



City of Arts & Innovation

Inclusiveness, Community Engagement & Governmental Affairs Committee

TO: INCLUSIVENESS, COMMUNITY ENGAGEMENT & GOVERNMENTAL AFFAIRS COMMITTEE MEMBERS **DATE: July 7, 2021**

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

SUBJECT: LANGUAGE ACCESS AND TRANSLATION SERVICES UPDATE

ISSUE:

Provide an update on costs and considerations for translation of City Council and Committee meeting video feed, meeting materials, and Riverside Police Department business application materials for future implementation to expand language access and translation services for Limited English Proficiency persons.

RECOMMENDATIONS:

That the Inclusiveness, Community Engagement & Governmental Affairs Committee provide input and guidance regarding the future implementation of translation of City Council and Committee meeting audio translation of video feed, meeting agenda and materials, and Riverside Police Department business application materials based on the information presented today.

BACKGROUND:

On May 5, 2021, the City Manager's Office presented a report to the Committee regarding current translation activities throughout the City and presented a list of potential options to continue to expand language access for Limited English Proficiency (LEP) persons. The Committee was then asked to provide input and collectively rank their top five choices presented for staff to research the feasibility, cost, benefits, and challenges that these solutions may present. Following the discussion, the Committee identified the following three options as priorities for future implementation:

1. Interpretation of Council and Committee Meeting Video Feed
2. Translation of Council and Committee Meeting Materials
3. Translation of Riverside Police Department Business Application Materials

DISCUSSION:

In an effort to continue to expand access through language translation and interpretation, staff is seeking additional guidance from the committee based on the information presented below. Staff

has conducted preliminary research to determine the estimated cost and feasibility of implementing the additional translation options identified as priorities.

1. Interpretation of Council and Committee Meeting Video Feed (Office of Communications, RiversideTV)

City staff researched several options for providing Spanish translation of City Council and Committee meeting video feed including automated captions and live in-person interpreters.

Due to technical restraints with the current web streaming provider and cable channels RiversideTV does not currently have the option for secondary audio channel (SAP) or multiple language closed captions. The options outlined below only pertain to the streaming web services. They do not allow for Spanish options on the three TV channels (Charter, Version and AT&T). There may be potential to provide TV services, but the current TV channel headend equipment does not support multiple channels of audio without additional significant costs to upgrade all three cable provider headends and broadcast systems. This includes both one-time hardware costs and ongoing capacity fees. Hardware costs can be paid with PEG funds but the estimated \$6,000 Charter Spectrum annual capacity fee could not.

In order to provide the web streaming options, RiversideTV would need an entirely separate live stream consisting of the live video feed with Spanish captions or interpreter's audio in place of the English spoken word with open Spanish captions. This is the same model we have in place to provide captions to the hard of hearing population. Current web services do not support digital closed captions resulting in all meetings being shown via two simultaneous streams: one with no captions, and one with open captions. Open captions always display the text on screen whereas closed captions allow the user to turn the caption on and off as needed.

Due to the technical restraints outlined above; there are four options available for consideration and ultimately requiring council direction:

1. Automated Spanish caption generation with English audio (3 live streams – English with no captions, English with open captions, English with open Spanish captions)
2. Live Spanish interpreters with NO captions (3 live streams – English with no captions, English with open captions, Spanish with no captions)
3. Live in-person Spanish interpreters with Spanish captions (3 live streams – English with no captions, English with open captions, Spanish with open Spanish captions)
4. Live remote Spanish interpreters with Spanish captions (3 live streams – English with no captions, English with open captions, Spanish with open Spanish captions)

The requirement to have a 3rd live stream requires an additional Granicus encoder which has a one-time purchase price of \$4,500 and an ongoing service contract cost of \$1,500 per year. The annual service contract costs would be a General Fund expense. Additional broadcast equipment would also be required to incorporate the interpreters into the broadcast systems. Those prices and required equipment have not yet been determined. All one-time hardware costs would be funded by the Public, Education and Government (PEG) Cable Fund.

One-Time Hardware Cost (required for all options)	Price
Granicus Encoder	\$4,500**

**Funded through PEG

Option 1: Automated Spanish Captions

This option would use an automated service to translate the spoken English audio to Spanish open captions. This option would not have any live Spanish audio spoken.

In order to enable automated Spanish captions, RiversideTV would need to bypass/repurpose the current automated caption system (ENKO) and switch to Lexi Automatic Captioning (EEG Ent.) or a comparable system. EEG Lexi on-demand service costs roughly \$16 per hour. The English audio with Spanish captions option would also require an additional automated add-on service by EEG called iTranslate which automatically converts the spoken English captions to Spanish and costs an additional \$12 per hour, for a total hourly rate of \$28 per hour. The EEG caption encoder has a one-time hardware cost of approximately \$9000, as well as the above mentioned on-going Lexi and iTranslate fees. Assuming 8 hour council meetings and 3 hour committee meetings, automated captions are estimated to cost \$1,484 per month, or \$17,808 a year. Although the hardware costs could be covered by available PEG funds, the ongoing costs would be a General Fund expense.

