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Committee Item No. 1

Board Item No. _____

COMMITTEE/BOARD OF SUPERVISORS

AGENDA PACKET CONTENTS LIST

Committee: Budget and Appropriations Committee Date May 21, 2025

Board of Supervisors Meeting Date _____

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Completed by: Brent Jalipa Date May 15, 2025

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LANGUAGE ACCESS

Strengthening Language Access in San Francisco

SAN FRANCISCO LANGUAGE ACCESS COMPLIANCE SUMMARY REPORT 2025

OCEIA SAN FRANCISCO OFFICE OF
CIVIC ENGAGEMENT
& IMMIGRANT AFFAIRS

LANGUAGE ACCESS

*Strengthening Language
Access in San Francisco*

SAN FRANCISCO LANGUAGE ACCESS COMPLIANCE SUMMARY REPORT 2025

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CONTENTS

- 03** **Introduction**
by Jorge Rivas, Jr., Executive Director
- 05** **Report Summary**
LAO overview and report preview
- 09** **Amendment Overview**
Summary of new LAO amendments
- 13** **Findings**
Department compliance data and trends
- 25** **Snapshot of San Francisco**
Demographics and populations
- 26** **District Data**
LEP population for San Francisco Supervisorial Districts
- 27** **Recommendations**
Looking back and looking forward
- 31** **Department Highlights**
City department compliance

ABOUT THIS REPORT

The annual Language Access Compliance Summary Report evaluates Citywide compliance and progress with the San Francisco Language Access Ordinance (LAO). As required by the LAO, the annual report is submitted to the San Francisco Board of Supervisors and the San Francisco Immigrant Rights Commission by February 1 of each year. This year's report covers Fiscal Year 2023-2024 (July 1, 2023 to June 30, 2024).

In addition to overseeing compliance, the Office of Civic Engagement and Immigrant Affairs (OCEIA) assists City departments to better meet the language needs of San Francisco's Limited English Proficient (LEP) residents and workers. These services include trainings, tools, resources, and technical assistance to increase City departments' capacity and provisioning for language access. On a limited basis, OCEIA's Language Access Unit also provides language assistance during public meetings to support the San Francisco Board of Supervisors and the San Francisco Immigrant Rights Commission.

INTRODUCTION

San Francisco continues to uphold its long-standing commitment to sanctuary city policies, cultural diversity, and welcoming values. Equitable access to information and public services is fundamental to building an inclusive city, strengthening public safety, and driving economic growth. This year's Language Access Compliance Summary Report demonstrates our ongoing dedication to providing multilingual services and information, even as we navigate evolving challenges and opportunities.

San Francisco's diversity of cultures and languages is one of our greatest strengths. Our diversity fosters innovation, enriches perspectives, and creates resilient communities. One in three of our residents is an immigrant, and about 42% of our population over the age of five speaks a language other than English at home. To meet the needs of all residents, public services must recognize and address language diversity. Providing information and services in multiple languages is essential to breaking down barriers to civic engagement, economic participation, and access to vital resources.

As the Office of Civic Engagement and Immigrant Affairs (OCEIA), we oversee the City's compliance with the Language Access Ordinance (LAO). OCEIA strives to advance language justice by providing technical assistance to City departments, coordinating trainings, investigating LAO complaints, and building community education and knowledge through deep partnerships with community-based organizations. Together with City departments, the Immigrant Rights Commission, and community partners, we work to ensure that every San Franciscan can access the resources they need to contribute and thrive.

Last year, the Board of Supervisors strengthened the LAO to ensure that City departments are better prepared to serve Limited English Proficient (LEP) communities. The amendments lower the thresholds for LEP populations, which will expand the number of required threshold languages. Additionally, the amendments introduce stronger reporting requirements to enhance accountability and improve service delivery. These updates represent a significant step forward in making San Francisco more inclusive and accessible for all.

This past year, we saw significant milestones in language access. City departments reported a record-high number of interactions with LEP clients. Additionally, more than half of Departments increased the amount of funding allocated to language services.

Despite these achievements, challenges persist. The number of certified bilingual staff has continued to decline. This highlights the need for renewed investment in training and certifying bilingual staff to meet the increasing demand.

As Departments prepare to comply with the new requirements of the LAO, OCEIA will continue to provide trainings, best practices, glossaries, and other resources. This year, OCEIA is also launching an updated Department LAO Liaison Resource Library for City employees with additional tools and information to help Departments comply with the new amendments.

Together, we will work to ensure that San Francisco advances language access and that all residents can access the information and services they need.

Jorge Rivas, Jr.
Executive Director

REPORT SUMMARY

The 2024 Language Access Compliance Summary Report included federal and state language access legislation updates. This year's report focuses on San Francisco's Language Access Ordinance (LAO) and the amendments the Board of Supervisors passed in 2024 to strengthen language access.

The report also provides an overview of the language access activities that have taken place in San Francisco over the past fiscal year. This includes City departments' self-reported compliance data and recommendations on ways the City can improve the multilingual accessibility of Department programs and services, along with tools and resources to support Departments in their compliance work.

The LAO amendments aim to improve the ways the City supports Limited English Proficient (LEP) community members. Some key changes include lowering the threshold for required languages from 10,000 to 6,000 LEP individuals, acknowledging receipt of translation requests within 48 hours and sharing an update on the anticipated completion time, and continuing to translate vital information, including digital media and signage. Along with these, OCEIA must create a "Know Your Rights" brochure and disseminate it to Departments to post in their offices. OCEIA will also create a website to provide updates on language access complaints and report back on a quarterly basis to the Board of Supervisors and the Immigrant Rights Commission.

This report's recommendations focus on strategies Departments can use to implement the amendments and improve their compliance with the LAO in the year ahead. They take into consideration multiple sources of information, such as Departments' compliance data, feedback from community-based organizations, and supplemental data sources like language access complaints. This year's recommendations include how to improve City departments' staff hiring and training practices, language services budgeting and planning, data collection methods, and language access capacity.

San Francisco Language Access Ordinance

There are more than 40 language access laws in existence in 40 states and local jurisdictions across the United States. San Franciscans have had a local language access law since 2001, when the City and County of San Francisco (the City) adopted its first language access policy as the Equal Access to Services Ordinance. The City amended the ordinance in 2009, renaming it the Language Access Ordinance (LAO) and designating the Office of Civic Engagement and Immigrant Affairs (OCEIA) as the Department responsible for oversight of the City's compliance with the policy. The LAO was amended again in 2015 and 2024.

LANGUAGE ACCESS LAWS

FEDERAL

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166

STATE

- Dymally-Alatorre Bilingual Services Act
- Unruh Civil Rights Act
- Government Code § 11135

The LAO requires all public-serving San Francisco City departments to provide equal access to information and services for Limited English Proficient (LEP) individuals. This means Departments must inform members of the public that they have the right to language services and must deliver the same quality of information and services to LEP individuals as they provide to English speakers. In addition, Departments must track their language access activities and report compliance data on an annual basis. OCEIA staff members are available throughout the year to provide language access tools and guidance to Departments.

Department Compliance Reporting Process

Every public-facing City department must engage in language access activities throughout the year in order to be in compliance with the Language Access Ordinance (LAO).

- Summer: Language access liaisons attend the annual LAO compliance training.
- By September 1: The digital compliance report submission form is available.
- By October 1: Departments must submit their compliance information online.
- By February 1: OCEIA publishes the Language Access Compliance Summary Report.

By October 1, City departments are required to submit their data on the language access services they provided to Limited English Proficient (LEP) community members over the past fiscal year along with other key information.

Some of the reporting questions include:

- Does the City department have a language access policy?
- What is the number of bilingual staff employed by the Department?
- What is the number of bilingual staff certified by the Department of Human Resources (DHR)?
- How many translated materials has the Department completed in the past year?
- How many phone and in-person interactions has the Department conducted with Limited English Proficient (LEP) clients in the past year?
- How much did the Department spend on language access services in the past year?

Language Access Complaint Process

Language access complaint forms are available on OCEIA's website in English, Spanish, Chinese, Filipino, and Russian.

To request additional languages:

Call 415-554-0060 or email language.access@sfgov.org.

Community members can submit a language access complaint in one of the following ways:

ONLINE

Complete OCEIA's digital [form](#)

EMAIL

Fill out a complaint form and email it to OCEIA:
language.access@sfgov.org

MAIL

Fill out a paper complaint form and mail or drop it off in person at OCEIA's office at 1145 Market Street, Suite #100, San Francisco, CA 94103

PHONE

Call OCEIA's office at 415-554-0600 and share the information by phone

**IN
PERSON**

Visit OCEIA's office at 1145 Market Street, Suite #100 and work with an OCEIA staff member to submit the complaint in person

For those who need additional support:

Community members can contact a community-based organization to help them fill out and submit the form.

LAO AMENDMENT OVERVIEW

In 2001, the San Francisco Board of Supervisors enacted the Equal Access to Services Ordinance. This was amended and renamed the Language Access Ordinance (LAO) in 2009, when OCEIA was mandated to oversee compliance, and was amended again in 2015 and 2024. The San Francisco LAO is considered one of the strongest local language laws in the nation, requiring all City departments that interact with or provide information to the public to provide language services, meet the requirements of the LAO, and report their data and progress on an annual basis.

The passage of amendments to the LAO in June 2024 marked the culmination of a collaborative, multi-year process involving the Board of Supervisors, City Administrator's Office, Office of Civic Engagement and Immigrant Affairs (OCEIA), Immigrant Rights Commission, and community-based organizations.

Formal discussions to amend the LAO began in 2021. In spring 2021, the Immigrant Rights Commission hosted two special hearings to learn from community-based organizations about the state of language access in San Francisco and explore improvements. During the summer of 2021, OCEIA conducted a citywide Language Access Community Survey, collecting responses from more than 2,000 individuals in 11 languages about their experience accessing City services in their languages. The survey findings are included in OCEIA's 2022 Language Access Compliance Summary Report.

