

CITY AND COUNTY OF SAN FRANCISCO
BOARD OF SUPERVISORS
BUDGET AND LEGISLATIVE ANALYST
1390 Market Street, Suite 1150, San Francisco, CA 94102
PHONE (415) 552-9292 FAX (415) 252-0461

Policy Analysis Report

To: Supervisor Walton
From: Budget and Legislative Analyst's Office
Re: Analysis of Language Access Services in San Francisco
Date: April 14, 2025



Summary of Requested Action

Your office requested that the Budget and Legislative Analyst conduct an analysis of language access services in the City, including (1) analyzing the City's current workforce and resource expenditures for language access services; (2) analyzing the current bilingual pay policies to determine their effectiveness in retaining bilingual employees within the City by department; and, (3) identifying the additional resources and staffing needed to comply with the latest amended Language Access Ordinance within the ordinance's timelines per department.

For further information about this report, contact Fred Brousseau, Director of Policy Analysis at the Budget and Legislative Analyst's Office.

Executive Summary

- San Francisco's Language Access Ordinance, adopted in 2001, was established to provide language access services to City residents with Limited English Proficiency. The ordinance requires that City and County of San Francisco departments provide translation and interpretation of oral or spoken information, vital department materials, signs, and recorded telephonic messages in languages other than English spoken by at least a certain percentage of the City's population. Translation of public meetings and transcripts are also required upon request.
- Currently, the required languages are Spanish, Chinese, and Filipino. Given current population trends and a lowering of the threshold for languages covered as a result of amendments to the ordinance adopted by the Board of Supervisors in 2024, Vietnamese is expected to become a required language as of 2026.
- The ordinance also includes administrative and reporting requirements, including delegation of authority for monitoring and reporting on Citywide compliance with the Language Access Ordinance to the Office of Civic Engagement and Immigrant Affairs (OCEIA) within the City Administrator's Office.

Budget and Legislative Analyst

- Amendments to the Language Access Ordinance adopted by the Board of Supervisors in 2024 added the following:
 - The threshold for determining whether a language is subject to the Language Access Ordinance was lowered from 10,000 to 6,000 residents speaking the language. This is expected to mean the addition of Vietnamese as a required language in 2026.
 - Mandatory requirements for signage translation were added.
 - Mandatory translation of digital content was added.
 - Requirements pertaining to billing documents prepared by the Public Utilities Commission and Treasurer and Tax Collector were added.
 - Emergency service departments are now required to offer language access during crises in any language spoken by five percent or more of the Limited English Proficiency population.
 - OCEIA is now responsible for investigating ordinance violations.

Annual costs of Language Access Ordinance

- The cost of meeting the requirements of the Language Access Ordinance was \$15.1 million in Fiscal Year 2022-23 according to annual department reports submitted to OCEIA. Costs over the five years ending in FY 2022-23 averaged \$17.1 million per year, with fluctuations likely reflecting the inclusion of one-time projects in some years and variations in the level of services requested.
- Approximately half of language access services expenditures in FY 2022-23 were reported to be for telephonic interpretations, compensatory pay for bilingual employees, and document translation. However, half of the expenditures were reported by City departments for “other” expenses, leaving a substantial amount of the expenditures unexplained. Without further definition of these costs, it is difficult to ensure the validity of all reported expenditures.

Exhibit A: City-Wide language access services Expenditures by Category, FY 2022-23

Category	Amount	Percent
Telephonic Interpretations	\$3,591,225	24%
Compensatory Pay	\$2,193,352	15%
Translation of Documents	\$1,494,231	10%
On-site City Vendors	\$464,907	3%
Other or non-categorized	\$7,353,949	49%
Total	\$15,097,665	100%

Source: Costs reported by City departments to OCEIA

- Further, the \$2.2 million in compensatory pay shown in Exhibit A reported to OCEIA by departments may be an understatement, as DHR reports that these same costs were \$4.4 million for FY 2022-23. Differences in methods used to account for these costs should be resolved so that OCEIA receives valid cost reports for compensatory pay, something that should be readily available from the City's payroll system.
- City departments report that they served 941,793 Limited English Proficiency (LEP) clients in FY 2022-23. Ten departments were responsible for serving 878,752 of those clients, or 93 percent of all clients reported. However, the methods used to count LEP clients appears to favor direct contact with clients such as at Department of Public Health clinics and Human Services Agency offices rather than indirect contact with Limited English Proficiency clients such as passengers on public transit and people using San Francisco International Airport. The reported number of Limited English Proficiency clients served in FY 2022-23 are presented in Exhibit C, by department.

**Exhibit B: Top City Departments by LEP Clients* Served and Corresponding
Language Access Expenditures, FY 2022-23**

Department	LEP Clients	Expenditures
Public Health (DPH)	441,871	\$3,324,321
Human Services Agency (HSA)	179,140	\$1,228,298
Office of Civic Engagement and Immigrant Affairs (OCEIA)	91,078	\$771,495
Office of Resilience and Capital Planning (ORCP)	55,222	\$53,883
Department of Elections (REG)	41,509	\$2,817,596
Emergency Management - 911	21,365	\$69,460
311 (Customer Service)	19,786	\$65,363
Municipal Transportation Agency (MTA)	10,816	\$1,307,342
San Francisco International Airport (AIR)	9,340	\$14,394
Building Inspection (DBI)	8,625	\$3,095,234
Remaining Departments	63,041	\$2,350,279
Total	941,793	\$15,097,665

*LEP = Limited English Proficiency

- City and County of San Francisco language access services are provided by:
 - **Certified bilingual employees:** these are employees who have passed an examination administered by the Department of Human Resources (or one of several other authorized organizations) demonstrating their proficiency in another language. There were 3,545 certified employees in FY 2022-23. These employees are paid a premium of \$60 per pay period each time they are called upon to provide interpretation or translation services on the job.

In FY 2022-23, certified employees were paid \$4.4 million according to DHR. As mentioned above, OCEIA records differ from those of DHR, however, with approximately \$2.2 million reported by OCEIA based on department reported costs.

- **Language special condition positions.** These are positions designated by the Department of Human Resources as regularly having public contact with Limited English Proficiency members of the public and therefore must be filled by certified employees. There were 1,157 such designated positions Citywide in 2022. However, there was a 17 percent vacancy rate for these positions, higher than the Citywide average of 12 percent. The high vacancy rate indicates that language access services were not being provided at the optimal level designated by DHR in 2022.
- **Contractors.** The City maintains contracts with private companies that provide translation and interpretation services as needed, sometimes standing in for staff vacancies and sometimes providing additional resources needed for special one-time projects. Currently, the City has as-needed contracts in place with eight vendors for language access services with a multi-year value of up to \$10 million. Actual expenditures between 2018 and 2023 have averaged \$1.8 million per year.
- **OCEIA staff.** OCEIA staff includes language specialists who can provide language access services and related support for departments when their bilingual staff resources are insufficient.

Bilingual staff retention

- In interviews conducted for this report, department representatives generally stated that retaining bilingual employees was not a problem. However, based on the 17 percent vacancy rate reported by DHR for language special condition positions in 2022, it appears that attracting workers to meet the optimal level of language access services identified by DHR is a problem.
- Other issues pertaining to attracting and retaining bilingual employees identified by department representatives included:
 - The \$60 per pay period premium pay for certified bilingual employees when they provide language access services may not be sufficient for attracting and retaining bilingual employees. This rate has been unchanged for over five years.

- The certification examinations conducted by DHR and other authorized organizations are considered inadequate by some departments.
- Adding a bilingual requirement to recruitment can make it more difficult than it already is to attract applicants for many City positions, according to department representatives.

Cost of 2024 LAO Amendments

- City departments have identified \$3.5 million in one-time costs and \$2.1 million in ongoing costs to implement the Language Access Ordinance amendments adopted by the Board of Supervisors in 2024, as detailed in Exhibit C below.

Exhibit C: Costs Identified by Departments to Implement the 2024 Amendments to the Language Access Ordinance

Category	One-time	Ongoing	Total
"Other" Requirements	\$905,405	\$1,529,968	\$2,435,373
Document Translations	\$1,535,283	-	\$1,535,283
Signage Translations	\$727,302	-	\$727,302
OCEIA	\$200,000	\$546,872	\$746,872
Digital Content Translations	\$108,190	\$18,250	\$126,440
PUC – billing translations		\$45,000	\$45,000
TTX - billing translations	\$14,682	\$1,680	\$16,362
Emergency Services	-	-	\$0
Total	\$3,490,863	\$2,141,770	\$5,632,632

- "Other Requirements" in Exhibit C mostly pertain to the new requirement for a community-focused approach to language access services. The ordinance does not define what the approach should entail. Some departments have proposed extensive, costly initiatives and others provided no estimate of their expected costs in our survey since they are not sure what they will need to do to comply with the requirement.
- We conclude that the costs of implementing the 2024 amendments to the Language Access Ordinance are understated to the degree that numerous departments did not provide estimates of their costs for implementing a community-focused approach to language access services. Costs associated with the other new requirements were generally understood by most departments.

Policy Options

The Board of Supervisors should:

1. Consider funding to ensure implementation of the 2024 Language Access Ordinance amendments adopted by the Board of Supervisors estimated to be \$5,632,632 consisting of \$2,141,770 in one-time costs and \$3,490,863 in ongoing costs, distributed among the Office of Civic Engagement and Immigrant Affairs (OCEIA) and other City departments as detailed in this report.
2. Request that OCEIA instruct departments to provide more specific accounting for their language access services every year so only a small percentage of costs, if any, are attributed to undefined “other” purposes in OCEIA’s annual compliance report.
3. Request that OCEIA and the Department of Human Resources collaborate to resolve discrepancies in their reported levels of compensatory pay for language access services provided by City staff.
4. Request that OCEIA prepare guidance for City departments to use in implementing the new Language Access Ordinance requirement for a community-focused approach to language access services by each department.
5. Consider requiring that OCEIA create a Citywide registry of bilingual employees to streamline language support across departments to help departments reduce costs by accessing available City bilingual staff in other departments as opposed to contracting language services from a third-party vendor.
6. Request a follow up report from DHR on what an appropriate premium pay rate would be for the City and County of San Francisco to remain competitive in recruiting, retaining, and lowering the vacancy rate for bilingual employees in language special condition positions.
7. Request that the Office of Digital Services and other appropriate staff identify and report back on incentives to encourage City departments to transition their websites, when feasible, to SF.gov. since the Office of Digital Services ensures that digital content is compliant with language access requirements, including providing machine-translation and human translation of content in all required languages.
8. Request that human translation be used for frequently visited City webpages to improve accuracy and cultural appropriateness as opposed to machine translation tools that often lack accuracy, cultural nuance, and contextual understanding.

