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**PSA MATERIALS -**

**TRANSLATION POLICY & PROTOCOL
Version 3.1 – April 2023**

1. **Policy Goal**

To establish standards and protocols for developing, reviewing, and approving translations of PSA materials.

1. **Reason for Policy**

To maintain equivalence across languages/dialects while developing a functional and culturally appropriate version of the original document(s).

1. **Who Should Be Familiar with this Policy**
* All PSA team members
* PSA cooperative agreement stakeholders, including PSA Executive and Steering Committee members
* Individuals, industry members, foreign government and university personnel, and others interested in translating PSA materials for use in the PSA Grower Training Courses.
* PSA Trainers and Lead Trainers that intend to utilize a translated version of the curriculum.
1. **Definitions**
	* **Primary Translator:** Individual who meets translator qualifications (see below), conducts the initial translation of document(s), and submits document(s) to PSA for review. If more than one individual is conducting the translation activity, one individual from the group must be identified as the Primary Translator.
	* **Secondary Translator:** Individual who meets translator qualifications and is independent from the person who conducted the primary translation. The Secondary Translator will review the work of the Primary Translator, fill out the Translation Evaluation Rubric, and provide edits and comments to the Primary Translator to improve the document and copy PSA personnel.
	* **Requester:** Individual or organization requesting and organizing the translation of the PSA Grower Training Curriculum.
2. **The Policy**
* **Summary**

This policy outlines a protocol that includes steps necessary to develop a translation and have it approved for use in PSA Grower Training Courses. These steps include identifying qualified translators to complete the translation, required documents, funding mechanisms, independent review of the translated documents, communication with the PSA regarding document layout, and proper acknowledgement.

* **Eligibility for PSA/AFDO Certificates of Course Completion**
	+ Educational materials developed by the PSA that are translated into other languages must be approved by the PSA prior to use in PSA Grower Training Courses.
	+ Courses conducted using *unapproved* translated materials cannot be registered with AFDO and participants will not be eligible to receive PSA/AFDO Certificates of Course Completion.
	+ The translation must include the following manual sections: Welcome, Modules 1-7, References, Glossary, Separator Tabs, Ring Binder Cover, and Ring Binder Spine. The PSA Grower Training Evaluation is also required. The Food Safety Modernization Act and FDA/USDA resources tabs are optional to be translated, however, an English version will be included in the final electronic document if they are not translated.
	+ Information on the current versions and available translations of the PSA Grower Training Course can be found here: <https://cals.cornell.edu/produce-safety-alliance/psa-curriculum/current-version-and-available-translations>.
	+ All PSA Grower Training Courses must be delivered in a language that is easily understood by participants, and trainers must provide a manual in an approved translation. PSA has developed an Alternative Language Policy for situations where an approved translation of the curriculum in the desired language is not available. Information on this policy can be found here: <https://cals.cornell.edu/produce-safety-alliance/psa-curriculum/alternative-language-delivery-policy>. Please contact the Produce Safety Alliance (psatrainers@cornell.edu) for more information.
* **Primary & Secondary Translator Qualifications**
	+ Bilingual, in English and in the target language
	+ Technical proficiency, including familiarity with relevant scientific, agricultural, and regulatory terminology to preserve the meaning of the original text with cultural and linguistic adaptations made as needed, so that the translated text is easy for the intended audience to understand and use
	+ Preferred qualifications:
		- Has attended the PSA Grower Training Course
		- Is a PSA Trainer or PSA Lead Trainer
		- Familiar with the subject area; including knowledge of the Food Safety Modernization Act (FSMA) Produce Safety Rule
	+ Provide at least one reference for each translator to PSA to confirm experience and reliability in translating written documents for the intended purpose and audiences prior to beginning translation work. PSA reserves the right to request samples of translation work to confirm qualifications of translator(s), if requested.
	+ Communicate clearly about timelines and translation policies.
	+ Both translators must be identified at the beginning of the project and be willing to work together to come to consensus on terminology and provide documentation to PSA so that questions can be addressed
	+ The Secondary Translator must be a different person than the Primary Translator. To ensure a rigorous review of the translation, we recommend that the Secondary Translator is independent from the Primary Translator.
* **Funding Translations**
	+ Ensure adequate funding is in place to complete the project. The requester must communicate with PSA about their ability to fund both the primary and secondary translation work, as well as funding for the layout of the curriculum materials.
	+ PSA does not have funds to compensate translators for their work. Funding must be secured by the requester. PSA is not responsible for reimbursing translators hired by other organizations or for any costs incurred during translation of the educational materials.
	+ PSA has limited funds to assist with the final layout for consistency with other translations of the curriculum. See more under ‘Document Formatting and Layout’.
* **Initial Translation Steps**
	+ Notify the PSA of the intent to translate the PSA Grower Training curriculum.
		- This is critical so that the PSA can ensure the proper version is being translated and can alert the group or individual if another group is already in the process of developing the translation. Time and effort spent on duplicative translations is not in the best interest of the stakeholder community. It is also important so that PSA personnel can communicate with the translators to ensure they are aware of this policy and have all the necessary documents.
	+ Identify a qualified Primary and Secondary Translator. Send PSA documentation of each translators’ qualifications prior to beginning translation work.
	+ PSA will share the appropriate documents and translation expectations with the selected Primary and Secondary Translators.
	+ The Primary and Secondary Translator must work together on the key terminology document and glossary before the Primary Translator begins work on the curriculum modules so that agreement can be made on the terminology to be used throughout for consistency.
	+ Individuals and organizations seeking approval by PSA for translated materials must agree to sharing translated content through internet or cloud-based document management (e.g., Dropbox) and other methods to maintain version control, design, and overall quality. This may vary, depending on the translation contractor and for the purposes of the final layout process.

