



**CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF CIVIC ENGAGEMENT & IMMIGRANT AFFAIRS**

**ADVANCING LANGUAGE ACCESS IN SAN FRANCISCO
LANGUAGE ACCESS ORDINANCE
ANNUAL COMPLIANCE SUMMARY REPORT
MARCH 2014**



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March 1, 2014

For nearly 17 years, the San Francisco Immigrant Rights Commission (IRC) has been a champion for the inclusion and integration of San Francisco's immigrant residents and workers. From sanctuary city ordinances to language rights and immigration reform, the IRC has fought for fair and humane policies at the local, state and federal levels.

The IRC is committed to ensuring that monolingual and limited-English proficient individuals have equal access to city services, programs and timely information in languages besides English. As early advocates for language rights, we applaud our community partners and city leaders for their vision and continued commitment to meeting the language needs of all San Francisco residents.

The San Francisco Language Access Ordinance (LAO) was enacted to ensure equal access to city services for all San Franciscans, including those with limited proficiency in English. The LAO requires the Office of Civic Engagement & Immigrant Affairs (OCEIA) to ensure citywide compliance with language access laws and to provide a summary report each year to the Immigrant Rights Commission (IRC), Board of Supervisors and Mayor indicating which Tier 1 departments have filed their annual language access plans as required by the law. The Commission commends the OCEIA staff, under the leadership of Executive Director Adrienne Pon, for preparing this annual report and for its continued partnership in improving the lives of San Francisco's most vulnerable residents.

Handwritten signature of Bill Ong Hing in cursive.

Bill Ong Hing, Chair

Handwritten signature of Celine Kennelly in cursive.

Celine Kennelly, Vice Chair

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ABOUT THIS REPORT

This report contains information and data for Fiscal Year 2012-13 (ended June 30, 2013), submitted in December 2013 by the following Tier 1 City Departments and analyzed by the Office of Civic Engagement & Immigrant Affairs in January-February 2014:

1. Adult Probation Department
2. Airport (San Francisco International)
3. Assessor Recorder (Office of the)
4. Building Inspection (Department of)
5. Building Management (City Hall)
6. District Attorney's Office
7. Elections (Department of)
8. Emergency Management (Department of)
9. Environment (Department of the)
10. Fire Department
11. Human Service Agency
12. Juvenile Probation Department
13. Mayor's Office of Economic and Workforce Department
14. Municipal Transportation Agency
15. Planning Department
16. Police Department
17. Public Defender's Office
18. Public Health (Department of)
19. Public Library (San Francisco)
20. Public Utilities Commission
21. Public Works (Department of)
22. Recreation and Park Department
23. Residential Rent Stabilization and Arbitration Board
24. Sheriff's Office
25. Treasurer and Tax Collector (Office of the)
26. San Francisco Zoo

An electronic version of this report will be available online by April 1, 2014 at www.sfgov.org/oceia. To view complete versions of individual Tier 1 Department plans, please contact the Office of Civic Engagement & Immigrant Affairs at (415) 581.2360 or email civic.engagement@sfgov.org.

2014 LAO ANNUAL COMPLIANCE SUMMARY REPORT

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I. EXECUTIVE SUMMARY

The thing about America is that if you're not native Indian, then you're an immigrant by default People risk so much to come here . . . and I think they should be able to retain their language and their culture.

—Kinmon "Kinney" Lau
Lead Plaintiff in 1974 Lau v. Nichols Bilingual Education Lawsuit¹

Overview: Language Access, a Civil Right

Forty plus years ago, a public interest lawyer named Edward Steinman filed a lawsuit on behalf of a six-year-old immigrant boy named Kinmon “Kinney” Lau and his mother, Mrs. Kam Wai Lau, a low-wage worker in a non-union sweatshop. Mrs. Lau had previously hired Steinman to represent her in a wage garnishment lawsuit.² She and her son became the lead plaintiffs in a class-action lawsuit against San Francisco Board of Education President Alan Nichols and school district officials for their failure to provide adequate language instruction to 1,800 students of Chinese descent who lacked English proficiency. The students were being instructed in English, a language none of them knew or could read, write or speak. Despite earlier efforts by community leaders to work out solutions with school officials, intense lobbying at board meetings, and even public protests, the District had only agreed to provide English as a Second Language (ESL) classes for one hour a day to less than half of its 2,586 Limited English Proficient students.

Steinman and his colleagues argued that integration into classes where English was the sole language of instruction denied students their right to equal educational opportunities, and was a form of discrimination and unequal treatment in violation of Section 601 of the Civil Rights Act of 1964 and the Fourteenth Amendment. The Civil Rights Act of 1964 bans discrimination based on the grounds of race, color, or national origin in any program or activity receiving federal financial assistance. In 1974, the U.S. Supreme Court overturned the lower court decision and found in favor of the students, ruling that the failure of the San Francisco school system to provide linguistically appropriate accommodations, such as English language instruction, to the approximately 1,800 students of Chinese ancestry who did not speak English,

¹Burke, Garance “Ambivalent in Any Language, Subject of landmark bilingual case uncertain of role.” Boston Globe, Monday, July 22, 2002, A1.

²Brillant, Mark. The Color of America Has Changed: How Racial Diversity Shaped Civil Rights, Reform in California, 1941-1978. New York: Oxford University Press, Inc., 2010. Note: in the lawsuit, Mr. Lau’s name appeared as Kinney Kinmon Lau.

or to provide them with other adequate instructional procedures, denied them a meaningful and equal opportunity to participate in the public education program.³

The landmark ruling in *Lau v. Nichols* paved the way for linking language access and bilingual education to civil rights and expanded the rights of language-minority students across the country. The ruling found that a person's language is so closely connected to national origin that language-based discrimination is a proxy for discrimination against national origin and thus, a violation of civil rights guaranteed under the law.

Unless programs are effectively implemented and meaningfully evaluated, their existence, *in and of itself*, will not provide the desired results. Programs may appear to follow the letter of the law, yet miss its spirit entirely.

—Dafney Blanca Dabach and Rebecca M. Callahan, *Rights versus Reality: The Gap between Civil Rights and English Learners' High School Educational Opportunities*⁴

Since 1974, much has been said about language access and rights. Despite numerous ESL/bilingual programs and thousands of laws addressing language access at every level of government, advocates and

experts fear that the essence of *Lau v. Nichols* and other rulings on the educational rights of English Learners (ELs) have yet to be systematically realized. The English-Only Movement and other efforts to dismantle language rights and multilingual instruction for non-English speakers continue today. But language access is not just an issue in the United States.

Global Migration Trends and Language Access

Global migration is dramatically increasing, not only in numbers but with greater diversity and intensity. Warfare, violence, human trafficking, natural disasters, climate change and other factors in addition to a global economy, technology, greater speed, and lower costs for international travel have increased both internal and international migration. Receiving nations and communities across the world are now faced with increasing numbers of migrants who are socially, culturally and linguistically more diverse. The impact of large waves of global migration is challenging the policies, resources and values of receiving nations and communities. Immigrants, and in some countries even native-born minorities, are often regarded with suspicion and considered as “other” by the dominant population. Immigrant integration, language access and human rights are no longer an issue for just a few countries but for the entire international community.

³ *Lau v. Nichols*, 414 U.S. 563 (1974). *Lau v. Nichols* was a civil rights class action lawsuit filed by appellants to compel the San Francisco Unified School District to provide all non-English-speaking Chinese students attending District schools with bilingual compensatory education in the English language. The U.S. District Court of Northern California ruled against the students but the decision was overturned by the U.S. Supreme Court. The defendants-appellees were the superintendent and members of the Board of Education of the School District, and members of the Board of Supervisors of the City and County of San Francisco.

⁴ Dabach, Dafney Blanca and Callahan, Rebecca M. “Rights versus Reality: The Gap between Civil Rights and English Learners’ High School Educational Opportunities.” *Teachers College Record*, Date Published: October 07, 2011. Accessed October 12, 2011 10:34:43 AM. Retrieved from <http://www.tcrecord.org> ID Number: 16558.

Here in the United States, the nexus between migration, integration and language acquisition has never been more apparent. The U.S. population is becoming more racially and ethnically diverse, with an immigrant population of over 40 million (or 13 percent of the total population). According to the Migration Policy Institute, immigration is a prominent part of the United States' DNA but concerns still exist about the ability of immigrants to integrate into broader society. Five indicators of successful integration include: language proficiency, socioeconomic attainment, political participation, residential locale, and social interaction.⁵

The keys to engagement and full civic participation depend largely on English language acquisition, workforce skills and employment opportunities. According to the Global Justice Initiative, a Washington, DC non-profit organization dedicated to promoting access to justice and social change, Language Access “refers to ensuring that persons who have limited or no English language proficiency are able to access information, programs and services at a level equal to English proficient individuals. Depriving people of language access undermines human dignity, exacerbates many immigrants’ innate vulnerabilities, and harms society at large by impeding the efficacy of the healthcare and justice systems. Twenty-first century U.S. demography and global migration trends suggest that the language access crisis is unlikely to abate.”⁶

Language Access in San Francisco

Non and Limited-English Proficient individuals (NEP/LEP) include lawful permanent residents (LPRs or green card holders), naturalized U.S. Citizens, and undocumented immigrants. Children, both immigrant and U.S. born, who are dependents of LEP and NEP parents or guardians may also be non or limited-English proficient before they become school-age if English is not the primary language spoken at home.

San Francisco remains a city with a large immigrant and NEP/LEP population. Approximately 36 percent (or more than one out of every three) of the City’s estimated 825,863 residents are immigrants.⁷ Of all San Franciscans over the age of five, 45 percent speak a language other than English at home, with the largest language groups being Chinese, Spanish, Tagalog and Russian. Thirteen percent of San Francisco households remain “linguistically isolated,” with no one over the age of 14 indicating that they speak English “well” or “very well.”⁸

⁵ Jiménez, Tomás R. . “Immigrants in the United States: How Well Are They Integrating into Society?” Migration Policy Institute, Washington, D.C. (May 2011). Accessed February 28, 2014 <http://www.migrationpolicy.org/research/immigrants-united-states-how-well-are-they-integrating-society>

⁶ Global Justice Initiative, Washington, D.C. Accessed February 28, 2014 <http://globaljusticeinitiative.wordpress.com/about/>

⁷ U.S.Census Bureau. (Last Revised: Thursday, 10-Jan-2013 15:07:36 EST). State and County QuickFacts. <http://quickfacts.census.gov/qfd/states/06/06075.html>. Accessed February 28, 2014. Data derived from Population Estimates, Census of Population and Housing, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated

⁸ A “linguistically isolated household” is defined by the U.S. Census Bureau as one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English “very well.” In other words, all members 14 years old and over have at least some difficulty with English.