Project Staff: Fred Brousseau and Daniela Estrada

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Background

In 2001, the Board of Supervisors approved the Equal Access to Services Ordinance aimed at providing equal language access across all City services. In 2009, the Board renamed the ordinance the Language Access Ordinance (LAO) and implemented other changes, including assigning the Office of Civic Engagement and Immigrant Affairs (OCEIA) the responsibility of overseeing its implementation and compliance.

Summary of Current Baseline LAO Requirements

Key provisions of the Language Access Ordinance, as codified in Chapter 91 of the City's Administrative Code, include:

- **Required Languages:** Spanish, Chinese, and Filipino are “required languages,” meaning a threshold number of residents speak each language and therefore the language is eligible for language access services. (Section 91.2)
- **Written Translations:** Vital written materials must be translated into the required languages. (Section 91.4)
- **Signage Translations:** Departments must make a good faith effort to translate facility signage into the required languages. (Section 91.5(b))
- **Public Meetings and Hearing:** Departments must provide translation services at public meetings and hearings upon request. (Section 91.7)
- **Recorded Telephonic Messages:** Messages must be translated into the required languages. (Section 91.8)
- **Crisis Situations:** Language access services (LAS), defined as translation and interpretation of oral or spoken information, must be prioritized during crisis events. (Section 91.9)
- **Complaint Resolution:** OCEIA is responsible for investigating and resolving complaints and potential violations of the LAO. (Section 91.10)
- **Annual Compliance Plans:** Departments must report their language access efforts to OCEIA annually through submission of plan documents. (Section 91.11)
- **Citywide Summary Reports:** OCEIA must compile departmental reports into an annual summary report for the Mayor, Board of Supervisors, and the Immigrant Rights Commission. (Section 91.12)
- **Additional Department Responsibilities:** Inform Limited English Proficiency individuals (LEP) of their rights to language access services ; designate a language access coordinator; and demonstrate good faith efforts to comply with the ordinance. (Section 91.14)
- **Immigrant Rights Commission Responsibilities:** Review OCEIA reports, address complaints, and recommend policy changes related to language access. (Section 91.15)
- **OCEIA Oversight:** OCEIA serves as the central agency for language access services, monitoring departmental compliance, providing technical assistance, conducting annual training, and investigating violations. (Section 91.16)

2024 Amendments to the LAO

In June 2024, the Board of Supervisors amended the LAO to clarify departmental responsibilities and expand language access services . These changes became effective in 2024 unless otherwise noted. Key changes include:

- **Vietnamese added as a Required Language:** The threshold for determining whether a language is a required language based on the “Substantial Number of Limited English Proficiency Persons” was lowered from 10,000 to 6,000 residents through the 2024 amendments. Based on 2021 Census data, Vietnamese meets the lower threshold, joining Spanish, Chinese, and Filipino on the City’s list of required languages. OCEIA may certify new languages that meet this threshold beginning January 1, 2026.
- **Signage Translation now Mandatory:** Departments are now required to translate all public-facing facility signage, replacing the previous “good faith effort” standard.
- **Translation of Digital Content:** Departments must translate digital content, including websites, into the required languages.
- **Enhanced Services for Specific Departments:** The Public Utilities Commission (PUC) and Treasurer and Tax Collector (TTX) must provide additional support to help LEP residents understand their taxes and utility bills. In addition, emergency service departments must offer language access during crisis in any language spoken by 5 percent or more of the LEP population.
- **Expanded Responsibilities for OCEIA:** New responsibilities include preparing investigation summary reports in addition to its existing oversight duties.

This report includes: (1) a detailed review of the City’s current workforce and resource expenditures for language access services; (2) an analysis of bilingual staff retention; and (3) and identification of additional resources and staffing needed to comply with the Language Access Ordinance as amended in 2024.

City's Current Language Access Expenditures and Workforce

Methodology

The Budget and Legislative Analyst's Office (BLA) conducted an analysis of the City's current language access workforce and expenditures. To conduct this analysis, we:

- **Reviewed Citywide data published in OCEIA's Annual Compliance Summary reports.** Annual Compliance Summary reports are prepared by OCEIA based on self-reported information submitted by City departments every year on October 1st. The information collected is based on requirements outlined in the Language Access Ordinance. The BLA utilized these summary reports to analyze language access expenditures and workforce Citywide.
- **Reviewed data on language access services expenditures and LEP interactions obtained from OCEIA.** The BLA requested data from OCEIA regarding language access expenditures, workforce, and LEP client interactions by department. This data is based on self-reported data submitted by City departments as mandated by the Language Access Ordinance and is utilized by OCEIA to create their Annual Compliance Summary reports.
- **Requested and analyzed data from the Department of Human Resources (DHR).** The BLA reviewed DHR data on the last five fiscal years (FY 2019 – 2023) pertaining to bilingual pay expenditures, count of certified bilingual employees, and count of special condition positions.

It is important to emphasize that data obtained from OCEIA is self-reported by departments and therefore should not be regarded as exhaustive or conclusive.

Analysis of Language Access Services Expenditures

Citywide expenditures for language access services were approximately \$15.1 million in FY 2022-23, lower than the five-year average between FYs 2018-19 and 2022-23 of \$17.8 million.¹ These costs are based on self-reported annual compliance data that departments are required to submit to OCEIA each year on October 1st. Costs mainly consist of compensatory pay for bilingual staff, telephonic interpretation services, and costs associated with the translation of documents. Over the last five fiscal years, departments have reported an average of \$17,775,837 in total expenditures for language access services. Cost ranged from a low in FY 2022-23 of \$15,097,665

¹ OCEIA 2024 Language Access Compliance Summary Report

to a high of \$20,608,374 in FY 2019-20. Based on OCEIA summary reports, fluctuation in total expenditures could be attributed to operational adjustments during the COVID-19 pandemic.²

Exhibit 1: City-Wide Language Access Expenditures, FY 2018-19 through FY 2022-23

Fiscal Year	Total Expenditures
2018-19	\$16,238,770
2019-20	\$20,608,374
2020-21	\$16,645,614
2021-22	\$20,288,400
2022-23	\$15,097,665
Average	\$17,775,837

Source: OCEIA

As shown in Exhibit 2, based on self-reported data departments submitted to OCEIA for FY 2022-23, approximately 24 percent of language access services expenditures were for telephonic interpretations, 15 percent for compensatory pay for bilingual employees, 10 percent on translation of documents, and three percent for on-site City vendors. Notably, 49 percent, or nearly half, of expenses, the largest category of reported expenditures, were either not categorized by departments or reported under as an “other” category, leaving a substantial portion of total expenses unexplained. As an example of the inexactitude of reported expenses, according to data from DHR, compensatory pay expenditures totaled \$4,385,026 in FY 2022-23, or approximately double the amount reported by departments to OCEIA.

Exhibit 2: City-Wide Language Access Services Expenditures by Category, FY 2022-23

Category	Amount	Percent
Telephonic Interpretations	\$3,591,225	24%
Compensatory Pay	\$2,193,352	15%
Translation of Documents	\$1,494,231	10%
On-site City Vendors	\$464,907	3%
Other or non-categorized	\$7,353,949	49%
Total	\$15,097,665	100%

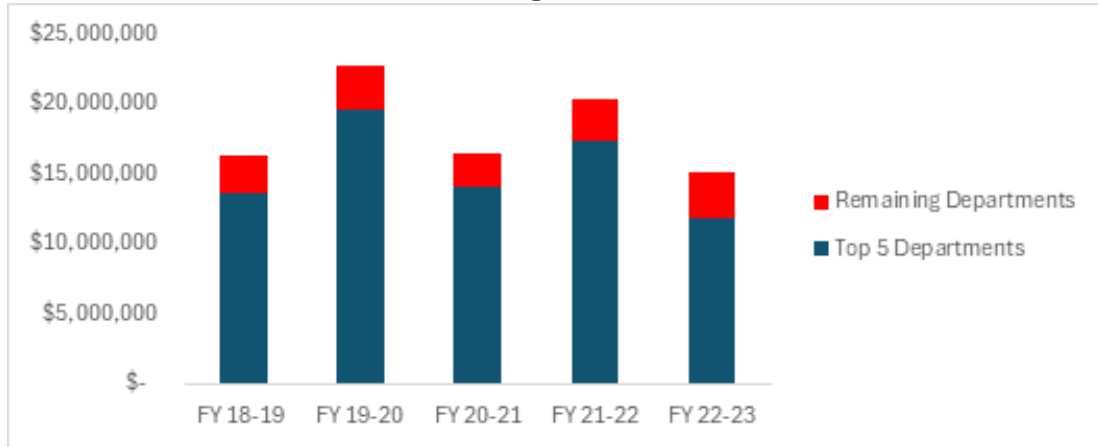
Source: OCEIA

Language access services expenditures remain concentrated among a few departments. In FY 2022-23, five departments accounted for 78 percent of Citywide language access expenditures, as shown in Exhibit 3: the Department of Public Health (DPH), the Department of Building Inspection (DBI), the Department of Elections, the Municipal Transportation Agency (MTA), and

² OCEIA 2024 Language Access Compliance Summary Report

the Human Services Agency. Over the past five years, these departments have continuously accounted for most of the City's language access expenditures.

Exhibit 3: Language Access Expenditures Concentrated Among 5 Departments, FY 2018-19 through FY 2022-23



Source: OCEIA

Note: Top 5 Departments includes the Department of Public Health (DPH), the Department of Building Inspection (DBI), the Department of Elections (REG), the Municipal Transportation Agency (MTA), and the Human Services Agency (HSA).

In FY 2022-23, the ten City departments responsible for the majority of LAS expenditures report providing services to 878,752 Limited English Proficiency (LEP) clients out of the total of 941,793 served. The number of LEP individuals assisted, representing those who accessed City services, are reported by departments to OCEIA each year. The top ten departments reported LAS expenditures in FY 2022-23 of approximately \$12.7 million, or 81 percent of total Citywide expenditures of \$15.7 million. Exhibit 4 provides a breakdown of the total number of reported LEP individuals assisted by the top ten departments and those departments' LAS expenditures for FY 2022-23.

