

Toll Free Language Translation Service

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11.1 Background

On August 11, 2000, President Clinton signed Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency. This Order was designed to enforce and implement the obligations of the Government under 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 who are Limited English Proficient (LEP).”¹ It also requires that federal agencies meet those same standards.

In a memorandum by Assistant Attorney General Ralph F. Boyd on July, 8, 2002, the Administration reaffirmed its commitment to Executive Order 13166, and urged federal agencies to create or update their plans for implementation of the Order. The U.S. Department of Justice is responsible to provide guidance to federal agencies under the order. Their opinion is that assistance with oral communication is part of the obligation of federal agencies, and assistance could include “contracting with qualified outside in-person or telephonic interpreter services.”² It is estimated that 47 million Americans have limited or no English ability.³

¹ “Commonly Asked Questions and Answers Regarding Executive Order 13166,” US Department of Justice, 6/20/2003, <http://www.usdoj.gov/crt/cor/Pubs/lepqapr.htm>, p.1

² p.5

³ U.S. Census Bureau, Census 2000 Summary File 3, Matrices P18, P19, P21, P22, P24, P36, P37, P39, P42, PCT8, PCT16, PCT17, and PCT19

11.2 Summary

To assist agencies in meeting their obligation for telephone access for LEP individuals, AT&T will provide Toll Free Language Translation Service (TFLTS). Combining the capabilities of AT&T Toll Free Service with the translation services of our partner, Language Line® Services, the AT&T offer will meet the needs of agencies to provide over the phone translation in compliance with Executive Order 13166.

AT&T's partner, Language Line Services (LLS), is the largest provider of language translation services, and has been leading the industry for over [REDACTED]. They maintain a staff of 1,500 interpreters who are scheduled to be available on a 24x7 basis supporting translation for over 150 languages. Interpreters are located in five call centers and from coast to coast in the continental United States as well as in Hawaii, Canada, Puerto Rico, the United Kingdom and Latin America. To ensure call confidentiality, all LLS interpreters are bonded, sign a strict confidentiality agreement and abide by the LLS Code of Professional Ethics. **Table 11.2-1** lists the languages for which services are provided. LLS monitors translation requests continually, adding or deleting languages based on customer need.

Table 11.2-1: Languages Supported by Language Line

Acholi	French	Kurmanji	Russian
Afrikaans	French Canadian	Lakota	Samoan
Akan	Fukienese	Laotian	Sango
Albanian	Fula	Latvian	Serbian
Amharic	Fuzhou	Lingala	Shanghai
Arabic	Ga	Lithuanian	Sicilian
Armenian	Gaddang	Luganda	Sinhalese
Assyrian	Gaelic	Luxembourgish	Sindhi
Azerbaijani	Georgian	Macedonian	Slovak
Bahnar	German	Malay	Slovenian
Bambara	Greek	Malagasy	Somali
Basque	Gujarati	Malayalam	Sorani

Belorussian	Haitian Creole	Maltese	Spanish
Bengali	Hakka	Mandarin	Swahili
Berber	Hausa	Mandinka	Swedish
Bosnian	Hebrew	Mankon	Szechuan
Bulgarian	Hindi	Marathi	Tagalog
Burmese	Hmong	Mien	Taiwanese
Cakchiquel	Hubei	Mixteco	Tamil
Cantonese	Hungarian	Mongolian	Telugu
Catalan	Hunanese	Navajo	Thai
Chaldean	Ibanag	Neapolitan	Tibetan
Chao-Chow	Ibo	Nepali	Tigre
Chavacano	Icelandic	Nigerian Pidgin English	Tigrinya
Cherokee	Igbo	Norwegian	Toishanese
Croatian	Ilocano	Nuer	Tongan
Czech	Indonesian	Oromo	Toucoulour
Dakota	Italian	Pampangan	Tshiluba
Danish	Jakartanese	Pangasinan	Turkish
Dari	Japanese	Papiamento	Ukrainian
Dinka	Jarai	Pashto	Urdu
Dutch	Javanese	Pidgin English	Vietnamese
Estonian	Kanjobal	Polish	Visayan
Ewe	Kashmiri	Portuguese	Welsh
Farsi	Khmer (Cambodian)	Portuguese Creole	Wolof
Fijian	Korean	Punjabi	Yiddish
Finnish	Krio	Rhade	Yoruba
Flemish	Kurdish	Romanian	Yupik