In 2023, representatives from the San Francisco Language Access Network, Self-Help for the Elderly, the South of Market Community Action Network, and other community-based organizations shared their assessment of community needs with the Immigrant Rights Commission, providing recommendations on how to improve language access in San Francisco.

After several meetings with community members, the Board of Supervisors passed amendments to the Language Access Ordinance in June 2024. The Board of Supervisors also passed a resolution to guide programmatic improvements. Together, the amendments and resolution aim to address gaps in the City's language services and improve language access in San Francisco.

LAO Amendments: Key Changes

In 2024, the Board of Supervisors passed amendments to improve the City’s language access services. Key initiatives included:

LIMITED ENGLISH PROFICIENT (LEP) POPULATION THRESHOLD ADJUSTMENTS

The threshold for certifying a Limited English Proficient (LEP) language population was reduced from 10,000 to 6,000 LEP individuals, effective January 1, 2026. This change is expected to include Vietnamese as a certified language, with additional evaluations to identify newly eligible languages based on data from the U.S. Census Bureau.

NEW TRANSLATION REQUIREMENTS

Departments must translate vital information, including signage and digital content (e.g., websites and social media), into required threshold languages.

Departments are required to respond to public translation requests within 48 business hours and provide updates on completion timelines.

OUTREACH AND COMMUNITY EDUCATION

OCEIA will develop and disseminate a multilingual "Know Your Rights" brochure detailing language access rights and the process for filing complaints. This brochure will be translated into the top 20 languages in San Francisco that are most spoken and have the highest rate of language access needs. Departments will ensure the brochures are publicly accessible.

OCEIA will develop best practices for first responders by January 1, 2025.

COMPLAINT REPORTING ENHANCEMENTS

OCEIA will provide quarterly language access complaint reports to both the Immigrant Rights Commission and the Board of Supervisors.

OCEIA will create a website to offer updates on the status of language access complaints and investigations.

CITY DEPARTMENT RESPONSIBILITIES

NO CHANGE	<ul style="list-style-type: none"> • Comply with all requirements of the LAO • Designate a language access liaison and attend the annual language access liaison training • Submit an annual language access compliance report • Develop, adopt, and implement a Department-specific language access policy
ENHANCED/ CLARIFIED	<ul style="list-style-type: none"> • Coordinate and provision for all of the Department's language services • Identify and budget for Departmental language needs
NEW	<ul style="list-style-type: none"> • Translate vital information, including signage and digital content (e.g., websites and social media), into required threshold languages • Respond to public translation requests within 48 business hours and provide updates on completion timelines

OCEIA RESPONSIBILITIES

NO CHANGE	<ul style="list-style-type: none"> • Train Departments on LAO compliance and reporting requirements • Develop tools, style guides, and resources to assist Departments with implementation • Identify language services vendors and coordinate Citywide contracting with the Office of Contract Administration
ENHANCED/ CLARIFIED	<ul style="list-style-type: none"> • Provide language access consultations and technical assistance to Departments • Provide complaint reports to both the Immigrant Rights Commission and the Board of Supervisors and create a website to share the status of complaint investigations
NEW	<ul style="list-style-type: none"> • Create a "Know Your Rights" toolkit • Create a best practices toolkit for first responders

LAO Resolution: Key Changes

In 2024, the Board of Supervisors also passed a resolution to enhance language access implementation.

Key initiatives included:

- Translation of the language access complaint form into the top 20 languages
- Development of best practices for recruiting and retaining bilingual staff
- Expansion of community employment opportunities and establishment of a community language bank, a network of trained community-based interpreters and translators that can increase capacity for language services
- Creation of benchmarks for Departmental investment in language access services, based on factors such as Department size, service types, and number of Limited English Proficient (LEP) clients

THRESHOLD LANGUAGES	EMERGING LANGUAGES
<p>Departments are required to translate vital information into the threshold languages.</p> <p>The three threshold languages are currently Spanish, Chinese, and Filipino.</p> <p>Under the LAO, a “threshold language” in San Francisco is a language population that has at least 10,000 or more Limited English Proficient (LEP) persons.¹</p>	<p>Departments are encouraged to translate information for emerging language populations.</p> <p>The LAO defines “emerging language populations” as any new or smaller language population that is at least 2.5% of persons who share a primary language other than English, or for whom there are identified language access needs.²</p>

¹ San Francisco Administrative Code, Sec. 91.1(b)(7). As of January 1, 2026, this number will change to 6,000 or more LEP persons.
² San Francisco Administrative Code, Sec. 91.2.

FINDINGS

Introduction

During the last fiscal year (July 1, 2023 - June 30, 2024), Departments continued to adapt their hybrid remote/in-person services. In November 2023, the Board of Supervisors and other public bodies ended remote public comment at public meetings, and community members shifted back to giving public comment in person.

Throughout this period, City departments reported a record high of Limited English Proficient (LEP) interactions and increases in telephonic interpretations, in-person interpretations, language services budgets, and translated materials. However, Departments continued to report a slight decline in bilingual staffing.

DEPARTMENT COMPLIANCE

53

Departments
required to file
reports

53

Departments
filed reports

47

Departments
attended OCEIA's
LAO training

51

Departments have
a written LAO policy

Limited English Proficient (LEP) Client Interactions

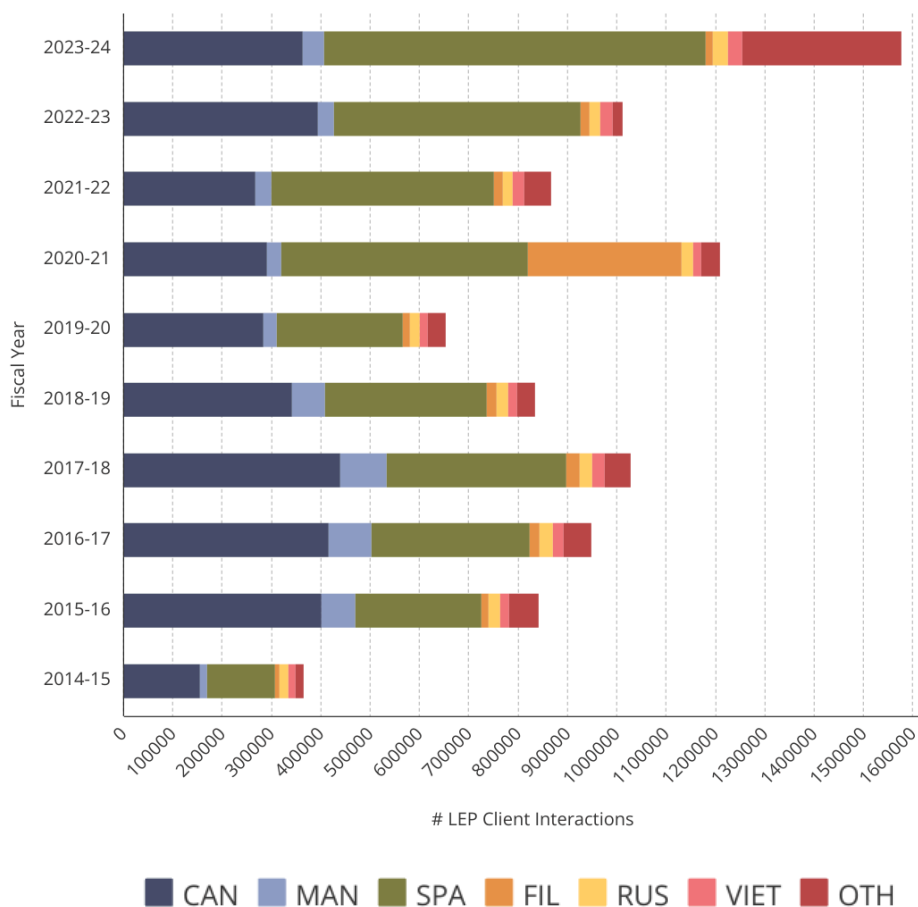
Limited English Proficient (LEP) client interactions track the total number of LEP individuals who used a City department's services. This data point provides a broad view of how many LEP clients were served by each Department.

A City department can use one of three methods to collect this information:

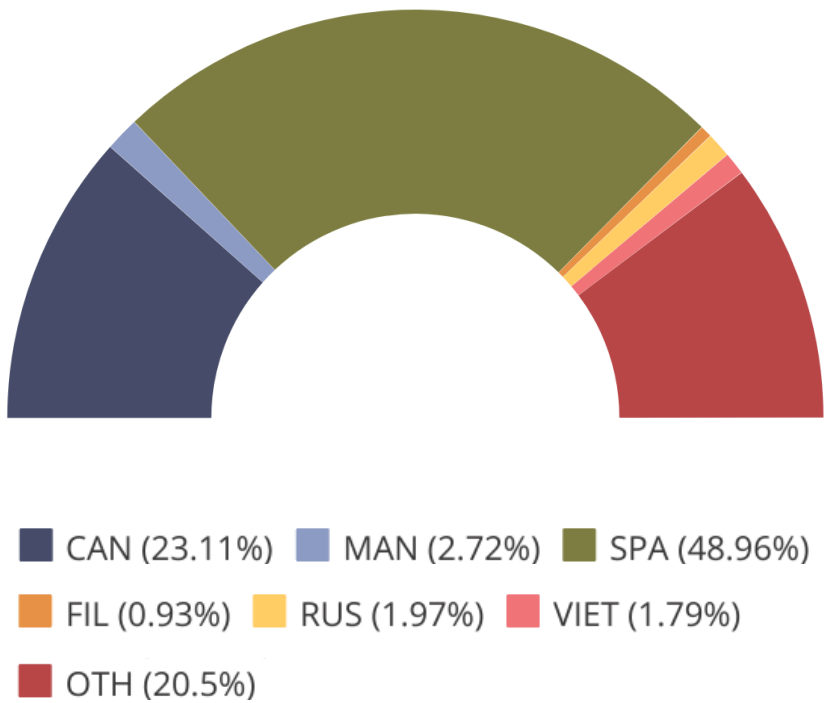
- **Intake Method (Recommended):** Collecting information during the Department's intake process for all clients (members of the public who are served by or interact with the Department), including appointments, walk-ins, public events, and outreach.
- **Survey Method:** Conducting an annual survey of all contacts with the public made by the Department during a period of at least two weeks.
- **Telephonic Interpretation Method:** Calculating the annual total number of requests for telephonic interpretation services.