Exhibit 4: Top 10 City Departments by LEP Clients Served and Corresponding Language Access Expenditures, FY 2022-23

Department	LEP Clients	Expenditures
Public Health (DPH)	441,871	\$3,324,321
Human Services Agency (HSA)	179,140	\$1,228,298
Office of Civic Engagement and Immigrant Affairs (OCEIA)	91,078	\$771,495
Office of Resilience and Capital Planning (ORCP)	55,222	\$53,883
Department of Elections (REG)	41,509	\$2,817,596
Emergency Management - 911	21,365	\$69,460
311 (Customer Service)	19,786	\$65,363
Municipal Transportation Agency (MTA)	10,816	\$1,307,342
San Francisco International Airport (AIR)	9,340	\$14,394
Building Inspection (DBI)	8,625	\$3,095,234
Remaining Departments	63,041	\$2,350,279
Total	941,793	\$15,097,665

Source: OCEIA

As shown in Exhibit 4, the Department of Public Health accounted for just over half of all LEP clients served in 2023. The Human Services Agency assisted the second-largest number, serving 179,140 LEP clients. Together, these two departments accounted for 70.7% of all LEP clients served.

Departments collect LEP client data through one of three methods:

- **Intake Method:** Data gathered during client intake, including appointments, walk-ins, public events, and outreach. This is OCEIA's recommended method.
- **Survey Method:** An annual survey conducted over a minimum of a two-week period, capturing all public interactions and extrapolating the results for the full year.
- **Telephonic Interpretation Method:** An estimate based on the annual number of telephonic interpretation requests.

Levels of LAO expenditures are not fully explained by the number of LEP clients served. The Department of Public Health accounted for the highest level of expenditures and highest number of LEP clients served of all City departments in 2023. However, some departments with fewer LEP clients served incurred higher expenditures. The Department of Building Inspection, Elections, and the Municipal Transportation Agency all had high LAO expenditures despite serving fewer LEP clients than departments with lower expenditures. This discrepancy may arise in part due to language access costs extending beyond direct client services, such as document and signage translations. In addition, the number of LEP clients served does not fully capture all LEP interactions with City services. For example, MTA provides assistance to tens of thousands

of LEP individuals through transportation services, such as multilingual signage and in-vehicle announcements, but these interactions may not be reflected in the LEP client service counts. While this data provides useful insights, variations in data collection methods across departments make direct comparisons difficult. The figures should be viewed as informative rather than definitive, as tracking LEP client interactions remains complex and often incomplete.

Analysis of LAS Workforce

Departments provide language access services through a combination of bilingual staff, third-party contractors, and resources offered by OCEIA. Departments utilize bilingual employees to provide language access services, including directly assisting the public with interpretations and assisting with other language access tasks like translating documents. The two primary categories of bilingual staff are:

- (1) **Certified Bilingual Employees:** Staff who have successfully passed a language proficiency exam administered by DHR or an approved private vendor. These employees receive bilingual premium pay when they utilize their bilingual skills in both public-facing and non-public-facing positions. According to DHR data, there were 3,454 certified bilingual employees Citywide in FY 2022-23.
- (2) **Language Special Condition Position Employees:** Employees in roles designated by DHR as requiring bilingual skills. These employees are primarily in public-facing positions. In FY 2022-23, there were 1,157 such positions Citywide, based on DHR data. Employees filling these positions receive bilingual pay and are a subset of the certified bilingual employee population described above.

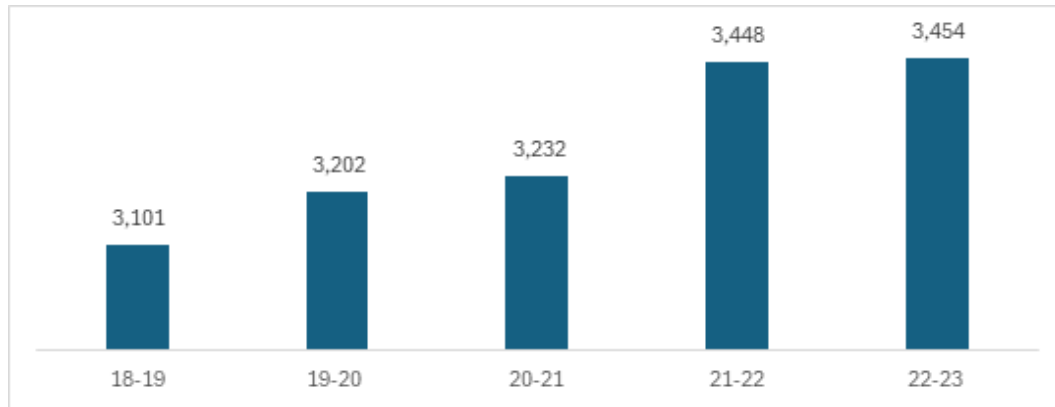
When public language needs cannot be fully addressed with bilingual staff, departments supplement these efforts by contracting third-party providers for services such as written translations and telephonic interpretation. Lastly, many departments rely on OCEIA's language resource staff, who provide departments with free language access support, including written translations and interpretation services.

The certified bilingual staff level of 3,454 employees is above the 5-year average that ended in FY 2022-23. Certified bilingual employees are individuals who have formally demonstrated proficiency in a second language through a certification process, which includes a language exam administered by DHR or an approved vendor. For a City employee to become certified, departments must provide DHR with justification demonstrating the need for bilingual services in the employee's position before the employee can take the language exam. Upon successful completion of the language exam, employees are eligible to receive bilingual pay.

As shown in Exhibit 5, DHR reports 3,454 certified bilingual employees Citywide in FY 2022-23, an 11 percent increase since FY 2018-19 and five percent higher than the 5-year average of 3,287 employees between FY 2018-19 and FY 2022-23. The positions with the highest number of bilingual staff are primarily public-facing roles, including HSA Senior Eligibility Workers (251),

Police Officers (215)³, Registered Nurses (185), Hospital Eligibility Workers (167)⁴, Health Workers (155), HSA Social Workers (77), and Librarians (77).⁵

Exhibit 5: Number of Citywide Certified Bilingual Employees, FY 2018-19 – 2022-23



Source: DHR

Most bilingual staff speak Spanish or Chinese. Based on DHR data on 1,157 language special condition positions, meaning positions that DHR has determined require bilingual skills, 560 positions, or 48.4 percent of all language special condition position employees, are for Spanish speakers. Chinese is second with 42.8 percent or 495 positions; the remaining 10 percent of language special condition positions are for Vietnamese, Russian, Filipino, and other languages. The information in Exhibit 6 is for language special condition positions only, as designated by DHR. The distribution of languages spoken by employees in these positions is not collected and reported for all 3,454 certified bilingual employees.

³ Includes the following classifications: Police Officer, Police Officer2 and Police Officer 3.

⁴ Includes senior classifications.

⁵ Includes the following classifications: Librarian 1, Librarian 2, and Librarian 3.

Exhibit 6: Bilingual Language Special Condition Positions, by Language

Language	Count	Percent
Spanish	560	48.4%
Chinese ¹	495	42.8%
Vietnamese	32	2.8%
Russian	29	2.5%
Filipino	27	2.3%
American Sign Language	8	0.7%
Japanese	4	0.3%
Khmer (Cambodian)	1	0.1%
Korean	1	0.1%
Grand Total	1,157	100.0%

Source: OCEIA Source: DHR, Language Special Condition Positions by Language.

¹ Chinese includes Cantonese, Mandarin and other Chinese.

In addition to bilingual staff, City departments utilize third-party contractors to provide language access services. Third-party contractors provide various language access services including translation of documents, in-person interpretations, and phone interpretations. San Francisco has 14 Citywide language access service contracts with a total not to exceed multi-year value of slightly more than \$10 million. The services provided by each contractor are shown in Exhibit 7. City departments must utilize their own budgets to cover the costs of third-party contractors. In addition to Citywide contracts, some City departments hire their own third-party contractors.

Exhibit 7: Multi-year Citywide Language Access Services Contracts

	Contract Amount	Contract Term (Years)
Telephonic Interpretation Services		
Lanuageline Solutions	\$2,000,000	5.0
Lionbridge Global Solutions II, Inc.	\$2,000,000	4.9
United Language Group, Inc.	\$2,000,000	4.8
<i>Subtotal</i>	<i>\$6,000,000</i>	
Document Translation Services		
Bilingva, LLC	\$400,000	3.5
Avantpage, Inc.	\$400,000	3.5
Accent on Languages, Inc.	\$400,000	3.5
<i>Subtotal</i>	<i>\$1,200,000</i>	
Translation Services for Written Documents		
Bilingva, LLC	\$400,000	4.0
Avantpage, Inc.	\$400,000	4.0
International Effectiveness Centers	\$400,000	4.0
<i>Subtotal</i>	<i>\$1,200,000</i>	
Non-Telephonic Interpretations		
Avantpage, Inc.	\$400,000	4.0
Bilingva, LLC	\$400,000	4.0
International Effectiveness Centers	\$400,000	4.0
<i>Subtotal</i>	<i>\$1,200,000</i>	
Community Based Interpretation Services for Specialized & Emerging Languages		
Bilingva, LLC	\$331,000	4.0
Interlingva, Inc.	\$80,000	4.0
<i>Subtotal</i>	<i>\$411,000</i>	
Total	\$10,011,000	

Source: Office of Contract Administration

Note: These figures reflect City-wide contracts as of September 2024.

Expenditures on Citywide contracts for language access services has fluctuated over recent years. As shown in Exhibit 8, the highest expenditures occurred in 2021, reaching nearly \$5 million, while the lowest expenditures occurred in 2019 at \$448,245.

Exhibit 8: Amount Spent on Citywide Language Access Services Contracts, 2018-2024

Year	Amount
2018	\$2,624,522
2019	\$448,245
2020	\$1,801,140
2021	\$4,984,762
2022	\$1,287,882
2023	\$1,345,735
2024	\$719,046
Total	\$13,211,332
Average	\$1,887,333

Source: Office of Contract Administration

OCEIA provides further assistance to City departments. OCEIA's Language Access Unit offers language services, including interpretation, translation, and equipment rentals to City departments free of charge, as capacity permits. OCEIA has one Language Specialist position per required language. Currently, this includes one Language Specialist position each for Spanish, Chinese, and Filipino. Language Specialists provide direct translation and interpretation services and provide technical assistance to departments in meeting the needs of LEP communities served. In FY 2022-23 OCEIA assisted a total of 23 departments with 74 interpretation projects and 118 translation projects. City departments do not reimburse OCEIA for these services. Interpretation projects include services for public meetings, including town halls, commission meetings, and public hearings. Translation projects involve the translation or translation review of materials like outreach content, presentations, agendas, and applications. In FY 2022-23, OCEIA spent a total of \$18,285 on third-party vendors for interpretation and translation services, with \$6,703 allocated to other departments.