As noted in previous LAO compliance reports, navigating the public process and obtaining critical, timely information are often difficult, even for longtime city residents. For individuals who speak no or limited English, routine activities such as obtaining a driver's license, seeking services and information, taking public transportation, paying taxes, or enrolling children in school can be confusing and extremely challenging. During crisis or emergencies situations, effective communication between local government agencies and residents, regardless of the languages they speak, is absolutely critical to ensuring public safety and saving lives.⁹

Past emergency and safety situations affecting LEP and monolingual residents highlight the continued need for language access in San Francisco: two fires in Chinatown six months apart that displaced over 130 LEP and monolingual low-income seniors and families, leaving them without critical information for hours; misunderstandings and fear of federal immigration enforcement raids ("ICE" raids) resulting from routine transit fare enforcement activities; officer-involved shootings; racial tensions and violence in the southeast neighborhoods due to cultural and linguistic differences; a water main break leaving dozens of non-English speaking residents confused and stressed; and the 2013 Asiana airline disaster with confusion over the provisioning of language assistance in Mandarin and Korean are just some examples of why language access is critical. With nearly half of the City's population speaking a language other than English at home, the consequences and liability of not being able to communicate during crisis, emergency and public safety situations are immense.

Language Access in San Francisco became a key priority in 2001 when the City enacted the Equal Access to Services Ordinance (EAS) to ensure meaningful access and the same level of service to Limited English Proficient (LEP) persons that was available to all city residents. Since the Ordinance was amended in 2009 as the Language Access Ordinance (LAO), the Office of Civic Engagement & Immigrant Affairs (OCEIA) has continued to focus its efforts on implementing one of the strongest and most comprehensive local language access laws in the nation, as well as engaging community organizations and city departments in an ongoing dialogue to better serve LEP residents in San Francisco.

Marking the 13th anniversary of the LAO, the purpose of this report is to evaluate citywide progress and summarize to what degree departments are currently complying with LAO provisions. The 2014 report addresses five main areas: 1) citywide progress for 26 Tier 1 Departments since implementation of 2009 amendments; 2) the extent to which departments are currently meeting the spirit, intent and legal requirements of the LAO, 3) barriers to compliance, 4) recommendations to further strengthen the efficacy of the LAO, ensure ongoing compliance, and better serve and inform LEP residents, and 5) improvements and innovations initiated by the City.

⁹ City and County of San Francisco, Office of Civic Engagement & Immigrant Affairs, Language Access: Annual Summary Compliance Report. San Francisco 2011, 2012, 2013.

Citywide Progress

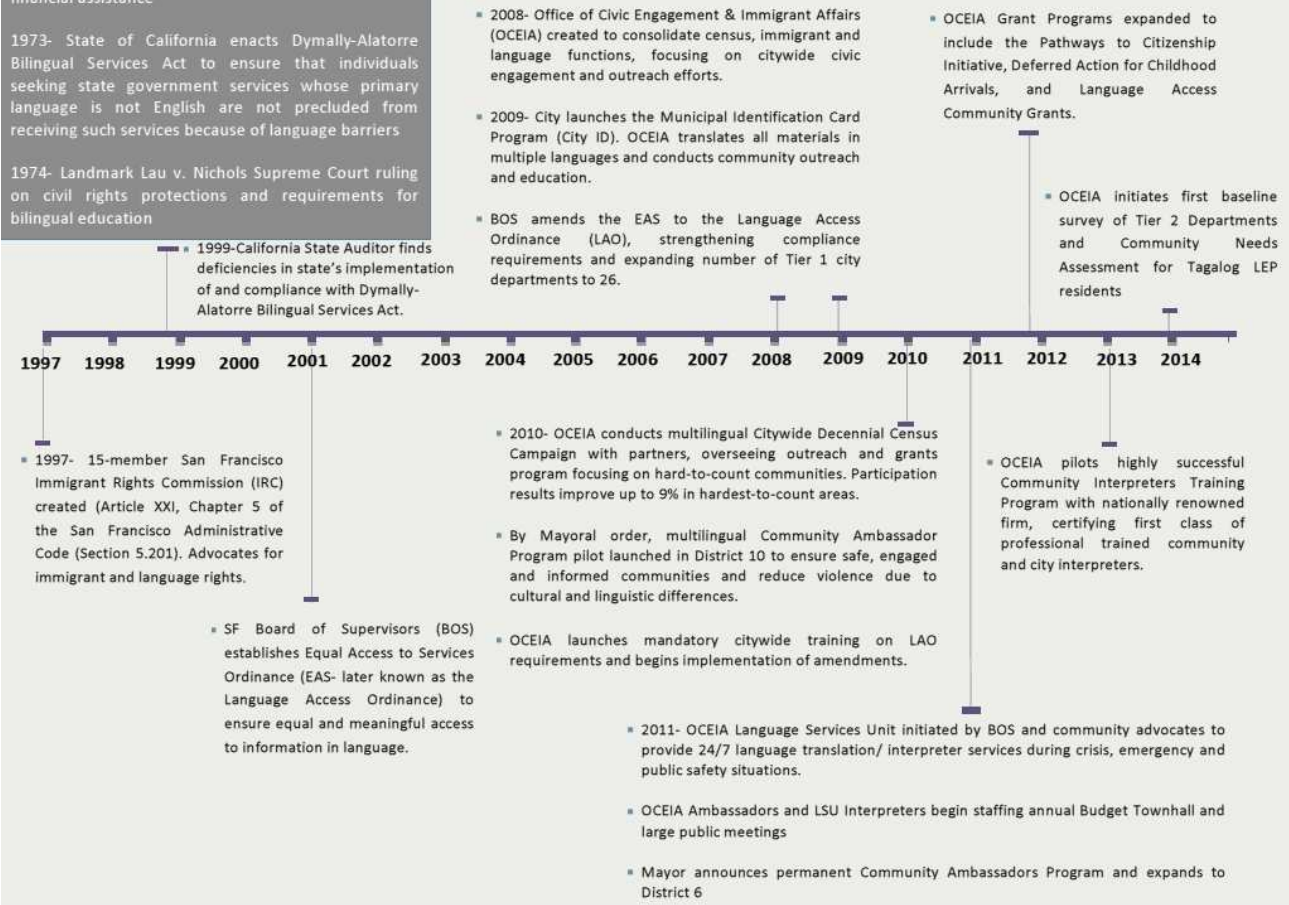
San Francisco has made great strides in ensuring language access and meeting both the spirit and intent of the Language Access Ordinance. While the city is far better prepared today to respond to emergency incidents, continuous training and recruitment of culturally and linguistically competent bilingual staff are needed to improve the response level, quality of services and timeliness. Increased outreach, education, and notification in languages in addition to English should be part of doing daily business and will help to ensure that residents are prepared and informed in a timely manner.

1964- Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance

1973- State of California enacts Dymally-Alatorre Bilingual Services Act to ensure that individuals seeking state government services whose primary language is not English are not precluded from receiving such services because of language barriers

1974- Landmark Lau v. Nichols Supreme Court ruling on civil rights protections and requirements for bilingual education

SF LANGUAGE ACCESS TIMELINE



Improvements and Innovations in Language Access

Since 2009, OCEIA has been implementing LAO requirements and training City Departments, both Tier 1 and 2. In 2012 and 2013, OCEIA held mandatory LAO training and a Language Access Summit and Community Interpreters Training for community-based service providers and City employees. Many improvements in language access have been the result of collaborations among OCEIA, City Departments and community partners.

Community Ambassadors Program (CAP) - CAP is a street-smart safety program designed to bridge tensions in the community due to cultural or linguistic differences. Developed and operated by OCEIA, the program was initiated in 2010 by community leaders and advocates concerned about public safety and intergroup conflicts. Multiracial, multilingual Ambassador teams speaking a total of eight different languages are assigned to “hotspots” along major transit and business corridors in Districts 6 and 10, and as needed elsewhere. Ambassadors act as a visible safety presence and provide residents with safety tips, language assistance, and bilingual information on city services and programs. Ambassadors also provide language services and other assistance for public information meetings, townhalls, community events and emergencies.

Community Engagement & Outreach - OCEIA has conducted extensive community outreach to service providers and residents on language access services. Through the Community Ambassadors Program and Language Services Unit, over 72,000 LEP residents have been reached during the past three years. In 2012, OCEIA also initiated the SF WireUp! consumer education program to educate immigrant, vulnerable and LEP residents on wireless telecommunications scams.

Department Head Approval of Annual Plans - OCEIA implemented a new requirement in 2012- all Tier 1 Departments compliance reports must be reviewed and signed by their respective department heads.

Language Access Community Grants - With leadership from the Board of Supervisors and community advocates, OCEIA established the Language Access Community Grants Program in late 2012 to increase community and city capacity to meet the language access needs of monolingual or Limited English Proficient (LEP) individuals who live or work in San Francisco, and underserved immigrant communities. The program emphasizes: 1) building community-based language access leadership and capacity, 2) assessing and evaluating language access needs in the community, 3) assisting city departments to more effectively communicate with and deliver services to residents who speak languages other than English, and 4) planning for language access needs during crisis, emergency and public safety situations. Grants in three major areas (Citywide Collaborative, Emerging Needs and Crisis, Emergency & Public Safety) were awarded to a total of eleven community-based organizations.

Language Access Network and Advisory Council - OCEIA partners closely with community service providers and the Language Access Network, as well as with other cities and national networks. OCEIA has facilitated conversations between Language Access Grantees and city departments on policies, programs and opportunities to better serve LEP residents and workers in San Francisco, leveraging both city and community assets.

Language Access Community Summit - In September 2012, OCEIA hosted the Community Summit on Language Access in San Francisco. Nearly 100 community-based service providers attended interactive day-long sessions featuring LAO training, planning, discussions and a resource fair by city departments. The Summit will be repeated in 2014.

Language Access Community Surveys - Since 2012, OCEIA has conducted Language Access Surveys of 1) community-based organizations working with immigrant, monolingual and LEP individuals to gauge awareness of laws and processes, satisfaction levels, experience, suggestions and community capacity, and 2) of city departments on how they provision services to these populations. The most recent survey in January 2014 provided baseline information on Tier 2 Departments and a Community Needs Assessment of the Tagalog-speaking LEP population is currently being conducted. Surveys help inform OCEIA of service gaps and are used to provide feedback to departments to better serve LEP residents.

Language Services Unit (LSU) - In early 2011, OCEIA established the Language Services Unit (LSU). Initiated by the Board of Supervisors and community advocates, the LSU was created to provide high quality, 24/7 translation and interpretation services during crisis, emergency and urgent public safety situations. The LSU has in-house capability in Cantonese, Mandarin, Spanish, Russian and Tagalog. While the LSU was initially created to provide assistance to city departments and agencies during emergency situations, the majority of requests for assistance have been urgent or short-turnaround assistance for special public information projects, technical advice, and on-site interpretations for meetings, hearings and interviews. The LSU has provided hundreds of document translation and on-site interpretation services to both city departments and community-based organizations serving immigrant, monolingual and/or limited-English proficient persons. The majority of services have involved Cantonese and Spanish translations and interpretations. In some cases, the LSU has translated or coordinated translations in other languages, including Russian, Tagalog and Vietnamese. The unit has also handled walk-in and telephonic requests for assistance, and reached over 15,000 LEP/monolingual city residents through multilingual community events, meetings, interviews and convenings.