Since Fiscal Year 2014-2015, LEP client interactions generally have trended upward, with the average number of annual client interactions estimated at 935,000. In the past fiscal year, City departments reported a record high of about 1,578,000 total LEP client interactions, which is 48% higher than the five-year average (FY 2019-2020 through FY 2023-2024) of about 1,067,000 interactions.

Total LEP Client Interactions by Language, Over Time



Total LEP Client Interactions by Language



City departments' aggregate interactions with LEP clients increased by 56% from the previous fiscal year, from an estimated 1,012,000 interactions in FY 2022-2023 to 1,578,000 interactions in FY 2023-2024. Year over year, there was a 26%³ average increase across all City departments. While the total count increased by over 560,000 interactions, this increase was not necessarily a citywide trend, but rather driven primarily by the Department of Public Health (DPH). DPH reported over 580,000 more LEP client interactions in FY 2023-2024 compared to FY 2022-2023. This may be due to an adjustment to the way the Department tracked, collected, and/or reported their LEP client interactions data.

LEP client interactions in Spanish and Russian saw substantial increases, with about 772,800 interactions in Spanish, a 55% increase from the previous fiscal year, and nearly 31,200 interactions in Russian, a 52% increase. Languages that saw modest increases included Mandarin, with about 42,900 LEP client interactions, a 28% increase; and Vietnamese, with about 28,300 LEP client interactions, a 12% increase.

However, the largest increases in LEP client interactions were seen in the Other Languages category, which rose by approximately 1,463% in aggregate count, with nearly 324,000 LEP interactions. Other languages include but are not limited to Arabic, Burmese, French, Korean, Portuguese, and Turkish. The increase in LEP client interactions in these languages was driven primarily by the Department of Public Health, which reported 300,000 more LEP client interactions in other languages year over year.

³ This average is inclusive of City departments that reported a drop to 0 LEP client interactions in FY 2023-2024.

Two languages saw decreases in LEP client interactions. Filipino LEP client interactions totaled about 14,700, representing a decrease of 23% compared to the previous fiscal year. Cantonese, with about 364,800 LEP client interactions, saw a slight decrease of 8% compared to the previous fiscal year.

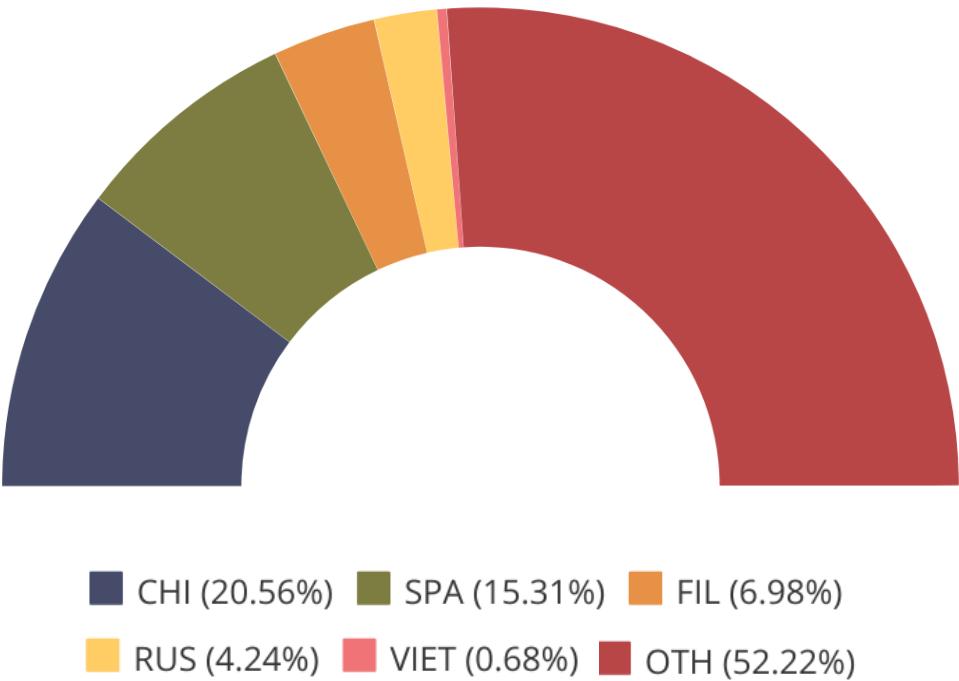
Translated Materials

This data point represents the number of written materials that City departments translated during FY 2023-2024. City departments must translate all vital information, which is information that affects the public's rights, benefits, duties and/or privileges. During the compliance reporting process, Departments are asked to report the total number of materials translated, and upload a list of each translated document, the languages into which each document has been translated, and the names of all individuals who reviewed each translation for accuracy and appropriateness.

Translation reviewers can be bilingual staff members, or employees who obtain quality checks from external individuals, such as translation vendors or bilingual staff from community-based organizations whose clients receive services from the Department. Translation reviews focus on assessing a document's grammar, meaning, and readability.

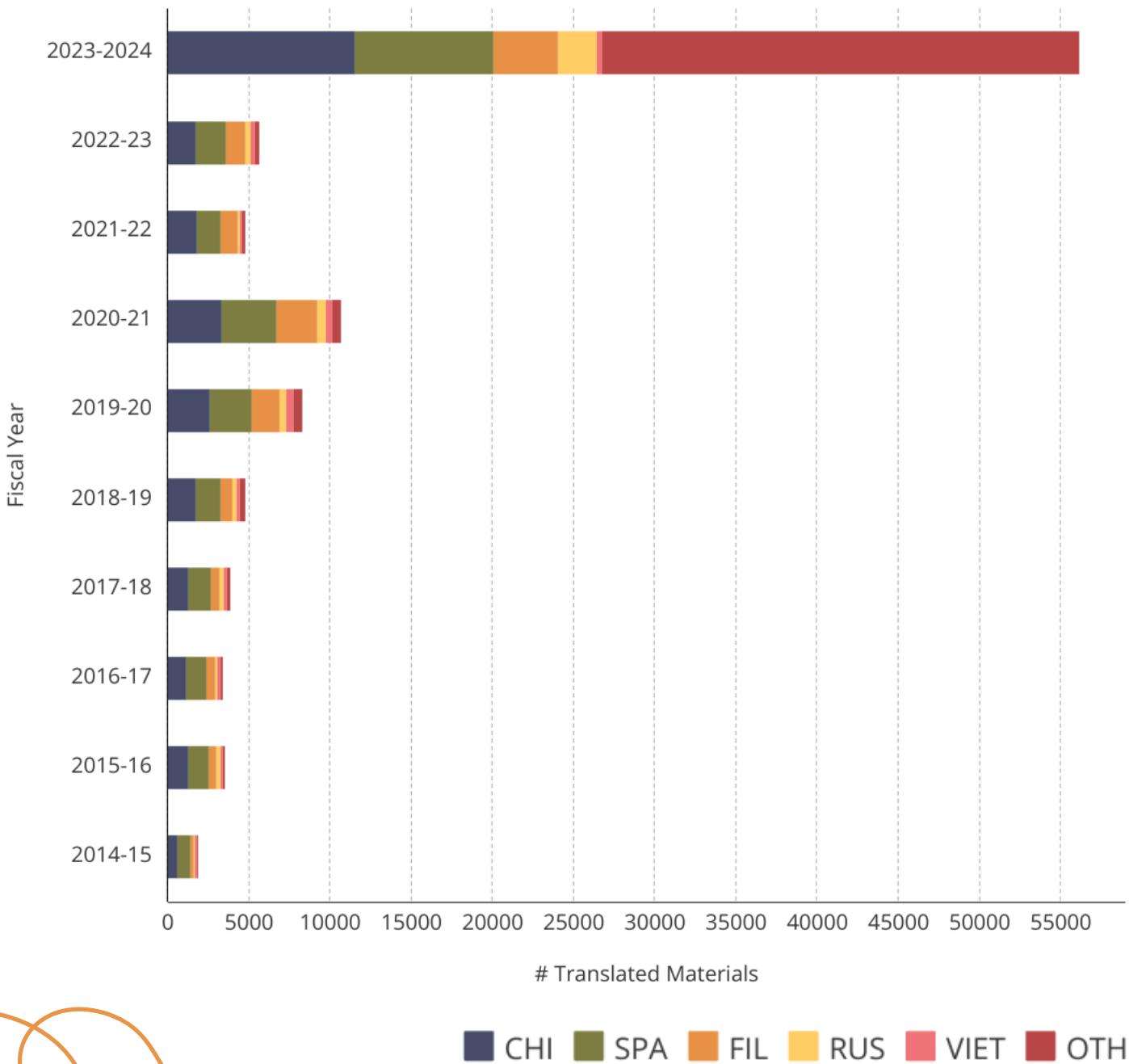
In FY 2023-2024, City departments reported about 56,200 total translated materials. Of this total, approximately 11,500 (21%) were in Chinese, 8,600 (15%) in Spanish, 3,900 (7%) in Filipino, 2,400 (4%) in Russian, and almost 400 (1%) in Vietnamese.