Analysis of Bilingual Employee Retention

The Budget and Legislative Analyst analyzed data from the Department of Human Resources and interviewed departments to assess bilingual employee retention. We found that the number of authorized bilingual positions and premium pay expenditures both increased over the five years ending in FY 2022-23 and that turnover was not reported as an issue by departments surveyed for this report. However, vacancies for bilingual positions are higher than City averages for all positions, indicating potential challenges in attracting bilingual talent.

Methodology

To evaluate bilingual employee retention, the BLA conducted informational interviews with the ten City departments listed in Exhibit 9.

Exhibit 9: Departments Interviewed by the Budget and Legislative Analyst

Department
311 (Customer Service)
Building Inspection (DBI)
Department of Elections (REG)
Department of Human Resources (DHR)
Emergency Management - 911 (DEM)
Environment (ENV)
Homelessness and Supportive Housing (HSH)
Human Services Agency (HSA)
Municipal Transportation Agency (MTA)
San Francisco Airport (AIR)

Source: BLA

In addition to department interviews, the BLA analyzed the following data from DHR for FY 2019-20 through FY 2022-23:

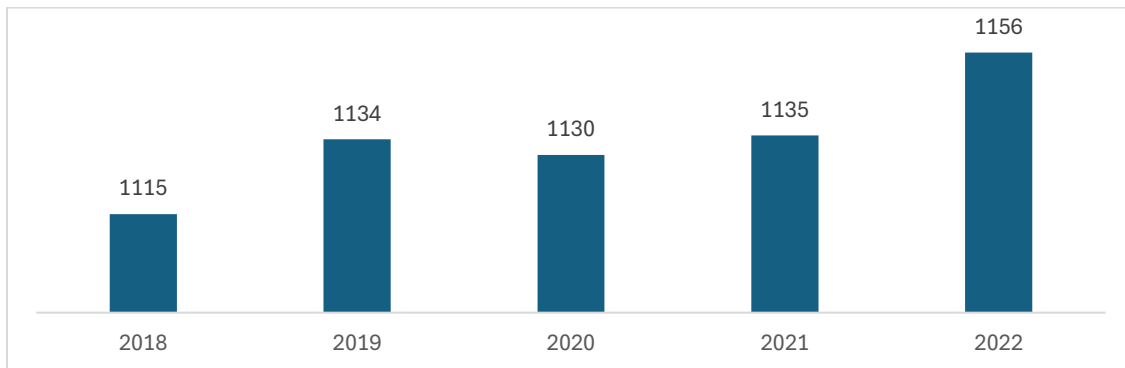
1. Total bilingual employee pay expenditures by department,
2. Total authorized, filled, and vacant language special condition positions by department,
3. Total certified bilingual employees by classification and by department, and
4. Vacancy data for certified and other authorized bilingual positions.

Bilingual Staff Retention

As discussed above, bilingual employees are counted in two ways by the City: 1) those filling language special condition positions, or positions that have been authorized by DHR as requiring bilingual employees, 2) certified bilingual employees, or those that have passed standardized language skills testing administered by DHR and other non-City organizations and may or may not regularly use these skills on the job. Information on the number of authorized positions and retention of each group is now presented. As shown, for both groups, the number of positions has been relatively stable or has grown modestly for at least four of the five years ending in FY 2022-23.

The number of authorized language special condition positions designated by DHR increased modestly every year between 2018 and 2022 from 1,115 to 1,156, indicating a stable need for language access services and positions where bilingual employees are necessary. This was particularly true for the Human Services Agency and the Department of Public Health, discussed further below.

Exhibit 10: Number of Authorized Language Special Condition Positions, FY 2018-29 through FY 2022-23



Source: DHR

Data on filled and vacant Language Special Condition positions show that vacancy rates fluctuated between 10 and 17 percent from 2018 to 2022. The highest vacancy rate occurred in 2022, reaching 17 percent, exceeding the 2023 Citywide average of 12.1 percent for all positions and underscoring a disproportionate challenge in filling all authorized Language Special Condition bilingual positions.⁶ This high vacancy rate in 2022 may be the result of difficulties attracting bilingual talent as opposed to retention. The need to hire bilingual staff is consistent

⁶ San Francisco Department of Human Resources. (2023). Workforce report 2023. City and County of San Francisco. <https://www.sf.gov/sites/default/files/2023-09/DHR-Workforce-Report-2023.pdf>

with OCEIA’s recommendation to increase City and community language access capacity, as shared in their Summary Compliance Reports, particularly as the City prepares to certify one or more additional languages in 2026.⁷

Exhibit 11: Number of Filled and Vacant Language Special Condition Positions, FY 2018 through FY 2022

FY	Authorized	Filled	Year over Year Change in Filled	Vacant	% Vacant
2018	1,115	999		116	10%
2019	1,134	967	-32	167	15%
2020	1,130	985	+18	145	13%
2021	1,135	1002	+17	133	12%
2022	1,156	955	-7	201	17%

Source: DHR

Language Special Condition employees are concentrated in four departments. The distribution of these positions by department shows the Human Services Agency leads with 47 percent of all authorized language special condition positions, followed by the Department of Public Health with 34 percent, Library with 8 percent, and the Office of City Administrator with 2 percent. Collectively, these four departments accounted for 81 percent of all Language Special Condition positions in FY 2022-23. The Human Services Agency faced the highest number of vacancies, with 100 unfilled positions out of 544 authorized positions, or 18 percent, followed by the Department of Public Health, which had 70 vacancies out of 396 authorized positions, also 18 percent. According to HSA, as of March 2025, their vacancy rate improved to 9.2 percent (477 filled out of 521), aligning with the agency-wide vacancy rate. HSA reports that language needs are generally met through a combination of bilingual staff and external language vendors.

⁷ Office of Civic Engagement & Immigrant Affairs. (2025). San Francisco Language Access Ordinance Compliance Summary Report.

**Exhibit 12: Authorized Language Special Condition Positions by Department
FY 2022-23**

Department	Authorized	Filled	Vacant	% Vacant
Human Services Agency	544 (47%)	444	100	18%
Department of Public Health	396 (34%)	326	70	18%
Library	87 (8%)	77	10	11%
Office of City Administrator	28 (2%)	28	0	0%
Other Departments	102 (19%)	80	21	21%
Total	1,156	955	201	17%

Source: DHR

As previously stated, certified bilingual staff levels were above the average for the five years ending in FY 2022-23. As shown in Exhibit 5 above, there were 3,545 certified bilingual employees Citywide in FY 2022-23, an 11 percent increase since FY 2018-19 and 5 percent above the 5-year average of 3,287 employees for FY 2018-19 through FY 2022-23.

In interviews, departments reported no significant challenge in retaining bilingual staff. Many noted stable or increased staffing levels for bilingual employees over recent years, which DHR data from FY 2018-19 through FY 2022-23 bears out for certified employees. However, these employees do not necessarily provide language access services because they do not all fill Language Special Conditions positions, or the positions identified by DHR as regularly providing language access services.

Certified bilingual employees are concentrated in five departments. The distribution of certified bilingual employees by department shows the Department of Public Health leads with 40 percent of all certified bilingual employees, followed by the Human Services Agency with 21 percent, Police with 12 percent, the Library with 8 percent, and the Sheriff's Office with five percent. Collectively, these five departments employed 85 percent of all certified bilingual staff in FY 2022-23.

Exhibit 13: Certified Bilingual Employees by Department, FY 2022-23

Department	Count	Percentage
Department of Public Health (DPH)	1,373	40%
Human Services Agency (HSA)	715	21%
Police (POL)	398	12%
Library (LIB)	283	8%
Sheriff (SHF)	175	5%
Other	510	15%
Total	3,454	100%

Source: DHR

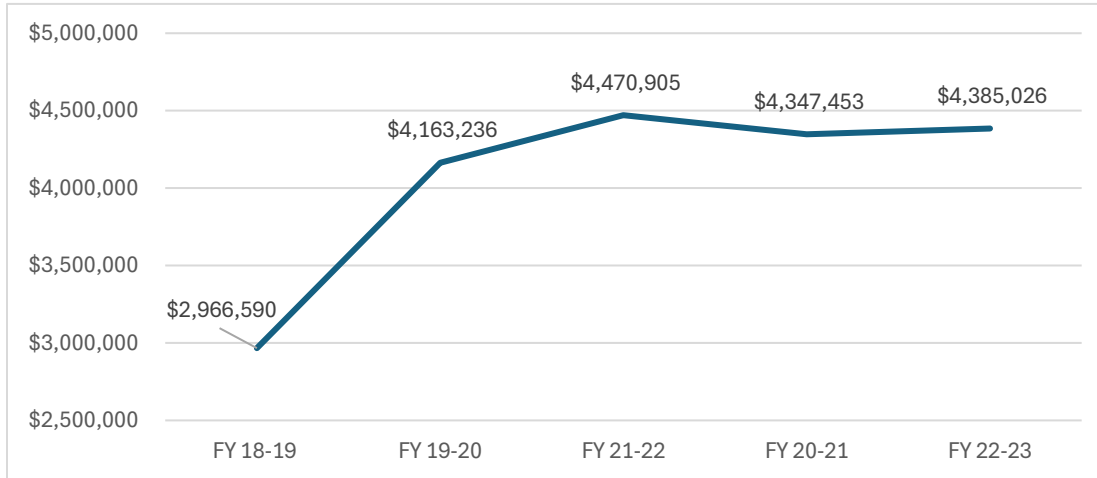
Based on department interviews, most departments believe they have sufficient bilingual staff to meet the language needs of the public, but further assessment is needed to evaluate need. In interviews, most departments expressed confidence in their bilingual staffing levels but acknowledged the complexity and challenge in assessing language demand. Two departments expressed that they are actively assessing and refining methods to measure the adequacy of bilingual staffing. For instance, the Human Services Agency, in partnership with the Controller's Office, is undertaking an evaluation of bilingual staffing levels among its eligibility workers to determine whether they have sufficient staff to cover bilingual caseloads. Further research is needed to identify potential gaps in bilingual service delivery and determine whether existing staffing levels across City departments are effectively meeting the needs of LEP clients. Further analysis of how often departments rely on the language line, a telephone service that provides interpretation services between LEP clients and City employees, could help identify potential gaps in bilingual staffing levels since use of the line occurs when employees are not available to provide interpretation services.