Mandatory Citywide LAO Training - San Francisco is the only local jurisdiction with a strong language access law and mandatory training requirement. OCEIA requires this as part of its oversight responsibilities and departments have been overwhelmingly supportive, attending sessions for the past three years. All Tier 1 and many Tier 2 Departments attended the interactive trainings, which also feature community feedback, survey results, and opportunities for department representatives to interact directly with advocates and experts. Annual trainings include the importance of language access, changing demographics and general legal requirements, sharing best practices, challenges and solutions, general tools and resources, and hands-on, interactive sessions for Tier 1 departments on how to complete annual compliance plan reports. The trainings allow OCEIA to gather direct feedback from departments on compliance challenges and innovations.

Technical Assistance to City Departments – Since 2009, OCEIA has increased ongoing technical assistance to Tier 1 and other city departments, including recommendations for wording of notices and signage, providing in-house translation and interpreter services, and identification

of community and external resources and low-cost solutions. OCEIA instituted an open-door policy for departments to schedule one-on-one consultations with staff experts and provided customized LAO training for Departments. LSU senior staff worked closely with Language Line, the largest and most commonly used vendor, to assist client departments with data collection, tailored reports, and account/billing management.

Technical Assistance and Capacity Building for Community-based Organizations Serving LEP communities- OCEIA provided advisors and consultants from Social Media for Nonprofits, Zero Divide, language access vendors and city departments to assist CBOs in planning their language access work. Partners are convened quarterly to address issues, concerns and solutions.

Tier 2 Departments Language Access Survey– Tier 2 departments have been voluntarily attending annual training sessions since OCEIA initiated mandatory training for Tier 1 Departments in 2010. In fiscal year 2012-2013, nearly half of Tier 2 departments attended fall training. However, the Language Access Ordinance does not impose a reporting mechanism for Tier 2 departments, therefore it is difficult to track Tier 2 compliance with the LAO. In February of 2014, OCEIA conducted a first time baseline survey of Tier 2 departments to better gauge the level of knowledge, understanding and compliance with the LAO. Forty-four percent of Tier 2 Departments responded to the survey.

- ✓ **LAO Compliance** - 73 percent of respondents indicated that they were in compliance with the LAO.
- ✓ **Budget** - 50 percent of departments reported having a departmental budget below \$5 million for fiscal year 2012-13, 17 percent reported having a budget between \$10 million to \$20 million, and 20 percent reported having a budget of \$20 million or more. However, 44 percent reported having a language access budget of \$0 for 2012-13; 30 percent reported having a budget between \$1 – 1,000 and 13 percent reported a budget between \$5,000 – 10,000.
- ✓ **Commonly Requested Languages** - The most commonly requested languages among Tier 2 Department responders were Spanish 39 percent, Cantonese 34 percent and Mandarin 17percent,
- ✓ **Common Scenarios Seeking Language Assistance** - The most likely scenarios for which LEP clients seek language assistance from Tier 2 Departments are in person (35 percent) or telephonic (32 percent) interactions.
- ✓ **Language Services** - Tier 2 Departments reported providing 1) in-person interpretation (62%); telephonic interpretation (59 percent); translated materials (44 percent outreach materials and 38 percent offer translation of public documents). The two highest language provision tools are bilingual staff (30 percent) and telephonic interpretation (30 percent), and 17 percent of other language assistance services.

Quality Standards in Community Interpreting

The consequences of not having adequate and appropriate language services have been well documented. Public safety risks, tragic situations for immigrants and LEP individuals, lawsuits and consent decrees all have had dramatic impact on residents and local governments across the world, increasing the need for competent and qualified in-

Speaking two languages is no longer enough to become a community interpreter: it is increasingly recognized that any interpreter should be tested for language proficiency, attend professional training programs, and demonstrate the skills and qualifications to demonstrate that they can support professional ethics and standards of practice.¹⁰

—Marjory A. Bancroft, MA & Lourdes Rubio-Fitzpatrick, MA, LPC, DAPA,
The Community Interpreter

terpreters and translators. According to Cross-Cultural Communications, LLC, a leader in Community Interpreter Training, increased migration, language access laws and safety, liability and quality of care are forces that have helped to advance the community interpreting profession globally. But Community Interpreting is a profession, not an accidental or incidental activity to be conducted by children, family or friends, particularly during life-threatening, crisis emergency or public safety situations. The profession involves complex professional skills, training, assessment of language fluency, certification, a code of ethics and conduct, and professional standards.

In September 2013, OCEIA partnered with Cross-Cultural Communications, LLC, to launch a pilot Community Interpreters Training program in San Francisco. Twenty-three participants, including OCEIA's entire Language Services Unit and language access grantees, completed an intensive 40-hour training and certification process. The training covered the foundations of community interpreting, including language proficiency, interpreter certification, language access laws, codes of ethics and standards of practice. Participants practiced basic skills and fundamentals on different modes of interpreting (consecutive, simultaneous and sight translation), positioning, accuracy, use of first person and professional introductions as well as message analysis, conversion, memory skills and note-taking. Training also covered culture and mediation, key areas for interpretation (health, education and human/social services), how to adapt ethics and standards to different situations, and how to ensure interpreter safety, advocacy and professional development. OCEIA plans to extend this training to city departments and community-based organizations in the future.

¹⁰ Bancroft, Marjory A, MA, and Rubio-Fitzpatrick, Lourdes, MA, LPC, DAPA, *The Community Interpreter: A Comprehensive Training Manual*. Columbia, MD: Culture and Language Press, a division of Cross Cultural Communications. 5th Edition, 2011.

Key Recommendations

After four years of implementing requirements in the 2009 LAO amendments, OCEIA recommends the following actions to strengthen the efficacy of the law.

1.	<p>Amend and clarify ambiguous sections of the LAO.</p> <ul style="list-style-type: none">✓ Abolish the two-Tier system and make LAO requirements applicable to all city departments that provide information or services to the public.✓ Departments should be clearly identified and named.✓ A standard method for determining District specific information should be outlined. OCEIA should be authorized to develop guidances for Departments to ensure citywide standards for LEP data collection.
2.	<p>The LAO currently allows departments to self-assess their progress and compliance using self-selected methods, which does not ensure citywide consistency.</p> <ul style="list-style-type: none">✓ More objective criteria and quantifiable measures should be developed by OCEIA.✓ Non-compliance penalties should be clearly stated in the Ordinance by the Board of Supervisors.
3.	<p>Provide adequate resources and funding for Language Services. Only a handful of Departments currently budget and spend for the provision of language services. There is no mechanism to verify that Departments are allocating resources as outlined in their annual compliance plans.</p> <ul style="list-style-type: none">✓ Adequately fund citywide translation and interpreter services either through a centralized unit for use by departments with modest general budgets, and/or require departments to allocate a percentage of their budgets to a centralized language services fund.✓ Adequately fund OCEIA to provide a wider range of technical assistance tools, templates and guidelines to departments.✓ Invest in citywide training and language certification such as OCEIA's Community Interpreter Training pilot initiative.✓ Continue to invest in community partners who can fill language service gaps with low-cost solutions.
4.	<p>Develop an effective citywide Language Access complaint process. Strengthen complaint resolution process and protocols. The LAO mandates each department to have a mechanism to process and resolve language access complaints, however this varies widely across departments and does not always provide an accurate picture of citywide trends.</p> <ul style="list-style-type: none">✓ Implement a mandatory citywide complaint process that assures accountability.✓ The complaint process should be centralized within OCEIA with review by the Immigrant Rights Commission.

5.	<p>The LAO mandates both City Departments and OCEIA to make language threshold determinations. Departments use various methods to make this self-determination which is not consistent across the city.</p> <ul style="list-style-type: none"> ✓ Language thresholds should be determined by a single entity- OCEIA currently conducts certification studies to support Census Bureau data used by the Planning Department, which is a more reliable method of determining thresholds. ✓ City Departments should use the LEP population clients served as a tool to better assess their clientele’s language access needs.
6.	<p>Develop standardized and accurate Quality Assurance and Data Collection Methods. Departments currently use a variety of methods to self-assess and determine the quality of language services delivered to LEP clients; however, very few methods include measurable goals, objectives or outcomes. In addition, there is great variance in how or if Departments collect LEP language needs data.</p> <ul style="list-style-type: none"> ✓ Conduct an audit of Department data collection methodology for Language Services. ✓ Establish guidances and criteria for standardized data collection. ✓ Develop and use technology tools to effectively collect data and track progress.
7.	<p>Develop Guidelines and Standards for implementation of the LAO. OCEIA has been providing mandatory general training since 2010. However, there is significant turnover for Language Access Liaisons in many Departments.</p> <ul style="list-style-type: none"> ✓ Establish citywide standards for quality and cultural/linguistic competence, including a certification program for bilingual staff that goes beyond testing for basic language ability. ✓ Adopt professional standards and a code of ethics for all interpreters. ✓ Establish baseline citywide protocols for emergency and crisis situations. ✓ Require periodic trainings and updates. ✓ Provide additional guidance or assistance to departments to address deficiencies in procedures and processes required by the LAO.
8.	<p>Leverage Community and City assets and knowledge to build capacity and collaboration</p> <ul style="list-style-type: none"> ✓ Collaborate with community based organizations and advocates to form a Language Access Task Force that meets regularly with a citywide departments. ✓ Conduct a citywide and departmental language needs assessment. ✓ Develop an objective tool that incorporates community feedback to gauge the adequacy and quality of language services.

Conclusion

Reductions in state and federal funding for traditional safety net programs, adult education, job training, and English as a Second Language (ESL) classes all contribute to an environment that is counter to creating a welcoming and nurturing place for Limited-English Proficient, immigrant and vulnerable residents. With Comprehensive Immigration Reform (CIR) questionable at the moment, it is essential that local governments take innovative steps to ensure immigrant integration, engagement and full civic participation without creating deeper divides between native-born and new residents.

