction

The increasing linguistic diversity in Prince William County highlights the need for effective language services and strong oversight to ensure consistent access across the County. Prince William County is deeply committed to improving access to programs and services for individuals with limited English proficiency (LEP). This dedication is backed by the County's Equity and Inclusion Policy and Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin by recipients of federal funds.

For departments, offices, and agencies not receiving federal funds, the priority is ensuring individuals with LEP have access to services, programs, and resources, enabling full participation in all benefits offered by Prince William County.

Purpose

The Language Access Plan (LAP) serves as a comprehensive guide for creating procedures that reduce barriers and ensure equitable access to services, programs, and activities for Limited English Proficient (LEP) individuals in Prince William County.



Definitions

It's essential to clarify the difference between interpretation and translation for the purposes of this document.

- **Back translation:** The process of translating a text back to its original language after it has already been translated. Back translation serves as a quality assurance method used to check the accuracy and quality of a translation by comparing the back translation to the original text.
- **Culturally relevant translation:** The process of translating content in a way that is sensitive to and reflective of the cultural context, values, and norms of the target audience, ensuring that the message is accurately and appropriately conveyed.
- **Equity Impact Screening Assessment (EISA) Tool:** A Prince William County monitoring tool used to measure the impact of policies, standard order of procedures, and program services on demographic populations.
- **Interpretation:** The conversion of spoken communication from one language to another.
- **Limited English Proficiency (LEP) individuals:** Individuals who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. For more information, visit: <https://www.lep.gov/>
- **Preferred or dominant language:** The language a client or customer primarily uses, which is essential for meaningful communication and full participation in services, resources, and programs.
- **Qualified interpreter:** An individual who has been assessed for professional skills, exhibits high proficiency in at least two languages, and possesses the training and experience necessary to interpret accurately and skillfully while adhering to established Interpreter Standards of Practice. (See HR Personnel Policy 5.2.12 Language Skills Stipend for the bilingual staff interpreter policy).
- **Translation:** The conversion of written communication from one language to another.



Primary Goal

The primary goal of the Language Access Plan (LAP) is to assist each department, agency, and office in developing and implementing processes that ensure LEP individuals can access government services and programs. Each departmental plan should be tailored to the specific needs of the department, agency, or office, and should promote organizational coherence aligned with the key procedures outlined below. Each procedure will be explained in the following sections of this guide.

Key Procedures for County Assessment

Section 1: Needs Assessment

- A. Four Factor Analysis
- B. LEP Touch Points
- C. Level of Interaction

Section 2: Delivery of Language Services

- A. LEP Rights
- B. Bilingual Family and Friends
- C. Modalities of Interpretation Services
- D. Staff Interpreters
- E. Translation Services
- F. Vital Documents

Section 3: Identifying Primary Language

- A. "I Speak" Cards
- B. Tag Lines/Statements
- C. Notice of Availability

Section 4: Training & Monitoring Impact

- A. Staff Training
- B. Community Engagement
- C. Monitoring Feedback and Complaints

1

NEEDS ASSESSMENTS



The initial section of a LAP should delineate how the organization will evaluate the language assistance requirements of the communities it serves. The Four Factor Analysis, LEP Touch Points, and Level of Interactions are essential to assessing language assistance needs.

A. Four Factor Analysis: Prince William County uses the Four Factor Analysis (see Figure 1) to ensure compliance with Title VI regulations and to guide language access planning. Departments can conduct a program-specific assessment using this analysis to determine the appropriate level of language assistance services needed. This tool helps organizations understand the frequency with which LEP individuals interact with their programs and identify the most effective methods for providing meaningful language assistance.

