Input for FHFA: Improving Language Access in Mortgage Lending and Servicing

CONDUCT MORE BUSINESS WITH MORE LANGUAGES

Monday, July 31, 2017

Federal Housing Finance Agency
Office of Housing and Regulatory Policy
400 7th Street, S.W., 9th floor
Washington, D.C. 20219

To Whom It May Concern,

Certified Languages International (CLI) is pleased for the opportunity to offer the Federal Housing Finance Agency (FHFA) insight into the language service industry and why on-demand interpreting services play a critical role in adequately servicing non-English speaking populations.
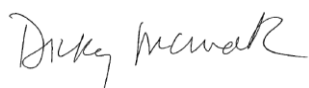
The U.S. housing market can be challenging to navigate, even under the best of circumstances. Individuals who were born and raised in the U.S., immersed in the culture and speaking English as their native language, can find the process intimidating and daunting.

Qualified borrowers with limited English proficiency (LEP) — people whose primary language is not English — need to overcome even more, as the language barrier adds an additional hurdle their fluent English-speaking counterparts do not encounter. Luckily, language service providers, such as CLI, can ease the burden and lessen the stress LEP and preferred language (PL) borrowers feel when making significant decisions during the mortgage lifecycle.

There are many steps to take when developing and implementing a uniform language access plan for LEP and PL borrowers, and we hope we can help bring some clarity to this process. CLI has stood at the forefront of world-class interpreting services since our inception in 1996, so we know the importance of creating a shared plan across all financial agencies to keep LEP and PL individuals and families housed and thriving for years to come.

Please let me know if I can provide you with any additional information about the language service industry in general, or our services specifically, beyond that submitted within this proposal.

Sincerely,

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CLI's Glossary of Terms

The language service industry is full of terms and acronyms that might not be immediately intuitive. CLI has provided below an explanation of some of the most common terminology you might encounter.

Average speed of answer (ASA)	The average time it takes for a call to be answered in a call center. This time includes the time the caller spends on hold waiting to be connected to a live operator, but it does not include time spent interacting with an IVR system. ASA algorithms may differ company to company.
Bilingual	An individual who can speak two languages fluently. Please note that there are important differences between bilingual individuals and interpreters. Interpreters often have official training on how to interpret, they have a significant depth and knowledge of industry-specific terminology, they strictly adhere to industry best practices and professional codes of conduct, and they have exemplary memories and trained focus. Bilingual individuals make excellent employees since they are able to converse in-language directly with LEP customers; however, without proper interpreter training, bilingual individuals often do not carry the skill set necessary to be successful interpreters.
Connection time	The time it takes for a caller to be connected to an interpreter in the requested language. The connection time typically begins once a live operator has identified the requested language and ends once the caller is connected to an interpreter in that language. Connection time calculations may vary company to company.
Customer service representative (CSR)	Also referred to as an agent or operator; the individual who answers the incoming phone call, receives the request for interpreting services, and connects an interpreter to the call before disconnecting. They typically assist with language identification, if necessary.
Interpreting	Converting one spoken language into another. Interpreting is the process of fully understanding, analyzing, and processing a spoken message and then rendering it into another spoken language. Interpreters must be able to accurately convey the meaning from one language to another in a culturally appropriate manner, while being mindful of the setting in which they are rendering their services. Interpreting is delivered in person or remotely, and is conducted either consecutively or simultaneously.

	Consecutive interpreting	A mode of interpreting in which the interpreter listens while the speaker presents their information. The speaker stops every one to two minutes, usually at the end of every paragraph or complete thought, and the interpreter renders what was said from the source language into the target language. This is the most common type of interpreting services performed.
	In-person interpreting	Also referred to as on-site interpreting; interpreting is provided with the interpreter physically present in person with the LEP individual for whom they are interpreting.
	Over-the-phone interpreting	Also referred to as telephone interpreting or telephonic interpreting; interpreting is provided remotely over the phone, typically using conference calling on either a dual-handset phone or a speakerphone. This can be conducted with the LEP individual in person with the company representative (for instance, a Spanish-speaking individual walks into a branch of a bank and the bank teller obtains an interpreter over the phone to conduct the transaction) or with the LEP individual calling in and the company representative patching in an interpreter (for

		instance, an Arabic-speaking individual calls their lender to discuss mortgage rates, and the company representative places them on hold while they call their interpreting company to connect an Arabic interpreter to help facilitate the call).
	Simultaneous interpreting	A mode of interpreting in which the interpreter listens to the beginning of the speaker's statement and starts conveying a sentence while the speaker continues talking. The interpreter must simultaneously speak sentence one and listen and comprehend sentence two. Simultaneous interpretation service requires the interpreter to use a headset with microphone attachment to transmit messages from the presenter to the target language wearing headsets.
	Video remote interpreting (VRI)	Interpreting is provided remotely, during which the interpreter is connected to the LEP individual and the company representative via a video platform, as opposed to in person or over the phone.
Interactive voice response (IVR)		A call-routing technology that allows a computer to interact with individuals through the use of voice recognition and DTMF tones input via a telephone keypad. This allows customers to interact with a company's host system to identify which language they need to request an interpreter in. For instance, it might be pre-programmed to provide direct connection to an interpreter in a client's top languages without going through a live operator, with the option to access live operators for language identification assistance and to request less common languages. Using an IVR solution, a call flow could be configured to, for example, direct callers to press 1 for Spanish, press 2 for Cantonese, press 3 for Arabic, press 4 for Mandarin, and press 5 for a live operator.
Language service provider (LSP)		Also referred to as a language service company (LSC); this is the company providing language services.
Languages of limited diffusion		Also referred to as languages of lesser diffusion, small language groups, minority languages, or rare languages; these are languages that don't have large populations of speakers in the U.S.
Limited English proficient / limited English proficiency (LEP)		Also referred to as English-language learner (ELL) or preferred language (PL); individuals who are not fluent in the English language, often because it is not their native language.
Linguist		An individual who studies the science of language. Interpreters, translators, or bilingual individuals are not intrinsically linguists, and linguists are not intrinsically interpreters, translators, or bilingual individuals.
Payment Card Industry Data Security Standard (PCI-DSS)		An information security standard for organizations that handle branded credit cards. Compliance with these standards helps to alleviate merchant-based vulnerabilities and protect cardholder data.
Source language		The language in which the original document is written, or the language in which the original words are expressed or spoken.
Target language		The language in which the original text, speech, or expression is translated or interpreted. For instance, if you have an English-speaking agent speaking to a Spanish-speaking customer

through an interpreter, the target language would be Spanish and the source language would be English.