Total Translated Materials by Language



More than 29,300 translated materials were in other languages, making up over half (52%) of the fiscal year total. This marked the first fiscal year when translated materials in the Other Languages category represented the majority of total translated materials Citywide, accounting for more translated materials than any other individual language. From FY 2022-2023 to FY 2023-2024, translated materials in the Other Languages category saw an upsurge of over 11,400%, from about 250 to over 29,300 materials. Chinese, Spanish, Filipino, and Russian translated materials also saw dramatic increases.

Total Translated Materials by Language, Over Time



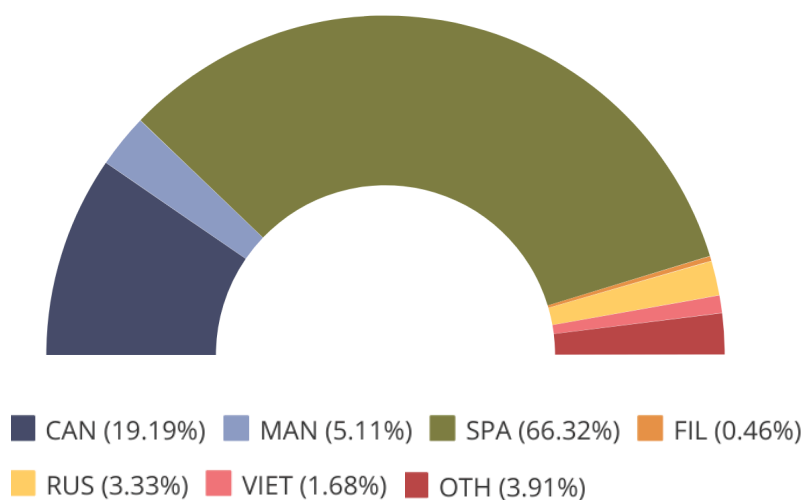
Language	Translated Materials FY 2023-2024	Percentage Increase or Decrease Compared to FY 2022-2023	Translated Materials Five-Year Average (FY 2020-2024)
Chinese	11,549	+ 554.71%	4,574
Spanish	8,600	+ 365.87%	3,942
Filipino	3,920	+ 225.58%	2,400
Russian	2,380	+ 580.00%	790
Vietnamese	382	+ 36.43%	370
Other Languages	29,328	+ 11,446.46%	6,194
TOTAL	56,159	+ 885.59%	18,270

The total number of translated materials increased by 886% from about 5,700 materials in FY 2022-2023 to about 56,200 materials in FY 2023-2024. However, this increase does not reflect a Citywide trend. Rather, it can be attributed to a sharp increase in translated materials by Fine Arts Museums of San Francisco, which reported 0 translated materials in FY 2022-2023, and 48,000 translated materials in FY 2023-2024. Following Fine Arts Museums, the Office of the City Administrator (ADM) accounted for the next largest increase in total translated materials, from about 200 in FY 2022-2023 to nearly 2,500 in FY 2023-2024, a 1,135% increase. Year over year, there was a 38% average increase in total translated materials across all City departments.

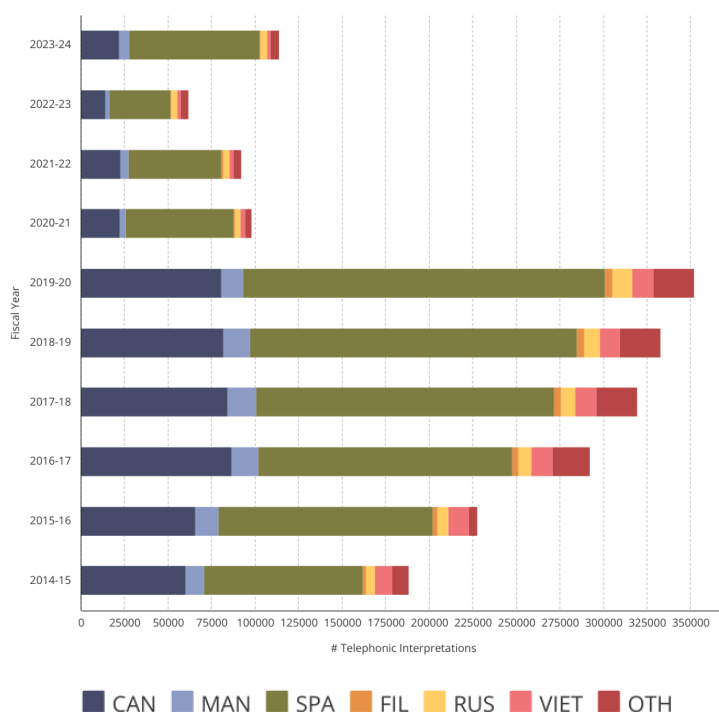
Telephonic Interpretations

As part of the compliance reporting process, Departments are also asked to report the total estimated volume of Limited English Proficient (LEP) callers, call volume by language, and the names of all interpretation service providers used, such as bilingual staff or language services vendors.

Total Telephonic Interpretations by Language



Total Telephonic Interpretations by Language, Over Time



In FY 2023-2024, City departments reported about 113,700 total telephonic interpretations. This represents a 93% increase over the previous year, and reverses a downward trend that the City experienced during the previous three years. About half of reporting City departments saw an increase in telephonic interpretations year over year. The increase in telephonic interpretations appears to be driven by three City departments: the Department of Emergency Management - 911, Human Services Agency, and Police Department.

Telephonic interpretations in Spanish made up the majority of the fiscal year total, with about 74,900 (66%), followed by 21,900 (19%) in Cantonese, 5,900 (5%) in Mandarin, 4,600 (4%) in other languages, 3,900 (3%) in Russian, 1,900 (2%) in Vietnamese, and 550 (0.5%) in Filipino.

In addition, City departments have worked during the past fiscal year to improve their telephonic voice messaging systems. OCEIA shared this recommendation in a previous Language Access Ordinance Compliance Summary Report, and has worked with City departments to ensure that telephonic language services are available for LEP clients.

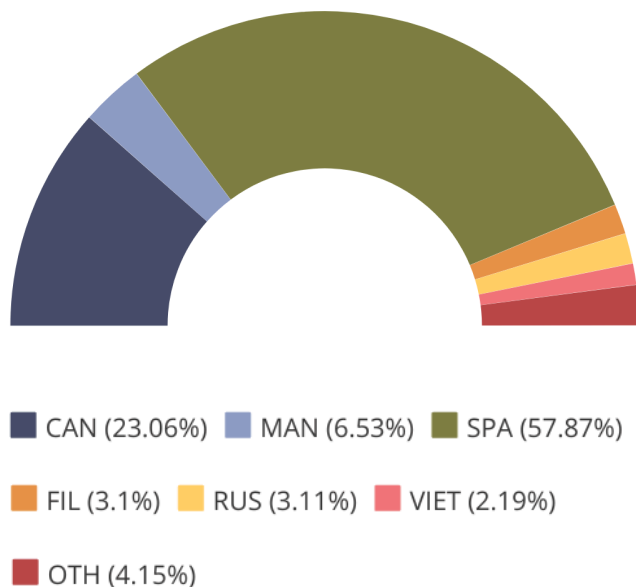
Language	Telephonic Interpretations FY 2023-2024	Percentage Increase or Decrease Compared to FY 2022-2023	Telephonic Interpretations Five-Year Average (FY 2020-2024)
Cantonese	21,870	+ 54.12%	32,053
Mandarin	5,930	+ 145.14%	6,040
Spanish	74,921	+ 132.33%	85,903
Filipino	550	+ 142.29%	1,394
Russian	3,883	+ 7.80%	5,095
Vietnamese	1,944	- 9.46%	4,235
Other Languages	4,588	+ 10.29%	8,036
TOTAL	113,686	+ 92.71%	142,756

In-Person Interpretations

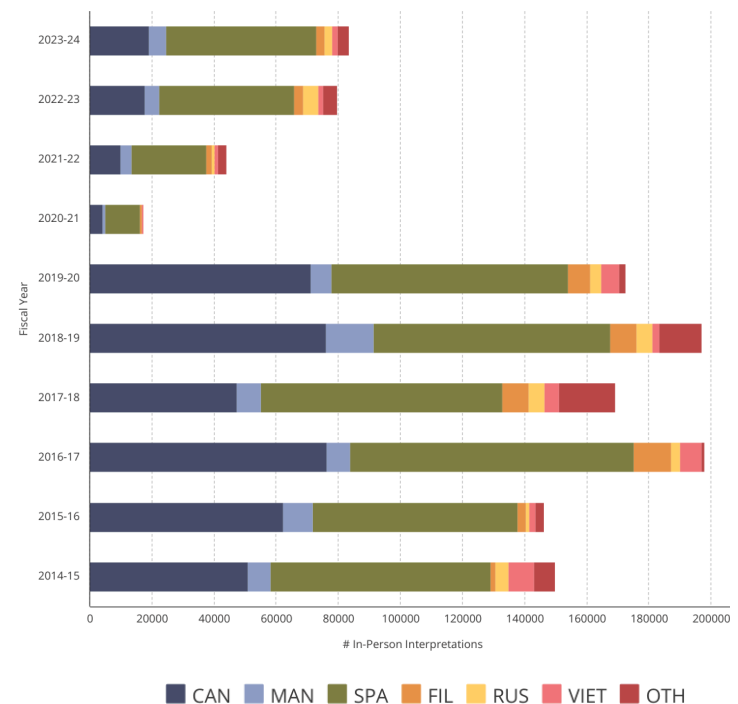
City departments are also asked to report the number of times their public-contact employees provide in-person interpretation in each language.

In FY 2023-2024, City departments reported about 83,500 total in-person interpretations. This marks a slight increase from the previous fiscal year, and continues an upward trend in the number of in-person interpretations since the dramatic drop reported in FY 2020-2021 after the start of the pandemic.