See next page for the full Four Factor Analysis

1

NEEDS ASSESSMENTS

Figure 1: Four Factor Analysis

	Factor	Measure	Data Source
1	The number or proportion of limited English proficient (LEP) individuals who are eligible for or likely to engage with the program or department.	<ul style="list-style-type: none"> There are 169 languages representing 144+ ethnicities in PWC. The number of LEP individuals in Virginia is about 435,851 residents The number of LEP residents in Prince William County is 46,820. 	<ul style="list-style-type: none"> The State of Virginia (ACS2017-21) American Community Survey (ACS) 2017-2021 U. S. Census Bureau (www.census.gov) <p>[Note: The US Census data categories of “foreign-born” or “language spoken” do not capture language proficiency or literacy.]</p>
2	The frequency with which LEP individuals from different language groups seek assistance. (The more frequent the contact with a particular language group, the more likely that enhanced language services in that language are needed.)	<p>The frequency with which LEP individuals interact with County services and programs.</p> <p>Ex: Number of Spanish-speaking calls received by County staff every month or week</p>	An internal Language Access Survey was conducted in July/August 2023, representing 25 departments and 6 partner liaisons.
3	The nature and importance of the program, activity, or service provided by the department. A department needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual.	The importance of local government services to public safety, health, and cultures and the ability for LEP to participate in Prince William County services if language resources did not exist.	<ul style="list-style-type: none"> American Community Survey Language Access Interpretation & Translation Services Survey (OEM-EI) (Appendix A) Bilingual Staff Survey (OEM-EI) (Appendix B) Community Questionnaire (OEM-EI)
4	The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.	An overview of existing resources for LEP individuals and a detailed explanation of how Prince William County ensures that LEP residents are informed about the availability of free language services.	Reports from departments on their LEP initiatives, along with a list of interpretation and translation vendors provided by the Finance and Procurement Department and Vendor Assessment.

1

NEEDS ASSESSMENTS

B. LEP Touch Points:

Departments should leverage existing internal data sources. [The Equity and Inclusion Census Tract Demographics Dashboards](#) provide valuable insights into the demographics of LEP individuals.

Each department should evaluate where LEP individuals engage with their services to determine the most appropriate language support needed at each point of contact.

C. Level of Interactions: Figure 2 outlines how language access services should be planned, from the initial call or reception desk check-in to filling out paperwork, navigating the department, paying bills, providing feedback, or filing a grievance. At each stage, services should be linguistically accessible and appropriate.

Departments should design services tailored to their specific interactions with LEP communities, considering the types of encounters, environment, responsiveness, and available resources. Prioritize language assistance where LEP individuals engage most frequently.

Figure 2: Cycle of Language Access Services

Interaction examples:

- Hotlines or information line calls
- Outreach programs
- Public meetings and hearings
- Websites
- Written materials or complaints
- Brochures intended to inform the public of services or special events



2

DELIVERY OF LANGUAGE SERVICES

This LAP outlines a protocol for using interpreters to ensure that Prince William County's departments, agencies, and offices effectively meet the communication needs of a linguistically diverse community. It addresses six key aspects of language service delivery: LEP rights, the use of bilingual family and friends as interpreters, modalities of interpretation services, the role of staff interpreters, translation services, and vital documents. Each key aspect will be explained below.

A. LEP Rights:

- **The Right to Language Identification:** LEP individuals have the right to have their primary language and LEP status identified during services, using tools like "I Speak" language identification cards or posters.
- **The Right to Transparency in Data Collection:** LEP individuals have the right to be clearly informed about the purpose and intended use of their primary language information. Providing this data is voluntary, will remain confidential, and will not affect their eligibility for any programs.
- **The Right to Privacy Protection:** LEP individuals have the right to have their data protected, ensuring it is not publicly disclosed in a way that identifies individual households. Data will only be shared in aggregate form.
- **The Right to Feedback and Evaluation:** LEP individuals have the right to provide feedback on the quality of services received through follow-up surveys. This feedback will be used to monitor and improve the equitable and inclusive delivery of language services.

B. Bilingual Family and Friends: Linguistic fluency doesn't ensure competency, particularly with organizational terminology and acronyms. Adult family members or friends may only serve as interpreters if specifically requested by the resident or constituent, with refusal of interpreter services documented on the [Waiver of Interpreter Services](#) (Appendix C). To maintain confidentiality and accuracy, children under 18 and unrelated individuals will not be used as interpreters.

2

DELIVERY OF LANGUAGE SERVICES

C. Modalities of Interpretation Services: Prince William County offers several approved modalities of interpretation services. The following options should be chosen based on the specific needs, time constraints, complexity, environment, or safety concerns:

- **Telephone Interpreter Services:** Available 24/7 through county-approved contracted services. This option is ideal for immediate and flexible language support.
- **Video Remote Interpreter (VRI) Services:** Accessible 24/7 via video conference technology on any laptop or iPad, using a county-approved contract service. VRI is suitable for situations where visual communication is important but an in-person interpreter isn't feasible.
- **In-Person Interpretation:** For *scheduled encounters*, an in-person interpreter can be arranged with advance notice. For *unscheduled encounters*, alternative interpretation modalities are available to ensure immediate communication needs are met.