Bilingual Employee Policies

Eligible bilingual staff receive a pay premium for providing bilingual services. To receive bilingual pay, an employee must be certified and must be assigned to perform bilingual services. According to the relevant memoranda of understanding (MOUs), certified bilingual employees receive \$60 per pay period for providing bilingual services.⁸ The \$60 per pay period premium is the same for all employees, regardless of time spent providing bilingual services. As shown in Exhibit 14, DHR reports that bilingual pay expenditures for certified bilingual employees in FY 2022-23 amounted to \$4,385,026 Citywide. As can be seen, there was a significant increase in these expenditures in FY 2019-20 and then modest growth in the ensuing years through FY 2022-23. Since the \$60 premium did not change during those five years and the number of certified employees did not increase significantly in FY 2019-20 (see Exhibit 5, above), the fluctuations appear to reflect variances in the levels of LAS service provided over the five years.

⁸ <https://www.sf.gov/sites/default/files/2024-07/SEIU-1021-Citywide-2024-2027.pdf>

Exhibit 14: Bilingual Pay Expenditures Citywide



Source: DHR

To receive bilingual pay, an employee must be certified and must be assigned to perform bilingual services. Certification means the employee successfully passed a language proficiency test approved by the Director of Human Resources. Language proficiency examinations are administered by the Department of Human Resources, third party vendors, or in-house by some departments. DHR administers two primary examinations, one oral and one written. Oral examinations are the default; written examinations are administered in addition to oral exams only if requested by a department. Oral exams are constructed to assess an employee's listening and comprehension skills in the foreign language, as well as their speaking and interpretation ability. Written examinations evaluate the employee's translation ability from English into the target foreign language. DHR administered 163 oral examinations and 65 written examinations in FY 2022-23. Over the five-year period ending in FY 2022-23, there were 621 oral examinations and 185 written examinations administered, with the majority of those tested passing both types.

Based on interviews, City departments identified the following challenges regarding bilingual policies:

- Some departments reported that some bilingual employees avoid certification, perceiving the \$60 pay premium as inadequate. Departments reported that there is a staff perception that certification will lead to an increase in workload such as attending additional community events or providing interpretation services outside normal business hours.

- Departments reported challenges in finding enough bilingual candidates who can also pass the required language examination. They specifically struggle to recruit candidates proficient in languages such as Cantonese, Russian, and Vietnamese. This often results in departments needing to rely on third-party contractors, which are more costly and less timely.
- Departments depend on other City departments to lend bilingual staff for assistance with language access services needs. This helps departments reduce costs by accessing available City bilingual staff as opposed to contracting language services from a third-party contractor. Departments expressed the need for a centralized, Citywide list of available bilingual employees to streamline access to language support and reduce reliance on external resources. According to OCEIA, the Language Access Ordinance requires departments to include in their Annual Compliance Report a roster of bilingual employees, including name, title, language(s), phone number, office location or facility, and whether or not they are certified bilingual by DHR or an external agency. However, this roster is not shared across departments. To address this need, the City could establish a centralized bilingual employee registry, managed by OCEIA, where departments can easily access up-to-date information on available bilingual staff.
- Many departments reported having no DHR-designated language special condition bilingual positions. They explained that the hiring process is already challenging and adding a language requirement further prolongs and increases the difficulty of filling a position. As a result, departments often list bilingual proficiency as a preferred qualification rather than a mandatory requirement.

Projected Costs to Implement 2024 Language Access Ordinance Amendments

This section outlines the estimated costs for each City department to comply with the new language access requirements set forth in the ordinance, as amended in June 2024.

Methodology

To estimate the implementation costs of amendments to the Language Access Ordinance approved in 2024, the BLA surveyed 42 City departments and received responses from 37, yielding a response rate of 88 percent. A list of the departments surveyed, along with those that did not respond, is provided in Appendix I.

The survey aimed to 1) assess the current level of language access services offered by departments and 2) gather cost projections for implementing the new language access requirements.

Survey responses helped the BLA identify areas where compliance costs would be minimal due to existing services. Exhibit 15 categorizes Language Access Ordinance required services into two categories:

- **Existing services:** New LAO requirements already in place in most departments.
- **New services:** New LAO requirements that may require additional resources for implementation.

Exhibit 15: New LAO Requirements- Existing versus New Services

Existing Services	New Services
Translating digital content into Spanish, Chinese, Filipino.	Translating vital information into Vietnamese.
Translating signage into Spanish, Chinese, Filipino.	Translating signage into Vietnamese.
Establishing a public feedback mechanism for language access services.	Translating digital content into Vietnamese.
Maintaining data on language access services provided to the public.	New responsibilities for OCEIA include: a) preparing annual summary reports of complaint investigations, b) creating “Know your Rights” brochures in 20 languages, and c) establishing best practices for providing language access services during crisis events.
Providing language access services in any language upon request.	Requiring the Public Utilities Commission and the Tax Collector to provide resources to help LEP clients understand their utility bills and property taxes, respectively.
Developing and annually reviewing the department’s language access policy.	Adopting a community-centered approach to delivering language access services.

Source: BLA analysis

Key Cost Drivers

The primary driver of implementation costs for the 2024 amendments is the addition of Vietnamese as a fourth required language. Based on the latest U.S. Census data, Vietnamese now meets the City’s threshold of 6,000 Limited English Proficiency (LEP) speakers, requiring its inclusion as a required language under the Language Access Ordinance.

The cost projections provided by departments primarily reflect the costs of adding Vietnamese as a required language. OCEIA anticipates that Russian may also meet the threshold in the future. However, this report only accounts for the cost of adding Vietnamese. If OCEIA certifies Russian as a required language, total implementation costs will increase. Certification of additional languages is expected to be finalized by 2026.

Department Challenges in Estimating Costs of Implementing LAO Amendments

The BLA encouraged departments to provide well-informed estimates, using prior fiscal year expenditures where applicable. However, departments identified several challenges in estimating costs:

- **Signage Costs:** Many departments reported needing more time to estimate signage costs to account for variables such as the number, size, and location of required signs.

- **Unclear Guidance on New Requirements:** Departments report that some of the new requirements would benefit from clear guidance from OCEIA. Specifically, Section 91.14(j), which requires a "community-focused" approach to language access, poses challenges for departments. Many were uncertain whether their current practices met this standard and indicated they would need further guidance before determining costs. This guidance is forthcoming from OCEIA.

Projected Implementation Costs

The total estimated implementation cost for the new language access requirements is \$5,632,632, of which \$2,141,770 will be ongoing annual costs. The largest expense category, "Other Requirements," accounts for \$2,435,373 and primarily reflects costs associated with adopting a community-centered approach to language access services along with some other lesser costs not identified by departments. Additional implementation costs include document translations at \$1,535,283 and signage translations at \$727,302.

The Office of Civic Engagement and Immigrant Affairs (OCEIA) projects \$200,000 in one-time costs and \$546,872 in ongoing costs. Digital content translations for departments managing their websites in-house are estimated at \$101,190 in one-time costs, while costs for department websites using SF.gov are estimated at \$25,250 for implementation and \$18,250 in annual ongoing costs. The SF Public Utilities Commission estimates annual ongoing costs of \$45,000 and the Office of the Treasurer and Tax Collector (TTX) estimates total cost at \$16,362, including \$14,686 in one-time costs and \$1,680 in ongoing costs. Emergency service departments reported no additional costs.

Exhibit 16: Citywide Implementation Costs

Category	One-time	Ongoing	Total
Other Requirements	\$905,405	\$1,529,968	\$2,435,373
Document Translations	\$1,535,283	-	\$1,535,283
Signage Translations	\$727,302	-	\$727,302
OCEIA	\$200,000	\$546,872	\$746,872
Digital Content Translations	\$108,190	\$18,250	\$126,440
PUC – billing translations		\$45,000	\$45,000
TTX - billing translations	\$14,682	\$1,680	\$16,362
Emergency Services	-	-	\$0
Total	\$3,490,863	\$2,141,770	\$5,632,632

Source: BLA Survey

Note: ongoing costs reflect new staff positions, including 7 new staff positions for the Environment Department totaling an estimated \$1,329,968, and 2 new staff positions for the Public Library totaling an estimated \$200,000.

1. Document Translations

Existing Services

Currently, departments translate "vital information" into the required languages: Spanish, Chinese, and Filipino. Vital information encompasses materials such as applications, forms, written notices, and materials explaining programs and services. According to our survey results, most departments report already having all vital information translated into these languages.

New Requirement

OCEIA estimates that, pursuant to the Language Access Ordinance amendments adopted in 2024, departments will be required to translate vital information into a fourth language—Vietnamese – in 2026 due to changes in the numbers of Vietnamese speakers in San Francisco.

Projected Implementation Costs

The BLA survey asked departments to estimate the cost of translating their vital materials into Vietnamese. To develop their projections, departments primarily referenced prior-year expenses for translations into Chinese, Spanish, and Filipino or obtained quotes from third-party vendors.

Citywide document translation costs are estimated at \$1,535,284, with Elections (\$1,225,000) and the Municipal Transportation Agency (\$110,000) accounting for 87% of total projected expenses. These costs are driven by the volume of vital documents—such as applications, forms, and information notices—that each department handles. Elections' high costs stem from translating materials like official ballots, voting instructions, and local voter information pamphlets, while the Municipal Transportation Agency's costs reflect the translation of essential transit-related documents and street project updates. In contrast, large departments such as the Human Services Agency and the Department of Public Health reported no additional costs, as they already translate vital information into Vietnamese. Cost projections by department are detailed in Exhibit 21.

2. Digital Content Translations

Existing Services

As shown in Exhibit 17 below, of the 55 department websites observed, most have their digital content translated into Spanish, Chinese, and Filipino, but not Vietnamese.

Exhibit 17: Number of Department Website Translations by Required Language

Language	Translated	Not Translated	Total
Spanish	46	9	55
Chinese	46	9	55
Filipino	44	11	55
Vietnamese	12	43	55

Source: BLA

New Requirement

The amended ordinance requires departments to translate their digital content into the required languages of Spanish, Chinese, and Filipino. Estimated to take effect in 2026, departments will also be required to translate digital content into Vietnamese.

Projected Implementation Costs

Since most departments already have digital content translated into Spanish, Chinese, and Filipino, departments' cost projections primarily reflect costs associated with translating their digital content into Vietnamese. To project costs, the BLA obtained estimates from departments that host their websites in-house and obtained estimates from the City's Office of Digital Services for departments that run their websites on SF.gov, the central platform hosting websites for 43 City departments (see listing in Appendix II).⁹ Based on survey data, one-time document translation costs are estimated to be \$101,190 Citywide for departments that host their own websites and \$25,250 for departments whose websites are hosted on SF.gov for a total of \$126,440.