Costs for Automated Captions	Meetings Per Year	Estimated Total Hours Per Year	Annual Cost
Council	48	384	\$10,752
Committee	84	252	\$7,056
Annual Granicus Service Fee			\$1,500
TOTAL ANNUAL COST			\$19,308

As a note, the current automated caption system has no cost and provides captions 24/7 to RiversideTV channel and meeting webcasts.

Automated Captions Summary of Costs	Year One Cost	Years 2+ Cost
One-Time Hardware (EEG + Granicus Encoder)	\$13,500**	0
Annual Granicus Service Fee	\$1,500	\$1,500
Automated Caption Service Fee	\$17,808	\$17,808
TOTAL ANNUAL COST	\$32,808	\$19,308

**Funded through PEG

As a note, the current automated caption system has no cost and provides English captions 24/7 to RiversideTV channel and meeting webcasts. EEG Lexi also offers an unlimited option for 24/7 automated caption service for \$25,000 a year. If the total length of meetings surpasses 800 hours a year switching to the unlimited option might be required, adding \$25,000 to the annual costs. This option would require extensive rebuilding of the current broadcast system.

Option 2: Live Spanish Audio WITHOUT Captions

This option would require two live, in-person Spanish interpreters to be in attendance during the council/committee meetings. Interpreters would speak into a microphone which would then replace the English audio and be sent to live webcast. No captions would be present.

Two local vendors were consulted to establish estimated costs for live Spanish interpretation of audio during City Council meetings. Staff requested estimates from Rise Interpreting and Language Network, who both have offices in Riverside.

Interpretation Provider	Hourly Cost Per Interpreter		
Rise Interpreting	\$75/hour (7am-5pm)	\$80/hour (5pm-10pm)	\$85/hour (10pm – 7am)
Language Network	\$550/6 hours	\$350/3 hours	

Due to the length of the council meetings, both vendors would require two interpreters to be assigned to each meeting. Interpreters would be requested to arrive on site 30 minutes before a session schedule start time to test all systems and ensure there are no issues. Due to the vendor's staffing requirements, the City would need to reserve interpreters to cover the entire time of the meeting from start to finish. If there is a break in between sessions, the hourly rate would continue to be charged regardless of whether interpreters are actively working. This precludes them from covering any other jobs at that time. If a meeting were to end early, the City would still be required to pay for the full time booked.

For cost estimating purposes, a start time of 12:30pm and an end time of 8:30pm was assumed for a total of 8 hours per Council meeting. For two interpreters based on the rates provided Rise Interpreting would cost approximately \$1,277 per meeting and Language Network would cost approximately \$1,800 per meeting. Council committees are priced using a 3-hour time slot and would also require two live interpreters.

Spanish Interpretation WITHOUT Captions Costs	Meetings Per Year	Cost Per Meeting	Annual Cost
Council	48	\$1,277.50	\$61,320
Committee	84	\$420	\$35,280
Annual Interpretation Costs			\$96,600*
Annual Granicus Service Fee			\$1,500
TOTAL ANNUAL COST			\$98,100

*Estimated cost and subject to formal bid.

Spanish Interpretation WITHOUT Captions Summary of Costs	Year One Cost	Years 2+ Cost
One-Time Hardware (EEG + Granicus Encoder)	\$4,500**	0
Annual Granicus Service Fee	\$1,500	\$1,500
Annual Interpretation Costs	\$96,600*	\$96,600*
TOTAL ANNUAL COST	\$102,600	\$98,100

*Estimated cost and subject to formal bid.

**Covered by available PEG Funds

In the occasion a meeting runs past 8:30pm, the City would incur additional costs, subject to interpreter availability. A replacement interpreter could be requested, however there is no guarantee that one would be available. There is a potential for a gap in interpreting if one interpreter ends their scheduled time and another is not yet available.

Option 3: Live In-Person Spanish Interpreters with Spanish Captions

This option combines the first two options discussed above and would provide both Spanish audio and Spanish open captions. Two live in-person Spanish interpreters would be required to be in attendance for each council/committee meeting. Interpreters would speak into a microphone which would then replace the English audio and be sent to live webcast. This option would

generate live Spanish open captions using an automated caption system such as the one described in Option 1.

Costs for Option 3 combine Option 1 and 2 above. Year one hardware and services costs equal \$129,408 and subsequent years drop to \$115,908 annually.