Transcription	The process of converting speech or expression into written form. For instance, an audio recording of a Vietnamese-speaking customer could be transcribed into a written document in Vietnamese. If an English version of that document is needed, a translator would translate the transcribed document from Vietnamese to English.
Translation	The rendering from one written language into another. This service is often referring to as "document translation" or "written translation," as opposed to interpreting services, which are the oral rendering from one language into another. Translations should be conducted by professional translators fluent in both English and the target language who have strong command of grammar, syntax, spelling, and industry-specific vocabulary; should go through a rigorous QA process; and should help ensure compliance with government regulations and equal access to written information for a diverse range of individuals. Note that nearly half of languages spoken worldwide do not have a written equivalent.[1]
	Sight translation Sight translation is translation from visual input in the source language (written document) to oral output in the target language.
Vendor	Also referred to as Provider, Bidder, etc. This is the language service company providing interpreting/translation services.
VoIP (voiceover internet protocol)	Also referred to as voiceover IP, VoIP, or IP telephony; this is a methodology and group of technologies for the delivery of voice communications over internet protocol (IP) networks, delivered via the public internet, rather than via the public switched telephone network (PSTN).

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[1] Source: Simons, Gary F. and Charles D. Fennig (eds.). 2017. Ethnologue: Languages of the World, Twentieth edition. Dallas, Texas: SIL International. Online version: https://www.ethnologue.com/enterprise-faq/how-many-languages-world-are-unwritten-0

CLI's Input for FHFA

Throughout this document, Certified Languages International (CLI) has provided helpful tips about the types of questions and topics financial agencies might consider when it comes to interpreting services. We hope these insights will help you become a more informed participant as you expand your knowledge of the language services industry and develop the best plan to serve LEP and PL borrowers.

Before refining this search, it can be valuable to identify your organization's goals for utilizing language services. These goals might include the following:

- Partnering with a quality language service provider to guarantee the accuracy and efficiency of encounters with non-English speaking borrowers.
- Developing and reinforcing customer loyalty by providing services in their preferred language.
- Ensuring compliance with federal law and industry best practices.
- Achieving higher levels of customer satisfaction throughout your diverse client base by providing equitable access with on-demand interpreting services.
- Ensuring timely, consistent data management, accountability, and reporting.
- Increasing employee productivity by implementing simple, cost-effective language access strategies.
- Hiring and/or qualifying highly proficient bilingual staff in key languages to offset the reliance on external interpreters.

About CLI

CLI is a full-service language company specializing in over-the-phone interpreting services. With a growing list of over 200 languages, CLI is among the largest providers of its kind in the world. CLI's professional, U.S.-based interpreters are skilled in industry-specific terminology and available 24/7/365. CLI is committed to helping businesses increase revenues and maximize the value of their non-English speaking customer relationships. With over 20 years of experience, we are accustomed to helping our clients maintain compliance with industry-specific regulations involving language barriers and access.

CLI is a privately held, woman-owned business certified by the WBENC (Women's Business Enterprise National Council) and the WBE (Women-Owned Business Enterprise). CLI was named among the top 3 leading over-the-phone interpreting service providers in North America in a 2016 industry report from the Common Sense Advisory (CSA); has been included on the Inc. 5000 list of fastest-growing private companies in 2016, 2015, 2014, 2013, and 2010; was recognized by *The Oregonian* as a Top Workplace in 2017, 2016, 2015, and 2014; and was named to *Portland Business Journal*'s list of fastest-growing private companies in 2016, 2015, and 2014.

CLI has remained independently funded and free of debt, demonstrating long-term financial stability and every indicator of continued growth. Our financial stability enables us to make substantial investments in operations and technology to advance our services. We maintain significant cash reserves that can sustain operations for over a year. We also carry ample insurance coverage, and have never had an insurance claim filed on any of our policies in over 20 years of business. The majority of CLI's revenue is generated from over-the-phone interpreting services.

CLI's executives are on the forefront of supporting strong industry standards, and our team has helped mold the accreditation processes that are being adapted by language service companies to ensure the delivery of quality in both interpreting services and translation services. Bill Graeper, CLI's founder and former CEO, was

a founding member of the Association of Language Companies (ALC), an organization that represents the interests of language company owners at a national level.

Our CEO, Kristin Quinlan, is a recognized leader. Ms. Quinlan's commitment to the language industry earned her a position on the ALC's Leadership Council, overseeing the Marketing Committee from 2007 to 2009. She was then elected to a four-year term on the ALC's Executive Board of Directors in 2010 and currently holds the position of association secretary. Ms. Quinlan is also on the Board of Directors of the Joint National Committee for Languages and the National Council for Languages and International Studies (JNCL-NCLIS), and is a contributing member of the world's largest association for the language industry, Globalization and Localization Association (GALA), where — among other distinctions — she has been a speaker in GALA's "Expert Presentation" series as an industry expert, and contributed to their international newsletter. Currently, in Ms. Quinlan's position on the Board of Directors with the JNCL-NCLIS, she is lobbying the government on initiatives that will effect positive changes and improvements in the language industry.

The quality of the interpreting services provided is only as strong as the integrity of the company providing them. Make certain you are partnering with a reputable language service provider that has a proven, long-term track record of success and robust financial stability backing them. Some questions you might ask include:

- Enclose a company profile including years providing the requested services, tenure of key management personnel, and any other value that your company can provide.

- Describe your company's ownership structure and demonstrated leadership within the industry.

- Provide the last three years of financial statements, including your current equity/debt ratio.

- Describe your insurance coverage (umbrella insurance, general liability insurance, professional liability insurance, cyber insurance, workers' compensation insurance, etc.), and if you have ever had insurance claims filed.

- What is your organization's experience in providing language services to financial institutions and departments such as mortgage lending and servicing, loan origination, customer service, credit and debt servicing, and collections?

- Provide at least three client references, preferably within the financial/banking industry. Include the duration of services provided, name and contact information of your primary point of contact, and the scope of services for each reference.