* **Review and Revision Process**
	+ Upon receipt of the translated documents from the Primary Translator, the translated documents will be reviewed by PSA personnel for formatting and shared with the Secondary Translator.
	+ The Secondary Translator will be responsible for using Track Changes to note edits, completing the Translation Evaluation Rubric, and proposing any additional edits or corrections using the translation evaluation form (if Track Changes is not used). Working directly with the Primary Translator, changes should be discussed and agreed upon.
	+ The Secondary Translator will notify PSA personnel when the review is complete. Track change notes between translators are helpful to share with PSA personnel so a record is available if word choice is questioned at a later point in time.
	+ PSA personnel reserve the right to request additional information and approve or deny edits based on Secondary Translator feedback.
	+ A pilot of the translated materials with produce growers who speak the language is strongly suggested, but not required. Piloting the translated PowerPoints and notes text will help identify any areas where language or word choice might need adjustment with the target audience.
	+ PSA reserves the right to decline any unsatisfactory translated documents and deny their approval for use in registered PSA Grower Training Courses.
* **Document Formatting and Layout**
	+ To preserve the original formatting and design of the PSA curriculum, the PSA will manage final layout of materials. The individual/organization will be required to cover the costs of the layout. A quote can be provided upon request. See the **Translation Document Checklist** for required documents needed prior to starting the layout.
	+ Once the translated documents are reviewed and approved by the PSA, a minimum of 6 weeks is needed to adapt the layout and produce final documents for use in PSA Grower Training Courses. The product of the layout process will be electronic files, publicly available for download from the PSA’s website.
	+ Payment can be made to the PSA in full prior to layout. At least 50% of the payment for the contracted design process must be provided prior to layout, and the remainder of payment will be required before the final electronic file is released.
	+ PSA will share the Welcome section and Module 1 with the translators after layout to ensure accuracy and formatting of the materials before proceeding to the remainder of the document layout process. Translators will be responsible for reviewing the final layout of the entire translated PSA Grower Training curriculum prior to approval for use in PSA Grower Training Courses.
* **Acknowledgements**
	+ PSA will acknowledge any individuals, companies, or entities involved in the translation and/or funding of approved PSA educational materials, if requested. Name(s), business/affiliation, date, and logo will be included on the new document(s) credit/authorship page. Other types of acknowledgements will be considered upon written request.
	+ Acknowledgement of the final approved curriculum will be made within the materials as well as on PSA’s website. AFDO will be notified that approval of courses using these materials can occur.
* **Workflow Outline**
1. The Requester contacts the PSA to coordinate development of a translated version.
2. Primary Translator, Secondary Translator, and appropriate funding are identified.
3. Requester schedules meeting with identified translators and PSA personnel to discuss documents requiring translation and translation policy expectations.
4. The Requester shares qualifications of translators with PSA personnel. PSA personnel approve, deny, or request additional information about selected translators.
5. The Primary and Secondary Translators work together to achieve consensus on the key terminology document and glossary terms prior to the Primary Translator beginning work on the curriculum content.
6. The Primary Translator completes translation and submits the required documents to PSA personnel for review. The documents will then be shared with the Secondary Translator for evaluation and comments.
7. The Secondary Translator conducts evaluation of document using the **Translation Evaluation Rubric** and provides edits and comments to the Primary Translator with a copy to PSA personnel.
8. The Secondary Translator and Primary Translator discuss any proposed edits to the original translated document. PSA personnel may be involved in discussions, if warranted.
9. PSA personnel review the proposed edits from the Secondary Reviewer, once completed.
10. Once the translation process has been completed by both translators, the final PowerPoints and required documents will be returned to PSA personnel to begin the final formatting process.
11. When the layout has been completed, the Primary and Secondary Translators must review the materials to ensure the layout accurately reflects the translation. PDF files will be supplied for each section. Using Adobe Acrobat, the translators will leave comments for any requested changes.
12. PSA will notify all translators and AFDO when electronic materials are finalized and courses can be conducted in that language.
13. PSA will post on the PSA and AFDO websites about the availability of the translated curriculum and any other pertinent details.

**Translation Document Checklist**

Contact Rob Way (rfw2@cornell.edu) for access to curriculum word counts and translation files.

**Required Translated Documents**

* Produce Safety Alliance Grower Training Version 1.2 Module PowerPoints, Modules 1-7
	+ PowerPoint slide text
	+ PowerPoint notes
* Printed Manual ‘Welcome’
	+ *Note: Acknowledgements for funders, translators, and project managers for the translation can be added this this section*
* Printed Manual ‘References’
* Printed Manual ‘Glossary’
* Printed Manual ‘Ring Binder Cover’, ‘Ring Binder Spine’, ‘Separator Tabs’
* PSA Grower Training Evaluation
* PSA key terminology document (See Page 5)
* Additional required text (See Page 5)

**Optional Translated Documents**

*Note: If a translation of the following documents is not completed, the English version will still be incorporated into the printed manual.*

* Printed Manual Contents within ‘The Food Safety Modernization Act’ Tab
* Printed Manual Contents within the ‘FDA/USDA Resources’ Tabs

**PSA Key Terminology**The terms below, in addition to the glossary, are required to be mutually agreed upon by both translators. If consensus cannot be achieved or additional discussion is required, please include a brief summary of the issue.

|  |  |  |
| --- | --- | --- |
| **English** | **Target Language** | **Notes** |
| farm |  |  |
| produce |  |  |
| must |  |  |
| should |  |  |
| fruits |  |  |
| vegetables |  |  |
| grower |  |  |
| as appropriate |  |  |
| as necessary |  |  |
| enforcement discretion |  |  |
| hops |  |  |
| pulse crops |  |  |
| Kill-step *(step during the commercial processing that adequately reduces the presence of microorganisms of public health significance)* |  |  |

**Additional Required Text to Translate**The following text appears in the PSA Grower Training manual and is required to be translated in order to complete the project.

|  |  |  |
| --- | --- | --- |
| **English** | **Target Language** | **Notes** |
| Notes |  |  |
| Additional Information |  |  |
| Visit https://cals.cornell.edu/psa/mod1 for web links |  |  |
| Produce Safety Alliance Grower Training Course • Version 1.2 • © 2019 |  |  |
| For resources related to writing food safety plans, please visit: https://cals.cornell.edu/psa/mod7 |  |  |