The \$101,190 costs for departments that host their own websites are largely attributed to San Francisco International Airport (AIR) and the Department of Elections (REG), with digital content translation costs projected at \$50,000 and \$43,659, respectively, accounting for 93 percent of total estimated costs for departments with in-house websites. Costs are high for these departments because they both reported human translation of vital digital content. In contrast, other departments managing their own websites reported minimal or no implementation costs. This is because they use machine translation tools powered by artificial intelligence (AI), which translate digital content automatically with little to no additional cost to include Vietnamese translations. Cost projections by department are shown in Exhibit 21.

⁹ A total of 204 departments, public bodies, and divisions are using SF.gov.

The Office of Digital Services reported \$25,250 in cost projections for Vietnamese translations for department websites hosted on SF.gov. According to Digital Services, to ensure accessibility, all pages on SF.gov are automatically machine-translated to make content accessible in the required languages. For costs associated with machine translations, Digital Services projects an added cost of \$3,250 annually to account for the addition of Vietnamese as a required language. Additionally, Digital Services provided cost projections for third-party vendors, which provide human translation of high-traffic pages or those specifically requested by authorized departments. For human translations, the Office of Digital Services projects \$22,000 in one-time costs for the first year of implementation and \$15,000 annually thereafter. In total, costs are estimated at \$25,250 in the first year of implementation and \$18,250 annually thereafter.

Exhibit 18: Projected Costs for Adding Vietnamese Translations on SF.gov Supported Department Websites

Category	FY 2026	On-going
Human Translations	\$22,000	\$15,000
Machine Costs	\$3,250	\$3,250
Total	\$25,250	\$18,250

Source: Office of Digital Services

Note: SF.gov is scheduled to undergo significant updates that may affect these cost estimates. Key changes include migration to a new platform that was scheduled for January 2025 and the transition to a new translation vendor, as the current vendor contract was set to expire in March 2025.

The Office of Digital Services utilizes the COIT Fund to support costs associated with digital content translations so departments using their translation services do not need to pay for these translation services from their budgets. According to the Office of Digital Services, there are funds available in the budget to support the additional translation of digital content into Vietnamese.

3. Signage Translations

Existing Services

Prior to adoption of the 2024 Language Access Ordinance amendments, departments were required to make a “good faith effort” to translate signage into required languages. According to our survey results, departments reported having signage translated in the required languages of Spanish, Chinese, and Filipino.

New Requirements

The amendments removed the “good faith effort” clause pertaining to signage translations and now require departments to translate all signage posted in their facilities designed to assist residents in obtaining services into the required languages. Estimated to take effect in 2026, this includes translating signage into Vietnamese.

Projected Implementation Costs

Since most departments already have signage translated in Spanish, Chinese, and Filipino, departments' cost projections primarily reflect costs associated with translating signage into Vietnamese. To estimate costs, departments primarily utilized prior costs to translate signage into Chinese, Spanish, and Filipino; or projected costs by requesting a quote from a third-party vendor.

Based on survey results, translation of signage is projected to cost an estimated \$727,302 in one-time implementation costs Citywide. The costs are largely attributed to the Municipal Transportation Agency (\$380,000) and the Elections Department (\$257,700), which together account for 88 percent of the total estimated costs for signage translations. These costs are driven by the volume of signage that each department displays. Department of Elections' costs stem from translating various polling place signage, including "Vote Here" signs, and drop box signage, while the Municipal Transportation Agency's costs reflect the translation of signage for public transportation. On the other hand, many departments projected no costs, due to the departments not being public-facing thus having no signage to translate, the department printing translations in-house, or other reasons. As already stated, departments' projected costs may be underestimated. Many departments expressed the need for additional time to gather information to provide a more educated estimate, such as calculating the number of signs, size of signage, and other relevant factors such as vendor costs. Cost projections by department are shown in Exhibit 21.

4. Other New Requirements

In addition to the cost projections discussed above, the BLA survey also gathered estimates for the following other new requirements outlined in the ordinance:

- Establishing a public feedback mechanism for language access services.
- Maintaining data on language access services provided to the public.
- Providing language access services in any language upon request.
- Developing and annually reviewing the department's language access policy.
- Adopting a community-centered approach to delivering language access services.

Most departments reported no additional costs for these other new requirements since they reported they align with their existing practices or can be absorbed within current language access budgets. However, departments that did provide estimates of implementation costs for the other new requirements estimated costs of \$2,435,373 though this amount is likely understated. Of the other new requirements listed above, Section 91.14(j), which mandates a "community-focused" approach, presented challenges. Many departments were uncertain

whether their current practices met this standard and indicated they would need further guidance before estimating costs. As a result, most did not report a financial impact.

Some departments, however, projected significant costs for adopting a community-centered approach to delivering language access services. The Environment Department estimated \$1,970,000 to fund various initiatives, including developing a language style guide, hiring seven permanent bilingual staff members to cover all required languages and conduct grassroots outreach, and producing LEP marketing materials. According to the Environment Department, their estimate includes a community-focused approach aligned with best practices and with the Department's Equitable Language Access Project (ELAP). The Department recognizes that their existing resources were not adequate for providing the same quality language access for existing languages to which the LAO aspires. The Public Library projected \$200,000 to hire two permanent outreach staff members, while the Public Utilities Commission (PUC) estimated \$150,000 for advertisements and promotional campaigns targeting LEP communities. Together, these three departments accounted for 87% of the total estimated costs for the new requirements under the other new requirements. We assume other departments may request new positions in the future after they firm up their plans for their community-centered approach to language access services.

OCEIA Costs to Implement 2024 LAO Amendments

The changes to the ordinance will increase OCEIA's role and responsibilities. The Office's primary new responsibilities are:

1. Working with departments providing emergency response services, including developing strategies for departments to use in deploying rapid response language access services during crisis situations and providing technical assistance to support implementation.
2. Preparing annual summary reports of LAO complaint investigations that include findings and recommendations.
3. Creating a "Know Your Rights" brochure for language access services and translating it into top 20 languages.
4. Assessing if a new language meets the 6,000 LEP resident certification threshold (per U.S. Census data, effective January 1, 2026) and supporting City departments in implementing Vietnamese—expected to qualify in 2026—through language services, training, and technical assistance.

OCEIA estimates implementation costs of \$746,872, including \$200,000 in one-time costs and \$546,872 in ongoing costs for its new responsibilities. As shown in Exhibit 19, this amount includes \$340,753 in ongoing costs for two new positions: one Training Officer (1232 classification) and one Language Specialist (1842 Management Assistant classification). Additionally, \$75,000 is estimated for on-going operating expenses to support the implementation and maintenance of the new requirements and \$131,119 is for upgrades of four

existing positions. These updates aim to meet expanded responsibilities and ensure effective implementation of the ordinance, according to OCEIA.

The proposed upgrades, costing \$131,119, subject to approval by the Department of Human Resources, include:

- Upgrading an 1823 Senior Administrative Analyst position to 0922 Manager I¹⁰
- Upgrading an 1840 Junior Management Assistant position to 1823 Senior Administrative Analyst
- Upgrading an 1822 Administrative Analyst position to 1823 Senior Administrative Analyst
- Upgrading an 1840 Junior Management Assistant position to 1842 Management Assistant

OCEIA estimates \$200,000 in one-time costs to subsidize City departments' interpretation and translation needs through external vendors during the first year of the new language requirement. While departments are required to budget and plan for translating vital information and providing interpretation, it is anticipated that many departments will rely on OCEIA for support as they adjust to the updated requirements. According to OCEIA, the \$200,000 allocation is a conservative estimate, noting that departments collectively spend about \$1,139,600 annually on translation services. Appendix III provides a detailed description of OCEIA's projected costs.

Exhibit 19: OCIEA Projected Costs for Implementation and Ongoing

Category	Amount
New Positions (ongoing)	\$340,753
Upgraded Positions (ongoing)	\$131,119
Operating Expenses (ongoing)	\$75,000
Operating Expenses (one-time support)	\$200,000
Total	\$746,872

Source: OCEIA

¹⁰ According to OCIEA, as of March 2025, the 1823 Senior Administrative Analyst position was upgraded to an 1824 Principal Administrative Analyst Position (not a 0922 Manager I), and the hiring for that position has been completed. The other three proposed upgrades (1840 to 1823; 1822 to 1823; and 1840 to 1842) have not yet been approved.

Emergency Departments: New Language Access Requirements

Section 91.1 introduces new requirements for departments providing emergency services during crisis situations. These changes became effective January 1, 2025, and include providing the following during crisis events:

1. Offering language access services related to the emergency in English and all languages spoken by 5% or more of the population with limited English proficiency.
2. Ensuring information provided during crisis events is timely and comprehensive.
3. Making efforts to involve community members, such as native speakers with cultural competencies, in delivering these services.

The BLA surveyed emergency response departments, including Police, Emergency Management, and Fire regarding implementation readiness. Based on their responses, the departments estimate minimal implementation costs, noting that they already make every effort to provide services in all required languages during emergencies and utilize Language Line to provide language access in over 100 other languages.

Under the new requirements, OCEIA is to:

- Identify the languages spoken by 5% or more of the LEP population.
- Design best practices for emergency departments to follow during crisis situations.
- Provide technical assistance to help departments meet these requirements.

OCEIA's projected costs for implementation, detailed in Exhibit 19, include \$25,000 in ongoing annual expenses to support training and technical assistance for departments that provide emergency services. These funds will be allocated for specialized language access experts to assist first responder departments. According to OCEIA, these experts will develop crisis-specific best practices and guidelines, ensuring emergency readiness while addressing the needs of LEP populations. The contractors will bring technical expertise, an understanding of first responders' operational limitations, and deep knowledge of LEP community requirements.

New Language Access Requirements for the SF Public Utilities Commission and Office of the Tax Collector

The amended Section 91.5(a) of the Language Access Ordinance requires the San Francisco Public Utilities Commission (SFPUC) and the Office of the Tax Collector (TTX) to provide resources that enable Limited English Proficiency persons to understand their utility and property tax bills. To estimate the cost associated with implementing this new requirement, the BLA asked these two departments to:

1. Explain current language access services provided by the department to assist LEP persons in understanding their utility bills or property taxes.

2. Outline plans for implementing the amendment, including projected costs.

Responses from the two departments were that implementation costs for these new provisions in the Language Access Ordinance will be \$61,362: \$45,000 for the SFPUC and \$16,362 for TTX.