D. Staff interpreters may be available in some county departments, offices, and agencies. Only bilingual staff who have completed the Interpreter Testing and Training provided by the county and have demonstrated their competency and adherence to the Interpreters' Standards of Practice may provide these services. (See [HR Personnel Policy 5.2.12 Language Skills Stipend](#) for more information.)

Agencies must ensure that all bilingual or contracted interpreters:

- Demonstrate proficiency in both languages and accurately convey information using the appropriate interpreting mode (e.g., consecutive, simultaneous, summarization, or sight translation).
- Know specialized terms, concepts, and cultural phrases relevant to the agency's programs and the LEP person's language.
- Follow confidentiality, impartiality, and ethical rules equivalent to those of the agency staff they support, and adhere strictly to their role as interpreters without assuming roles such as counselor or legal advisor.

2

DELIVERY OF LANGUAGE SERVICES

E. Translation Services: Ensure accurate and effective translation of documents. “Vital” documents, including applications, intake forms, legal documents, and policies, must be translated (see section F below). Departments should also consider translating informational outreach materials if necessary to prevent limiting residents' access to services.

Federal regulations mandate translation for any LEP language group constituting at least 5% or 1,000 individuals of the population served. Major LEP groups include **Spanish, Urdu, Dari, Arabic, and Pashto**, with Spanish being the most requested. Current and forecast statistics are provided by the Census Bureau.

F. Vital Documents: Six types of “vital” documents must be translated into the languages common in Prince William County and relevant to the residents served by departments, offices, and agencies:

notices of “free” language services	intake forms and applications	informed consent forms
notices of eligibility criteria for services	any instructions	complaint forms

Documents can be outsourced for translation to a contract service or trained professional and should be back-translated to ensure accuracy. If a document is not translated, it will be sight-translated or interpreted by a qualified interpreter.

Note: The Equity Impact Screening Assessment (EISA) Liaison will report these cases for further assessment of emerging language groups. Ensuring that translations are conceptually, linguistically, and culturally accurate is crucial, and collaborating with the communities served helps ensure cultural relevance.

3

IDENTIFYING PRIMARY LANGUAGE

LEP individuals should have a way to identify their primary language upon first contact in order to receive necessary services from your department. Here are some best practices for the initial approach. Keep in mind that Prince William County provides two main types of language services: spoken (interpretation) and written (translation).

First Point of Contact

- Identify the frontline team, whether multilingual or monolingual English-speaking.
- All outreach staff should greet customers in English, including on the phone, to avoid assumptions about the need for an interpreter

Top Languages in PWC

- ★ Spanish
- Urdu
- Dari
- Arabic
- Pashto

Language Assistance Signage:

Notices about language assistance services should be prominently displayed where all potential LEP individuals may come for services. Below are some examples.

- **"I Speak" Cards:** These cards identify the individual's language and the language needed for interpretation (Appendix D). For samples and to create tailored versions, visit LEP.gov.
- **Tag Lines/Statements:** Words matter, Short plain words and messages like "Speak Spanish?" and "Language assistance is free" should be displayed to inform those with limited English skills about available help. The [Federal Plain Language Guidelines](#) from The Plain Language Action and Information Network (PLAIN) offers excellent examples of plain language to consider when creating tag lines or statements.
- **Notice of Availability:** Language access services are free to LEP individuals. Departments must display multilingual signs or posters at all points of interaction and on department webpages, informing about language assistance services. LEP groups such as **Spanish, Urdu, Dari, Arabic, and Pashto** are prioritized based on interpreter requests and annual reporting.

4

TRAINING AND MONITORING

The Equity Impact Screening Assessment (EISA) liaison will track and evaluate customer service and LAP impact. Responsibilities include:

- Maintaining a database of qualified interpreters and translators.
- Monitoring budget costs for language assistance services.
- Reporting results from the Annual Language Access Interpretation & Translation Services Survey (Appendix A) and the Bilingual Staff Questionnaire (Appendix B) to assess program needs.

The effectiveness of these processes will be informed through the following monitoring tools:

A. Staff Training: Essential for effective language assistance, training should cover:

- The importance of language assistance services.
- Effective and respectful communication with LEP individuals.
- No charges for interpretation and translation services.
- Data collection and monitoring of LEP language needs and preferences.
- Protocols for requesting and working with interpreters, including service types and access information.



