

**TUCSON UNIFIED SCHOOL DISTRICT**  
**Language Acquisition Department**  
**Memorandum**

**DATE:** July 25<sup>th</sup>, 2014  
**TO:** Ignacio Ruiz, Director  
Language Acquisition Department  
**FROM:** Luis Orantes,  
Meaningful Access Coordinator  
**SUBJECT:** Annual Report of Interpreter/Translator Services (OCR #08011157)

As originally required under the corrective action agreement noted above, the following report details the results from 2013-2014 School Year of TUSD's efforts to meet the goals established for each of the six compliance areas specified in the agreement:

- I NOTICE TO LIMITED ENGLISH PERSONS (LEPs)**
- II IDENTIFICATION OF LEPs**
- III PROVISION OF INTERPRETATION/TRANSLATION SERVICES TO LEPs**
- IV DOCUMENTATION OF INTERPRETER/TRANSLATOR SERVICES TO LEPs**
- V TRAINING**
- VI MONITORING**

**I NOTICE TO LIMITED ENGLISH PERSONS (LEPs)**

*Goal: To provide notice to all TUSD Limited English Persons of their right to English Interpretation/Translation services*

**Report:** All TUSD schools were once again required to post an enlarged version of the *Notice to LEPs Rights to Interpretation/Translation Services*. Nearly all principals asserted through an affidavit that the notice was posted and was clearly visible in or near the school office, that registrars and school office staff kept extra copies of the notice to hand out to newcomers and LEP parents, and that copies of the following documents translated are available for parents and students as necessary and as follow:

- Notice of Legal Rights Multi languages (77 Languages)
- FERPA Notice Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- PPRA Arabic, Chinese, Nepali, English, Somali, Spanish and Vietnamese
- Registration Form Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- Emergency Card Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- Guidelines for Student Rights & Responsibilities (GSRR) Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- Multiple Health Forms Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- Procedural Safeguard Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- Student Equity and Intervention Brochure Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- Family Community Outreach Brochure Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- TUSD Preschool Brochure Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese
- Open Enrollment and Magnet Application Arabic, Chinese, English, Nepali, Somali, Spanish and Vietnamese

**II. IDENTIFICATION OF LEPs:**

*Goal: To identify those LEP families who have requested or have been identified as needing interpreter/translation services.*

All schools appear to be using appropriate forms to identify those parents needing to receive school communications in languages other than English and all schools submitted affidavits indicating that Legal Notices to Limited English Proficient Persons had been mailed out after the regular registration period was concluded at the beginning of the school year.

- Total number of identified Limited English Proficient families per school as of May 23, 2014: **4899**

| School                    | PHLOTE | Lang_Pref List | % LANG PEF vs PHLOTE |
|---------------------------|--------|----------------|----------------------|
| Tucson Magnet             | 516    | 344            | 67%                  |
| Pueblo Magnet             | 344    | 412            | 120%                 |
| Rose                      | 301    | 170            | 56%                  |
| Cholla Magnet             | 297    | 313            | 105%                 |
| Lynn/Urquides             | 287    | 242            | 84%                  |
| McCorkle PreK-8           | 258    | 128            | 50%                  |
| Naylor                    | 249    | 148            | 59%                  |
| Catalina Magnet           | 242    | 226            | 93%                  |
| Grijalva                  | 234    | 84             | 36%                  |
| Hollinger                 | 221    | 101            | 46%                  |
| Rincon                    | 210    | 211            | 100%                 |
| Valencia                  | 181    | 179            | 99%                  |
| Doolen                    | 166    | 154            | 93%                  |
| Wright                    | 164    | 131            | 80%                  |
| Fickett Magnet            | 160    | 101            | 63%                  |
| Miller                    | 154    | 58             | 38%                  |
| Cavett                    | 152    | 126            | 83%                  |
| Myers-Ganoung             | 148    | 97             | 66%                  |
| Pistor                    | 148    | 132            | 89%                  |
| Mansfeld                  | 144    | 128            | 89%                  |
| Roskruge Bilingual Magnet | 142    | 88             | 62%                  |
| White                     | 141    | 27             | 19%                  |
| Safford Magnet            | 139    | 104            | 75%                  |
| Bonillas                  | 136    | 89             | 65%                  |
| Sahuaro                   | 134    | 61             | 46%                  |
| Utterback Magnet          | 134    | 145            | 108%                 |
| University                | 126    | 42             | 33%                  |
| Maldonado                 | 120    | 38             | 32%                  |
| Van Buskirk               | 119    | 33             | 28%                  |
| Mission View              | 117    | 52             | 44%                  |
| Pueblo Gardens            | 115    | 54             | 47%                  |
| Robison                   | 115    | 39             | 34%                  |
| Vesey                     | 115    | 18             | 16%                  |
| Morgan Maxwell            | 114    | 72             | 63%                  |
| Manzo                     | 113    | 53             | 47%                  |
| Tully                     | 112    | 59             | 53%                  |
| Tolson                    | 111    | 58             | 52%                  |
| Henry (Hank) Oyama        | 108    | 39             | 36%                  |
| Palo Verde Magnet         | 108    | 136            | 126%                 |
| Davis                     | 102    | 22             | 22%                  |
| Blenman                   | 99     | 27             | 27%                  |
| Ochoa                     | 81     | 81             | 100%                 |
| Holladay                  | 80     | 46             | 58%                  |
| Borton                    | 76     | 31             | 41%                  |