Total In-Person Interpretations by Language



Total In-Person Interpretations by Language, Over Time



Of the 83,500 total in-person interpretations, about 48,300 (58%) were in Spanish, 19,200 (23%) in Cantonese, 5,400 (7%) in Mandarin, 3,500 (4%) in other languages, 2,600 (3%) in Russian, 2,600 (3%) in Filipino, and 1,800 (2%) in Vietnamese. These figures represent a 5% increase from about 79,600 in-person interpretations in FY 2022-2023 to nearly 83,500 in-person interpretations in FY 2023-2024 across all reporting City departments, which is also above the five-year average (FY 2019-2020 to FY 2023-2024) of about 81,700. The compliance data indicates that in-person interpretations are trending upward, with about half of City departments reporting an increase in in-person interpretations year over year.

Language	In-Person Interpretations FY 2023-2024	Percentage Increase or Decrease Compared to FY 2022-2023	In-Person Interpretations Five-Year Average (FY 2020-2024)
Cantonese	19,253	+ 8.33%	24,927
Mandarin	5,449	+ 14.07%	4,805
Spanish	48,312	+ 11.68%	41,145
Filipino	2,588	- 12.86%	3,256
Russian	2,593	- 47.00%	2,418
Vietnamese	1,826	+ 14.99%	2,164
Other Languages	3,462	- 20.18%	2,957
TOTAL	83,483	+ 4.88%	81,672

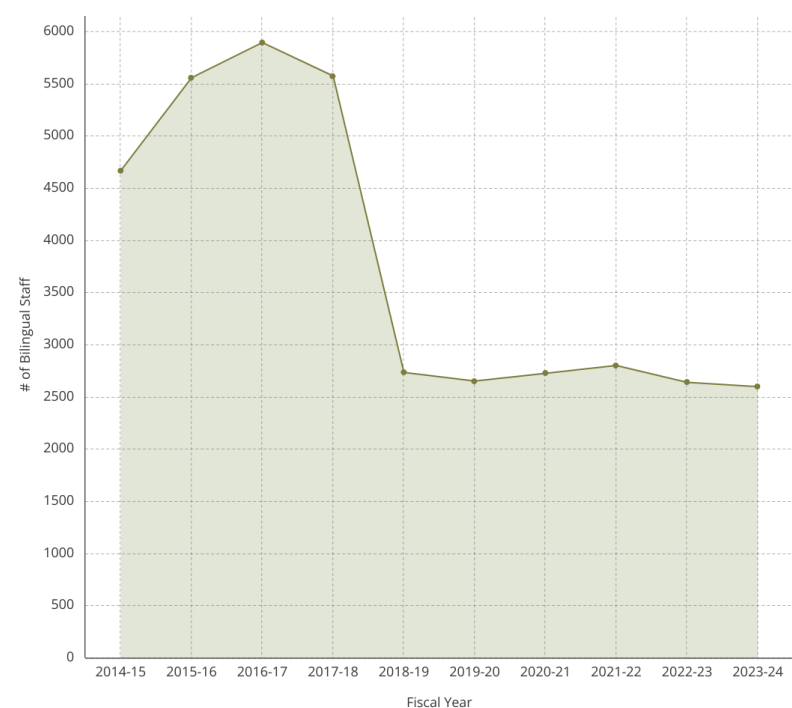
Bilingual Staffing

The annual compliance report requires Departments to provide information about their bilingual staffing, including both non-certified and certified bilingual employees. Certified bilingual employees are employees who have passed the language proficiency testing administered by the Department of Human Resources (DHR). Bilingual employees who are not certified are individuals who identify as bilingual but have not taken the certification test. The figures listed below are estimated numbers of public contact staff and may not represent the full number of bilingual employees for all City departments.

In FY 2023-2024, City departments reported about 2,600 bilingual employees, which is a 2% decline from the previous fiscal year's estimate of 2,640 bilingual employees. Both figures fall below the five-year average (FY 2019-2020 to FY 2023-2024) of about 2,680 bilingual employees and are well below the peak of nearly 6,000 bilingual employees in FY 2016-2017.

Language	Bilingual Staff FY 2023-2024	Bilingual Staff Five-Year Average (FY 2020-2024)	Certified Bilingual Staff FY 2023-2024	Certified Bilingual Staff Five-Year Average (FY 2020-2024)
Cantonese	746	741	619	646
Mandarin	286	311	186	222
Spanish	939	943	796	864
Filipino	200	239	108	131
Russian	65	73	53	65
Vietnamese	69	85	53	68
Other Languages	292	289	39	58
TOTAL	2,597	2,682	1,854	2,054

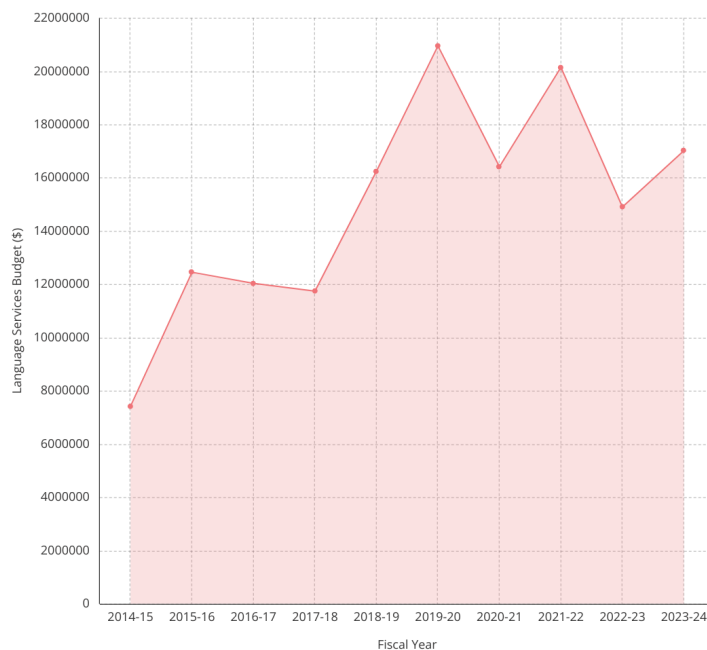
Total Bilingual Staff



City departments reported that about 1,850 bilingual employees have been certified by DHR, a 15% decrease from the previous fiscal year’s estimate of 2,200 certified bilingual employees. The number of certified bilingual employees in the past fiscal year falls below the five-year average of about 2,050 certified bilingual employees.

Language Services Budgets

Overall Language Services Budget



Language service budgets include translation and interpretation services, bilingual pay and compensation, multilingual community outreach efforts, and production of multilingual materials, among other costs.

The amount of money City departments spent on language services increased by 14% from approximately \$14.91 million in FY 2022-2023 to \$17.02 million in FY 2023-2024. This figure continues to fall below the five-year average (FY 2019-2020 to FY 2023-2024) of about \$17.80 million.

However, more than half of City departments reported increases in their language services budgets, reflecting a positive Citywide trend.

The top five City departments that showed the largest percentage increases in language services budgets were:

Department	FY 2022-2023	FY 2023-2024	% Change	\$ Change
San Francisco International Airport	\$14,394.00	\$173,937.90	+ 1108.4%	\$159,543.90
Treasure Island Development Authority	\$300.00	\$3,511.00	+ 1070.3%	\$3,211.00
Public Works	\$6,000.15	\$49,050.88	+ 717.5%	\$43,050.73
Office of Economic & Workforce Development	\$3,000.00	\$22,577.21	+ 652.6%	\$19,577.21
Fine Arts Museums of San Francisco	\$16,650.00	\$59,118.00	+ 255.1%	\$42,468.00

SNAPSHOT OF SAN FRANCISCO

1 in 3 San Francisco residents is an immigrant.

With **34%** of its residents born outside of the U.S., San Francisco remains one of the most **culturally and linguistically diverse cities** in the country.

836,321

Total population*

34%

Foreign-born residents

18%

Limited English Proficient (LEP)

42%

Residents (over the age of 5) speak a language other than English at home

40+

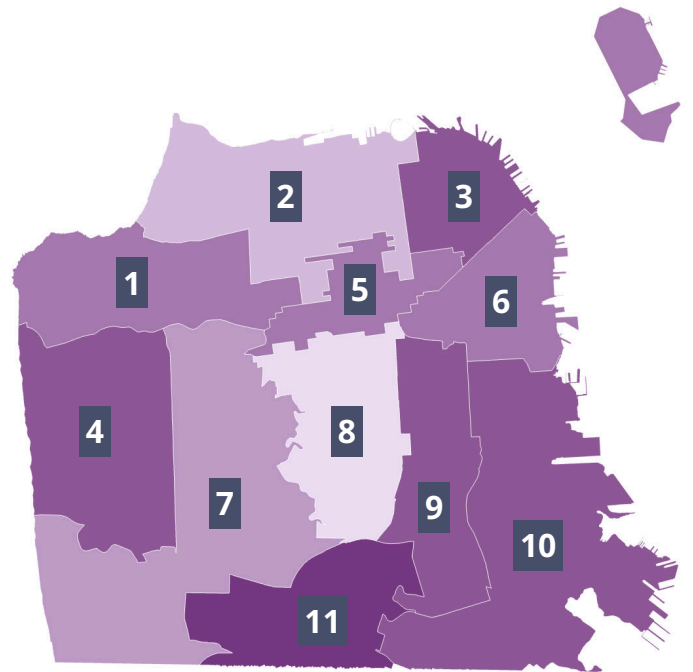
Languages spoken in San Francisco**

* United States Census Bureau's 2019-2023 American Community Survey

** These estimated numbers represent a departure from previous reports due to a change in how the United States Census Bureau categorizes and codes language data. In 2016, the code list was revised to match the ISO-639-3 standard. The Census Bureau also [reports](#) that the ACS estimates are samples of the total population and there may be languages spoken that are not recorded. A detailed list and explanation of how the Census Bureau defines and uses language coding and tabulation are available [here](#).

District Data

San Francisco's Supervisorial Districts, from the highest to lowest percent Limited English Proficient (LEP) population.