- What differentiates your company from other language service providers? How do these differentiators enhance the services you provide compared to your competitors?

Overview of Language Services

Markets Using Over-the-Phone Interpreting Services

There is no official language in the U.S., and a substantial portion of people living here speak a language other than English at home. Helping organizations and businesses access this growing population is what language service providers do. Over-the-phone interpreting services are utilized by any company or organization that needs to communicate on demand with non-English speaking customers.

Some language service providers specialize in certain markets and hone their craft to meet industry-specific demands. CLI provides services for every major market, including financial institutions, customer service hubs, call centers, government agencies, medical/healthcare systems and pharmacies, court and legal systems, debt collection, corporate and global business sector, telecommunications, educational institutions, retail industry, insurance companies, utility companies, transportation companies, travel/tourism and hospitality industry, and the technology sector.

Additional Language Services

Although over-the-phone interpreting services are the most frequently accessed, most language service companies also offer other related services to better support their clients. Typically, language assistance is provided in two ways: orally and written. Some organizations will hire their own internal interpreters, translators, and/or bilingual employees, some hire a third-party interpreting and translation organization such as CLI, and some hire a mix of the two.

Although CLI has specialized in providing over-the-phone interpreting services since our inception, we are a full-service language company with many other services that include:

- Video remote interpreting (VRI)
- Document translation in 100+ languages
- Transcription (audio, video, and Braille)
- Bilingual proficiency testing
- Interpreter skills testing
- Desktop publishing
- Typesetting

Some questions you might ask include:

- Provide a concise, high-level overview of your proposed solution for over-the-phone interpreting services, describing key aspects.
- Describe all additional capabilities and related language service offerings.
- Identify how many languages are available for each type of language service.

Language Industry Organizations

Language organizations are an important part of the language industry, as they help support policy, fund training and educational programs, elevate the status of professional interpreters and translators, and advocate for the industry as a whole. Below you'll find a list of notable language organizations with which CLI has partnered.

CCHI — Certification Commission for Healthcare Interpreters

The **Certification Commission for Healthcare Interpreters (CCHI)** is helping set the standards for a national, credible, vendor-neutral certification program for healthcare interpreters.
cchicertification.org

CIIC — Contract Interpreter Information Center

The **Contract Interpreter Information Center (CIIC)** is dedicated to supporting independent contractors across the nation who represent the backbone of the language services industry.
contractinterpreters.com

CHIA — California Healthcare Interpreting Association

The **California Healthcare Interpreting Association (CHIA)** is dedicated to improving the quality and availability of language services in healthcare.
chiaonline.org

ata

The **American Translators Association (ATA)** was founded to advance the translation and interpreting professions and foster the professional development of individual translators and interpreters.
atanet.org

elia. european language industry association

The **European Language Industry Association (ELIA)** is a European-focused organization devoted to providing language service companies with events and forums that support language industry initiatives.
elia-association.org

GALA — Globalization & Localization Association

The **Globalization and Localization Association (GALA)** is the world's largest association for the language industry; as a nonprofit, it provides resources, education, and research.
gala-global.org

NCIHC

The **National Council on Interpreting in Health Care (NCIHC)** is a multi-disciplinary organization whose mission is to promote and enhance language access in healthcare in the United States.
ncihc.org

NOTIS — Northwest Translators & Interpreters Society

The **Northwest Translators and Interpreters Society (NOTIS)** is a forum for professional interpreters and translators in the PNW to strengthen the language community through networking, building resources, and influencing public policy.
notisnet.org

The Association of LANGUAGE COMPANIES

The **Association of Language Companies (ALC)** is a national trade association representing businesses that provide translation, interpretation, localization, and language training services.
alcus.org

IMIA

The **International Medical Interpreters Association (IMIA)** is an organization that offers a certification program, establishes industry best practices, and provides resources for professional medical interpreters.
imiaweb.org

InterpretAmerica — Raising the Profile of Interpreting

InterpretAmerica's mission is to create a space where interpreting professionals from all sectors can come together to help raise the profile of the interpreting profession.
interpretamerica.com

JNCL-NCLIS

The **Joint National Committee for Languages-National Council for Languages and International Studies (JNCL-NCLIS)** is an association that advocates for national policy surrounding foreign language issues.
languagepolicy.org

Some questions you might ask include:

- Describe any strategic partnerships that you currently have with other industry organizations.
- Provide details about any partnerships or alliances you have in place that may benefit our company.

Top Languages Spoken in the U.S.

According to the most recent United States Census Bureau report[2], there are 381 languages spoken in the U.S. In August 2016, the U.S. Department of Health and Human Services and Office for Civil Rights released a list[3] of the top 15 languages spoken by individuals with limited English proficiency in each of the 50 states, the District of Columbia, and the U.S. territories.

As evident in this list, location plays a huge role in language diversity, so it's very common to have a different language mix city to city, state to state, and region to region. The top languages that have the largest population of speakers across the U.S. include Spanish, Chinese (Cantonese and Mandarin), French and French Creole, Tagalog, Vietnamese, Russian, Arabic, Korean, and German. Because populations of speakers migrate and disperse, language populations by state do shift over time.

Languages of Limited Diffusion

The ability to provide interpreters in languages of limited diffusion is a consideration that should not be overlooked when vetting language service providers. The list of the top 15 languages spoken by LEP individuals by state mentioned above is helpful in understanding the most frequently requested languages, but beyond these top 15 (or even the top 50 languages spoken in the U.S.), companies need reliable access to interpreters in uncommon languages. When a customer walks in to a bank to apply for a home loan or calls to discuss her mortgage payments but she only speaks Jarai (a rare language spoken in regions of Vietnam and Cambodia with only 332,557 known speakers left in the world), the agent assisting her needs to be able to immediately get a Jarai interpreter on the phone to seamlessly facilitate every facet of that transaction.

CLI routinely provides information to our clients on language trends and developments from a regional, national, and global level. CLI analysts continually research immigration, refugee, and migration trends across the U.S. in order to anticipate our customers' language needs, which can be particularly advantageous for diverse states that contain large refugee resettlement populations. This level of industry involvement and closely tracking the refugee surge make it possible for CLI to stay ahead of the curve, so as to meet emerging language demands.