The PUC currently provides language support in three required languages for in-person and phone assistance. The PUC plans to implement this new requirement by adding messaging on utility bills to refer customers to existing language services. The SFPUC plans to include notices in bills, translated into four languages, mailed twice annually. Estimated ongoing costs for these inserts are approximately \$45,000 annually, subject to variations based on the number of customer accounts, reproduction costs, and additional language requirements. Included in this estimate are translation costs for these materials estimated at \$1,000–\$2,000. SFPUC's online bill portal, which hosts full PDF versions of utility bills, will include information about accessing translated bill overlays at no additional cost.

The Tax Collector's office provides language support via its taxpayer assistance staff who can assist property owners in Chinese and Spanish. In addition, the Tax Collector translates a property tax bill insert, mailed with property tax bills that includes information about postponement and exemption programs. The printed insert directs taxpayers (in their appropriate language) to the TTX website for translated versions of the insert in Chinese, Spanish, and Filipino. To comply with the new requirements, TTX plans on implementing the following services:

1. Annually translate a sample property tax bill and post on the TTX website. The printed bill will instruct (in the appropriate language) taxpayers to visit the TTX website to view sample bills translated into Chinese, Spanish, and Filipino. Upon the certification of Vietnamese as a required language, TTX will add a sample bill translated into Vietnamese.
2. Translate relevant website content using human translation. Upon the certification of Vietnamese as a required language, TTX will translate this content into Vietnamese.
3. Translate the Office's property tax payment instructional video, which is currently provided in English only, into all required languages including Vietnamese once language is certified as a required language.

As shown by Exhibit 20, TTX projects implementation costs of \$12,272 in FY 2024-25, which reflects costs associated with implementing new services for the three current required languages of Spanish, Chinese, and Filipino. TTX projects an additional \$4,090 in expenditures to incorporate Vietnamese in FY 2025-26.

**Exhibit 20: Office of Tax Collector Initial Costs to Implement Language Access
Ordinance 2024 Amendments**

	FY 2024-25	FY 2025-26
Property tax bill template (ongoing)	\$1,260	\$420
Website content (One-Time)	\$7,745	\$2,581
Instructional video (One-time)	\$3,267	\$1,089
Total	\$12,272	\$4,090

Source: TTX

Note: FY 2024-25 reflects costs for three languages: Spanish, Chinese, and Filipino. FY 25-26 reflects costs associated with the addition of Vietnamese.

Exhibit 21: Implementation Costs by Department by Category

	Department	Documents	Signage	Digital Content ¹	Other	Total
1	Adult Probation (ADP)	\$3,000	\$500	-	\$0	\$3,500
2	Appeals, Board of (BOA)	\$2,066	\$0	-	\$500	\$2,566
3	Assessor Recorder (ASR)	\$12,000	\$0	\$0	\$2,000	\$14,000
4	Board of Supervisors (Clerk) (BOS)	\$1,800	\$300	\$0	\$0	\$2,100
5	Building Inspection (DBI)	\$20,000	\$3,000	-	\$0	\$23,000
6	Children, Youth and Their Families (CYF)	\$1,605	\$0	-	\$0	\$1,605
7	District Attorney's Office (DAT)	\$0	\$0	\$0	\$0	\$0
8	Early Childhood, Department of (DEC)	\$9,000	\$0	\$5,208	\$0	\$14,208
9	Elections (REG)	\$1,225,000	\$257,700	\$43,659	\$0	\$1,526,359
10	Emergency Management - 911 (DEM)	\$4,725	\$0	-	\$0	\$4,725
11	Environment (ENV)	\$3,808	\$425	\$1,323	\$1,970,000	\$1,975,556
12	Ethics Commission (ETH)	\$4,100	\$0	\$0	\$4,257	\$8,357
13	Fire Department (FIR)	\$0	\$0	\$0	\$0	\$0
14	Homelessness and Supportive Housing (HSH)	\$8,969	\$0	-	\$0	\$8,969
15	Human Services Agency (HSA)	\$0	\$0	\$0	\$0	\$0
16	Juvenile Probation (JUV)	\$5,580	\$20,000	-	\$0	\$25,580
17	Mayor's Office (MYR)	\$0	\$0	-	\$0	\$0
18	Mayor's Office of Housing and Community Development (MYH)	\$12,026	\$0	-	\$0	\$12,026
19	Municipal Transportation Agency (MTA)	\$110,000	\$380,000	\$0	\$0	\$490,000
20	Office of City Administrator ²	\$37,740	\$5,157	-	\$30,000	\$72,897
21	Office of Civic Engagement and Immigrant Affairs	\$0	\$0	\$0	\$746,872	\$746,872
22	Office of Digital Affairs	\$0	\$0	\$25,250	\$0	\$25,250
23	Planning Department (CPC)	\$8,000	\$0	\$0	\$40,000	\$48,000
24	Police Accountability, Department of (DPA)	\$2,500	\$350	-	\$300	\$3,150

25	Police Department (POL)	\$0	\$0	\$0	\$0	\$0
26	Port of San Francisco (PRT)	\$0	\$0	\$0	\$0	\$0
27	Public Defender's Office (PDR)	\$0	\$0	\$0	\$0	\$0
28	Public Health (DPH)	\$0	\$30,000	-	\$0	\$30,000
29	Public Library (LIB)	\$2,320	\$15,870	\$0	\$205,000	\$223,190
30	Public Utilities Commission (PUC)	\$10,011	\$0	\$0	\$197,500	\$207,511
31	Public Works (DPW)	\$1,790	\$500	\$1,000	\$15,000	\$18,290
32	Recreation and Parks (REC)	\$10,000	\$0	\$0	\$0	\$10,000
33	Rent Board (RNT)	\$14,243	\$1,400	-	\$0	\$15,643
34	San Francisco International Airport (AIR)	\$15,000	\$8,000	\$50,000	\$0	\$73,000
35	San Francisco Zoo (ZOO)	\$0	\$1,500	\$0	\$200	\$1,700
36	Sheriff (SHF)	\$10,000	\$0	\$0	\$15,616	\$25,616
37	Status of Women (Department on the) (WOM)	\$0	\$0	\$0	\$0	\$0
38	Technology (DT)	\$0	\$0	-	\$0	\$0
39	Treasurer and Tax Collector (TTX)	\$0	\$2,600	\$0	\$16,362	\$18,962
	Total	\$1,535,283	\$727,302	\$126,440	\$3,243,607	\$5,632,632

Source: BLA Citywide Survey

Note 1: This column includes cost projections for departments that manage their websites in-house. A dash (–) reflects departments that host their websites on SF.gov, which is managed by the Office of Digital Services and are therefore shown under Office of Digital Services.

Note 2: Office of City Administrator includes all City Administrator Divisions, which include 311, Animal Care and Control (ACC), City Hall Events, Contract Monitoring, County Clerk, Digital and Data Services, Entertainment Commission, Mayor's Office on Disability (MOD), Medical Examiner (OCME), Civic Engagement and Immigrant Affairs (OCEIA), Office of Cannabis, Labor Standards Enforcement (OLSE), Permit Center, Real Estate Division, Treasure Island Development Authority, and Resilience and Capital Planning (ORCP).

Policy Options

The Board of Supervisors should:

1. Consider funding to ensure implementation of the 2024 Language Access Ordinance amendments adopted by the Board of Supervisors estimated to be \$5,632,632 consisting of \$2,141,770 in one-time costs and \$3,490,863 in ongoing costs, distributed among the Office of Civic Engagement and Immigrant Affairs (OCEIA) and other City departments as detailed in this report.
2. Request that OCEIA instruct departments to provide more specific accounting for their language access services every year so only a small percentage of costs, if any, are attributed to undefined “other” purposes in OCEIA’s annual compliance report.
3. Request that OCEIA and the Department of Human Resources collaborate to resolve discrepancies in their reported levels of compensatory pay for language access services provided by City staff.
4. Request that OCEIA prepare guidance for City departments to use in implementing the new Language Access Ordinance requirement for a community-focused approach to language access services by each department.
5. Consider requiring that OCEIA create a Citywide registry of bilingual employees to streamline language support across departments to help departments reduce costs by accessing available City bilingual staff in other departments as opposed to contracting language services from a third-party vendor.
6. Request a follow up report from DHR on what an appropriate premium pay rate would be for the City and County of San Francisco to remain competitive in recruiting, retaining, and lowering the vacancy rate for bilingual employees in language special condition positions.
7. Request that the Office of Digital Services and other appropriate staff identify and report back on incentives to encourage City departments to transition their websites, when feasible, to SF.gov. since the Office of Digital Services ensures that digital content is compliant with language access requirements, including providing machine-translation and human translation of content in all required languages.
8. Request that human translation be used for frequently visited City webpages to improve accuracy and cultural appropriateness as opposed to machine translation tools that often lack accuracy, cultural nuance, and contextual understanding.

Appendix I: List of Surveyed Departments

A total of 42 City departments were surveyed. 37 departments responded to the survey. The nonresponsive departments are highlighted in gray.

1. Adult Probation (ADP)	2. Mayor's Office of Housing and Community Development (MYH)
3. Appeals, Board of (BOA)	4. Municipal Transportation Agency (MTA)
5. Asian Art Museum (AAM)	6. Office of City Administrator*
7. Assessor Recorder (ASR)	8. Planning Department (CPC)
9. Board of Supervisors (Clerk) (BOS)	10. Police Accountability, Department of (DPA)
11. Building Inspection (DBI)	12. Police Department (POL)
13. Child Support Services (CSS)	14. Port of San Francisco (PRT)
15. Children, Youth and Their Families (CYF)	16. Public Defender's Office (PDR)
17. District Attorney's Office (DAT)	18. Public Health (DPH)
19. Early Childhood, Department of (DEC)	20. Public Library (LIB)
21. Economic & Workforce Development (ECN)	22. Public Utilities Commission (PUC)
23. Elections (REG)	24. Public Works (DPW)
25. Emergency Management - 911 (DEM)	26. Recreation and Parks (REC)
27. Environment (ENV)	28. Rent Board (RNT)
29. Ethics Commission (ETH)	30. San Francisco International Airport (AIR)
31. Fine Arts Museums of San Francisco	32. San Francisco Zoo (ZOO)
33. Fire Department (FIR)	34. Sheriff (SHF)
35. Homelessness and Supportive Housing (HSH)	36. Status of Women (Department on the) (WOM)
37. Human Services Agency (HSA)	38. Technology (DT)
39. Juvenile Probation (JUV)	40. Treasurer and Tax Collector (TTX)
41. Mayor's Office (MYR)	42. War Memorial (WAR)

*Includes all City Administrator Divisions, which include 311, Animal Care and Control (ACC), City Hall Events, Contract Monitoring, County Clerk, Digital and Data Services, Entertainment Commission, Mayor's Office on Disability (MOD), Medical Examiner (OCME), Civic Engagement and Immigrant Affairs (OCEIA), Office of Cannabis, Labor Standards Enforcement (OLSE), Permit Center, Real Estate Division, Treasure Island Development Authority, and Resilience and Capital Planning (ORCP).

