



City of Arts & Innovation

Inclusiveness, Community Engagement & Governmental Affairs Committee

TO: INCLUSIVENESS, COMMUNITY ENGAGEMENT & GOVERNMENTAL AFFAIRS COMMITTEE MEMBERS **DATE: MAY 5, 2021**

FROM: CITY MANAGER'S OFFICE **WARDS: ALL**

SUBJECT: LANGUAGE ACCESS AND TRANSLATION SERVICES UPDATE

ISSUE:

Receive a report regarding an update to the Translation Guidelines Policy, Administrative Policy Number: 01.024.00 and options to expand language access and translation services for Limited English Proficiency (LEP) persons.

RECOMMENDATIONS:

1. That the Inclusiveness, Community Engagement & Governmental Affairs Committee provide direction to staff and rank five options for staff to research costs and implications for future implementation to prioritize language access for LEP persons.

BACKGROUND:

There are two California laws that require local agencies to provide language access services. California Government Code §11135 prohibits discrimination by agencies that receive state funds and requires them to provide equal access without regard to race, color, national origin or ethnic group and the Bilingual Services Act, California Government Code §7290 requires that every local public agency "serving a substantial number of non-English-speaking people" provide language access services to LEP persons.

On January 1, 2019 the City Manager signed into effect Administrative Manual 01.024.00 (Translation Guidelines) to raise awareness to consider translation of City documents, provide direction on when and what documents to translate into alternative languages, and identify where to find resources to assist with translation. The current policy addresses what to translate, who will translate, style of translation, tips, and internal resources in the Hive.

On February 4, 2021 an Internal Translation Committee Meeting was held with representatives from each department in attendance with the aim of understanding our community's language preferences, reviewing other communities' best practices, and reviewing and adjusting the Translation Guidelines Policy as needed. Members from each department provided input and information identifying current departmental translation and interpretation activities.

Based on the discussion within the internal working group, the following changes to the Translation Guidelines Policy were proposed:

- Title will be modified to: Language Access and Translation Policy (more inclusive of all language access needs)
- Add section on interpretation (ADA accommodations) to the policy
- Refine the listing of materials
- Expand Glossary of technical terms in Spanish; publish to intranet as an internal resource

DISCUSSION:

Who We Are: Demographics

**Please note that all data in this report is based on the US Census Bureau’s 2019 American Community Survey, therefore may not reflect current demographics*

City of Riverside – Population Size: 331k (United States Census Bureau)

Languages spoken at home:

English	Spanish	Asian & Pacific Islander Dialects	Other Indo-European Dialects	Other Languages
49.2%	41.5%	5.1%	2.4%	1.8%

Best Practices from Other Cities

The Internal Translation Committee reviewed in detailed best practices from other cities of both similar size and demographic breakdown along with other progressive cities providing additional access to LEP individuals. While there is no one-size-fits-all solution, there are best practices that can be adopted and modified to fit Riverside’s needs.

Anaheim, CA – Population Size: 350k (United States Census Bureau)

Languages spoken at home:

English	Spanish	Asian & Pacific Islander Dialects	Other Indo-European Dialects	Other Languages
38.9%	43.7%	12.2%	3.3%	1.8%

Language Access Policy ([City of Anaheim Title VI Plan](#)):

- Full Spanish interpretation services are available at all city council meetings using headsets
- Service provider contract to provide foreign language, ASL, and translation of written documents of vital information identified by the departments business needs upon request
- Considerations to convert text to target language are localization, internationalization, and globalization

- Language identification cards identifying which languages are available are displayed at all public counters and service can be provided upon request by designated internal staff

Buena Park, CA – Population Size: 82k (United States Census Bureau)

Languages spoken at home:

English	Spanish	Asian & Pacific Islander Dialects	Other Indo-European Dialects	Other Languages
43.6 %	27.3%	22.8%	5.6%	.8%

Language Access Policy ([City of Buena Park City Council Policies](#)):