Live Spanish Audio WITH Captions	Year One Cost	Years 2+ Cost
One-Time Hardware (EEG + Granicus Encoder)	\$13,500**	0
Granicus Annual Service Fee	\$1,500	\$1,500
Automated Caption Service Fee's	\$17,808	\$17,808
Annual Interpretation Costs	\$96,600*	\$96,600*
TOTAL ANNUAL COST	\$129,408	\$115,908

*Estimated cost and subject to formal bid.

**Funded through PEG

Option 4: Live Remote Spanish Interpreters with Spanish Captions

Similar to options 2 and 3, there is the ability to have all interpreters operate remotely utilizing a platform such as Zoom. Remote interpretation is offered at a lower hourly rate by some vendors; however, this option requires additional equipment in the TV channel control room and adds more levels of complexity. This system would be subject to any internet connectivity issues, Zoom system outages and other technical issues beyond City staff control. Live translated audio in Zoom is only available via the Zoom app. Phone callers would not be able to hear the translated audio channel.

Rise rates mentioned above reflect both in-person or virtual interpretation services. Language Network's price drops to \$89 an hour per interpreter when remote. Rise annual estimate for services would remain the same at \$88,550.00 while Language Network would decrease to \$90,780 annually. Interpreting services are subject to formal city bidding requirements.

Comparison of Options*	Year 1 Estimated Cost	Subsequent Years Estimated Cost
Option 1: Automated Spanish OPEN Captions with English audio	\$32,808	\$19,308
Option 2: Live Spanish audio WITHOUT Spanish captions	\$102,600	\$98,100
Option 3/4: Live Spanish Audio WITH Captions	\$129,408	\$115,908

*These are estimated costs and subject to formal bid.

Additional Benefits

Although not directed to research the option, having live in-person or remote interpreters gives the City the ability to have live in-person Spanish translation via wireless headsets for residents attending meetings in the Council Chambers. Similar to an assisted listening system, Spanish speakers would request a wireless headset from the City Clerk's Office. On the headset, they would hear the live Spanish translation as it is being spoken by the translator.

Having two in-person interpreters also allows Spanish speakers to speak at the podium for public comment and have their comments translated to English and heard over the Chamber's speaker

system. The public comment translation would require the commentor to speak in short sentences to allow the translator to speak the English version in short bits and pieces. This option would generally take more time and require longer than the established three-minute public comment time.

Challenges

With enhanced equipment and software, providing the outlined options above is feasible, however, there may be challenges that are faced in terms of the user experience. Limitations within the software may cause a confusing online experience and potential for challenges in accessing alternative feeds or captioning. While technically able to implement these options, there are concerns about how easily the public will be able to locate the options and their experience.

In addition, RiversideTV staff faces other potential issues to consider. RiversideTV control room has limited space and is an odd shape which constricts access at the doorway within the Council chambers. This leaves no room to house on site interpreters. With the addition of phone-in public comment staff has already had to utilize the former press box for phone-in public comment station and staff. Space for added equipment is also limited as equipment racks are near capacity and there is no room to expand in the chambers. With both in-person or virtual options, adding additional streams for live interpretation will add a level of complexity that would increase the probability of issues with the live meeting broadcasts. It would only take one setting to be missed or one piece of gear to fail to bring the entire channel/web streaming system to a halt. RiversideTV staff are generalists in the TV field, having knowledge across multiple aspects of video production. The knowledge and understanding of how all these systems work independently and together as one highly complex system is not something that can be easily trained.

All factors considered, providing translation for all council and committee meetings would require significant modifications to the infrastructure and channel and greatly increases the risk of errors that could delay meetings. Due to the many technical challenges faced by RiversideTV to make Spanish captions or live interpretation possible, staff recommends that interpreters be provided on an as-needed basis when translation is requested, and staff is notified in advance.

2. Translation of Council and Committee Meeting Materials (City Clerk's Office)

Staff reached out to several companies offering professional document translation to compare rates for document translation. Accurately estimating the annual cost of translating all council and committee meeting materials is difficult, as agenda packets can range from hundreds to thousands of pages. Samples of an average council agenda, committee agenda, and minutes were sent as reference and pricing was as follows.

Vendor	Price per word	Turn-around time	Committee Agenda (590 words)	Council Agenda (2,131 words)	Council Minutes (2,437 words)	Committee Minutes (300 words)
Stepes	\$.13	1 Bus. Day	\$76.70	\$277.03	\$316.81	\$39.00
The Spanish Group	\$.07	2-3 Bus. Days	\$41.30	\$149.17	\$170.59	\$21.00

The Language Network	\$.14 (\$100 project min)	2-3 Bus. Days	\$82.60	\$298.34	\$341.18	\$42.00
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* The costs reflected are rough estimates for planning purposes. In addition, quantity discounts may apply based on commitment to a single vendor.