Source: United States Census Bureau's 2019-2023 American Community Survey

District	Total Population	LEP Population	% LEP
11	80,433	28,418	35%
10	71,120	19,983	28%
3	74,705	18,542	25%
4	72,041	17,695	25%
9	76,087	16,212	21%
1	71,235	12,215	17%
5	78,891	12,607	16%
6	62,076	9,659	16%
7	77,312	9,745	13%
2	63,426	3,360	5%
8	70,971	2,952	4%

RECOMMENDATIONS

Looking Back

In last year's Language Access Compliance Summary Report, OCEIA recommended that City departments:

- Build capacity for language access
- Hire and retain bilingual staff and budget for language services
- Improve their data collection through best practices and trainings

Departments showed some improvements in these areas over the past fiscal year. For example, they increased budgeting for language services, and reported a record number of in-person interactions with Limited English Proficient (LEP) clients. However, Departments still need to improve their data collection methods and their ability to hire and retain bilingual staff.

Looking Forward

Given the recent amendments to the Language Access Ordinance (LAO) and the City's current economic climate, it is imperative for Departments to establish a dedicated language services budget and plan to enhance services for LEP community members. Language access is key to ensuring that all community members can stay informed with accurate information and continue to access the City services they need. Building capacity through the hiring and training of bilingual staff, ensuring accurate Departmental data collection, and allocating a robust language services budget can significantly enhance the quality of language services provided by Departments.

Planning for Implementation of New Amendments:

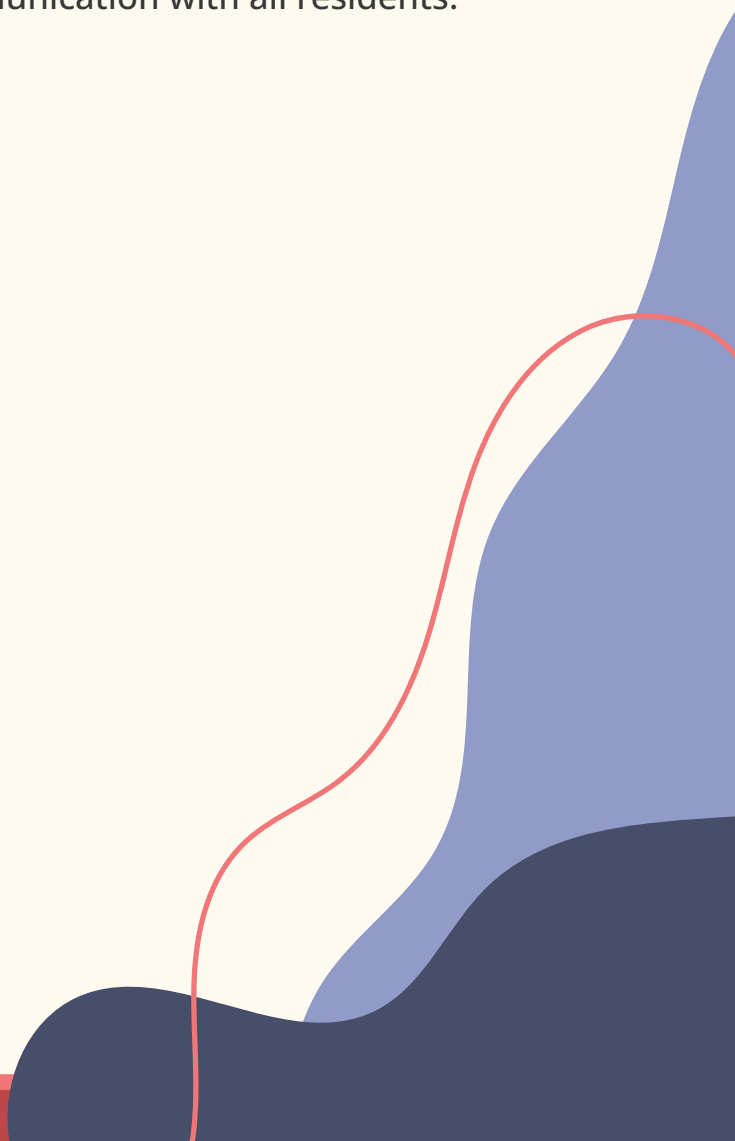
Language Services Budgeting

The successful implementation of the LAO amendments depends on the work of each City department. First and foremost, it is essential for each Department to ensure that it has a planned language services budget for the new threshold language(s) that will take effect on January 1, 2026. This includes planning for interpretation in the new language(s), as well as the translation of all vital materials, including forms, applications, information about outreach events, and anything that affects the rights, benefits, duties and/or privileges of an LEP individual.

Without a proper budget, Departments may struggle to meet the need, which can create barriers to crucial services and information. A well-planned language services budget will enable each City department to proactively address these challenges, ensuring equity, compliance, and effective communication with all residents.

Training City Staff

Training City staff about the LAO and its new amendments is imperative to ensuring that City departments are in compliance and ready to provide services to members of the public. OCEIA hosts an annual language liaison training for City departments and provides various capacity-building tools. These include style guides, best practices for interpretation, guidelines for identifying vital information, accurate data collection methods, and instructions on submitting the annual data compliance report.



Recruiting, Hiring, and Retaining Bilingual Staff

As City departments work to comply with the new requirements of the LAO, they must build their capacity to provide services in multiple languages. One of the most effective ways of doing this is to prioritize recruitment, hiring, and retention of bilingual staff. Bilingual staff are experts in City department programs, services and terminology. Having a robust list of culturally competent bilingual employees in the Department removes the barriers to access for LEP individuals. Forward-thinking strategies for recruiting bilingual staff, ensuring diversity, and fostering retention will further enhance access and equity in service delivery for all San Franciscans.

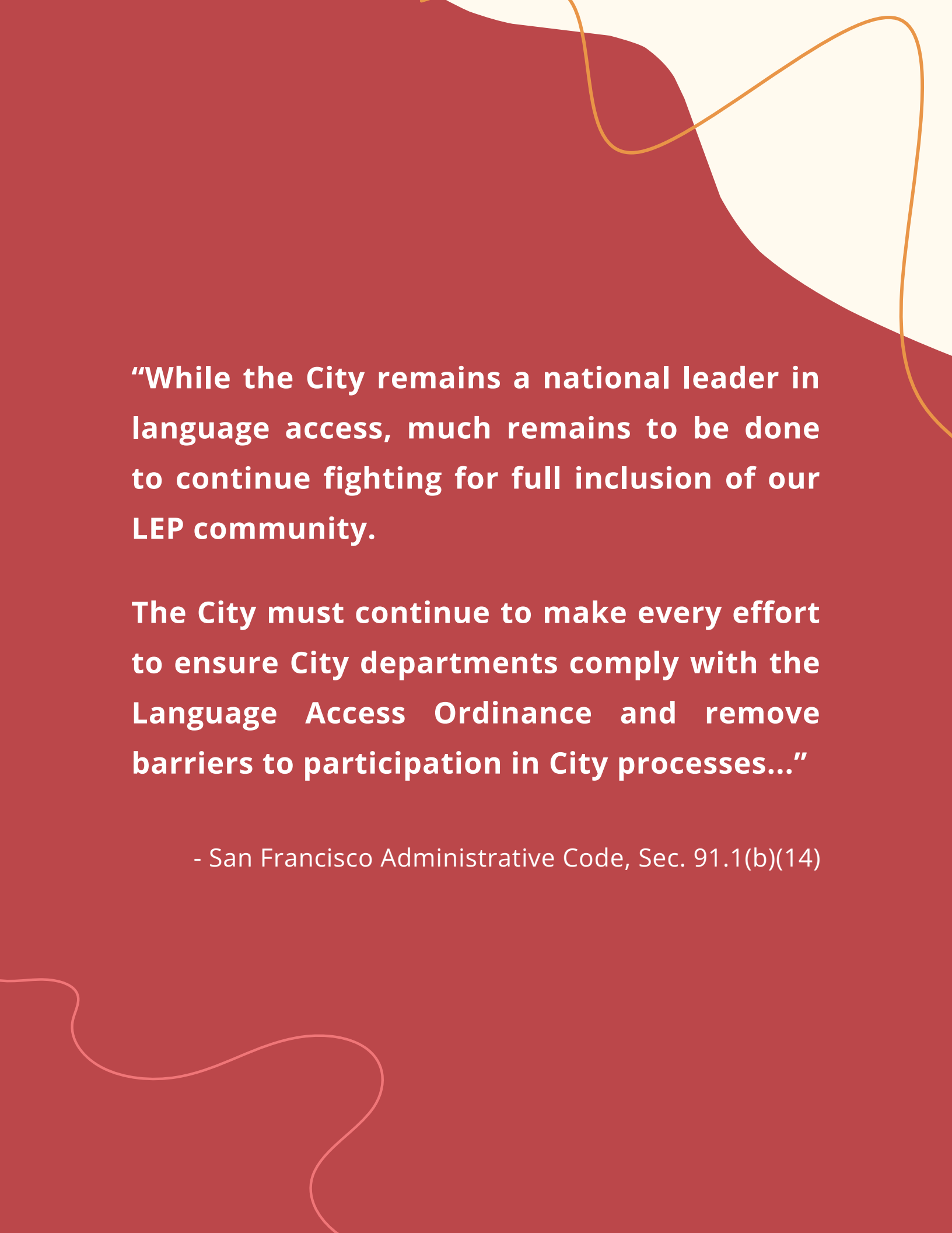
Resources for City Employees

In order to assist City departments with improving their language services and meeting the new requirements of the LAO, OCEIA is launching a new and improved Department LAO Liaison Resource Library for City employees. This resource library has existed for years to provide City employees with helpful tips, tools, best practices, and glossaries. This year's edition includes updated slides from previous LAO trainings, the full text of the amendments, and OCEIA's new digital form to request translation, interpretation services, and interpretation equipment.