- Considerations to convert text to target language are determined depending on importance of the program, information, or service involved as determined by the authoring department
- Departments should consult the city clerk when deciding whether to translate certain types of documents
- City council and commission meeting agendas shall include a standardized statement, in the languages designated, that the agenda or specific items of interests are available for translation upon request

San Antonio, TX – Population Size: 1.5m (United States Census Bureau)

Languages spoken at home:

English	Spanish	Asian & Pacific Islander Dialects	Other Indo-European Dialects	Other Languages
57.2% %	38.8%	1.8%	1.5%	.7%

Language Access Policy ([City of San Antonio Language Services Page](#)):

- ASL & Spanish interpreters available upon request for all City Council Committee meetings
- Assistive listening devices available at all City Council meetings
- Following meetings, residents can request post-production videos with Spanish interpretation audio, ASL interpretation or closed captioning via fillable form on their website
- Use DeafLink to provide accessible emergency alerts
- Employ “Spanish Language Liaison” as Spanish-speaking general coordinator of public relations
- Essential services and departments that constitute a high priority include emergency services, SAPD, COSA clerks, city council meetings, and community town halls

Long Beach, CA – Population Size: 462K (United States Census Bureau)

Languages spoken at home:

English	Spanish	Asian & Pacific Islander Dialects	Other Indo-European Dialects	Other Languages
53.9 %	34%	9.3%	2.1%	.7%

Language Access Policy (Est. Cost 453K) ([Long Beach Language Access Policy](#))

- Upon determination of the City Manager, to the extent funding is available, City departments may offer to translate written materials that provide vital information to the public
- Established threshold to apply translation set at 4% or more of population who speak language other than English (currently Spanish, Cambodian and Filipino)
- Language Access Plan includes estimated costs of implementation

What Language Access Services are Currently Provided by the City

Under the current policy Departments are responsible for determining which documents to translate using the Translation Guidelines for reference. Activities translated fell into three categories:

1. In-house translation by bilingual staff as needed
 - a. Customer phone calls (All Departments that receive external calls)
 - b. Visits to public counters (One Stop Shop, Treasury)
 - c. Election Notices (Clerk)
 - d. Passport Application Requirements (Clerk)
 - e. Marketing Graphics (Communications)
 - f. Social Media Posts (Communications)
 - g. Press Releases, Nextdoor postings (Communications)
 - h. Citywide Email (Communications)
 - i. CDBG mailers, forms and flyers (CEDD)
 - j. Violation Notices, Letters and Flyers (Code Enforcement)
 - k. Library brochures
 - l. Aquatics flyers, Event flyers, Operation Splash flyers, Parks Master Plan, Reimagine Campaigns (PRCSD)
 - m. Sewer Lateral Program materials, Inspections (Public Works)
 - n. Parking Enforcement, Administration & Customer Service (Public Works)
 - o. Recreational flyers and Master Plan (PRCSD)
 - p. As requested, assist city departments as needed with translating documents or reviewing documents translated by third party for accuracy (Human Resources, Communications)
2. Contract with Professional Interpreter for services
 - a. Exhibitions, programs, flyers and newsletters (Museum)
 - b. Site Wayfinding (Museum)
 - c. Public Safety Messages (Communications)
 - d. Grant Applications (Economic Development, CDBG)

- e. Capital Improvement Project customer communications (RPU/Communications)
 - f. Direct mail and postcards (Utilities)
 - g. Website Updates (Utilities)
 - h. Marketing materials for events and programs (Communications, Arts and Cultural Affairs, Office of Sustainability, Utilities)
 - i. Customer Resource Center Sign (Utilities)
 - j. Urgent Shutoff notice, Schedule WA-12 AG Service Application, Notice of Public Hearing (Utilities)
 - k. Peer reviewed brochures/flyers/notices (Prepared by Consultant) (Planning)
 - l. Housing Element Update – Public Workshops/Presentations (Planning)
 - m. City Tree Inspection Door Tags (Public Works)
 - n. Automated Collection Program Flyer (Public Works)
 - o. Notification of Customer Service (Public Works)
 - p. New Refuse Services Announcement (Public Works)
 - q. Customer Emails (RPU)
 - r. Other critical information as determined by the department (ALL)
3. Utilize Assistive Technology available
- a. Live open caption for all government meetings (automated)
 - b. All City web pages (Google Translate)
 - c. Zoom translation feature for City Council meetings viewed virtually