| School           | PHLOTE      | Lang_Pref List | % LANG PEF vs PHLOTE |
|------------------|-------------|----------------|----------------------|
| Cragin           | 74          | 35             | 47%                  |
| Drachman         | 73          | 24             | 33%                  |
| Howell           | 73          | 46             | 63%                  |
| Vail             | 72          | 87             | 121%                 |
| Robins           | 70          | 9              | 13%                  |
| Davidson         | 69          | 54             | 78%                  |
| Warren           | 69          | 25             | 36%                  |
| Santa Rita       | 66          | 39             | 59%                  |
| Dietz            | 65          | 35             | 54%                  |
| Erickson         | 65          | 22             | 34%                  |
| Johnson          | 65          | 15             | 23%                  |
| Wheeler          | 65          | 15             | 23%                  |
| Laura N Banks    | 63          | 37             | 59%                  |
| Hughes           | 61          | 13             | 21%                  |
| Whitmore         | 60          | 25             | 42%                  |
| Kellond          | 59          | 18             | 31%                  |
| Lineweaver       | 59          | 23             | 39%                  |
| Sabino           | 54          | 17             | 31%                  |
| Sewell           | 52          | 33             | 63%                  |
| Carrillo         | 51          | 6              | 12%                  |
| Magee            | 51          | 27             | 53%                  |
| Lawrence         | 49          | 37             | 76%                  |
| Dodge Magnet     | 40          | 32             | 80%                  |
| Secrist          | 40          | 28             | 70%                  |
| Gale             | 37          | 8              | 22%                  |
| Steele           | 37          | 11             | 30%                  |
| Bloom            | 36          | 6              | 17%                  |
| Gridley          | 34          | 21             | 62%                  |
| SolengTom        | 32          | 8              | 25%                  |
| Hudlow           | 28          | 7              | 25%                  |
| Ford             | 27          | 10             | 37%                  |
| Fruchthendler    | 27          | 1              | 4%                   |
| Marshall         | 23          | 6              | 26%                  |
| Henry            | 22          | 3              | 14%                  |
| Borman           | 18          | 2              | 11%                  |
| Alternative      | 16          | 18             | 113%                 |
| Dunham           | 14          | 4              | 29%                  |
| Miles - E. L. C. | 14          | 19             | 136%                 |
| Project MORE     | 14          | 9              | 64%                  |
| Collier          | 12          | 4              | 33%                  |
| Meredith         | 5           | 4              | 80%                  |
| Direct Link I    | 3           | 7              | 233%                 |
| <b>Total</b>     | <b>7333</b> | <b>4899</b>    | <b>67%</b>           |

**III. PROVISION OF INTERPRETATION/TRANSLATION SERVICES TO LEPs****Goal: To provide quality interpretation and translation services to LEP clients.****Distribution of Oral Interpretations (all languages/all events):**

TUSD continued to provide interpretation/translation services to LEPs on an individual and group basis. Each time that service is provided, the interpreter or translator fills out an event form, which is then entered in Mojave program database by the school's office manager or by central office staff.