By studying population and language patterns on a regional level and cultivating contacts with refugee resettlement agencies and migrant health offices across the country, CLI knows which languages will be needed and in which regions, and we aggressively recruit for interpreters in these languages. This research and recruitment process often occurs before our clients are even aware of their evolving needs, and ensures that we can quickly connect our clients to professional interpreters in hundreds of languages at any time of the day or night, accurately facilitating interactions with a substantial segment of the population.

Language service providers generally staff or contract with thousands of professional interpreters and offer services in hundreds of languages. CLI's over-the-phone interpreting services are currently available in 226 languages — a number that continues to grow as we recruit interpreters in new languages of limited diffusion.

Please note that if a company offers more than one service in addition to over-the-phone interpreting (video remote interpreting or document translation, for example), the number of interpreters and/or translators available for the additional services will vary. The breadth of available languages through any given language

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[2] U.S. Census Bureau report: https://www.census.gov/prod/2013pubs/acs-22.pdf

[3] U.S. Department of Health and Human Services and Office for Civil Rights list:
https://www.hhs.gov/sites/default/files/resources-for-covered-entities-top-15-languages-list.pdf

service provider will determine the extent that a financial company is able to provide services to their non-English speaking borrowers.

> Some questions you might ask include:
>
> - How many languages do you support? Provide a list of all languages available for over-the-phone interpreting services.
> - Explain how you accommodate languages you do not currently support, or add new ones.

U.S.-Based Interpreters

CLI utilizes interpreters predominately located in the United States. U.S.-based interpreters understand the American culture for which they're interpreting, adeptly interpreting idioms, local vernacular, and colloquialisms. Using U.S.-based interpreters also allows for easier enforcement of HIPAA, information privacy laws, and regulations, and ensures dual-culture immersion and reduction of accent barriers. Further, the U.S. telephone infrastructure is vastly more reliable, hence reducing the propensity for dropped calls and allowing for consistent, clear connections.

> Some questions you might ask include:
>
> - Are your interpreters based entirely in the U.S.? If not, in what other countries are they located, and what percentage are located outside the U.S.?
> - Will any of the services be subcontracted to other interpreting companies?
> - If any services will be subcontracted, are the subcontractors' interpreters 100% based in the U.S.? If not, where?
> - If you have interpreters based outside of the U.S., how do you prevent dropped calls and ensure the audio quality of calls?

24/7 Access to Over-the-Phone Interpreters

One of the benefits of utilizing over-the-phone interpreters (as opposed to in-person interpreters) is how quickly they can be accessed, without scheduling an appointment in advance. Most companies should prioritize contracting with a language service provider that can offer 24/7/365, around-the-clock services across all languages, because today's global economy relies on uninterrupted communication.

> Some questions you might ask include:
>
> - Indicate if all languages are available 24/7/365 or if any languages have limited availability or require pre-scheduling.
> - If pre-scheduling is required for any languages, identify which languages and what your process is for clients to pre-schedule these.
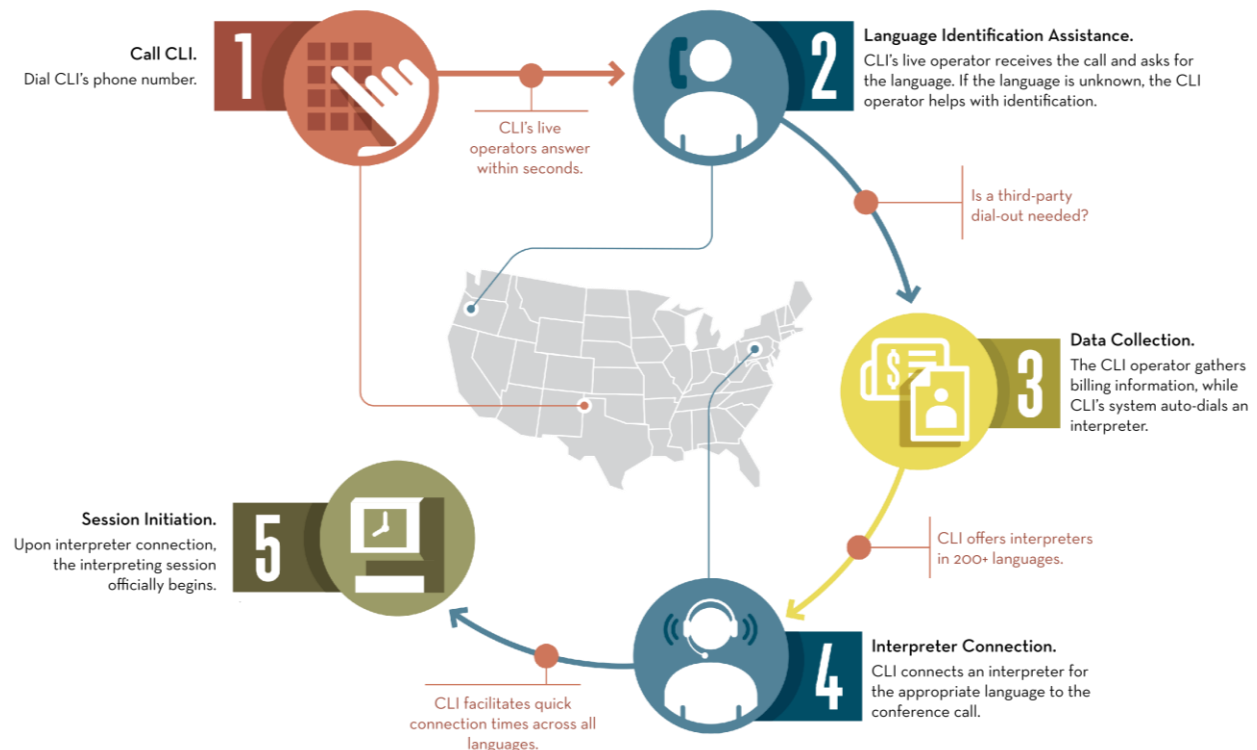
Call Routing Options

Providers of over-the-phone interpreting services offer an array of call routing options, with different degrees of variety and customization. CLI has the ability to highly tailor our clients' call flow process in whatever way they prefer. In addition to 24/7/365 access to live customer service representatives (CSRs), we offer technology-driven solutions that include interactive voice response (IVR) and the option to dial interpreters directly in a company's most frequently needed languages. Client preference determines whether calls are answered via CSR, IVR, direct dial, or a combination of call routing solutions — all offered at no additional charge.