Appendix II: List of City Department or Division Websites on SF.gov

Description: Listed below are City departments using SF.gov, which is operated by San Francisco Digital Services. Digital Services maintains websites for participating departments, including translating digital content in required languages.

	Name	Parent or related Department
1	Adult Probation Department	
2	Board of Appeals	
3	Child Support Services	
4	Children, Youth and Their Families	
5	City Administrator	
6	Civil Service Commission	
7	Contract Monitoring Division	City Administrator
8	Controller's Office	
9	County Clerk	City Administrator
10	DataSF	City Administrator
11	Department of Building Inspection	
12	Department of Elections	
13	Department of Emergency Management	
14	Department of Police Accountability	
15	Department of Public Health	
16	Department of Technology	
17	Digital Services	City Administrator
18	Emergency Medical Services Agency	Department of Public Health
19	Entertainment Commission	
20	FilmSF	Office of Economic and Workforce Development
21	Grants for the Arts	City Administrator

22	Human Resources	
23	Human Rights Commission	
24	Juvenile Probation Department	
25	Mayor's Office of Housing and Community Development	
26	Mayor's Office of Innovation	
27	Mayor's Office on Disability	
28	Office of Cannabis	City Administrator
29	Office of Civic Engagement and Immigrant Affairs	City Administrator
30	Office of Contract Administration	City Administrator
31	Office of Economic and Workforce Development	
32	Office of Labor Standards Enforcement	City Administrator
33	Office of Small Business	Office of Economic and Workforce Development
34	Office of the Chief Medical Examiner	City Administrator
35	Office of the County Clerk	City Administrator
36	Office of the Inspector General	Sheriff's Department
37	Office of the Mayor	
38	Office of Transgender Initiatives	Human Rights Commission
39	Rent Board	
40	San Francisco Government TV	Department of Technology
41	San Francisco Law Library	
42	Treasure Island Development Authority	City Administrator
43	311 Customer Service Center	City Administrator

Source: Digital Services

Appendix III: OCEIA Cost Projections

Action	Description	FY25 Cost	FY26 Cost
New 1232 Training Officer	<p>A 1232 Training Officer position would support the expanded requirements of the Language Access Ordinance (LAO) amendments and to meet the growing needs of City departments in implementing language access compliance and best practices.</p> <p>Key Responsibilities:</p> <ul style="list-style-type: none"> Complaint Investigation Support: The Training Officer will assist the Director of Language Access Policy and Programs, who is the compliance lead, with communications and administrative tasks related to language access complaints, which are expected to increase significantly under the LAO amendments. Public-Facing Requirements Under LAO: The LAO now mandates the publication of “Know Your Rights” information in public-facing offices and the updating of complaint forms in the 20 most-needed languages. This requires consistent guidance and collaboration with departments to ensure compliance. Citywide Focus Distinct from Language Specialists: Unlike the language specialists who provide language-specific technical assistance, the Training Officer will have a Citywide training mandate, focusing on department systemic issues and compliance across all departments. This broader scope ensures consistency in LAO implementation Citywide and provides departments with the tools to meet their obligations independently, reducing reliance on ad hoc support from OCEIA. <p>Anticipated Allocation of Time</p> <ul style="list-style-type: none"> Training and Workshops (40%): Conducting training sessions and workshops for departments on LAO amendments, best practices for language access, and new compliance requirements. 	\$180,818	\$187,301

	<ul style="list-style-type: none"> • Capacity-Building and Technical Assistance (30%): Providing tailored technical assistance to departments, ensuring they have the resources, knowledge, and infrastructure to comply with LAO requirements. • Complaint Assistance and Administrative Support (20%): Assisting with the investigation of complaints, supporting communications, and maintaining compliance-related documentation. • Coordination with Departments on public-facing requirements (10%): Working with departments to develop and disseminate “Know Your Rights” materials and ensure complaint forms and processes meet LAO requirements. <p>Why This Position is Needed:</p> <ul style="list-style-type: none"> • Increased Complaint Volume and Complexity: With the LAO now requiring updates to complaint forms in 20 languages, investigation of complaints, and publication of findings, a significant increase in complaints is anticipated. This position will support the compliance lead, the Director of Language Access Policy and Programs, by handling the associated administrative workload and providing departments with training on handling complaints. • Citywide Training Needs: Departments have expressed the need for structured guidance on compliance. A dedicated Training Officer will ensure consistency in implementation, reduce compliance gaps, and provide departments with proactive solutions to meet LAO mandates. • Support for Public-Facing Mandates: The LAO amendments require departments to display “Know Your Rights” materials in public offices where services are provided. This necessitates a Citywide training approach to ensure these materials are appropriately integrated and visible, and that departments are equipped to engage effectively with LEP communities. • Proactive Capacity-Building: Without a dedicated Training Officer, departments may struggle to adapt to the new LAO requirements, leading to non-compliance and over-reliance on OCEIA for direct intervention. This position addresses the need for a proactive and sustainable approach to capacity-building. 		
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New Language Specialist Position (1842 Management Assistant)	<p>OCEIA has a Language Specialist position per required language. This new position is for a Vietnamese Language Specialist.</p> <p>Key responsibilities:</p> <ul style="list-style-type: none"> • Direct translation services. • Direct interpretation services. • Contributor to language-specific style guides and best practices materials. • Advising and technical assistance to departments on meeting the needs of LEP communities in language of specialization. 	\$159,935	\$165,743
Funds to support OCEIA interpretation and translation services from vendors.	<p>The LAO requires that OCEIA immediately update, translate and distribute existing documents, in particular the Know Your Rights and the Language Access Complaint Form:</p> <p>Proposed allocation breakdown:</p> <ul style="list-style-type: none"> • \$15,000 to update and translate “Know Your Rights” materials into the top 20 languages needed to publish and disseminate to community and city departments. • \$10,000 to translate updated complaint forms into 20 languages. 	\$25,000	On-going
Funds to Support Contractors (i.e. specialized support, facilitators, first responder language access experts, language specialists)	<p>This funding will secure contractors with expertise in key areas to support the expanded scope of compliance with the amended Language Access Ordinance (LAO).</p> <p>Proposed Allocation Breakdown</p> <ol style="list-style-type: none"> 1. Specialized Language Access Experts: \$25,000 <ul style="list-style-type: none"> • Per the LAO, it will be necessary to engage first responder departments and first responder language access experts and facilitators to develop crisis-specific best practices, guidelines and ensure readiness for emergencies. • These contractors will possess technical skills and deep knowledge of 	\$50,000	On-going

	<p>Limited English Proficiency (LEP) needs, as well as an understanding of the limitations and requirements of first responders.</p> <p>2. Technical Support to Update Salesforce for Complaint Form Submission: \$25,000</p> <ul style="list-style-type: none"> Once the forms are translated, contractors with computer programming and design expertise will be needed to build the back-end infrastructure for submitting language access complaints. This work includes ensuring that the system can accept and process complaints in the 20 most-needed languages, as required by the LAO. 		
<p>Funds to support City Departments access to interpretation and translation services from vendors. - Year One of New Language</p>	<p>This allocation is designed to directly support City departments by subsidizing their interpretation and translation needs through vendors during the first year of the new language requirements. While departments are required to budget and plan for translating vital information and providing interpretation, it is anticipated that many departments will rely on OCEIA for support as they adjust to the updated requirements.</p> <p>The \$200,000 allocation is a conservative estimate, considering that departments collectively spend about \$1,139,600 annually on translation services. This funding will help bridge the gap during the transitional year and ensure equitable access to critical language services.</p> <p>Proposed Allocation Breakdown</p> <p>1. Interpretation for Service Delivery: \$40,000</p> <ul style="list-style-type: none"> Providing real-time interpretation services for public-facing interactions and hearings in the newly required languages. This includes both planned services (e.g., scheduled public meetings) and urgent interpretation needs that arise unexpectedly and have higher costs for OCEIA. <p>2. Translation of Departmental Materials: \$160,000</p> <p>Ensuring that critical documents, forms, and public-facing materials are translated for departments.</p>		<p>\$200,000 (One-time Support)</p>

Appendix IV: OCEIA Staff Position Upgrades with Rationale

Action	Title	Rationale for Upgrade	Incremental Cost FY 2025	Incremental Cost FY 2026
Upgrade 1823 Senior Admin Analyst to 0922 Manager 1	Director of Language Access Policy and Programs	The 1823 Senior Administrative Analyst classification is designed for roles focused on individual technical contributions, data analysis, and policy recommendations. In contrast, the 0922 Manager 1 classification encompasses responsibilities such as supervising teams, managing programs, and providing strategic direction. According to OCEIA, this position has transitioned into the latter category as the responsibilities of this position have evolved to include strategic leadership, programmatic oversight, stakeholder engagement, and citywide decision-making.	\$34,657	\$36,036
Upgrade 1840 Junior Management Assistant to 1823 Senior Admin Analyst	Language Access Data Analyst and Compliance Lead	This role has seen high turnover for several years. According to OCEIA, this is due to the classification not being a strong fit for the volume of work required in the role. In addition, under the LAO amendments, the roles' responsibilities are expanded, including establishing the processing procedure for complaints. OCEIA believes the role's scope has outgrown the 1840 classification, necessitating a higher level of expertise and capacity to meet the increased demands of	\$54,350	\$56,075

		compliance and data analysis. Converting this position to a higher classification would better equip OCEIA to fulfill the data analysis needs associated with implementing changes to the LAO.		
Upgrade 1822 Admin Analyst to 1823 Senior Admin Analyst	Language Services Supervisor	This position will experience expanded responsibilities mandated by the LAO amendments, including supervising a larger team, coordinating language services for new required languages, increased vendor coordination and expanded liaison and technical support responsibilities. According to OCEIA, the role's higher levels of supervision, coordination, and technical expertise required to meet the demands of the updated LAO justify a reclassification to 1823 Senior Administrative Analyst.	\$25,280	\$26,091
Upgrade 1840 Junior Management Assistant to 1842 Management Assistant	Filipino Language Specialist	While this position does not have expanded responsibilities mandated by the LAO amendments, this upgrade ensures parity with other language specialists on the team, whose roles are classified at a level reflecting similar advisory and technical responsibilities.	\$16,832	\$17,361

Source: OCEIA