While San Francisco remains a language access leader, more can and should be done to fully meet the needs of LEP residents and encourage immigrant integration. The importance of complying with language access laws is clear; the investment in ensuring that all San Francisco residents and workers have equal access to information, services and opportunities to participate in meaningful and relevant ways is critical to our future. As stated time and time again, language access should be a normal part of doing business with local government. The City's goal is to communicate effectively with all its diverse communities and residents, and to provide the same information at the same time and in the same place, regardless of the languages spoken.¹¹

Providing multilingual language services is not only good government, it is also a huge global competitive advantage. According to Common Sense Advisory, an independent market research company, worldwide revenues for language services totaled \$34.8 billion in 2013. Common Sense Advisory also found that 60 percent of the world's top global brands are multilingual, with an average of eight languages per website.¹² Businesses have figured out that communicating to customers in their own languages can build credibility, increase relevance, maintain brand integrity and build customer loyalty. For local governments and communities, investing resources and building human capital through community interpreter training and workforce development are opportunities to build credibility and trust, engage and involve residents, and respond appropriately and competently to diverse and multilingual community needs.

Language Access in San Francisco is part of a broader public engagement vision that links access to meeting core community needs, supporting immigrant integration, and encouraging civic participation. By supporting community-based efforts to articulate needs and develop relevant, culturally appropriate solutions; providing tools and access for meaningful and relevant participation; and leveraging collaborative efforts among city departments, officials and community leaders, the City can ensure that every resident and worker benefits from and contributes to San Francisco's overall success as a world class city.

¹¹ In *Brown v. Board of Ed.*, 347 U.S. 483 (1954). In *Brown v. Board of Education* (1954), the late Supreme Court Justice Thurgood Marshall argued that "Equal means getting the same thing, at the same time and in the same place."

¹² "Market for Outsourced Translation and Interpreting Services and Technology to Surpass US\$34.7 Billion in 2013" and "Sixty Percent of the World's Top Global Brands are Multilingual, with an Average of Eight Languages per Website" Common Sense Advisory Press Releases, June 3, 2013 and January 16, 2014. Accessed February 28, 2014. <https://www.common senseadvisory.com/Media/PressReleases.aspx>

II. KEY FINDINGS

All 26 Tier 1 Departments (“Departments”) are required by the LAO to file annual compliance plans with the Office of Civic Engagement & Immigrant Affairs (“OCEIA”) by December 31 of each year. For this report period, Departments were asked to submit their annual plans by December 16, 2013 to allow time for clarifications and corrections with LAO Liaisons before the holidays. All data contained in submitted Annual Compliance Plan reports are self-reported.

Overall Compliance and Reporting

In general, overall compliance, timeliness of report submittal and mandatory training attendance for the current report period were good. All 26 Departments filed annual compliance plans, with 69 percent (18) filing by the requested December 16, 2014 deadline, 23 percent (6) filing by December 18, 2013, and eight percent (2) filing late after January 1, 2014. Eighty-eight percent (23) attended mandatory training conducted by OCEIA in September 2013.

Over the past three years, compliance reporting has remained generally good. In FY 2010-2011, 88 percent of departments filed reports on time (three departments filed late by January 6, 2012) and 96 percent attended mandatory training. In FY 2011-2012, all Departments submitted their reports by December 31 and attended mandatory training.

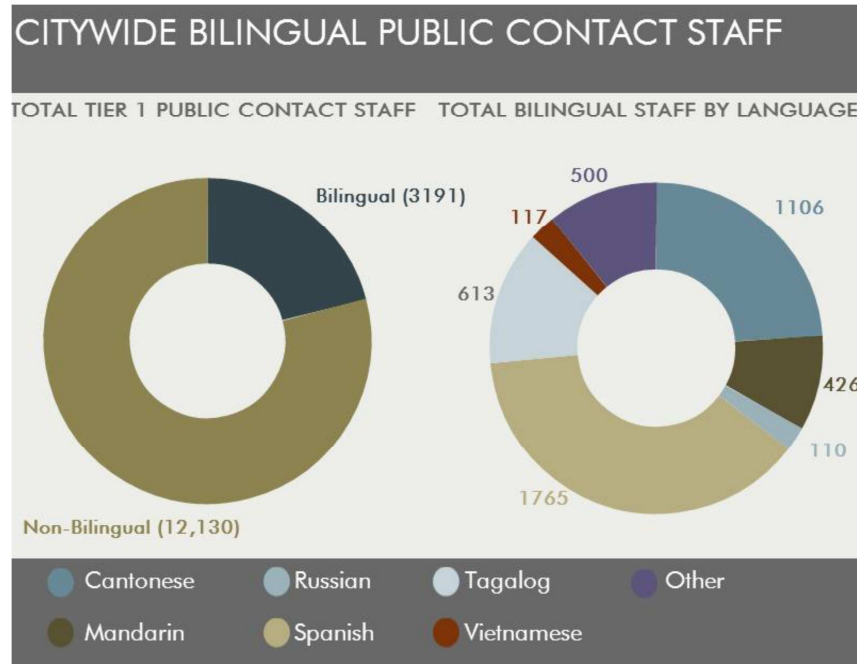
Self Assessment of Adequacy of Internal Processes and Continuous Improvement

The LAO mandates Departments to provide an assessment of their compliance plans.¹³ Ninety-six percent (26) reported that their current processes to facilitate communication with LEP persons are adequate. Ninety-two percent (24) provided their goals and planned improvements for providing services for LEP clients for FY 2012-2013. The most commonly reported goals include: translating additional materials, educating and training employees, and developing policies and procedures regarding the LAO. In addition, 73 percent (19) plan to make improvements of some kind to their procedures for communicating with LEP clients for FY 2013-2014. Proposed improvements include: hiring additional bilingual staff, publicizing interpreter/translation services, and translating more documents.

Many Departments continue to report that they plan to maintain current levels of service and have provided the same goals for each year, such as developing written protocols, seeking additional bilingual staff, or providing bilingual certification for staff. Some Departments may require additional guidance or assistance from OCEIA in planning, measuring, and reaching stated goals as well as addressing deficiencies in procedures and processes required by the LAO.

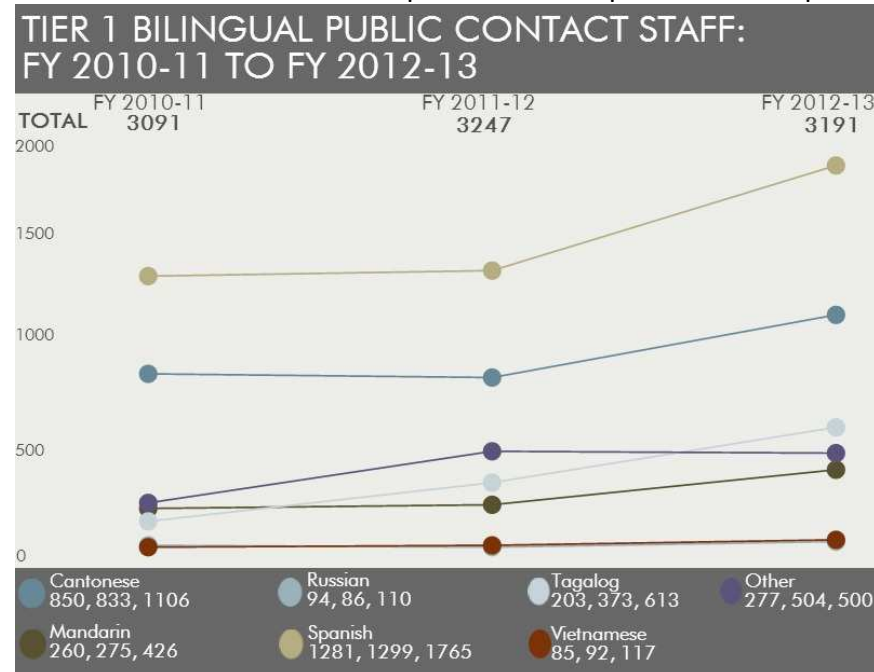
¹³ Sec. 91.10(r).

Bilingual Staffing, Public Contact Positions and Quality Control



Reported information on bilingual public contact positions continues to vary widely across departments with criteria inconsistently used to determine overall quality of language services; the number of bilingual employees who perform Language Access work; cultural and linguistic competency; languages spoken and the level of proficiency; ongoing development and skills training; and quality control protocols for bilinguals.

Bilingual Public Contact Positions- As mandated by the LAO, Departments must ensure that public contact positions are adequately filled by bilingual employees in order to serve LEP clients. The LAO defines a public contact position as “a position in which a primary job



responsibility consists of meeting, contacting, and dealing with the public in the performance of the duties of that position.”¹⁴ Departments reported 3,191 total bilingual public contact staff out of 15,321 public contact positions, a decrease of 1.7 percent from the last fiscal year. Bilingual public contact staff in relation to total public contact staff was 20 percent, a four percent decrease from the last fiscal year.

¹⁴ Section 91.2(j)

Languages Spoken by Bilingual Public Contact Staff- In FY 2012-13, the most commonly spoken languages by bilingual public contact staff were Spanish (11.5 percent of total public contact staff) a 36 percent increase from last fiscal year, Cantonese (7.2 percent of total public contact staff) a 33 percent increase from last fiscal year, and Tagalog 4.0 percent a 64 percent increase from last fiscal year. In FY 2011-12, 8.9 percent Spanish, 5.7 percent Cantonese, and 2.6 percent Tagalog and in FY 2010-11 Spanish 9.8 percent, Cantonese 6.5 percent and Tagalog 1.6 percent.

Over the last three years the languages spoken by the highest number of bilingual staff have been Spanish and Cantonese. Numbers for Cantonese bilingual staff have increased by 30 percent while Spanish increased by 38 percent, and Tagalog more than tripled in the last three years. In FY 2011-12 Departments reported 3,247 total bilingual public contact staff out of 13,550 total public contact staff, and in FY 2010-11, 3,091 bilingual public contact staff out of 13,034 total public contact staff. Although the total number of bilingual public contact staff as reported by Departments has increased 13 percent over the last three years, there has been a 1.23 percent decrease in percentage of bilingual public contact staff as compared to total public contact staff.

Consistency of Bilingual Staff Training – Annual compliance reports should include an update on “employee training and development strategy to maintain well trained bilingual employees and general staff.”¹⁵ In FY 2010-11, 58 percent of departments reported offering training to bilingual staff. For FY 2011-12 and FY 2012-13, 54 percent of departments reported that they offered training for bilingual staff.

Over the past three years, there has been a slight decrease of departments that offer training to their bilingual staff (one department). However, the content, breadth and depth of training offered to employees continues to differ significantly among departments, ranging from basic language courses available through City College or standardized terminology and usage, to more intense language assistance trainings tailored to requirements of the LAO.

Quality Controls for Bilingual Staff- Departments are mandated to provide a mechanism for maintaining quality controls for bilingual staff.¹⁶ In FY 2010-11, 65 percent (17) of departments reported having quality controls. In FY 2011-12, 62 percent (16) reported having quality controls. In FY 2012-13, 65 percent reported having quality controls and 54 percent reported offering training in connection with language services.

Overall, departments remain inconsistent in applying objective evaluation criteria for quality control. As noted in previous reports, most departments rely solely on the certification testing administered by the Department of Human Resources to serve as quality controls. The DHR certification process tests for basic language ability and is not an indicator of ongoing translation/interpretation accuracy and competence.