Connection time (the amount of time it takes to connect an interpreter to the call) can range anywhere from a few seconds to minutes. Connection time varies by language. The languages that are most frequently requested (and therefore the ones that are often supported by the highest number of interpreters) typically experience a lower connection time, such as Spanish, Arabic, Mandarin, Cantonese, Russian, and Korean.

Each language service provider will have their own process for how to access their pool of over-the-phone interpreters. For instance, at CLI the most common configuration is that when a customer calls, they are connected to a live CSR. When a CSR receives an incoming call, they greet the caller and ask what language the caller needs. After the CSR enters the requested language into the system, the system autodials all of the available interpreters in that chosen language.

Meanwhile, the CSR gathers any required billing information requested by that client. An available interpreter is able to accept the call, often before our CSR has finished gathering the customized billing data (which will appear on the client's call reports and invoices), ensuring a quick connection. This process is depicted below.

Call CLI.
Dial CLI's phone number.

CLI's live operators answer within seconds.

Language Identification Assistance.
CLI's live operator receives the call and asks for the language. If the language is unknown, the CLI operator helps with identification.

Is a third-party dial-out needed?

Data Collection.
The CLI operator gathers billing information, while CLI's system auto-dials an interpreter.

CLI offers interpreters in 200+ languages.

Session Initiation.
Upon interpreter connection, the interpreting session officially begins.

CLI facilitates quick connection times across all languages.

Interpreter Connection.
CLI connects an interpreter for the appropriate language to the conference call.

Some questions you might ask include:
- Describe all the call routing options you offer, and what extra costs (if any) each entails.

- Do you provide toll-free phone numbers to access interpreting services? Is there a limit on toll-free numbers you can provide?

- Is any special hardware required to access your over-the-phone interpreters?

- Outline your call flow process from beginning to end.

- What is your average time to answer (ASA)? Explain how you measure ASA.

- What is your average connection time to an interpreter, and how does this vary by language? Explain how you measure connection times.

- On average, what percentage of interpretation requests are you able to fill?

Instructional Resources & Usage Materials

Most interpreting companies offer their clients some kind of resources or materials. Depending on the company, they may or may not charge for these materials. In some cases, they will customize materials for their clients, or provide generic versions. CLI offers a variety of free, customized resources and materials for the life of the agreement to help our clients promote interpreting services to their non-English speaking customers, assist with language identification, and enable their staff to quickly access an interpreter. We work closely with our clients to help determine which materials would be appropriate for their various locations, facilities, and departments. Examples of these materials are described below.

- **Plastic Instruction Badges:** Employee badges that list the CLI phone number and company-specific billing information.

- **Instruction Cards:** Include the CLI phone number, company-specific billing information, steps for making an interpreting call, and suggestions for working with an over-the-phone interpreter.

- **Instruction Stickers:** Include the CLI phone number and company-specific billing information.

- **Language ID Brochures:** Include the top 60 languages for identification assistance, enabling customers to easily self-identify their language by pointing.

- **Language ID Posters:** Include the top 18 or 26 languages for identification assistance, enabling customers to easily self-identify their language by pointing.

- **Language ID Counter Displays:** Include built-in easel for countertops and desks, offering language identification assistance in the top 18 or 26 languages.

We offer these materials in hard copy as well as electronic versions. If clients identify a need for materials we don't currently offer, we are happy to work with them to develop an entirely new type of resource that could support each company's environment around accessing interpreting services.

WE SPEAK YOUR LANGUAGE

CERTIFIED LANGUAGES INTERNATIONAL — Interpreting Services Available

نحن نتكلم العربية
We speak Arabic.

我们讲中国普通话
We speak Chinese.

Nous parlons français.
We speak French.

Nou pale kreyòl ayisyen.
We speak Haitian Creole.

우리는 한국어를 구사합니다.
We speak Korean.

Falamos Português.
We speak Portuguese.

Waxaan ku hadalnaa Somali.
We speak Somali.

Мы говорим по-русски.
We speak Russian.

Nosotros hablamos español.
We speak Spanish.

Chúng tôi nói tiếng Việt.
We speak Vietnamese.

CertifiedLanguages.com | 1.800.CALL.CLI

For example, CLI was recently approached by a large financial client who wanted a point-to sign they could hang on the front door of every bank location, alerting non-English speaking customers in their top 10 languages that interpreting services were available. Within 24 hours, we created a customized sign for them based on their requested parameters (pictured above).

> Some questions you might ask include:
> - Describe the instruction, usage, or access materials you provide.
> - Do you charge for any of these materials? If so, outline any costs you pass on to your clients.

Service Training & Resources

Training on how to use and maximize language services should come standard with utilization. Trainings are a great opportunity for service providers to meet clients and their staff, and better understand their questions and service environment.

CLI provides as much free, customized training as our customers would like on any topic related to language services. For example, CLI provides training sessions that teach staff how to increase efficiency, save money, and provide a higher level of compliance and customer care through the provision of CLI's interpreting services. We find that educating staff on best practices for accessing interpreting services directly benefits our clients and, more importantly, their end users.

We find that new clients are often surprised at the simplicity and ease of access to our interpreting services, and they rarely request training. That being said, our experienced client relations and implementation teams are fully prepared to provide as much or as little training, educational resources, instructional materials, and ongoing support as needed. We are experienced at making this transition seamless and comfortable, and our support staff extends every resource and courtesy as we work closely with new clients and their staff to facilitate this shift fluidly and with no service interruption — which should be a primary goal of any language service provider.

> Some questions you might ask include:
> - What is your process for service implementation?
> - How will you train our staff on the use of your service?
> - Describe any additional training and training topics you provide to clients, and any costs you pass on for these trainings.

Reporting & Billing

Data Tracking, Reporting & Billing

Usage reporting is a valuable component of utilizing language services, because it enables companies to more effectively track their usage, monitor the shifting demographics of their LEP customers, and harness that data for accountability and compliance purposes. Some language service providers will charge for this services, while others (such as CLI) offer it as a complimentary benefit.

CLI's tracking and reporting system gives our clients secure, real-time access to all their call data through our easy-to-use online portal, available 24/7/365. Because security is a top priority, CLI's web-based reporting tool is encrypted and password-protected. Our clients are able to easily generate and export reports themselves on demand into Excel, PDF, MS Word, CSV, TIFF, MHTML, and a number of other format options. Additionally, CLI can email customized reports on any pre-determined schedule or automatically upload them to a secure FTP site upon request. Data is updated in near real time, and detailed reports can be generated showing metrics that users define within any specified service timeframe.

CLI provides two standard reporting options (Call Detail Reports and Language Summary Reports), both of which can be highly customized to capture virtually any specified information that we can collect for each call, such as the following:

- Language of each call
- Date and time of each call
- Duration in minutes per call
- Total minutes per month
- Total number of calls
- Average call length

- Percentage of total minutes per language
- Total charges per call
- Summary for each department by category
- Connection time per call
- Percent of successfully connected calls

Billing generally commences once the interpreter is actually connected to the call; CLI never bills for the time spent connecting to the operator, making a request for an interpreter, or collecting billing information.

Some questions you might ask include:

- Describe the reports available (including what data elements can be included, if these can be generated in real time, and in what format).

- Does your reporting system allow users to auto-generate reports in a web-based dashboard? If so, provide details.

- Provide samples of available reports.

- How and at what frequency does your company bill clients?

- When do invoices become available?

Interpreters

Types of Interpreter Models

Language service providers operate within a variety of interpreter models, including interpreters who are independent contractors, employees, or a combination of both.

Brick-and-Mortar Interpreter Call Center Model

Many interpreting companies rely on employee interpreters located in call centers across the U.S. and abroad. Because Spanish is the most popular language spoken in the U.S. other than English, if a call center is located outside the U.S., it's usually located in Latin American. Interpreters in call centers travel to a physical location and take calls in designated shifts.

It's nearly impossible for companies who offer a breadth of languages to exclusively use employee interpreters who work out of brick-and-mortar call centers. That's because this staffing model limits any interpreter recruiting to the commutable proximity surrounding the facility, which might not have access to highly qualified interpreters in rare, diverse languages. Brick-and-mortar call centers can also entail challenges with accommodating unexpected spikes in call volume, restricted by the number of interpreters physically sitting in the call center.

Independent Interpreter Contractor Model

Some companies, such as CLI, utilize an independent interpreter contractor model. In the independent interpreter model, interpreters work as professional contractors, providing interpreting services remotely from secure (often home-based) offices.

At CLI, our interpreters are located all across the U.S, which means we can immediately respond to spikes in call volume, national emergencies, natural disasters, and volume shifts because of our virtual base of interpreters with broad geodiversity. This model also affords a broad array of languages and a wider pool of experienced professionals to recruit from, thus reducing the risk of settling on interpreters who don't meet minimum requirements and qualifications.

Examples of Contractor Models in Other Industries

The independent contractor model has proven to be a valuable, effective framework in many industries. For example, the U.S. Department of State staffs only 20 interpreters as employees, yet it contracts with over 1,000 interpreters who are independent contractors[4]. In addition to the U.S. government, other professions that reflect the contractor model include accountants, court reporters, dentists, doctors, lawyers, medical transcriptionists, and veterinarians.

> Some questions you might ask include:
>
> - How many interpreters do you employ as permanent employees and how many interpreters are independent contractors?
>
>   - Where are your interpreters located?
>
>   - Do your interpreter work from brick-and-mortar call centers? If not, where do they work from?

Interpreter Qualifications

Ensuring that you select a company that carefully vets their interpreters is one of the most important considerations. Each language service provider's approach to interpreter recruitment, qualifications, and monitoring can have a serious impact on the accuracy, efficiency, and customer satisfaction of interpreting sessions. While every company might have a different vetting and testing process, institutions selecting a language service provider should take into consideration some of the following indicators:

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[4] Source: http://www.state.gov/m/a/ols/index.htm

- Years of interpreting experience
- Confirmed fluency in English and the target language
- Certifications and education
- Completed training programs
- Specialized, industry-specific skill sets
- Demonstrated adherence to professional code of interpreter ethics and confidentiality agreements

Experienced interpreters know that having an arsenal of general, industry-specific, and client-specific terminology on hand while servicing calls is an essential part of the job. Professionals should be able to deftly navigate calls across a variety of industries with ease, and dedicated language service providers aid their interpreters by disseminating lists of terminology, common phrases, acronyms, and industry jargon. These glossaries are distributed via training sessions, monthly newsletters and emails, or at the behest of the client. For example, CLI's Spanish glossary for the financial industry is over 120 pages long. This comprehensive glossary includes English words, terms, and common phrases; the Spanish translation or equivalent; and notes explaining context and any necessary reasoning for chosen translations.

CLI's Professional Interpreters

Our interpreters are carefully vetted for their experience, training, certifications, and qualifications in interpreting to ensure that calls are handled with the utmost accuracy and integrity.

On average, our interpreters possess 7.68 years of interpreting experience prior to joining our team. CLI's interpreters typically bring at least 2 years of prior interpreting experience, have a minimum of 40 hours of completed training, and must pass our rigorous interpreting exam. The vast majority of CLI's interpreters have at least a bachelor's degree, and most of our interpreters are certified through nationally recognized organizations and/or have completed formal interpreter training programs. CLI also prioritizes working with professional interpreters who hold nationally recognized interpreting certifications through third-party organizations.

Note that currently, interpreter certification through nationally recognized organizations is only available in the healthcare industry, in a handful of languages. While CLI actively pursues contracting with certified interpreters, the number of certified interpreters across the country is quite low. For example, nationwide there are only 38 Korean interpreters certified through the National Board of Certification for Medical Interpreters (NBCMI) and only 68 Arabic interpreters certified through the Certification Commission for Healthcare Interpreters (CCHI). Further, most certified interpreters tend to be staff interpreters working directly for hospitals.

Ongoing education and professional development are instrumental to interpreter quality. To ensure that our interpreters are routinely informed about current standards, and updated on new client-specific and industry-specific terminology, CLI maintains a rigorous continuing education program. It's important to us that our interpreters remain on the forefront of new advances, which often lead to new acronyms, terminology, and neologisms. We incorporate this information into our monthly newsletters and regular email communication with our interpreters.