4

TRAINING AND MONITORING

B. Community Engagement: The LAP should incorporate a human-centered design with strategies to engage the communities served by departments, agencies, and offices. Understanding and collaborating with community members ensures that efforts are culturally and linguistically appropriate. To achieve this, departments, agencies, and offices should:

- **Consult Stakeholders:** Seek feedback from community-based organizations and other stakeholders before finalizing the plan to assess effectiveness and performance in providing meaningful access for LEP individuals.
- **Conduct Customer Surveys:** Administer surveys in multiple languages at the point of service to improve customer experience and support continuous improvement.
- **Include Demographic Information:** Incorporate home language data into the Prince William County Community Survey and provide access to the survey in the County's top languages.

C. Monitoring Feedback and Complaints:

All departments must complete the Cycle of Language Access Services by conducting a customer language access survey in the county's top languages at the point of service. This survey aims to enhance customer experience and support continuous improvement.

Complaints or grievances from LEP individuals or their representatives should be referred to the Office of Human Rights.

Figure 2: Cycle of Language Access Services



Conclusion

Effective communication with individuals who have limited English proficiency is essential for overcoming barriers, enhancing community engagement, and ensuring compliance with anti-discrimination laws. Offering language access services at all touchpoints guarantees equitable participation in Prince William County services. A well-structured language access plan helps meet legal requirements and addresses the communication needs of LEP individuals.



Interpreting bridges communication gaps, fosters understanding, builds trust, and enhances customer service

Acknowledgments

We extend our heartfelt appreciation to the departments and offices for their invaluable insights and feedback, which have been crucial in shaping and advancing this plan.

Agency on Aging
Circuit Court Clerk's Office Court Case Services Division
Circuit Court Records Division
Commonwealth Attorney's Office
County Attorney's Office
Criminal Justice Services
Department of Community Services
Department of Development Services
Department of Economic Development
Department of Facilities & Fleet Management
Department of Finance
Department of Fire and Rescue
Department of Housing and Community Development
Department of Human Resources
Department of Human Rights
Department of Information Technology
Department of Juvenile Court Service Unit
Department of Libraries
Department of Management & Budget
Department of OEM/Communications
Department of Parks, Recreation, and Tourism
Department of Planning
Department of Public Safety Communications
Department of Public Works
Department of Social Services
Department of Transportation
Office of Elections
Police Department
Prince William-Manassas Regional Adult Detention Center
Virginia Cooperative Extension

Acknowledgments

Thank you to bilingual Prince William County employees for your valuable feedback, which has been instrumental in refining and improving the plan.

Aaren Cravari
Abraham Uribe
Aholibama Pena
Aldo Bonilla
Alex Mauricio Mejia
Alexia Tapia
Alicia Nataly Bravo
Ambar Segura
Amira Gonzalez
Ana Cabrera
Ana Isabel Seger
Andrea Gallo
Andrea Vega Mendez
Andres Paz-Juarez
Angela "Jeny" Martinez
Angela Zevallos Ghiorzo
Angelina Domena-Reynolds
Angie Guandique
Anthony Duban Meyers
Antonia Rodriguez
Ashim Pandey
Bakur Bejaneishvili
Bertha Ruiz Ortiz
Bo Nguyen
Borys Vargas
Candace Johnson
Candace K Johnson
Candice Sample-Smalley
Carmen Fermin
Carmen Granados Lopez
Caroll Reyes Chavez
Casey Rosales
Celina Cary
Christian Canales
Christian Valdez
Christopher B. Smith
Cindy Estrella
Cinthia Gomez
Claudia Quevedo
Cristina Caminade
Cynthia Macey
Cynthia Macey

Danis Bermeo
Darcie Garnier
David U Nieves
Deanne Alvarado
Diana Arana
Diana Benites-Villalobos
Diana Cuya
Donanthony King
Dorothea Schulz-Trujillo
Elda Govea
Eleni Liagouris
Eliann Rivera Diaz
Elizabeth Andrade
Elizabeth Lovos
Emely Ramirez
Enisha Cray
Enrique Dentone
Erick Ibarra Montes
Erick Vera Cervantes
Erika Guevara
Eunyoung Fitzgerald
Evelyn Galindo
Fabienne Pernet-McCulloch
Flor C Huaytan
Francisco Cortes
Fressia Verastegui Brunal
Gabriela Garay
Gardy Morales
Garry L . Mendoza
German G. Morrobel
Giannina Pinedo
Giuseppe Vozzolo
Gladis Arboleda
Glenda Soto-Roca
Glenda Cruz
Gonzalo Gracia
Gualberto Rosa
Gustavo Camargo
Hazel Zink
Hector Jose Amaya
Heidi Cruz
Heidy Del Carmen Valdez Nieves