LAO SHAREPOINT **RESOURCE LIBRARY**

An internal site for City
department LAO liaisons

For questions, contact OCEIA:
language.access@sfgov.org



“While the City remains a national leader in language access, much remains to be done to continue fighting for full inclusion of our LEP community.

The City must continue to make every effort to ensure City departments comply with the Language Access Ordinance and remove barriers to participation in City processes...”

- San Francisco Administrative Code, Sec. 91.1(b)(14)



DEPARTMENT HIGHLIGHTS

**All Department compliance data
required by the Language Access
Ordinance (LAO) can be viewed
online at:**

sf.gov/languageaccess














DEPARTMENT LIST: FISCAL YEAR 2023-2024















- Adult Probation
 - Appeals, Board of
 - Arts Commission
 - Asian Art Museum
 - Assessor-Recorder
 - Board of Supervisors, Clerk of the Board
 - Building Inspection, Department of
 - Children, Youth and Their Families, Department of
 - Child Support Services
 - District Attorney's Office
 - Early Childhood, Department of
 - Economic and Workforce Development, Office of
 - Elections, Department of
 - Emergency Management, Department of (911)
 - Environment Department
 - Ethics Commission
 - Fine Arts Museums of San Francisco
 - Fire Department
 - Homelessness and Supportive Housing, Department of
 - Human Rights Commission
 - Human Services Agency
 - Juvenile Probation
 - Mayor's Office
 - Mayor's Office of Housing and Community Development
 - Municipal Transportation Agency
 - Planning Department
 - Police Accountability, Department of
 - Police Department
 - Port of San Francisco
 - Public Defender's Office
 - Public Health, Department of
 - Public Library
 - Public Utilities Commission
 - Public Works, Department of
 - Recreation and Parks
 - Rent Board
 - San Francisco Film Commission
 - San Francisco International Airport
 - San Francisco Zoo
 - Sheriff's Office
 - Status of Women, Department on the
 - Technology, Department of
 - Treasurer and Tax Collector
 - War Memorial
- ### City Administrator Departments
- 311 (Customer Service)
 - Animal Care and Control
 - City Administrator (Central Office)
 - Civic Engagement and Immigrant Affairs, Office of
 - County Clerk
 - Labor Standards Enforcement, Office of
 - Mayor's Office on Disability
 - Medical Examiner, Office of the Chief
 - Transgender Initiatives, Office of
 - Treasure Island Development Authority










Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
Adult Probation	\$ 41,760			
Appeals, Board of	\$ 280			
Arts Commission	\$ 41,751			
Asian Art Museum	\$ 2,049			
Assessor-Recorder	\$ 24,898			
Board of Supervisors, Clerk of the Board	\$ 45,334			
Building Inspection, Department of	\$ 2,773,673			







Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
Children, Youth and Their Families, Department of	\$ 411,431			
Child Support Services	\$ 16,500			
District Attorney's Office	\$ 105,996			
Early Childhood, Department of	\$ 58,396			
Economic and Workforce Development, Office of	\$ 22,577			
Elections, Department of	\$ 2,528,896			
Emergency Management, Department of (911)	\$ 55,196			
















Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
Environment Department	\$ 198,917			
Ethics Commission	\$ 2,215			
Fine Arts Museums of San Francisco	\$ 59,118			
Fire Department	\$ 12,630			
Homelessness and Supportive Housing, Department of	\$ 82,404			
Human Rights Commission	\$ 6,175			
Human Services Agency	\$ 1,228,415			

Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
Juvenile Probation	\$ 36,304			
Mayor's Office	\$ 0			
Mayor's Office of Housing and Community Development	\$ 29,718			
Municipal Transportation Agency	\$ 2,611,514			
Planning Department	\$ 66,113			
Police Accountability, Department of	\$ 6,038			
Police Department	\$ 891,558			

Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
Port of San Francisco	\$ 5,417			
Public Defender's Office	\$ 116,199			
Public Health, Department of	\$ 3,392,942			
Public Library	\$ 758,294			
Public Utilities Commission	\$ 130,851			
Public Works, Department of	\$ 49,051			
Recreation and Parks	\$ 103,461			
Rent Board	\$ 158,790			

Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
San Francisco Film Commission	\$ 0			
San Francisco International Airport	\$ 173,938			
San Francisco Zoo	\$ 0			
Sheriff's Office	\$ 206,282			
Status of Women, Department on the	\$ 8,414			
Technology, Department of	\$ 0			
Treasurer and Tax Collector	\$ 88,449			
War Memorial	\$ 1,628			

City Administrator Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
311 (Customer Service)	\$ 65,546			
Animal Care and Control	\$ 14,133			
City Administrator (Central Office)	\$ 53,883			
Civic Engagement and Immigrant Affairs, Office of	\$ 699,806			
County Clerk	\$ 464			

City Administrator Department	Total budget for language access	Has a written LAO policy	Training for public contact staff	Completed mandatory LAO training
Labor Standards Enforcement, Office of	\$ 16,920			
Mayor's Office on Disability	\$ 13,417			
Medical Examiner, Office of the Chief	\$ 1,181			
Transgender Initiatives, Office of	\$ 0			
Treasure Island Development Authority	\$ 3,511			



About OCEIA

The Office of Civic Engagement and Immigrant Affairs (OCEIA) is a policy, compliance, direct services, and grantmaking office.

OCEIA's current programs and initiatives include:

- Civic Engagement
- Community Safety
- Immigrant Assistance and Inclusion
- Immigrant Economic Inclusion
- Newcomer Support Services
- Language Access

In addition to overseeing compliance, OCEIA assists City departments, the Mayor's Office, and the Board of Supervisors to better meet the needs of residents and workers for whom English is not a primary language. These services include trainings, tools, resources, and technical assistance to increase capacity and provisioning for language access services. On a limited basis, OCEIA's Language Access Unit also provides direct translation and interpretation assistance.



sf.gov/oceia

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[sf_immigrants](https://www.instagram.com/sf_immigrants)



[/sfgov.oceia](https://www.facebook.com/sfgov.oceia)



[oceia_sf](https://twitter.com/oceia_sf)



OCEIA

SAN FRANCISCO OFFICE OF
**CIVIC ENGAGEMENT
& IMMIGRANT AFFAIRS**

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

Table of Contents

Summary of Requested Action.....	1
Executive Summary	1
Background.....	8
City’s Current Language Access Expenditures and Workforce.....	10
Methodology.....	10
Analysis of language access services Expenditures.....	10
Analysis of LAS Workforce.....	15
Analysis of Bilingual Employee Retention	20
Methodology.....	20
Bilingual Staff Retention.....	21
Bilingual Employee Policies	24
Projected Costs to Implement 2024 Language Access Ordinance Amendments	27
Methodology.....	27
Key Cost Drivers	28
Department Challenges in Estimating Costs of Implementing LAO Amendments	28
Projected Implementation Costs.....	29
OCEIA Costs to Implement 2024 LAO Amendments.....	34
Emergency Departments: New Language Access Requirements.....	36
New Language Access Requirements for the SF Public Utilities Commission and Office of the Tax Collector	36
Policy Options.....	41
 Appendix I: List of Surveyed Departments	 42
Appendix II: List of City Department Websites on SF.gov	43
Appendix III: OCEIA Cost Projections.....	45
Appendix IV: OCEIA Staff Position Upgrades with Rationale	49

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%

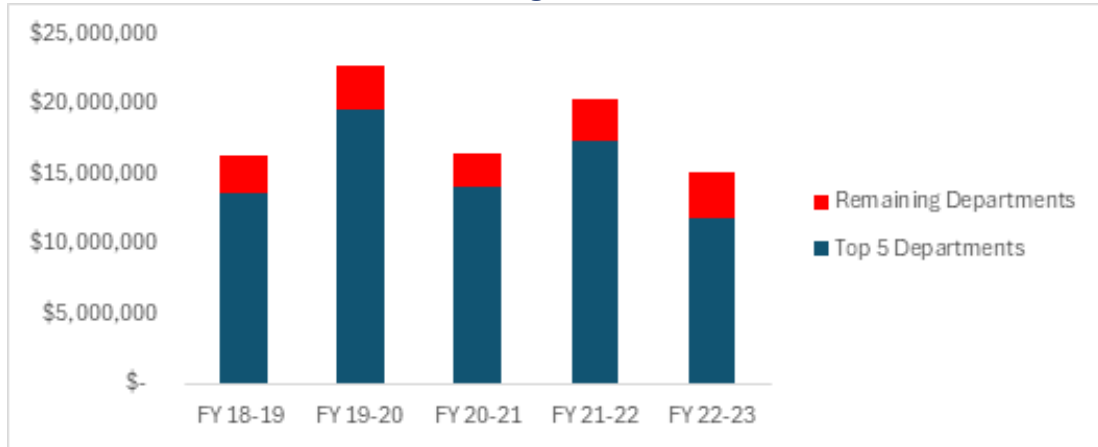
Source: OCEIA

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.