**Translation Evaluation Rubric**

**Document Title:
Secondary Reviewer:
Date:**

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| --- | --- | --- | --- | --- | --- |
|  | Excellent (1) | Above Average (2) | Average (3) | Below Average (4) | Very Poor (5) |
| **Accuracy/Transfer** | [ ] The translated text is fully usable for the purpose specified in the translation instructions. The meaning and sense of the source text have been fully and appropriately transferred to the translated text. | [ ] Translated text transfers meaning in a manner fully consistent with the translation instructions. Translation contains few or no transfer errors, and those present have a minor effect on meaning. | [ ] Translated text transfers meaning in a manner sufficiently consistent with the translation instructions. Translation contains occasional and/or minor transfer errors that slightly obscure or change meaning. | [ ] Translated text transfers meaning in a manner somewhat consistent with the translation instructions. Translation contains more than occasional transfer errors that obscure or change meaning. | [ ] Translated text transfers meaning in a manner inconsistent with the translation instructions. Translation contains frequent and/or serious transfer errors that obscure or change meaning. |
| **Terminology/Style** | [ ] Terminology is appropriate in context. Style/ register are appropriate for the topic in the target language and for the specified audience. | [ ] Translated text contains few or no inappropriate term or style/register choices. Any errors have a minor effect on meaning. | [ ] Translated text contains occasional and/or minor inappropriate term or style/register choices. Such errors may slightly obscure meaning. | [ ] Translated text contains frequent inappropriate and/or incorrect terms or style /register choices. Such errors may obscure or change meaning. | [ ] Translated text contains excessive inappropriate and/or incorrect terms or style/register choices. Such errors obscure or change meaning. |
| **Idiomatic writing** | [ ] Translated text reads smoothly. Wording is idiomatic and appropriate for the topic in the target language and for the specified audience. | [ ] Translated text is almost entirely idiomatic and appropriate in context. Any errors have a minor effect on meaning. | [ ] Translated text contains occasional unidiomatic or inappropriate wording. Such errors may slightly obscure meaning. | [ ] Translated text contains frequent and /or obvious unidiomatic or inappropriate wording. Such errors may obscure or change meaning. | [ ] Translated text contains excessive and/or disruptive unidiomatic or inappropriate wording. Such errors obscure or change meaning. |
| **Target mechanics** | [ ] Translated text fully follows the rules and conventions of target language mechanics (spelling, grammar, punctuation, etc.). | [ ] Translated text contains few or no errors in target language mechanics. | [ ] Translated text contains occasional errors in target language mechanics. | [ ] Translated text contains frequent and/or obvious errors in target language mechanics. | [ ] Translated text contains excessive and/or disruptive errors in target language mechanics. |
| **Overall** | [ ] The target text would require little if any editing in order to be used for the purpose specified in the Translation Instructions. | [ ] The target text could be published or used for professional purposes after minimal work by a bilingual editor and a target language copy editor. | [ ] The target text could be used for the purpose given in the Translation Instructions after some work by a bilingual editor and/or a target language copy editor. | [ ] The target text would require extensive bilingual editing and/or target language copy editing before it could be used for the purpose given in the translation instructions. | [ ] This translation cannot be used for the purpose given in the translation instructions. |

*Adapted from American Translators Association, 2011 Guidelines* **Translation Meets Acceptable Requirements** – all sections receive a score of 1 or 2
 **Translation Does Not Meet Acceptable Requirements** – scores of 3, 4, and 5 occur in some sections

**Translation Evaluation – Proposed Edits**

If your translation workflow involves the use of Microsoft Word, translations can be edited using Track Changes directly into the documents. This form is not required if Track Changes is used with additional comments to describe justification for requested edits.

|  |  |
| --- | --- |
| **Original translation completed by:** |  |
| **Secondary review conducted by:** |  |
| **Date:** |  |

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| --- | --- | --- | --- | --- |
| **Resource Title/Module Number** | **Slide/Page #/Notes** | **Original text** | **Proposed edit to text** | **Justification for edit** |
| *EXAMPLE: PSA Grower Training/Module 6* | *Slide 2 - Notes* | *Enter in original text from primary translation* | *Enter in proposed edit to text for final version* | *Enter in justification (incorrect term, misspelling, grammatical issue)* |
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