Some questions you might ask include:
- Describe your company's recruiting, qualification, and hiring process for interpreters.
- Provide details about your interpreter testing process and how you measure skill sets.
- Describe background checks performed on interpreters.
- How do you recognize interpreter performance and encourage retention?

- What professional code of ethics do your interpreters abide by? How do you monitor your interpreters to ensure they are abiding by the code of ethics?

- What kind of experience and expertise do your interpreters hold specific to the financial services industry and banking terminology?

Quality Assurance

Quality assurance will typically be two-tiered: QA for interpreter performance and QA for call centers and call stats.

QA for Interpreter Performance

Language service providers should regularly monitor their interpreters for indicators that include the following:

- Customer service skills
- Correct and accurate interpreting
- Maintaining neutrality, impartiality, and confidentiality
- First-person interpreting
- Preparedness
- Proficiency in industry-specific terminology

At CLI, we have developed extensive auditing metrics to determine if the interpreter meets professional standards of practice within areas such as accuracy, impartiality, role boundaries, customer service etiquette, professionalism, interpreter knowledge, interpreting proficiency, precision of dual-language skills, compliance, tone, and pace. We conduct periodic blind performance reviews using our proprietary internal evaluation rubric, as well as daily scripted, unannounced internal test calls to evaluate interpreter performance. Throughout the day, we also monitor our "on-call" interpreter log to make certain we have ample interpreters logged in to accept calls across all languages.

QA for Call Centers & Call Stats

In call centers, underperforming metrics could lead to increased costs through inefficiencies including higher wait times, lost time due to abandoned calls, and delays caused by language selection difficulties. At a minimum, language service providers should monitor call center metrics such as:

- Average speed of answer
- Average connection time to interpreters in each language
- Percentage of calls successfully connected

At CLI, at the beginning of each new business day, a report is run on our connection times from the previous day, so we can continuously strive to reduce this time. We closely monitor our call centers and CSRs on a wide range of metrics and indicators, and have extensive QA controls and supervisory staff in place. Customized monitoring and tracking tools are built into CLI's proprietary technology platform, which allows us to view all current system capabilities and provide real-time alerts and performance tracking. CLI has developed internal alerting processes for network, hardware, and application monitoring. All core business systems are monitored and logs are reviewed based on current needs and future requirements. Management meets regularly to discuss findings, evaluate performance, and make plans to correct, modify, or enhance any target areas.

With this level of attention to detail, constant monitoring, and automated alert systems, CLI's management team is able to immediately identify and quickly address any deficiencies in performance. We have exhaustive procedures in place to promptly remedy any potential performance issue, depending on the nature and cause of the problem.

Some questions you might ask include:

- Describe your process for monitoring staffing levels (of both customer service representatives and interpreters) to meet service level goals.

- Explain how you plan for and respond to unexpected spikes in call volume in terms of staffing levels and service quality.

- What technologies are utilized in your call centers to increase the quality, efficiency, and effectiveness of service delivery?

- What is the percentage of uptime your system has had in the past 12 months?

- What performance metrics do you utilize to track and measure call center performance?

- Explain your quality monitoring process of interpreters.

- How do you monitor interpreter performance on calls? How often is it done, and how often is feedback given to the interpreters?

- What performance metrics do you utilize to track and measure interpreter performance?

- In the event that there is concern over the interpreting quality of a call, please detail the quality assurance process that you would follow to address this concern and any action you would take as a result.

Business Continuity

Redundancy & Disaster Recovery

Language service providers should develop their infrastructure with the understanding that clients rely on these important services 24/7/365 — with no room for down time. Conducting due diligence to guarantee that the provider you ultimately partner with is prepared to handle dramatic volume surges (as a result of any event ranging from natural disasters and national emergencies to telecom failures and server outages) is essential. This entails a provider that upholds sufficient redundancy, call capacity, business continuity, and disaster recovery plans.

CLI has blended business continuity and disaster recovery objectives into a model that allows us to provide uninterrupted services. Our corporate headquarters and primary call center are both located in Portland, Oregon; we also operate a second, fully redundant call center in Phoenix, Arizona. Failover systems have been integrated into all core business functions so that if there is a power outage or business disruption, CLI's infrastructure can independently handle the full load of daily operations at either location. We have allowed for aggressive growth in our capacity planning and can add resources on the fly, as demand dictates.

Our geodiversity ensures that even with an outage within one of our carriers' networks, we will never experience the impact at both locations simultaneously. This allows CLI to seamlessly handle any network or power disruption that may occur at either physical location or within our carriers' networks. In case of an emergency that cuts off service to one part of the country, our interpreter model permits us to utilize an interpreter for the same language located in an unaffected region of the U.S., with no service disruption. We purposely sited our call centers on a fiber ring, using multiple communications companies in addition to backup facilities. Our facilities are equipped with multiple sources of uninterruptible power supplies and supported by on-site emergency generators. CLI's core business servers and data are backed up in real-time, and data archiving, backup, and recovery procedures are conducted continually.

CLI utilizes a multicarrier approach to provide redundant paths for all inbound and outbound calls. Call routes are proactively monitored in real time by a service aggregator who tracks all of our call paths for traffic flow and connectivity, allowing for a real-time response to any outages our carriers may experience. If any issues on the three unique carrier networks are noticed, the service aggregator initiates a load-balanced reroute of calls being handled by any one carrier to the redundant carriers. When monitoring indicates the service issues have been resolved, calls will resume standard routing over all carrier networks. This approach ensures CLI has the resources and flexibility to withstand local, regional, or nationwide carrier-related outages.

Some questions you might ask include:

- Provide an overview of your contingency/disaster recovery plan for those processes and systems used to support the provision of services.

- How does your organization maintain services in the event of a power outage or natural disaster? What if this scenario lasts for several days?

- How many actual minutes of downtime did your communication system experience in the past 12 months and how did it impact service delivery?

- How often is your company's disaster recovery plan tested?

Security & Confidentiality

Keeping each customer's personal information safe is of prime importance, so it's critical to choose a language service provider with sound security and confidentiality practices.