In addition, the Police Department has a Limited English Proficiency Services Policy (RPD Policy 350) to ensure means to communicate with citizens regarding police matters. Police Department activities include the following:

- 1. In-house translation by existing bilingual staff as needed
 - a. Translation during calls for service/police activities
 - b. ASL interpretation in the field (several Officers translate ASL and are called upon as needed)
- 2. Contract with Professional Interpreter for services as needed
 - a. ASL Interpretation available 24/hrs. via iPads to employees that require service (Purple Communications)
 - b. Lengthy investigations (RISE Interpretation Services responds to scene)
 - c. Translation Hotline (Language Line)

Exploring Future Language Access Options

In an effort to continue to expand access through language translation and interpretation, staff is seeking additional guidance from the committee. Through the lens of limited capacity and funding, staff is seeking input to better guide the research time to assess feasibility, cost and benefits and challenges these solutions may present. During the committee presentation, staff will review the following options and ask committee members to collectively rank their top five choices.

RANK (TOP 5)	CATEGORY	DESCRIPTION
	Internal Translation vs. External Translation	Staff to conduct cost analysis on an internal translation options versus continuing to outsource translation.
	Volunteer Interpretation Program	Staff to research the feasibility of a volunteer translation service for items that do not need to be professionally

		translated. May serve as a review resource. Staff to assess time commitment for management of volunteer program and any associated costs.
	Citywide Telephonic Interpretation Services	Staff to review RPD current service (referenced above) and available other services for on-demand services. Staff to review costing.
	Establish Thresholds for Additional Language Use	Staff is currently recommending focus on Spanish translation (13% of the population that speaks “Only Spanish”) but would research and establish thresholds for adoption of same recommendations when percentages reach a certain amount
	Community Survey: Seek Data that expands beyond just Census Data, Expand Beyond Language	Census data only showcases the languages spoken inside the home, it does not address other needs such as ASL interpretation or other data to better understand the needs of our community.
	Establish Annual Language Access Compliance Review	In effort to track and monitor the use of efforts and ensure compliance across the organization, staff would prepare annual review and estimated cost.
	Provide Interpretation Services for In-Person Events	Staff to assess the event types and associated costs across all departments.
	Public Meetings*: Audio Translation of Video Feed	Staff to research, assess technology and cost to provide translation in video feeds for public meetings.
	Public Meetings*: Translation of Meeting Materials (Agenda, Minutes)	Staff to research cost of translation of materials, additional lead time and technical limitations of existing systems.
	Public Meetings*: Translation of In-person, Phone-In Public Comments	Staff to research the cost for translation of public comments and phone-in and make recommendation for process moving forward.
	Public Meetings*: Translation of Supporting Documents (such as staff reports, EIRs, subtitled videos, ordinances, etc.)	Staff to provide cost estimates for the translation and additional lead time for the translation of supporting documents. Staff anticipates significant cost and time.

	Public Meetings*: Allow for Additional Time for Translated Comments	If committee moves forward with the translation of in-person and phone-in comments, committee to decide to allow additional time for translated comments.
	Expanded Translation of Public Facing Materials	Staff to provide estimate for the expansion of translation materials beyond the scope of current policy and expectations. Staff to expand the listing of “when to translate” from existing policy for review and recommend adoption along with estimated costs.
	Any items committee members would like to add to the list.	Committee members will have an opportunity to submit any additional items for ranking during the meeting.

*If ranked within the top five, committee to define public meetings – all public meetings (council, commission, boards) OR council meetings only OR council and committee only.

FISCAL IMPACT:

There is no fiscal impact related to the receipt of this informational report.

Prepared by: Stephanie Harvey, Marketing Officer
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Attachments:

1. Administrative Policy 01.024.00: Translation Guidelines
2. Presentation