¹⁵ Section 91.10(i).

¹⁶ Section 91.10(i).

Communication Policies and Emergency Protocols for LEP

The LAO requires Departments to provide narrative assessments of their protocols and procedures to facilitate communication with limited English speaking (or LEP) persons.¹⁷ In FY 2010-11, 57 percent (15) Departments reported having policies to communicate with LEP clients and in FY 2011-12, 65 percent (17) Departments had such protocols. Seventy-three percent (19) currently have written policies on how to communicate with LEP clients. This represents a 26 percent increase over the last three years.

Emergency and Crisis Situation Protocols –All Departments that assist clients in crisis situations are mandated by the LAO to include language service protocols in their annual compliance plans.¹⁸ Although many Departments are not considered first responders, 65 percent (17) reported working regularly with clients in crisis or emergency situations; 65 percent (17) have protocols in place; and 46 percent (112) have written protocols. Thirty-five percent (9) of all Departments reported not having current protocols to serve LEP clients in emergency situations.

In FY 2010-11, 68 percent (15) of Departments reported working with clients in crisis; 65 percent (17) had protocols in place; and 50 percent (13) had written protocols. In FY 2011-12, 62 percent (16) reported working with LEP persons in emergency crisis situations; 58 percent (15) had protocols in place; and 46 percent (12) had written protocols. Over the last three years, 8 percent or two additional Departments have adopted protocols for serving LEP clients in crisis; however, there has been a decrease of six percent in Departments with written emergency protocols.

Complaint Processes

The LAO requires Departments to allow the public to make complaints alleging violations of the LAO in each language spoken by a Substantial Number of Limited English Speaking Persons.¹⁹ Sixty-nine percent of Departments reported having written complaint procedures, and 61 percent (16) reported that complaint procedures were publically posted. Although all city departments are required by the LAO to forward complaints to OCEIA, in FY 2012-13, the office did not receive any complaints by Departments. However, annual compliance plans revealed that 19 percent (5) Departments received a total of 31 LAO complaints in FY 2012-13. These language access complaints made up only 0.10 percent of all complaints received by Departments.

During the past three years, Departments have reported receiving few language access complaints: in FY 2010-11, only 18 complaints were reported, representing only 0.008 percent of total complaints received for that year. Similarly, in FY 2011-12, Departments reported receiving 18 complaints, representing 0.04 percent of all complaints received. However, Departments continue to resolve complaints internally with no involvement of OCEIA or the Immigrant Rights Commission (IRC) as required by the LAO. Information reported by Departments does not appear to be consistent with anecdotal information reported by

¹⁷ Section 91.10(h).

¹⁸ Section 91.8.

¹⁹ As defined by section 91.2(k) means either 10,000 City residents, or 5 percent of those persons who use the Department's services.

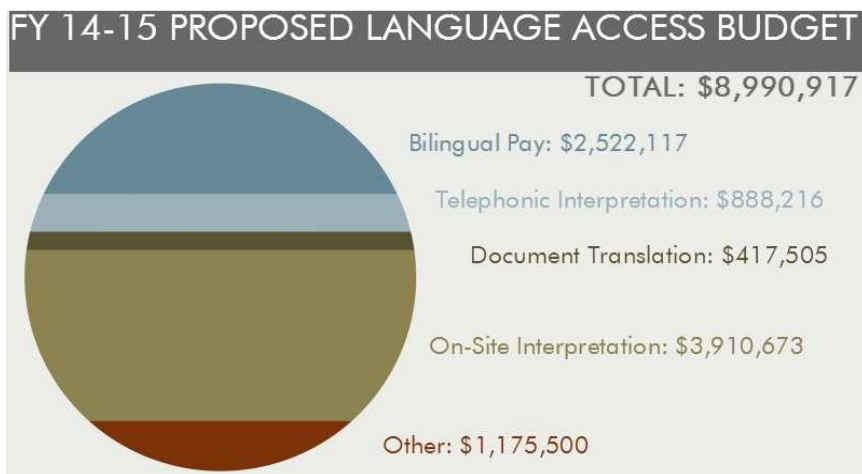
community based organizations working with NEP or LEP clients. OCEIA will be addressing this issue in new guidances to Departments.

Data Collection

Consistency in Collection Processes, Tracking LEP Client Information and Reporting Data - Departments are required under the LAO to use one of three methods to determine the number of LEP clients they serve: 1) surveys, 2) at the point of service, and/or 3) records from telephonic interpretation vendors contracted by the Department.²⁰ For this report period, 88 percent (23) used one or more of the methods listed in the LAO to track clients, tracking actual LEP interactions rather than using general Census Bureau estimates, which do not provide an accurate picture of actual clients served.

Over the past three years, there has been a 21 percent improvement in how Departments track LEP client information, with less reliance on Census Bureau data and greater use of one or more prescribed methods outlined in the LAO. In FY 2010-11, 73 percent reported using one or more of the mandated tracking methods and in FY 2011-12, 77 percent reported using one or more of the LAO prescribed tracking methods.

Language Access Citywide Budgeting



The LAO mandates that Departments provide budget information related to language services. With the exception of a few Departments, most are spending very little on language services which account for approximately 0.14 percent of total Tier 1 Department budgets. Departments reported a total proposed language services budget of \$8.9million for FY 2014-15, a seven percent increase in projected spending from the previous fiscal year, and a 40 percent increase overall in the past two years. Forty-three percent of the total proposed budget for Language Access is comprised of on-site interpretation, 28 percent for compensatory bilingual pay, 13 percent for special projects, 10 percent for telephonic interpretation, and five percent for document translation services.

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- ✓ The projected budget for language services categories are skewed by a handful of departments. Three departments account for the vast majority (81%) of the citywide projected budget for language access: 62 percent by the Department of Public Health (\$5.6 million); 12 percent by the Department of Elections (\$1.1 million); 7 percent by Human Services Agency (\$690,065); and the remaining 19 percent by 23 other Departments (\$1.6 million).

²⁰ Section 91.2(k).

- ✓ With the exception of the Department of Elections and the Residential Rent Stabilization and Arbitration Board (7 percent and 3 percent respectively of their total departmental projected budgets), the remaining 24 Departments are projected to spend less than 1 percent of their projected total departmental budgets on language services.

On-site Interpretation Budget - Sixty-two percent of the total proposed Language Access budget is comprised of on-site interpretation. However, 98 percent of this projected budget is from the Department of Public Health (\$3,782,792), and 1.6 percent (\$64,000) is from the Public Defender. Thus, the remaining 24 Departments are contributing only 0.5 percent of the total budget to on-site interpretation.

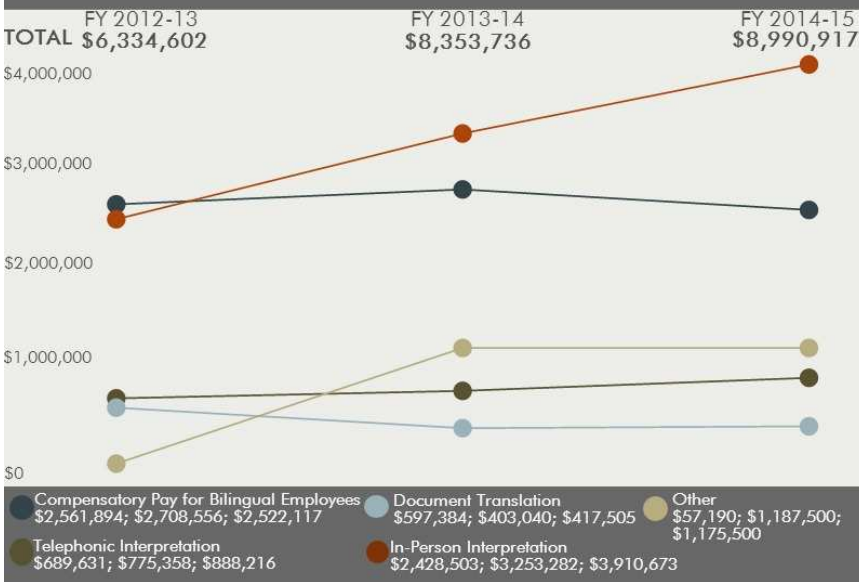
Bilingual Staffing Budget - Twenty-eight percent of the projected budget for language services is anticipated for bilingual employee compensation. Seventy-three percent of the total projected budget reported by the 26 Tier 1 Departments is from three departments: Department of Public Health (44 percent/\$1,120,494), Human Services Agency (19 percent/\$478,765) and San Francisco International Airport (10 percent/\$256,500); the remaining 27 percent reported for bilingual pay is spread across the 10 Departments that reported an allocation.

Budget for “Other” or Special Language Projects - Special projects is the third largest category for language services, representing 13 percent of the total. This category consists of grants and other special programs associated with language access, and is again, largely from three departments: Department of Elections, 80 percent or (\$950,000); the Residential Rent Stabilization and Arbitration Board, 10 percent (\$120,000); and the San Francisco Public Utilities Commission, 8.5 percent or \$100,000. The remaining 23 departments account for only 1.5 percent of the budget category.

Telephonic Interpretation Budget – Ten percent of the total projected language budget is allocated to telephonic interpretation. The Department of Public Health represents 76 percent (\$679,000) and the Human Services Agency 11 percent (\$101,100); 24 Departments account for the remaining 13 percent.

Translation Services Budget - Seventy-three percent of the translation of documents budget is comprised of the Human Services Agency 26 percent (\$110,200), the Department of Elections 34 percent (\$145,000) and the District Attorney 13 percent (\$55,000). The remaining 27 percent is shared among 23 Departments.

TIER 1 PROPOSED LANGUAGE ACCESS BUDGETS: FY 2012-13 TO FY 2014-15



Comparison with previous years- Over the past three years, the total proposed Language Access budget has increased by 41.93 percent; however, nearly 80 percent or more of the budget has been from three departments. The Department of Public Health has accounted for more than 50 percent of the total proposed Language Access budget (FY 2012-13: 61 percent, FY 2013-14: 57 percent, and FY 2014-15: 67 percent);

the Human Services Agency has also accounted for a significant share of the budget (FY 2012-13: 14 percent, FY 2013-14: 11 percent, FY 2014-15: 7 percent). In FY 2012-13, the San Francisco Police Department was the third department with the largest budget at five percent. For the past two years, the Department of Elections has also accounted for a significant portion of the total budget (FY 2013-14: 13 percent, and FY 2014-15: 12 percent).