The lowest of the three rates quoted was used to estimate costs for translating of materials for council and committee meetings below. Average word counts were taken from sample materials for the calculation.

Translation of Council Agenda's/Minutes	Meetings Per Year	Annual Cost
Council Agendas Only (agendas are regularly revised so this cost could be double)	48	\$7,160
Council Minutes Only	48	\$8,188
TOTAL ANNUAL COST		\$15,348

Translation of Committee Agenda's/Minutes	Meetings Per Year	Annual Cost
Committee Agenda's Only	84	\$3,469
Committee Minutes Only	84	\$1,764
TOTAL ANNUAL COST		\$5,233

Translation of ALL Meeting Materials	Average Meetings Per year	Average Annual Cost
Council - Average Agenda Packet in 2020 of 616 pages at 89,851 words would cost \$10,782 per packet	48	\$517,536
Committee - Average Agenda Packet of 20 pages at \$350	84	\$29,400
TOTAL ANNUAL COST (does not include printing costs for public inspection and permanent record)		\$546,936

*Estimated costs and subject to formal bid.

If Council should decide to move forward with translation of meeting materials, the City Clerk's Office would need additional time to send the materials out for translation and duplicate the agenda items in Legistar (the agenda management system) upon receipt to generate the agenda in Spanish for a similar user experience. In order to meet Sunshine Ordinance requirements, due dates would need to be adjusted to accommodate this additional time and staff would be required to submit meeting materials further in advance.

Considering the need and viability of offering translated materials long term has yet to be determined and the fiscal impact could be significant, the City Clerk's Office recommends implementing one of the options:

Option 1: Add translated language to the face of all City Council and Standing Committee meeting agendas, offering translated materials upon request, with a 48-hour turnaround.

Option 2: On a trial basis, have only the agendas translated. This option will assist with determining the impact on staff, labor costs, and demand for this service. Factors to be considered with the second option would be publication due dates to meet deadlines for posting translated

materials following the publication of the English version, including the posting of revised agendas, the fiscal impact, and additional staff time required for administrative functions.

3. *Translation of Riverside Police Department Business and Application Materials (Riverside Police Department)*

The VICE Unit of Riverside Police Department (RPD) is comprised of three detectives and one sergeant who currently review approximately 446 business permits. RPD was asked to review current translation services in relation to business application materials and looked at what comparable organizations offered. RPD reviews for permit compliance the following types of establishments:

- **Tobacco:** 244 permits, inspection required, valid for two years
- **Massage:** 50 permits, annual inspection required, valid for one year
- **Entertainment:** 70-80 permits pending, inspection required, valid for two years
- **Fortune teller:** 5 permits, no inspection required, valid for one year
- **Driver for hire:** 45 companies, no inspection required, valid for one year
- **Federal firearms:** 23 businesses, includes pawn shops, no inspection required, valid for one year
- **Pool Hall:** 4 permits, no inspection required, valid for three years

To compare best practices RPD looked at translation options offered by other police organizations:

- **Riverside Police:** translating service provided on web page, does not translate permit applications
- **Riverside County Sheriff:** no translation service provided
- **Corona Police:** translating service provided on web page, does not translate permit applications
- **Ontario Police:** translating service provided on web page, does not translate permit applications
- **Santa Ana Police:** translating service provide on web page, does not translate permit applications
- **Long Beach Police:** translating service provided on web page, does not translate permit applications
- **Glendale Police:** Google translate used for web page, does not translate permit applications

Currently all business application materials are located online as PDF's that are only offered in English. The VICE Unit reviews these applications and calls upon internal bilingual staff to translate as-needed. Although it would be possible to provide a second link to a translated version of the fillable form, the issue arises that all application responses submitted in other languages would then need to be translated back into English for review by RPD. Oftentimes when Detectives conduct inspections for these business applications and they are aware that the owner(s) speaks a foreign language, the Detective will take with them an officer that speaks that language. When applicants must undergo a hearing process which requires the applicant to meet in person with the Deputy Chief, applicants are required to bring their own interpreter if necessary. The Vice Unit has no known documented complaints regarding the need for translation.

Another factor to note is that the permit applications are only one step in part of a larger process of becoming a licensed business within the City. Applicants applying for the above listed permit

applications within the City must also submit applications with the State and the Business Tax division. Currently the Business Tax division does not offer their applications in any languages other than English. Business Tax normally relies on internal staff to help translate or applicants provide their own interpreters to assist as needed. One concern to note is that unless all of the other steps in the process were offered in other languages, efforts to translate materials may be ineffective. At this time, RPD does not recommend moving forward with offering these permit applications in any language other than English, due to the factors discussed above and lack of data to support this request.

FISCAL IMPACT:

There is no fiscal impact related to this report.

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Attachment:

1. Presentation