Standards & Protocols

CLI has the following standards, protocols, and policies in place:

- We hold certification for compliance with the Privacy Shield Framework through the U.S. Department of Commerce.
- CLI maintains current certification for compliance with PCI Data Security Standards.
- All CLI employees and interpreters complete annual HIPAA (Health Insurance Portability and Accountability Act) training, testing, and certification.
- We are fully compliant with the HITECH (Health Information Technology for Economic and Clinical Health) Act and the Gramm-Leach-Bliley Act.

- Our corporate offices and call centers have restricted, security-card access.
- We require mandatory password protection of all computers.
- Our internal network access is protected by a two-factor VPN authentication, multiple firewalls, and digital certification.
- CLI's call centers are supervised 24/7, with continual oversight of computer activity and tight security restrictions with limited access for CSRs.
- CLI does not document, store, or process any customer information that has not been specifically requested for billing (which would be captured by our CSRs, prior to interpreter connection).
- We do not access our clients' systems or records in any way.

Interpreter Security

Interpreter security should be continually tracked with regular QA monitoring and security audits. Security measures will differ depending on whether the interpreter is located in a home-based office or in a call center. For CLI's independent model, interpreters:

- Are bound by a signed statement of confidentiality and HIPAA Business Associate Agreement.
- Must follow the Code of Professional Ethics.
- Are required to work in a secure work environment, free from distraction. ("Secure" is defined as a private location that has a locked door and is free from ambient noise.)
- Are required to have proper window coverings in place to obscure view from the outside.
- Are required to promptly shred notes after each interpreting session, or must immediately erase any notes taken on white boards.

As part of CLI's qualification process and before they are permitted to accept calls, interpreters:

- Must pass extensive national criminal background checks and social security number screening, which covers criminal, felony, misdemeanor, sex offender registry, and arrest records.
- Are screened against exclusion lists, including OIG (Office of Inspector General), System for Award Management (SAM), and OFAC SDN (Office of Foreign Assets Control Specially Designated Nationals and Blocked Persons). Interpreters also undergo exclusion list screenings on a monthly basis for the duration of their contract with CLI.

As interpreters are occasionally used to facilitate payment card processing or to provide account information, security measures are paramount, and we thoroughly address security compliance protocols. Upon hire, our interpreters receive guidelines regarding confidentiality and nondisclosure agreements. All CLI interpreters must read, sign, and demonstrate understanding of and adherence to our HIPAA Business Associate Agreement, Interpreter Basic Conduct and Procedures, Code of Professional Ethics, and statement of Confidentiality and Protection of Customer Information.

CLI does not permit interpreters to use cell phones; they may use only approved landlines. Interpreting via a cell phone is not HIPAA-compliant, is not as secure as a landline, and does not provide the same connection quality as a landline. For these security and quality reasons, we also don't allow interpreters to use phones with speaker capabilities or phones that use VoIP (voiceover internet protocol) technologies. CLI reserves the right to randomly conduct on-site visits and/or video inspections of CLI interpreters' office environments to verify they are compliant with industry standards, adhering to our security guidelines, using approved equipment, and working from a secure office. New interpreters must also sign an annual attestation that they will adhere to all CLI security requirements.

Some questions you might ask include:

- What confidentiality and security measures do you have in place to protect customer information?

- With which federal laws and other agreements are your interpreters required to be in compliance?

- Describe your policies and procedures with respect to privacy and data security in your interpreters' work environment.

- If calls are recorded, where are they located and how long are they retained? How are the recordings secured?

Pricing and Cost Considerations

Typically, language service providers use a pricing model for over-the-phone interpreting services based on a per-minute rate, in which a client is only billed for the actual time they utilize services. Some language service providers might charge additional fees for the following:

- Third-party dial-outs
- Implementation and account setup
- Monthly minimums
- Taxes or excise fees
- Proprietary or toll-free numbers

- Long-distance calls
- Online reporting tool
- Usage and instructional materials
- Service training or tutorials

The per-minute price we offer is driven by factors such as language mix and average monthly volume. For instance, the higher the percentage of Spanish calls, the lower the cost will typically be. If a new client does not know what these are or has no historic volume, we typically start their pricing on the higher end, and then we can revisit and lower it to a more competitive rate once we develop an understanding of what their language mix and volume is going to be.

Language service providers also offer a variety of pricing structures. At CLI, we work with clients to find the most advantageous or preferred pricing structure, which might include the following types:

- **Flat, Blended Rate** — A single, per-minute price for all languages

Per-Minute Pricing for Over-the-Phone Interpreting Services: Flat, Blended Rate, All Languages	
All spoken languages	$_____

- **Split Rate** — One price for Spanish, and one price for all other languages (wherein the price for Spanish would be considerably lower)

Per-Minute Pricing for Over-the-Phone Interpreting Services: Split Rate	
Flat rate for Spanish	$_____
Flat rate for all non-Spanish languages	$_____

- **Tiered Rate** — One flat price for all languages at each tier of call volume

Per-Minute Pricing for Over-the-Phone Interpreting Services: Tiered Rate, All Languages	
Average Minutes per Month	**Price per Minute**
1 – 1,000	$_____
1,001 – 2,500	$_____
2,501 – 5,000	$_____
5,001 – 10,000	$_____
10,001 and over	$_____

- **Tiered Split Rate** — Different prices for Spanish at each tier of call volume, and different prices for all other languages at each tier of call volume

Per-Minute Pricing for Over-the-Phone Interpreting Services: Tiered Split Rate, All Languages		
Average Minutes per Month	**Price per Minute:** **Spanish**	**Price per Minute:** **All Non-Spanish Languages**
1 – 1,000	$_____	$_____
1,001 – 2,500	$_____	$_____
2,501 – 5,000	$_____	$_____
5,001 – 10,000	$_____	$_____
10,001 and over	$_____	$_____

- Individual accounts subject to price negotiation based on estimated volume.
- Pricing based on estimated and historical account usage.

CLI routinely revisits our clients' pricing and rate structure when we start to notice that, for example, a client is experiencing a much higher volume of Spanish or higher overall call volume than they have historically. When this occurs, we like to offer them lower pricing that better matches their actual usage.

Some questions you might ask include:

• If your customer service representatives need to connect to a third party to provide the translation service, is there a cost associated with this? If so, what is the additional fee per minute for this service?

• Outline the price proposal at the dollars per minute, fully defining what is and is not included in rate.

• Provide any other expenses Company would be responsible for in the delivery of interpreting services identified in this request beyond per-minute costs.