Helton Pereira
Hilfi Martinez
Hugo Ariel Reyes Contreras
Ilyes Chalghaf
Iris Barlow
Irma A Heckathorn
Israel Perla
Jaime U. Aguilar
James Sanchez
Jamilet Hernandez
Jason Mendez
Jecica Richards
Jefferson Fabricio R. Tapia
Jennifer Hines
Jessica Christie Salas
Jessica Salas
Jessica Y. Sorto
Jibran Muhammad
Jimmy Otoniel Salgado-Lizama
Joanna Campos
Johana Pinzon
Jonathan Alvarez
Jorge E. Ochaita
Jose A. Gonzalez Tirado
Jose Miguel Chavez
Joseph Agyemang
Josue Raul Cuadra
Juan C. Bernal
Juan J Fernandez
Juan Trujillo
Juana Lozano
Juliette Ambriz Rodriquez
Karen Mills
Karina Parada
Karolyn Ruiz
Katherine Nash
Katherine Peters
Kathryn E. Long
Kathy LaVallee
Katia Arze
Kelvin Carias

Acknowledgments

Laura Arriaza
Laura Lilley-Bell
Laura Soto Gonzales
Lauren Swartz
Leandro Pena
Leman Jessel Sandoval
Lena Gonzalez Berrios
Leonardo Monterroso
Lesly Fasulo
Linda palmer
Lissette Guzman
Lissette Montenegro Aguilera
Lizeth Castro
Lourdes Tamayo
Luis C Salazar
Luis Quintero
Lya Y. Canizales
Magdalena (Maggie) Dobrev
Malcolm Echaluce
Manuela Dietrich
Marcia Rivera
Maria Armstrong
Maria Berta Larios
Maria F. Aguilera Jimenez
Maria Irish
Maria K Thacker
Maria Martinez
Maria Nieves
Maribel Orta
Marjorie J. Vergara
Marleny Pastora
Mary Anne E. Baker
Matthew Yunque
Mayra Arbaiza
Meg Orsini
Melanie Erhart
Melanie Stewart
Melissa Cimino-Hurt
Melody Aguilera
Melvin Negron
Miguel Bentivegna
Mirna Turcios
Monacy Cabral Bonham
Monica Arispe
Monica Wilen
Muriel Tapia
Nadia Torres
Nandanandana Alvarado Arteaga
Naoko Braxton
Natalia Taylor

Natalie Benitez
Natalie Lizano
Natasha Colebank
Nathan Castillo
Nelofar Jamdar
Nicole Kephart
Noel Maldonado Salinas
Norma Sanchez
Odimar Camacho (Allie)
Olena Pushkar-Gauvin
Omar Mendez
Orlandina B. Gomes
Oscar Delgado
Oscar Hernandez
Pablo Alvarado
Patricia R Shore
Patty Jane Zavaleta
Paula Arias
Polly Searight
Rachelle Bustos
Rafael Miera Martinez
Raul Mendez, Jr.
Rebeca P Velazquez
Renata Daum
Reza Ramyar
Ricardo A. Evans
Ricardo Canizales
Robert Ivanovich-Nunez
Ronald A. Naj
Roshni Dhillon
Rossanna Clark
Roxana O. Cruz
Ruben D. Castilla
Ruby G. Ragsdale
Samuel Rodriguez
Sandra Briones
Sandra P Carvajal-Carabali
Sanjin Benjamin Brooks
Santos Sanchez
Saroj Uprety
Satvir Grewal
Sebastian Tornee
Shahla W. Latif
Shahram Jamshidi
Sheren McInnis
Sherry Martinez
Smita Maskey
Sonia Pantoja
Sonnia Luciano
Stephanie Oulatta
Sunny I. Kim