- ✓ The total FY 2012-13 projected budget for language services was \$6.3 million: 40 percent for compensatory bilingual pay, 11 percent for telephonic interpretation, nine percent for document translation, 38 percent for on-site interpretation, and one percent for other unallocated costs. The total FY 2013-14 projected budget was \$8.3 million: 39 percent for on-site interpretation, 32 percent for compensatory bilingual pay, 14 percent for special projects, nine percent for telephonic interpretation, and five percent for document translation. The total FY 2014-15 projected budget is \$8.9 million: 43 percent for on-site interpretation, 28 percent for compensatory bilingual pay, 13 percent special projects, 10 percent for telephonic interpretation, and five percent for document translation services.
- ✓ The top three language services categories over the last three years have been: on-site interpretation (FY 2012-13: 38 percent, FY 2013-14: 39 percent, and FY 2014-15: 43 percent), compensatory bilingual pay (FY 2012-13: 40 percent, FY 2013-14: 32 percent, and FY 2014-15: 28 percent), and telephonic interpretation (FY 2012-13: 11 percent, FY 2013-14: 9 percent, and FY 2014-15: 10 percent). For FY 2013-14 and 2014-15, the “other” category is 14 percent and 13 percent respectively.²¹
- ✓ On-site interpretation services increased over the past three years by 61 percent, followed by telephonic interpretation services by 12 percent. Document translation decreased by 30 percent, Compensatory bilingual pay decreased by two percent and “other” or special projects decreased by 37 percent.

²¹ The category of “other” was added for reporting period of 2011-2012. As such, only a two-year comparison is available. This category accounts for any special projects, grants or other language services initiative that does not fit neatly into any of traditional language services categories.

Language Services Provisioning

The LAO also mandates Departments to provide both written translations and interpretation services to LEP residents.

Translated Materials - Departments are mandated to translate written materials that provide vital information to the public about department services and programs. In FY 2010-11, Departments reported 2,600 document translations; in FY 2011-12, 1,250 translated materials were produced. In FY 2012-13, Departments reported producing over 1,866 translated documents, a 49 percent increase from the previous year. The Planning Department and the Residential Rent Stabilization and Arbitration Board reported the highest number of translated materials (approximately 549 and 390 translated documents, respectively) while other departments reported a wide range of types of documents translated and languages. The majority of documents were translated into Spanish and Chinese; a few included Russian, Vietnamese, and Tagalog. Departments such as Human Services Agency, Municipal Transportation Agency, and San Francisco Public Library translated materials in several other languages such as Arabic, Gujarati, Hindi, Thai, French, Tigrinya and Korean. Over the past three years, there has been a 28 percent decrease in the number of translated materials.

Telephonic Messages - In FY 2010-11 and FY 2011-12, 69 percent (18) of Departments reported having telephonic messages in other languages in addition to English. In FY 2012-13, 73 percent of Departments reported having recorded telephonic messages available in languages other than English. The Department of Public Health and the San Francisco Public Library have recordings in five languages other than English. Sixty-two percent (16) of Departments have greetings in at least Spanish and Cantonese; 23 percent (six) departments only offer greetings in English. Over the last three years, only one department has added additional languages to its telephonic message.

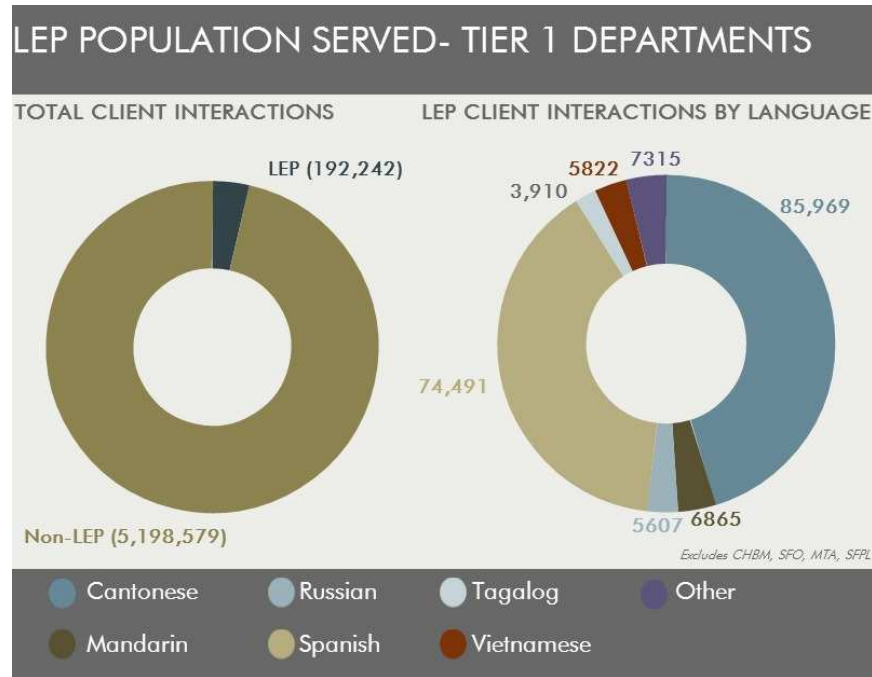
Interpretation Services for Public Meetings –In FY 2010-11, 11 Departments provided oral interpretation at meetings and in FY 2011-12, 12 provided the service. In FY 2012-13, 54 percent of Departments provided oral interpretation at public meetings. Over the past three years, there has been a 27 percent increase in provision of oral interpretation at public meetings.

Telephonic Interpretation Services –Departments may track their interactions with LEP clients using telephonic records of language assistance.²² Twenty Departments track call volumes, 77 percent utilize Language Line or another telephonic interpretation provider, and eight percent (two) solely utilize bilingual staff to track requests for telephonic interpretation. Among the calls reported, 51 percent were conducted in Spanish (an eight percent increase from FY 2011-2012), 30 percent in Cantonese, six percent in Mandarin and four percent in Russian. In FY 2010-11, 44 percent were conducted in Spanish, 40 percent in Cantonese, six percent Vietnamese, four percent in Mandarin and four percent Russian. In FY 2011-12, 43 percent of all calls were conducted in Spanish, 32 percent Cantonese, five percent Mandarin and five percent Vietnamese.

²² Sec. 91.2 (k).

Over the past three years, the number of telephonic Cantonese speaker interactions citywide has declined, while Spanish speaker interactions have increased. In FY 2011-12, 22 departments used telephonic interpretation numbers and five departments used bilingual staff to track requests for telephonic interpretation. In FY 2010-11, 13 departments used telephonic interpretation numbers and three departments used estimates or staff tracking.

LEP Clients Served



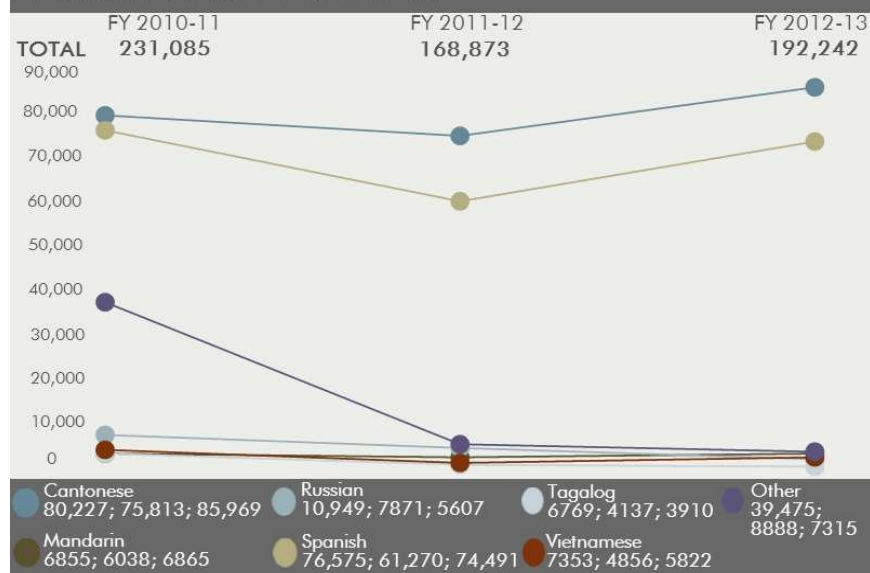
LEP Interactions-Over the past three years, there has been a 56 percent increase in the total population served by Departments, but a 16 percent decrease in LEP client interactions. In FY 2010-11, total client interactions reported were 3,332,145, of which 231,085 (6.9 percent) were LEP interactions.²³ In FY 2011-12, total clients served were 4,166,295, of which 168,873 (4.1 percent) were LEP.²⁴ The total number of client interactions as reported by Departments for FY 2012-13 was 5,198,579- 192,242 (3.7 percent) were LEP.²⁵

²³ Does not include Municipal Transportation Authority (MTA), Airport (SFO), Library (SFPL), and Public Utilities Commission (PUC) due to use of general ridership/traveler or Census estimates.

²⁴ Does not include MTA, SFO, SFPL, and PUC due to use of general ridership/traveler or Census estimates.

²⁵ Number does not include client interactions reported by MTA and SFO, as their reported total client interactions of 200 million and 44.5 million clients would skew the data sample since the numbers do not represent unique individuals. Also Departments that submitted information based on Census estimates, rather than actual data collected, are not included.

LEP CLIENTS SERVED BY LANGUAGE SPOKEN: FY 2010-11 to FY 2012-13



LEP Client Interactions by Language— the most commonly spoken languages have remained consistent for the past three years. In FY 2010-11, Cantonese was 34 percent of all LEP interactions, Spanish 33 percent, Russian four percent and Tagalog three percent. In FY 2011-12, 45 percent of all LEP interactions were in Cantonese, 36 percent Spanish, five percent Russian, and two percent Tagalog. In FY 2012-13 LEP interactions by language were 45 percent Cantonese, 39 percent Spanish, three percent Russian, and two percent

Tagalog. When compared to general client interactions across all Departments, only Cantonese and Spanish are more than one percent of total client interactions (1.65 percent for Cantonese and 1.43 percent for Spanish).

Supervisory District Data on LEPs

As part of annual compliance plan reporting, Departments are required to provide information on LEP clients served by their facilities located in each corresponding Supervisory District.²⁶ For this report period, only 27 percent (7) provided data collected for all 11 districts and two departments provided partial information based on their facilities located in Districts 6 and 7.²⁷ A total of 143,191 LEP interactions were reported by supervisory district for this report period. Among the nine Departments that reported this information, 35 percent of all LEP client interactions reported were located in District 9, followed by 13 percent in District 11, and 12 percent in District 10.²⁸

In FY 2010-11, three Departments provided data for all 11 districts.²⁹ Four Departments reported partial district data.³⁰ In FY 2011-12, six Departments reported collected data for all

²⁶ Section 91.10 (b)- The number and percentage of limited English speaking residents of each district in which a Covered Department Facility is located and persons who use the services provided by a Covered Department Facility, listed by language other than English, using either method in Section 91.2(k) of this Chapter.