| LANG                   | Interpretation Events | Type of Events               | No. Events |
|------------------------|-----------------------|------------------------------|------------|
| Spanish                | 1366                  | IEP Meetings/Assessments     | 647        |
| Arabic                 | 145                   | P/T Conferences              | 421        |
| Kirundi                | 91                    | Teacher Conferences          | 235        |
| Somali                 | 83                    | MET-Evaluations              | 163        |
| American Sign Language | 72                    | Phone Call - Academic        | 153        |
| Swahili                | 60                    | No Show (Parent/Guardian)    | 87         |
| Nepali                 | 47                    | Summer Events                | 63         |
| Vietnamese             | 41                    | Registration Events          | 41         |
| Chinese                | 33                    | Student Discipline Hearings  | 41         |
| Marshallese            | 32                    | Phone Call - Legal           | 24         |
| Russian                | 32                    | Counselor Meetings           | 20         |
| French                 | 26                    | MET-Permission to Evaluate   | 20         |
| Farsi                  | 12                    | Phone Call - Administrative  | 19         |
| Tigrigna               | 10                    | 504 Meetings/Assessments     | 18         |
| Af-MayMay              | 9                     | Emergency, Health/Medical    | 18         |
| Thai                   | 7                     | Child Study                  | 12         |
| Croatian               | 5                     | Extra-Curricular Activities  | 12         |
| Korean                 | 3                     | Social Service Programs      | 9          |
| Laotian                | 6                     | Evaluations                  | 8          |
| Portuguese             | 3                     | Grades and Report Cards      | 8          |
| Japanese               | 2                     | Home Visits – Administrative | 8          |
| Bengali                | 1                     | Alternative Language Program | 7          |
|                        |                       | Home Visits - Academic       | 7          |
|                        |                       | Public Meetings Event        | 7          |
|                        |                       | Policies and Procedures      | 6          |
|                        |                       | Home Visits - Legal          | 5          |
|                        |                       | Tutoring/Supplemental Svcs   | 5          |
|                        |                       | Advanced Placement           | 3          |
|                        |                       | Permission to Evaluate       | 3          |
|                        |                       | Translations                 | 3          |
|                        |                       | Attendance Issues            | 2          |
|                        |                       | Discrimination Complaints    | 2          |
|                        |                       | Expulsion Hearing            | 2          |
|                        |                       | Law Enforcement/CPS          | 2          |
|                        |                       | MET-Psych Evaluation         | 2          |
|                        |                       | General Information Meeting  | 1          |
|                        |                       | Psych Evaluation             | 1          |
|                        |                       | Transportation Issues        | 1          |
|                        |                       | Total                        | 2,086      |
| Total Events 2013-14SY | 2,086                 |                              |            |

\*Data availability upon request

- Total number of Interpretations Events were 2,086; an average of 11.6 Interpretations Events per day.

**Recommendation:** The greatest number of interpretation events involved Exceptional Education Meetings, Parent/Teacher Conferences, Phone Calls and Student Discipline Meetings. It was necessary to set up new minimum requirements for our Interpreters. In order to provide quality Interpretations services where legal terminology is involved, it was necessary a certification from four main sources: *Agnes-Haury Institute Certification*, *National Center for Interpretations through University of Arizona Certification*, *Interpretations/Translations Program through Pima Community College Certification* or a minimum of four years of experience through our Court Legal System.

**IV. DOCUMENTATION OF INTERPRETER/TRANSLATOR SERVICES TO LEPs.**

**Goal: To document the quantity of interpreter/translator services provided to LEP clients.**

- Total times in minutes, all events for 2013-14 School Year were 94,977 minutes or 1,582 hours.

| SCHOOL                | Total Minutes |
|-----------------------|---------------|
| Alt Prog              | 120           |
| Blenman               | 550           |
| Bloom                 | 591           |
| Bonillas              | 2,894         |
| Borman                | 120           |
| Borton                | 790           |
| Carrillo              | 485           |
| Catalina Magnet       | 5,359         |
| Cavett                | 1,206         |
| Cholla Magnet         | 3,345         |
| Collier               | 300           |
| Cragin                | 1,520         |
| Davidson              | 2,378         |
| Davis                 | 60            |
| Dietz                 | 335           |
| Direct Link I         | 149           |
| Direct Link II        | 90            |
| Dodge Magnet          | 434           |
| Doolen                | 3,908         |
| Drachman              | 415           |
| Dunham                | 360           |
| Erickson              | 580           |
| Exceptional Education | 580           |
| Fickett Magnet        | 1,055         |
| Ford                  | 1,370         |
| Gale                  | 505           |
| Gridley               | 640           |
| Holladay              | 345           |