Susana Machado
Svetlana Olchevski
Syed A Naqvi
Tahniah Thamm
Tanequa Askew
Telma Imaca
Ursula Juarez-Wall
Veronica Marquez
Victor Molina
Walter Josue Valladares Godoy
Walter Zarate Jr
Wanda Powell
Yanci Marquez
Yasmeen Vargas
Yelitza Ortiz
Yestin Rodriguez
Yolanda Rivera
Yoselis Altigracia Delapena
Younghwan Juan Kim
Yulissa Rojas-Smith
Zainab Saiyed
Zhenya Velasquez

El Language Plan Core Team

Joseph Gilkerson
Director of Human Resources

Lisa Madron
Chief Transformation Officer

Nicole Brown
Director of Communications

Raul Torres
Human Rights Executive Director

Rob Mancini
Chief Information Officer

Sarah Henry
Director of Community Outreach
and Partnership

A Special Thank You:

Pamela C. Jones, Senior Equity and
Inclusion Coordinator, is responsible
for data collection, analysis of data,
and initial LAP draft.

APPENDIX A

Language Access Interpretation & Translation Services Survey

All departments will use this survey to update the EISA tool and inform the annual Language Access Plan Review by the Office of Equity and Inclusion.

1. Individual responsible for Language Access for your Department
2. How do staff determine the client/customers/consumer's preferred language?
3. How often do you offer interpreter services utilizing bi-lingual staff interpreters?
4. How often do you offer interpreter services utilizing telephonic interpreter services?
5. How often do you offer interpreter services utilizing video remote interpreter services?
6. How often do you offer interpreter services utilizing professional in-person interpreter services?
7. If you have not used a professional interpreter service (telephonic/video/in-person or bilingual staff interpreter indicate why (mark all that apply)
8. Does your department provide written translated materials to your clients/customers/consumers and their families?
9. Where does translated material come from?
10. Are you satisfied with your department's current Interpretation/translation services?
11. How many clients needed an interpreter, and what languages do they speak?
12. What is the biggest challenge regarding communicating or providing interpreter services with limited English proficient clients/customers/consumers?

APPENDIX B

Sample of Bilingual Staff Questionnaire


Below are the sample questions included in the annual Bilingual Staff questionnaire, which will contribute to the data gathering for the Office of Equity and Inclusion's annual Language Access Plan Report.

1. Number of years have you been with the county?
2. What language(s) do you speak other than English?
3. Do you serve as an interpreter (speaking) when interacting with a Limited English-proficient individual who speaks a language you speak?
4. If yes, was it part of your assigned responsibilities?
5. How often do you provide translation (written) services for the county?
6. If yes, was it part of your assigned responsibilities?
7. How often do you participate in interpreter professional development training?
8. How often do you interpret?
9. Do you receive the Prince William County Bilingual Employee stipend?
10. Is there anything else you would like to share about interpreter and translation services at PWC?

APPENDIX C

Sample of Waiver of Interpreter Services

Departments may document interpreter service refusals on the Waiver of Interpretive Services form. Children under 18 or unrelated individuals will not be used as interpreters to ensure confidentiality and accurate communication.

 **PRINCE WILLIAM COUNTY**

Waiver of Interpreter Services

Name of Department/Program: _____

You have been offered **free** interpreter services provided by a Qualified Interpreter who:

- Has demonstrated expert proficiency in both English and your language
- Knows specialized terms and concepts related to the program/service you are seeking.
- Is trained to follow confidentiality, impartiality, and ethical rules to protect your privacy.

An untrained interpreter:

- May not know technical terms or words and may give you the wrong information.
- May add or leave out information.
- May learn things about you that you may not want to share.
- May share with others about your condition or life situation.
- May misunderstand what is being said.

Risks of not using a Qualified Interpreter may affect your services.

If you do not want to use a Qualified Interpreter, **please initial all items below.**

____ The risks of not using a Qualified Interpreter have been explained in my language.

____ I have been advised that a Qualified Interpreter and/or the use of auxiliary services are available to me **at no cost** through Prince William County.

____ I am aware that I am **not** required to bring an interpreter to interpret for me. I have been offered interpreter and auxiliary services and I **decline the use of such services.** The following individual is providing interpreting services for me: _____

____ I have been advised that if I prefer to use a Qualified Interpreter or auxiliary services at no cost, services will be provided to me by notifying a Prince William County staff member.