²⁷ Adult Probation Department, District Attorney, Department of Public Health, Department of Elections, Department of the Environment, Human Services Agency, Office of Economic and Work Force Development, Public Defender (Districts 6 & 7) and Juvenile Probation Department (District 7).

²⁸ There appears to be a discrepancy with numbers reported by the Department of Public Health which were the same numbers for the past two years but with different district information for the current year.

²⁹ District Attorney, Department of Elections, and Human Services Agency.

³⁰ City Hall Building Management (District 6), Department of Public Health (Districts 3, 4, 6, 7, 9, and 10), Public Defender (Districts 6 and 7) and Juvenile Probation (District 7). Because reporting of district data has been inconsistent and varied over the past three years, OCEIA corrected the methodology for reporting clients served by districts. Department data on clients served based on Census population estimates rather than actual numbers will no longer be included as part of department reporting. As such, OCEIA did not include data from any departments that submitted Census data as part of their client served information for this report period. The San Francisco Public Library provided information for all 11 districts for FY 2012-13,

11 districts³¹ and one department provided partial data.³² For this report period, only 27 percent (7) provided collected data for all 11 districts and two departments provided partial information based on their facilities located in Districts 6 and 7.³³ Over the last three years, only four additional departments have provided data by supervisorial district. While this is a 28 percent improvement, most Departments consistently struggle to capture district data and even partial information has been inconsistent. OCEIA is working with data experts to develop more effective and accurate methods for Departments to capture LEP and language access data by supervisorial district.

Over the past three years, Departments have provided limited data for LEP supervisorial district interactions. In FY 2010-11, 38 percent of all LEP client interactions reported occurred in District 10, 13 percent occurred in district 11 and 11 percent occurred in district 3. In FY 2011-12, 19.6 percent of all LEP client interactions reported occurred in District 9, 5.7 percent in District 6 and 5.5 percent in District 3.

The following charts display information submitted by Departments by Supervisorial Districts, as required by the LAO. However, only nine out of 26 Tier 1 Departments, submitted full or partial information, therefore data on the following pages provide only a limited picture of how the LEP population is being served. Most Departments continue to struggle with capturing information on LEP clients served in each district using one of the three methods outlined in the LAO. Their past reliance on using Census estimates has improved, but this is clearly an area in which Departments need guidance and tools.

however, the data was based on Census estimates and not actual library usage. Therefore, data provided was not included in the current year analysis for FY 2012-13 or three year comparison for 2010-11 and FY 2011-12.

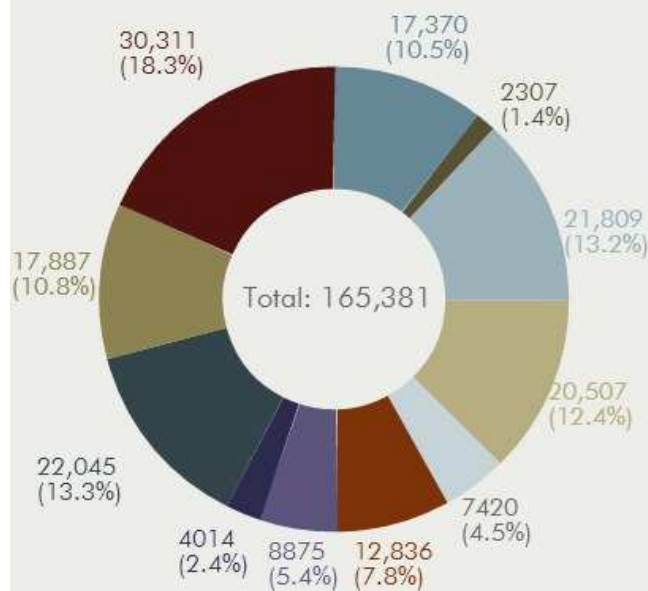
³¹ District Attorney, Department of Public Health, Department of Elections, Department of the Environment, Human Services Agency and the Office of Economic and Workforce Development.

³² Public Defender provided data for districts 6 and 7.

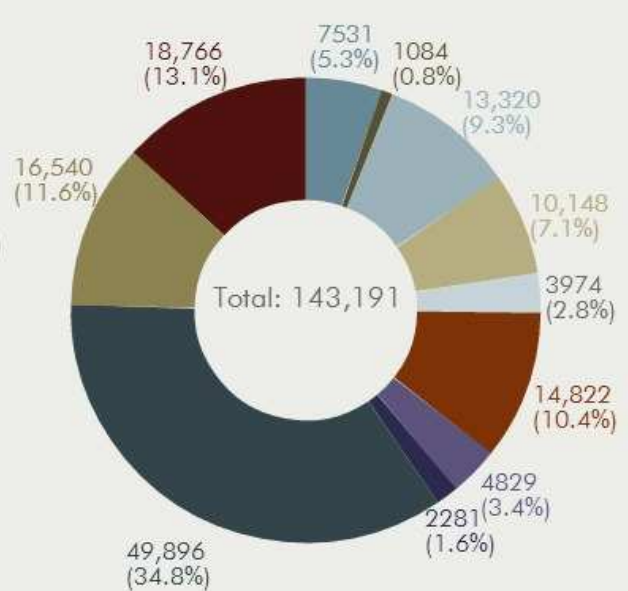
³³ Adult Probation Department, District Attorney, Department of Public Health, Department of Elections, Department of the Environment, Human Services Agency, Office of Economic and Work Force Development, Public Defender (Districts 6 & 7) and Juvenile Probation Department (District 7).

CITYWIDE LEP POPULATION AND CLIENTS SERVED: SUPERVISORIAL DISTRICTS

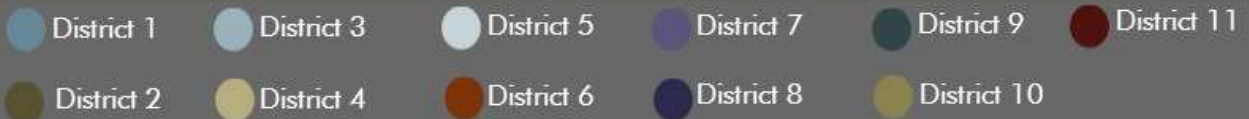
LEP POPULATION BY DISTRICT



CLIENTS SERVED BY TIER 1 DEPTS.