| SCHOOL            | Total Minutes |
|-------------------|---------------|
| Hollinger         | 1,525         |
| Howell            | 315           |
| Hudlow            | 460           |
| Hughes            | 762           |
| Johnson           | 1,310         |
| Kellond           | 541           |
| Laura N Banks     | 280           |
| Lawrence          | 825           |
| Lineweaver        | 1,085         |
| Lynn/Urquides     | 3,095         |
| Magee             | 465           |
| Maldonado         | 395           |
| Mansfeld          | 1,355         |
| Manzo             | 670           |
| Marshall          | 35            |
| Maxwell           | 100           |
| McCorkle PreK-8   | 45            |
| Meredith          | 90            |
| Miles - E. L. C.  | 2,476         |
| Miller            | 926           |
| Mission View      | 435           |
| Morgan Maxwell    | 1,184         |
| Myers-Ganoung     | 3,214         |
| Naylor            | 2,840         |
| Ochoa             | 310           |
| Palo Verde Magnet | 2,000         |
| Pistor            | 615           |
| Pueblo Gardens    | 150           |
| Pueblo Magnet     | 4,568         |

| SCHOOL                    | Total Minutes |
|---------------------------|---------------|
| Rincon                    | 2,398         |
| Robins                    | 120           |
| Robison                   | 1,597         |
| Rose                      | 665           |
| Roskrige Bilingual Magnet | 1,305         |
| Sabino                    | 265           |
| Safford Magnet            | 510           |
| Sahuaro                   | 570           |
| Santa Rita                | 525           |
| Secrist                   | 511           |
| Sewell                    | 780           |
| Steele                    | 900           |
| Tolson                    | 330           |
| Tucson Magnet             | 3,340         |
| Tully                     | 2,262         |
| University                | 240           |
| Utterback Magnet          | 3,100         |
| Vail                      | 2,443         |
| Valencia                  | 150           |
| Van Buskirk               | 1,795         |
| Vesey                     | 200           |
| Warren                    | 550           |
| Wheeler                   | 735           |
| White                     | 975           |
| Whitmore                  | 1,295         |
| Wright                    | 4,861         |
|                           |               |
| <b>Total</b>              | <b>94,977</b> |

\*Data availability upon request

**Recommendation:**

As it has been recommended during the previous five years, it is again strongly recommended that school-based, TUSD-trained interpreters performing interpreter/translator services receive some type of compensation or stipend for those added services. I am hopeful that once compensation becomes available, the provision and documentation of services will markedly improve. Also, it is recommended to make the OCR Training for Interpreters available online. Some changes should be made in order to have this plan completed.

**Distribution for Spanish Translations:**

We have two categories of Translations: One is official documents originated from our *District Departments or from our schools*; the second category originated exclusively from *Exceptional Education Staff*.

➤ Total number of Spanish Translations for *District's Department and our Schools*: **1,016**

| School/Dept.              | No. Translations Requests |
|---------------------------|---------------------------|
| McCorkle K-8              | 106                       |
| Utterback Middle          | 55                        |
| Robison Magnet Elementary | 43                        |
| Title 1 Program           | 41                        |
| Bonillas                  | 36                        |
| GATE                      | 35                        |
| USP                       | 33                        |
| Desegregation             | 32                        |
| MASS                      | 31                        |
| POLICIES                  | 26                        |
| Lang. Acquisition Dept.   | 24                        |
| Miller Elementary         | 24                        |
| Lawrence Intermediate     | 22                        |
| Cholla Magnet             | 20                        |
| Safford K-8 Magnet        | 20                        |
| Comm. & Media Relations   | 19                        |
| OMA                       | 19                        |
| Legal Dept.               | 18                        |
| Mansfeld MS               | 18                        |
| Carrillo K-8 Magnet       | 17                        |
| Planning and Assessment   | 15                        |
| Banks Elementary          | 13                        |
| Pueblo High               | 13                        |
| Tucson High Magnet        | 13                        |
| Bonillas                  | 12                        |
| Accountability & Research | 11                        |
| Dietz elementary          | 11                        |
| Policies                  | 11                        |
| Health Services           | 10                        |
| Student Equity            | 10                        |