11.3 Description of Service

11.3.1 Toll Free Language Translation for Call Centers

For agencies receiving calls via Toll Free Service, Toll Free Language Translation Service may be accessed by contacting Language Line Services using the Call Redirection (2.2.3.2.2.1 [q]) Conference and Transfer option. The call center agent

utilizes a toll free number specific to their agency for this purpose. The use of agency-specific toll free access numbers ensures billing to the correct organization.

Once the call is terminated in the Voice Response Unit at LLS, the agent is prompted for the language requested: 1 for Spanish, 2 for all others. For languages other than Spanish, the language requested is determined through the use of Speech Recognition. The agent will then be connected with the appropriate translator. **Figure 11.3.1-1** represents the call flow of calls into Language Line.

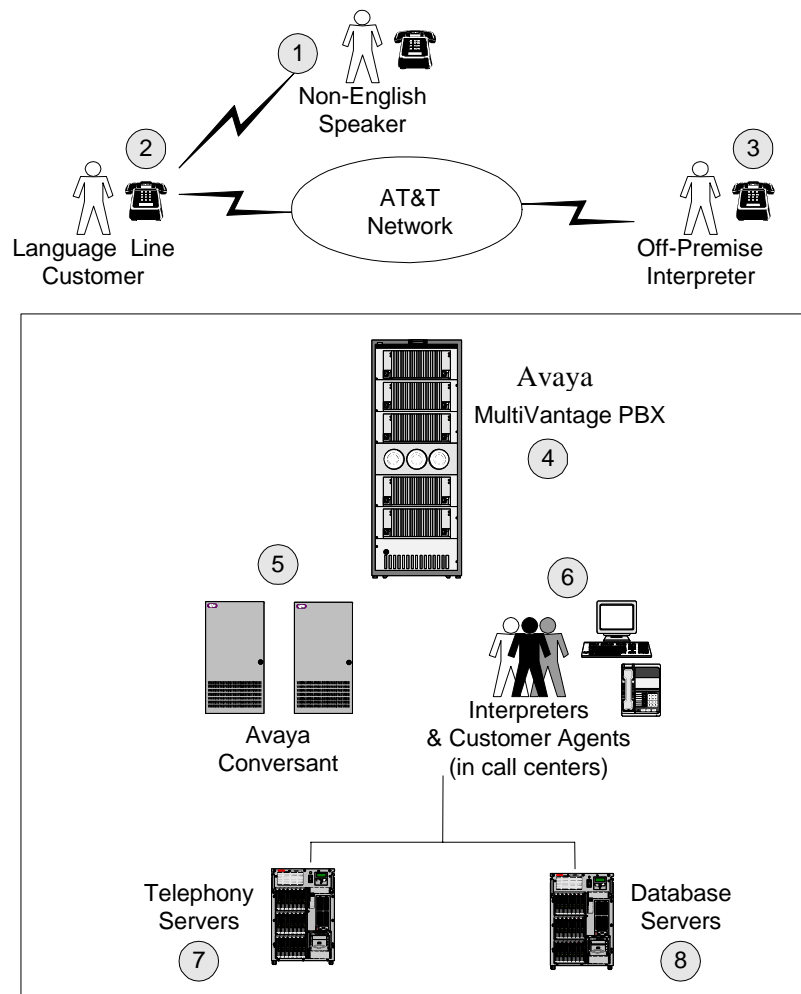


Figure 11.3.1-1: Language Line Call Flow

In a typical call, a Limited English Proficient (LEP) caller (1) originates the call to an existing toll free number of a subscribing agency (2). The agency, with the LEP caller on the line, utilizing the Transfer Connect Conference and Transfer option, places a call to their designated toll free number at Language Line in Monterey, California or Skokie, Illinois. The incoming call is routed by the Language Line PBX (4) to an Automated Platform on Language Line's Voice Response Unit (VRU) (5).

Telephone Servers (7) deliver call specifics from the PBX (4) and agency data from Database Servers (8) to the VRU (5). The VRU collects language and account information from the agency caller to process the request for an Interpreter. This information is collected by the Database Servers (8) to generate a transaction record.

The VRU (5) requests the Telephony Servers (7) to instruct the PBX (4) to place a call to the next available Interpreter. This call is sent over Language Line's private network if the selected interpreter is located in one of Language Line's call centers (6), or via the AT&T network to an Off-Premise Interpreter (3). The Telephony Servers (7) are used to conference the Interpreter (3)/(6) and the agency (2) with the LEP caller (1). The conferenced call is monitored briefly for language match and connection clarity, and then the VRU disconnects and is available for another call.

11.4 Toll Free Language Translation for Walk-In Centers

In addition to receiving calls from the public via toll free numbers, many agencies also interact with LEP individuals in person. These offices may also require the assistance of language translation service, especially for languages whose usage is not widespread.

In the walk-in environment, the agency representative places a call to the agency specific toll free number in order to reach the Language Line translator. This may be the same number as the agency uses for their call center translations, or a different

number could be provided. Once the call is received by the Language Line VRU, the process for call flow is the same as for call centers.

11.4.1 Features

11.4.1.1 Language Line Phone

To facilitate calls to Language Line from walk-in locations, agencies may utilize the Language Line Phone. This telephone, which is compatible with most analog telephone jacks, has two handsets to allow secure, clear 3-way conversation, without having to pass the handset back and forth. The phone is pre-programmed to dial the appropriate Language Line toll free number. The Language Line Phone offers more privacy than use of a speaker phone, and is more efficient than passing a single handset back and forth.

11.4.1.2 Certified Interpreter

For agencies that require an interpreter with highly specialized training in translating for medical and legal applications, AT&T will offer certified interpreters.

Agencies could utilize Certified Medical Interpreters for such applications as Medicare claims, wellness education and medical counseling. Certified Medical Interpreters must complete extensive training, including:

- + Pass the Interpreter Skills Assessment Test
- + Complete intensive medical interpreting training
- + Pass the Medical Certification Test
- + Demonstrate ongoing competence in accurate, impartial and culturally sensitive interpreting
- + Interpret an average of 500 hours in a healthcare setting

- + Interpret for healthcare organizations for at least six months

Certified Medical Interpreters are available in the following languages:

▪ Arabic	▪ Bosnian
▪ Cantonese	▪ Croatian
▪ Farsi	▪ French
▪ German	▪ Haitian Creole
▪ H'mong	▪ Italian
▪ Japanese	▪ Khmer
▪ Korean	▪ Mandarin
▪ Polish	▪ Portuguese
▪ Russian	▪ Serbian
▪ Somali	▪ Spanish
▪ Tagalog	▪ Vietnamese

Agencies that require translation from interpreters familiar with legal applications may request Court Certified Interpreters. These interpreters have passed an examination testing simultaneous, consecutive and/or sight translation administered by one of the following entities:

- + United States Administrative Office of the Courts
- + California Judicial Council
- + Consortium for State Court Interpreter Certification
- + New York State Unified Court System.

Certified Court Interpreter are available in the following languages:

▪ Arabic	▪ Cantonese
▪ French	▪ Haitian Creole
▪ H'mong	▪ Japanese
▪ Khmer	▪ Korean
▪ Mandarin	▪ Polish
▪ Portuguese	▪ Russian
▪ Spanish	▪ Tagalog
▪ Vietnamese	



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Proposal to Add Federal Telecommunications Service – Long Distance (FTS-LD)

Agencies may set up their accounts initially to automatically route calls to Certified Interpreters, or they may request a Certified Interpreter at call set-up. AT&T cannot guarantee that a Certified Interpreter will be available at all times. There is no additional charge for utilizing a Certified Interpreter.

11.5 Performance

The Service Level Objective for Language Line Service is for calls to be connected to an interpreter providing the appropriate language in less than 35 seconds on average from the time the call is requested in the VRU.