____ I understand the risks and still choose not to have a Qualified Interpreter.

Client's Name (Print) _____

Client's Signature _____ Date: _____

Service Provider's Signature _____ Date: _____

Qualified Interpreter Signature (if present) _____ Date: _____

If interpreted by phone/ video, interpreter name or # and vendor: _____

APPENDIX D

Sample of “I Speak” Card

“I Speak” cards help request interpreter services and identify a person's primary language. All government departments should use them. Below is a sample from Homeland Security.

I Speak...

Language Identification Guide

A

Amharic
አኔ አማራጅ ነው ምናገረው.

Arabic
أنا أتحدث اللغة العربية

Armenian
Ես խոսում եմ հայերեն

B

Bengali
আমি বাংলা কথা বলতে পারি

Bosnian
Ja govorim bosanski

Bulgarian
Аз говоря български

Burmese
ဤကောရ်/ဤကောရ် နှို ဗိုဂ်ဝေဝ် ဝဲကေဝ်

C

Cambodian
ខ្ញុំនិយាយភាសាខ្មែរ

Cantonese
我講廣東話 (Traditional)
我讲广东话 (Simplified)

Catalan
Parlo català

Croatian
Govorim hrvatski

Czech
Mluvim česky

D

Danish
Jeg taler dansk

Dari
من دری حرف می زنم

Dutch
Ik spreek het Nederlands

E

Estonian
Ma räägin eesti keelt

F

Finnish
Puhun suomea

French
Je parle français

G

German
Ich spreche Deutsch

Greek
Μιλώ το ελληνικά
Γίνεστε

මු වුඤැති බොලු ඉ

H

Haitian Creole
M pale kreyòl ayisyen

Hebrew
אני מדבר עברית

Hindi
मैं हिंदी बोलता हूँ ।

Hmong
Kuv has lug Moob

Hungarian
Beszélék magyarul

I

Icelandic
Ég tala íslensku

Ilocano
Agsaonak ti Ilokano

Indonesian
saya bisa berbahasa Indonesia

Italian
Parlo italiano

J

Japanese
私は日本語を話す

K

Kachchiquel
Quin cha güic'á chí ba'í ruin' rí

Korean
한국어 합니다

Kurdish
man Kurdiî zaniim

Kurmanji
man Kurmanjî zaniim

L

Lao
ຂ້ອຍປາກົນລາວ

Latvian
Es runāju latviski

Lithuanian
Aš kalbu lietuviškai

Q

Qanjohal
Ayin ti chi wal q' anjob' al

Quiche
In kinch'aw k'uin ch'e quiche

R

Romanian
Vorbesesc românește

Russian
Я говорю по-русски

S

Serbian
Ja govorim српски

Sign Language


Slovak
Hovorim po slovensky

Slovenian
Govorim slovensko

Somali
Waxaan ku hadlaa af-Soomaali

Spanish
Yo hablo español

Swahili
Ninasongea Kiswahili

Swedish
Jag talar svenska

T

Tagalog
Marunong akong mag-Tagalog

Tamil
நான் தமிழ் பேசுவேன்

Thai
พูดภาษาไทย

Turkish
Türkçe konuşurum

U

Ukrainian
Я розмовляю українською мовою

Urdu
میں اردو بولتا ہوں

V

Vietnamese
Tôi nói tiếng Việt

W

Welsh
Dwi'n siarad

X

Xhosa
Nditheba isiXhosa

Y

Yiddish
איך רעד יידיש

Yoruba
Mo nso Yoruba

Z

Zulu
Ngiyasikhuluma isiZulu

Executive Order 13166 requires DHS to take reasonable steps to provide meaningful access to its programs and activities for persons with limited English proficiency and - as also required by Title VI of the Civil Rights Act of 1964 - to ensure that recipients of federal financial assistance do the same.

I Speak is provided by the Department of Homeland Security Office for Civil Rights and Civil Liberties' (CRCL). Other resources at www.lep.gov

Contact the DHS Office for Civil Rights and Civil Liberties' CRCL Institute at CRCLTraining@dhs.gov for digital copies of this poster or a "I Speak" booklet.

Download copies of the DHS LEP plan and guidance to recipients of financial assistance at www.dhs.gov/crcl



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**Translation is that which
transforms everything so that
nothing changes.
— Günter Grass**

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interpreters in Prince William
County Government who ensure
excellent customer service.**

**LANGUAGE ACCESS PLAN
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**Prepared by: Maria D. Burgos
Director of Equity and Inclusion**



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