|                         |   |
|-------------------------|---|
| Lineweaver              | 9 |
| Superintendent's Office | 9 |
| Pueblo Gardens          | 8 |
| Transportation          | 8 |
| Booth-Fickett           | 7 |
| Borton                  | 7 |
| Cavett                  | 7 |
| Davidson Elementary     | 7 |
| Drachman                | 7 |
| Vail MS                 | 7 |
| Elementary Schools      | 6 |
| High Schools            | 6 |
| Operations              | 6 |
| ALE                     | 5 |
| Doolen Middle           | 5 |
| Magee Middle School     | 5 |
| TAPP                    | 5 |
| UHS                     | 5 |
| Wheeler                 | 5 |
| Catalina High           | 4 |
| Governing Board         | 4 |
| Governing Board         | 4 |
| Gridley Middle          | 4 |
| Hughes                  | 4 |
| Morgan Maxwell k-8      | 4 |
| Pistor M. S.            | 4 |
| Policies                | 4 |
| Tolson                  | 4 |
| Transportation          | 4 |
| Desegregation           | 3 |
| Erickson Elementary     | 3 |

|                                |   |
|--------------------------------|---|
| GATE                           | 3 |
| Johnson Elem.                  | 3 |
| Maldonado                      | 3 |
| Maxwell                        | 3 |
| Naylor                         | 3 |
| Policies /WEB site             | 3 |
| School Community Services      | 3 |
| THMS                           | 3 |
| Wright                         | 3 |
| 21st CCLC Program              | 2 |
| CE Rose                        | 2 |
| Dodge                          | 2 |
| Exc. Educ.                     | 2 |
| Family Engagement              | 2 |
| Food Services                  | 2 |
| Guidance & Counseling          | 2 |
| Hollinger                      | 2 |
| Mexican American Studies       | 2 |
| Myers Gonoung                  | 2 |
| Sahuaro                        | 2 |
| School Comm. Wel. Center       | 2 |
| University High School         | 2 |
| ADE                            | 1 |
| African American Studies       | 1 |
| C. E. Rose                     | 1 |
| Career and Technical Education | 1 |
| Core Plus                      | 1 |
| Cragin                         | 1 |
| Davis                          | 1 |
| Direct Link                    | 1 |
| Financial Services             | 1 |

|                                    |      |
|------------------------------------|------|
| Food Services                      | 1    |
| Fruchthendler                      | 1    |
| Hollinger                          | 1    |
| Howell                             | 1    |
| Infant Educational Learning Center | 1    |
| Interpreter Services               | 1    |
| Kellond                            | 1    |
| LAD                                | 1    |
| Meredith                           | 1    |
| Mexican American Studies           | 1    |
| Operations                         | 1    |
| Oyama/Vesey                        | 1    |
| Peter Howell                       | 1    |
| Principal Vail MS                  | 1    |
| Pueblo High                        | 1    |
| Resource Development               | 1    |
| Richey                             | 1    |
| Rincon HS                          | 1    |
| Sabino High School                 | 1    |
| Sam Hughes                         | 1    |
| Secondary Schools (Pistor)         | 1    |
| Steele Elem.                       | 1    |
| Student Equity (MASS)              | 1    |
| Teenage Parent H. S.               | 1    |
| Tully                              | 1    |
| USP                                | 1    |
|                                    |      |
|                                    |      |
| Total                              | 1016 |

\*Data availability upon request

- Total number of documents translated 1016; average approx. 6 documents per day.
- Total number of pages all documents 2335; average pages approx. 13 pages per day.

**Recommendation:** We currently have three Translators but one of our Spanish Translators is in Medical Leave. It is necessary to substitute this person with a Temporary position; however, this will impact our Budget. Also, this person might work a minimum of 20 hours per week and the new Affordable Medical Care Plan Act suggests any person who works more 20 hours per week for 20 weeks consistently, the District is obligated to pay this person benefits.

**Distribution for Spanish Translations:**

- Total number of Spanish Translations for **Exceptional Education Department: 294**

| Documents Requested for Translation | No. Documents |
|-------------------------------------|---------------|
| IEP                                 | 225           |
| Grad Plan                           | 12            |
| Prg Rep                             | 11            |
| Eval/MET summ                       | 6             |
| Goals                               | 5             |
| Eval/Met Summary                    | 4             |
| MET PWN                             | 3             |
| Prog Rep                            | 3             |
| IEP Rev                             | 2             |
| Progress Report                     | 2             |
| 4th qt prog                         | 1             |
| 4th qt prog                         | 1             |
| active IEP                          | 1             |
| Goals 2012-13                       | 1             |
| Goals/old IEP                       | 1             |
| Grad Plan 12/6/13                   | 1             |
|                                     |               |

| Documents Requested for Translation | No. Documents |
|-------------------------------------|---------------|
| IEP & Progress Report               | 1             |
| IEP 2/5/14                          | 1             |
| IEP -active                         | 1             |
| IEP Amendment                       | 1             |
| IEP ammend                          | 1             |
| IEP goals                           | 1             |
| IEP initial                         | 1             |
| IEP Rev - 11/6/13                   | 1             |
| IEP/PWN                             | 1             |
| IEP/Reeval                          | 1             |
| Last IEP goals                      | 1             |
| Prg Rep & IEP                       | 1             |
| Prog Rep 2012-13                    | 1             |
| PWN                                 | 1             |
| RoD/MET - PWN                       | 1             |
|                                     |               |
|                                     |               |
| <b>Total</b>                        | <b>294</b>    |

\*Data availability upon request

- Total number of documents translated was 294; the average per day was approximately 1.6 documents. Each document has an average of 18 pages per document.

**Recommendation:** Based on data analysis, we discovered our program has been providing Interpretations and Translations services to parents/families that are not part of our Mojave-Based Language Preference List Report or it is not accurate. It will be necessary to implement a plan in order to make sure the requests for Interpretations/Translations services matches each sites' Language Preference List.

## **V TRAINING**

**Goal:** To have a minimum of one trained interpreter at each site designated by an Administrator at the site in order to avoid the provision of our services provided by non-certified staff member.

We do have two types of trainings:

1. The first type of trainings is for new hired TUSD employees. This training has been presented at each Orientation class by Human Resources staff. We created this training only for employees that are in full contact with ELL students or LEPs.
2. The second training has been created for Bilingual staff (mostly in Spanish) at each site that might provide only basic interpretations services to our LEPs which might involve basic communication, Parent/Teacher Conferences or phone calls. This staff members are not authorized to provide interpretations services were legal terminology is involved such as Suspension Hearings, Medical Emergencies, Group Meetings or Exceptional Ed. Meetings.

The second Training is an essential instrument for our Bilingual staff working at the sites. In order to target this group of staff members, it is recommended to create and develop an Online Training either through North Logic or through Intranet. This option needs to be done as soon as possible due to number of requests on the Parent/Teacher conferences week scheduled the months of September 2014 and February 2015.

### **Recommendation:**

The Bilingual staff has not been compensated due to lack of budget. Back in 2010, Mr. Sal Gabaldon created a stipend plan to pay for these services according to the number of LEPs at each site but it has not been implemented due to budget constraints.

## VI MONITORING

**Goal:** Make sure all our services have been intended for our LEP according and aligned with our corrective action agreement Case No. 08011157 signed in 2002. Also, identify and analyze gaps that might be happening in our schools and our staff due to the lack of knowledge or lack of training.

**Recommendation:** Plan two visits per year to each site and take notes, make observations and compare data against previous visits or through the year. However, only one person is fully in charge coordinating all Interpretations/Translations events and this plan has not been implemented due to the lack of time and resources.

Finally, we have been experiencing financial difficulties in our district and our program has been impacted due to this situation. We do have a legal obligation and a legal federal requirement to provide accurate and qualified interpretations and translations services, to the extent feasible, to our LEPs. This provision has been also part of the USP and it is extremely important not to limit our resources or our budget. We acquired four Temporary Translators that have been providing written translations in our most predominant languages in our district and their positions/services are fundamental. If we keep experiencing more changes, limitations or cuts to our program, we might face some OCR violations in a near future. We cannot omit this federal obligation. I've included some links at the bottom related to our services in order to present a better scale about Meaningful Access.

Respectfully,

Luis C. Orantes  
Meaningful Access Coordinator  
Language Acquisition Department  
Tucson Unified School District

OCR Agreement

<http://intranet/interpreter/documents/commitment.pdf>

Department of Education-Departmental Directive

<http://www2.ed.gov/policy/gen/leg/foia/acsocroco1102.pdf>

Board Policy

<http://www.tusd1.org/contents/govboard/SectK/KBF-R.html>

USP Requirements, Page 52, **Section D**

<http://168.174.252.75/usp/Documents/uspfinal.pdf>

Procedural Safeguard, Native Language 34 CFR§300.29

[http://www.tusd1.org/contents/depart/exced/Documents/Procedural\\_Safeguards.pdf](http://www.tusd1.org/contents/depart/exced/Documents/Procedural_Safeguards.pdf)

cc Julie Tolleson, General Counsel

cc Sam Brown, Director Desegregation

cc Maggie Leonard, Legal Assistant

cc Richard Foster, Director Professional Development