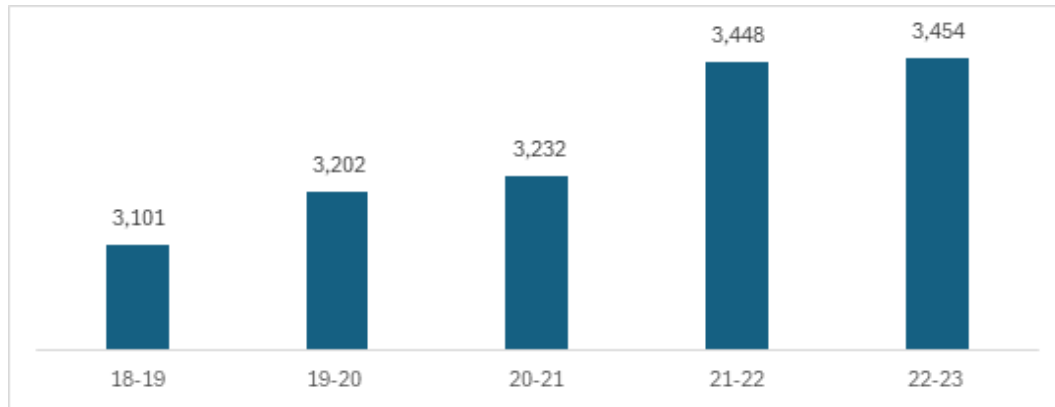
When public language needs cannot be fully addressed with bilingual staff, departments supplement these efforts by contracting third-party providers for services such as written translations and telephonic interpretation. Lastly, many departments rely on OCEIA's language resource staff, who provide departments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

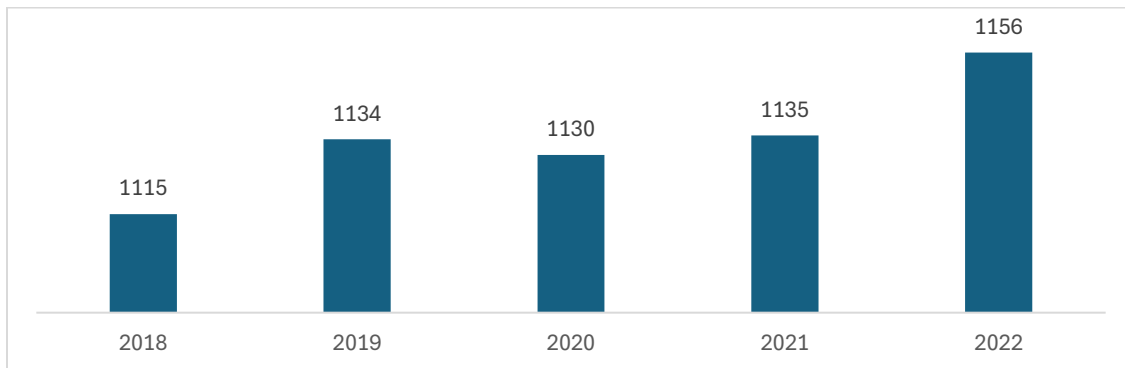
1. Total bilingual employee pay expenditures by department,
2. Total authorized, filled, and vacant language special condition positions by department,
3. Total certified bilingual employees by classification and by department, and
4. Vacancy data for certified and other authorized bilingual positions.

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

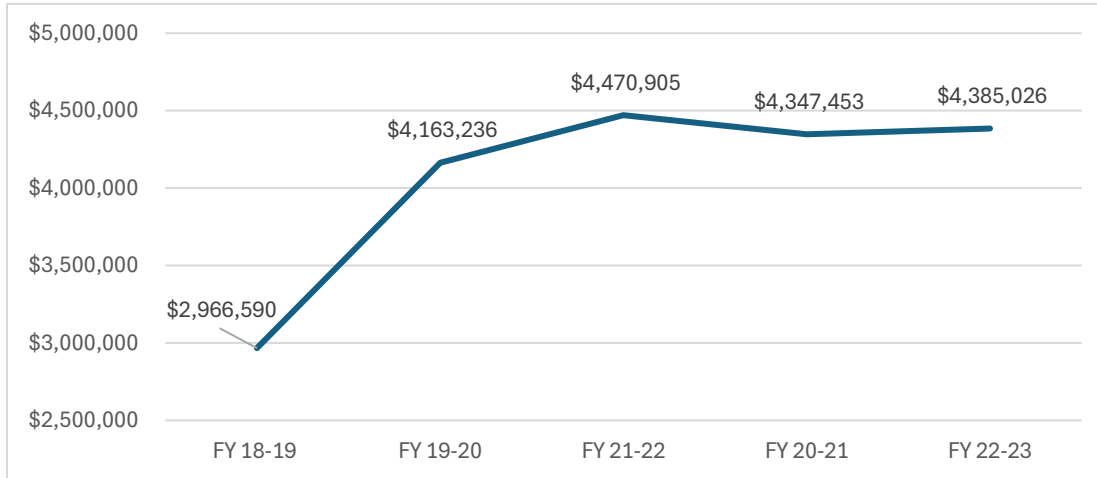
Based on department interviews, most departments believe they have sufficient bilingual staff to meet the language needs of the public, but further assessment is needed to evaluate need. In interviews, most departments expressed confidence in their bilingual staffing levels but acknowledged the complexity 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



YOUTH COMMISSION MEMORANDUM

TO: BOS Budget and Appropriations Committee

CC: Brent Jalipa, Assistant Clerk
Angela Calvillo, Clerk of the Board
Alisa Somera, Legislative Deputy Director

FROM: 2024-2025 Youth Commission

DATE: Monday, April 21, 2025

RE: SUBJECT: YOUTH COMMISSION LEGISLATION REFERRED 04/07/25

At its in-person meeting on Monday, April 07, 2025 the Youth Commission discussed BOS File No. 250242:

1. The Youth Commission understands and stresses the importance of having access to language translation services for all individuals needing it in San Francisco.
2. The Youth Commission acknowledges that we must increase language assistance in schools and the City and County of San Francisco.
3. The Youth Commission put together the following questions for the hearing:
 - What steps has OCEIA affairs taken to ensure that youth feel empowered to advocate for fair language access?
 - What steps has OCEIA taken to promote better language access for immigrant communities?
 - How are departments ensuring that ESL youth can access services like mental health counseling, housing support, or afterschool programs?
 - How does the City collect data on language access needs and outcomes?
 - What accountability measures are in place if a city department fails to meet language access requirements?
 - The report says that over half of departments increased funding for language services. What is the overall increase for funding of language access citywide, and how is this funding being distributed amongst departments?
 - How will OCEIA and departments ensure that language access brochures are available to the public? Through connections with community organizations?

Youth Commission
City Hall ~ Room 345
1 Dr. Carlton B. Goodlett Place



(415) 554-6446
(415) 554-6140 FAX

Please do not hesitate to contact Youth Commissioners or Youth Commission staff (415) 554-6446 with any questions. Thank you.

BOARD of SUPERVISORS



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1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

MEMORANDUM

TO: Jorge Rivas, Executive Director, Office of Civic Engagement and Immigrant Affairs
Carman Chu, City Administrator, Office of the City Administrator
Nicolas Menard, Office of the Budget and Legislative Analyst

FROM: Brent Jalipa, Assistant Clerk
Budget and Appropriations Committee

DATE: March 14, 2025

SUBJECT: HEARING MATTER INTRODUCED

The Board of Supervisors' Budget and Appropriations Committee has received the following hearing request, introduced by Supervisor Shamann Walton:

File No. 250241

Hearing to assess the current status of the implementation of Ordinance No. 116-24, review the 2025 Language Access Compliance Summary Report, discuss the upcoming Budget and Legislative Analyst Report on Language Access, and provide an opportunity for the public to provide community feedback on language access in City services; and requesting the Office of Civic Engagement and Immigrant Affairs, Office of the City Administrator, Office of the Budget and Legislative Analyst, and Language Access Network to present.

Pursuant to the hearing request, you or a representative will be expected to attend and present on the subject when this matter is agendized.

If you have any comments or reports to be included with the file, please forward them to me by email to: brent.jalipa@sfgov.org.

c: Sophie Hayward, Office of the City Administrator
Vivian Po, Office of the City Administrator
Angela Yip, Office of the City Administrator
Dan Goncher, Office of the Budget and Legislative Analyst

BOARD of SUPERVISORS



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MEMORANDUM

TO: Alondra Esquivel-Garcia, Director, Youth Commission

FROM: Brent Jalipa, Assistant Clerk
Budget and Appropriations Committee

DATE: March 18, 2025

SUBJECT: HEARING INTRODUCED

The Board of Supervisors' Budget and Appropriations Committee has received the following request for Hearing, introduced by Supervisor Shamann Walton on March 11, 2025. This item is being referred to the Youth Commission for comment and recommendation.

File No. 250241

Hearing to assess the current status of the implementation of Ordinance No. 116-24, review the 2025 Language Access Compliance Summary Report, discuss the upcoming Budget and Legislative Analyst Report on Language Access, and provide an opportunity for the public to provide community feedback on language access in City services; and requesting the Office of Civic Engagement and Immigrant Affairs, Office of the City Administrator, Office of the Budget and Legislative Analyst, and Language Access Network to present.

Please return this cover sheet with the Commission's response by email to:
Brent.Jalipa@sfgov.org.

RESPONSE FROM YOUTH COMMISSION **Date:** _____

_____ **No Comment**

_____ **Recommendation Attached**

Chairperson, Youth Commission

Introduction Form

(by a Member of the Board of Supervisors or the Mayor)

I hereby submit the following item for introduction (select only one):

- ☐ 1. For reference to Committee (Ordinance, Resolution, Motion or Charter Amendment)
- ☐ 2. Request for next printed agenda (For Adoption Without Committee Reference)
(Routine, non-controversial and/or commendatory matters only)
- ☐ 3. Request for Hearing on a subject matter at Committee
- ☐ 4. Request for Letter beginning with "Supervisor inquires..."
- ☐ 5. City Attorney Request
- ☐ 6. Call File No. from Committee.
- ☐ 7. Budget and Legislative Analyst Request (attached written Motion)
- ☐ 8. Substitute Legislation File No.
- ☐ 9. Reactivate File No.
- ☐ 10. Topic submitted for Mayoral Appearance before the Board on

The proposed legislation should be forwarded to the following (please check all appropriate boxes):

- ☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission
- ☐ Planning Commission ☐ Building Inspection Commission ☐ Human Resources Department

General Plan Referral sent to the Planning Department (proposed legislation subject to Charter 4.105 & Admin 2A.53):

- ☐ Yes ☐ No

(Note: For Imperative Agenda items (a Resolution not on the printed agenda), use the Imperative Agenda Form.)

Sponsor(s):

Subject:

Long Title or text listed:

Signature of Sponsoring Supervisor: