

# Analysis of Language Access Services in San Francisco

*Policy Analysis Report for Supervisor Shamann Walton*

---

Presentation to:

BUDGET AND APPROPRIATIONS COMMITTEE

CITY AND COUNTY OF SAN FRANCISCO

May 21, 2025

Staff: Fred Brousseau: [fred.brousseau@sfgov.org](mailto:fred.brousseau@sfgov.org), Daniella Estrada: [Daniela.Estrada@sfgov.org](mailto:Daniela.Estrada@sfgov.org)

# Language Access Ordinance (adopted 2001, amended 2009)

---

- Requires language access services to City residents with Limited English Proficiency.
  - Translation and interpretation of oral or spoken information, vital department materials, signs, and recorded messages in languages other than English spoken by at least a certain percentage of City residents.
  - Translation of public meetings and transcripts required upon request.
- Currently required languages: Spanish, Chinese, Filipino (10,000 person threshold).
  - Vietnamese expected to become required as of 2026.
- Administrative and reporting requirements:
  - Monitoring and reporting on Citywide compliance delegated to the Office of Civic Engagement and Immigrant Affairs (OCEIA): e.g., Language Access Ordinance Summary Reports, technical assistance, etc.

# Language Access Ordinance 2024 Amendments


---

- Threshold for adding languages reduced from 10,000 to 6,000: should add Vietnamese January 2026.
- Mandatory requirements for signage translation (replaced good faith efforts).
- Mandatory translation of digital content.
- Added requirements pertaining to billing documents prepared by the Public Utilities Commission and Treasurer and Tax Collector.
- Emergency service departments required to offer language access during crises in any language spoken by five percent or more of the Limited English Proficiency population.
- OCEIA responsibility expanded: produce “know your rights” brochure, audits as needed, new reporting requirements for investigations of ordinance violation complaints.

## Annual cost of language access services, FY 2022-23: \$15.1 million

---

- Data self-reported by departments to OCEIA and from DHR.
- High level of unidentified costs (see “Other, non-categorized”)
- Discrepant reporting of compensatory pay: DHR reports \$4.4 mn vs. depts. \$2.2 mn. reported to OCEIA.
- 5 year average = \$17.8 mn., FY 2022-23 = \$15.1 mn.



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%
<b>Total</b>	<b>\$15,097,665</b>	<b>100%</b>

\* DHR reports \$4.4 mn.

## Number of Clients Served & Expenditures by Department, FY 2022-23

- Issue: how are clients counted?
- DPH and HSA accounted for 66% of reported LEP clients served.

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
<b>Total</b>	<b>941,793</b>	<b>\$15,097,665</b>

# OCEIA services

---

- One Language Specialist position per required language, providing translation and interpretation services and technical assistance to departments.
- FY 2022-23: assisted 23 departments with 74 interpretation projects and 118 translation projects.
- Monitors department compliance; prepares Annual Compliance Report required by ordinance.
- Provides training and technical assistance.
- Investigates and resolves complaints and potential violations of the LAO.

# Language access services workforce and providers

---

Language special condition positions	1,157 positions (2022)	Designated by DHR. 17% vacancy rate 2022
Certified bilingual employees	3,545 (FY 2022-23)	Provide services as needed. \$60 premium per pay period
Contractors	\$1.8 million expended/year (avg. 2018-2023)	As-needed contracts with 8 vendors: multi-year value = \$10 million (FY 2024-25)
OCEIA staff	Staff provides language access services & dept. support as needed	

## Language Special Condition Positions, by Language: 2022

---

Language	Count	Percent
Spanish	560	48.4%
Chinese*	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%
<b>Grand Total</b>	<b>1,157</b>	<b>100.0%</b>

\*includes Cantonese, Mandarin, and other Chinese



# Bilingual staff retention

---

- In BLA survey of 37 departments, respondents generally did not report a retention problem.
  - Vacancy rate for 1,157 language special condition positions in 2022 = 17%, indicating optimal level of LAS services may not have been provided due to retention/attraction issues, though more contractors reportedly used.
- \$60 per pay period premium pay may not be sufficient for attracting and retaining bilingual employees.
- Bilingual requirement can make it more difficult to attract applicants for City positions, some departments report.
- Challenge: how is bilingual staff need determined?

## Costs to implement 2024 LAO amendments

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
<b>Total</b>	<b>\$3,490,863</b>	<b>\$2,141,770</b>	<b>\$5,632,632</b>

- Costs identified by departments likely understated: “Other” requirements mostly pertain to requirement for community-focused approach to language access services. Many departments unsure how to implement or estimate those costs.

# Policy options for the Board of Supervisors

---

1. Consider new funding needs in annual budget.
2. Request more specific accounting for their language access services; to reduce “other category.
3. Request OCEIA and Department of Human Resources collaboration to resolve discrepancies in their reported levels of compensatory pay for language access services provided by City staff.
4. OCEIA prepare guidance for City departments to use in implementing the new Language Access Ordinance requirement for a community-focused approach.
5. Consider OCEIA creating a Citywide registry of bilingual employees for cross-department service
6. Request report from DHR on appropriate premium pay rate.
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. to ensure 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.

# Questions and comments

---

## Analysis of Language Access Services in San Francisco

*Policy Analysis Report for Supervisor Shamann Walton*

Presentation to:

BUDGET AND APPROPRIATIONS COMMITTEE  
CITY AND COUNTY OF SAN FRANCISCO

May 21, 2025

Staff: Fred Brousseau: [fred.brousseau@sfgov.org](mailto:fred.brousseau@sfgov.org), Daniela Estrada: [Daniela.Estrada@sfgov.org](mailto:Daniela.Estrada@sfgov.org)

Full report: <https://sfbos.org/budget-legislative-analyst-reports>