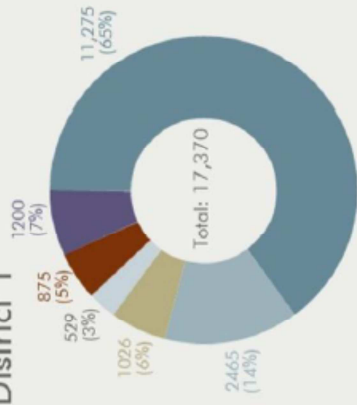


Data: SF Planning

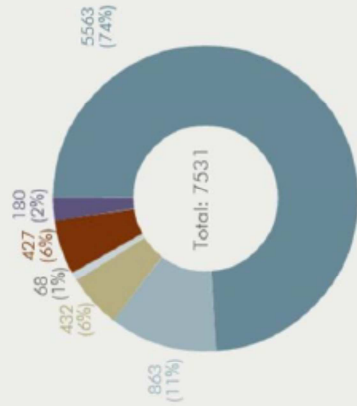


LEP POPULATION AND CLIENTS SERVED: SUPERVISORIAL DISTRICTS

District 1

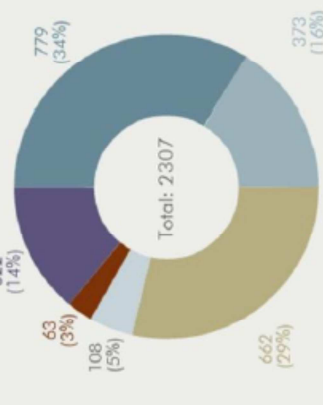


SF Planning Data

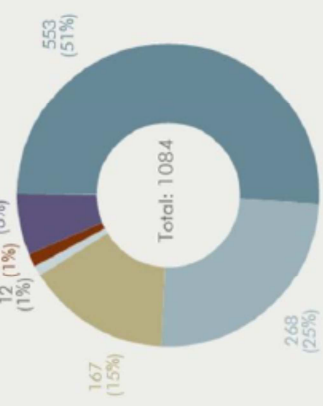


Department Data- Clients Served

District 2



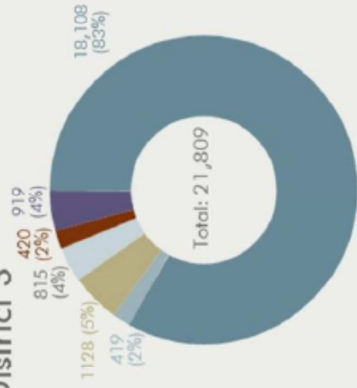
SF Planning Data



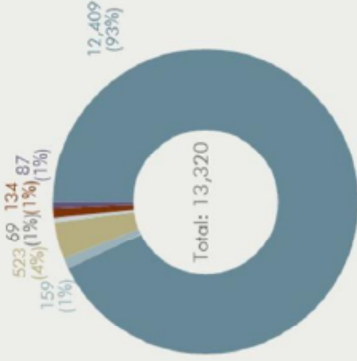
Department Data- Clients Served

LEP POPULATION AND CLIENTS SERVED: SUPERVISORIAL DISTRICTS

District 3

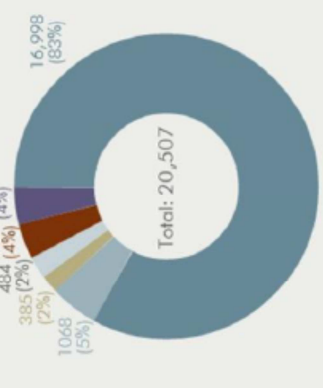


SF Planning Data

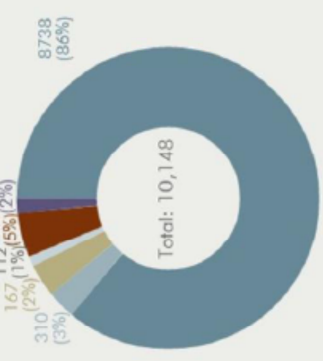


Department Data- Clients Served

District 4



SF Planning Data

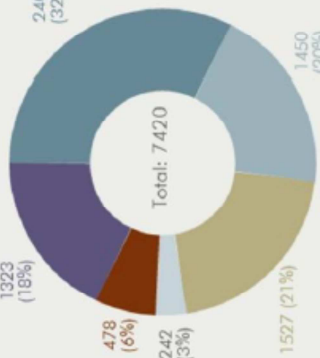


Department Data- Clients Served

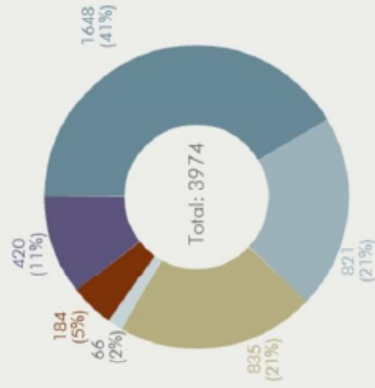


**LEP POPULATION AND CLIENTS SERVED:
SUPERVISORIAL DISTRICTS**

District 5

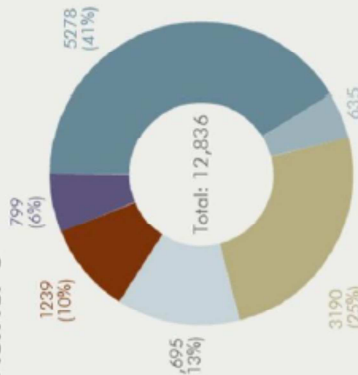


SF Planning Data

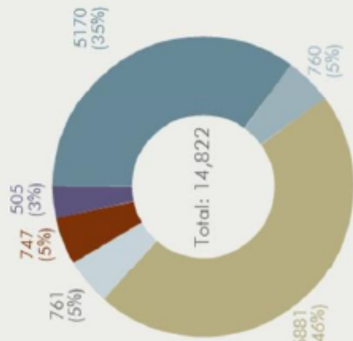


Department Data- Clients Served

District 6



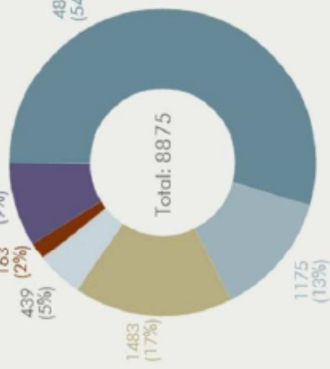
SF Planning Data



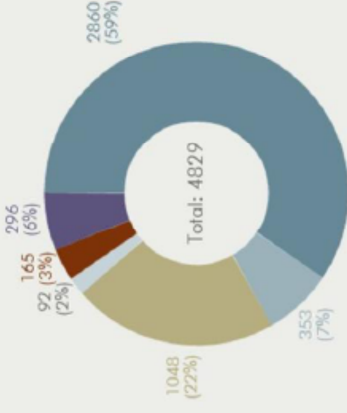
Department Data- Clients Served

**LEP POPULATION AND CLIENTS SERVED:
SUPERVISORIAL DISTRICTS**

District 7

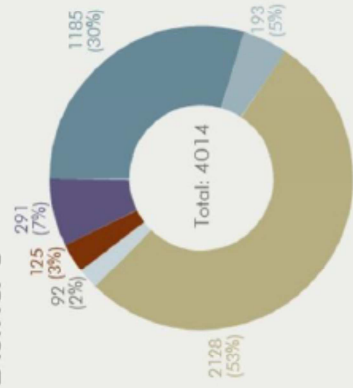


SF Planning Data

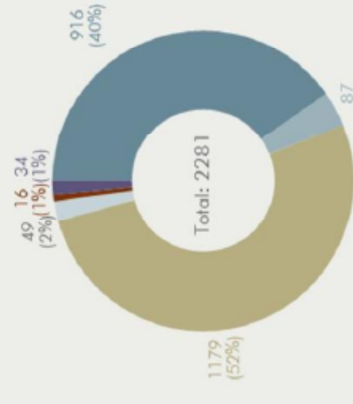


Department Data- Clients Served

District 8



SF Planning Data

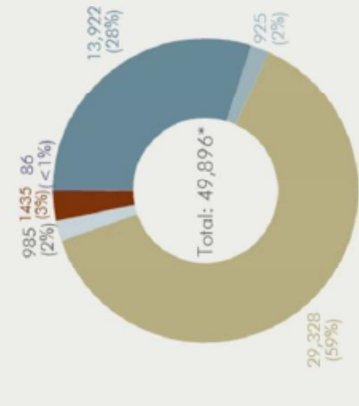
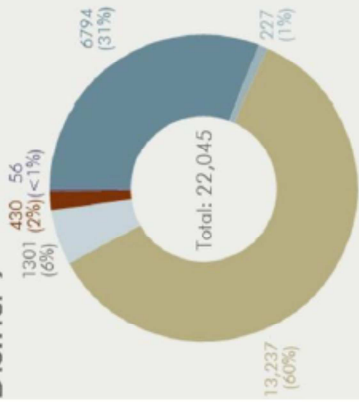


Department Data- Clients Served



LEP POPULATION AND CLIENTS SERVED: SUPERVISORIAL DISTRICTS

District 9

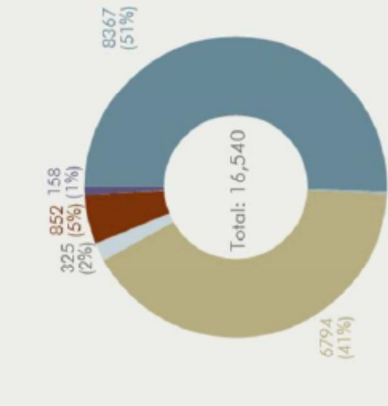
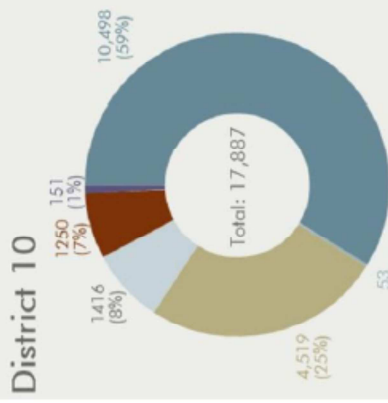


SF Planning Data

Department Data- Clients Served

*Several departments submitted client data that was not disaggregated by language. Number of clients disaggregated by language is 49,891.

District 10

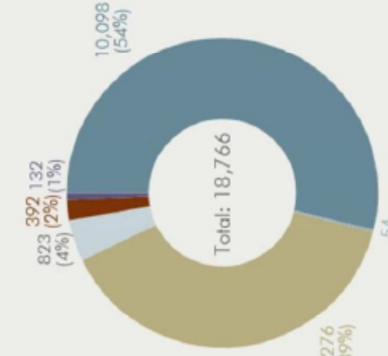
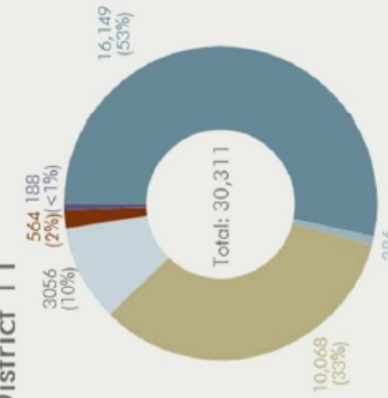


SF Planning Data

Department Data- Clients Served

LEP POPULATION AND CLIENTS SERVED: SUPERVISORIAL DISTRICTS

District 11



SF Planning Data

Department Data- Clients Served



Whether in an emergency or in the course of routine business matters, the success of government efforts to effectively communicate with members of the public depends on the widespread and nondiscriminatory availability of accurate, timely, and vital information.

—U.S. Attorney General Eric J. Holder, Jr.

Adequate funding is a vital aspect of compliance.... However, fiscal pressures are not a blanket exemption from civil rights requirements.³⁴

—U.S. Department of Justice letter to North Carolina Courts on their obligation to meet federal language access requirements

³⁴Assistant U.S. Attorney General Thomas E. Perez March 2012 letter to Honorable John W. Smith Director North Carolina Administrative Office of the Courts. Retrieved from http://www.justice.gov/crt/about/cor/TitleVI/030812_DOJ_Letter_to_NC_AOC.pdf See also “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons,” 67 Fed. Reg. 41,455, 41,460 (June 18, 2002). Retrieved from http://www.dhs.gov/xlibrary/assets/crcl_lep_guidance.pdf.

III. LAO REQUIREMENTS

The Language Access Ordinance (LAO) was enacted in 2001 to ensure equal access to city services for all San Franciscans, including those with limited proficiency in English. The LAO imposes on Tier 1 City departments the obligation to use sufficient numbers of bilingual employees in public contract positions to provide the same level of information and services to Limited English Proficient (LEP) persons as they provide to English speakers in each language that meets certain language thresholds.³⁵

TIER 1 DEPARTMENTS	TIER 2 DEPARTMENTS
<p>All departments designated as Tier 1 must comply with the full extent of the law and submit Annual Compliance Plans to the Board of Supervisors, Mayor, and the Immigrant Rights Commission through the Office of Civic Engagement & Immigrant Affairs.</p> <ol style="list-style-type: none"> 1. Adult Probation Department 2. Airport (San Francisco International) 3. Assessor Recorder (Office of the) 4. Building Inspection (Department of) 5. Building Management (City Hall) 6. District Attorney’s Office 7. Elections (Department of) 8. Emergency Management (Department of) 9. Environment (Department of the) 10. Fire Department 11. Human Service Agency 12. Juvenile Probation Department 13. Mayor’s Office of Economic and Workforce Department 14. Municipal Transportation Agency 15. Planning Department 16. Police Department 17. Public Defender’s Office 18. Public Health (Department of) 19. Public Library (San Francisco) 20. Public Utilities Commission 21. Public Works (Department of) 22. Recreation and Park Department 23. Residential Rent Stabilization and Arbitration Board 24. Sheriff’s Office 25. Treasurer and Tax Collector (Office of the) 26. San Francisco Zoo 	<p>All other city departments not specified as Tier 1 that provide information or services directly to the public must comply with minimum requirements of the LAO. Based on the extent of their work with the public, the following departments are considered Tier 2 (list not limited to these departments):</p> <ol style="list-style-type: none"> 1. 311 2. Animal Care and Control 3. Child Support Services 4. Department of Children, Youth & Their Families 5. Office of Citizen Complaints 6. City Administrator’s Office 7. City Attorney 8. Clerk of the Board of Supervisors 9. Office of Contract Administration 10. Controller’s Office 11. County Clerk 12. General Services Agency 13. Human Resources 14. Human Rights Commission 15. Office of Labor Standards Enforcement 16. Mayor’s Office 17. Mayor’s Office of Criminal Justice 18. Mayor’s Office on Disability 19. Mayor’s Office of Housing 20. Mayor’s Office of Neighborhood Services 21. Medical Examiner 22. Port of San Francisco 23. Office of Public Finance 24. Purchasing 25. Office of Small Business 26. Department on the Status of Woman 27. Department of Technology

³⁵ Departments must provide information and services in each language spoken by either a Concentrated or Substantial number of Limited English Speaking Persons. “Concentrated Number of Limited English Speaking Persons” means either five percent of the population of the district in which a covered department facility is located or five percent of those persons who use the services provided by the facility. Section 91.2(e). “Substantial Number of Limited English Speaking Persons” means either 10,000 city residents or five percent of those persons who use the department’s services. Section 91.2(k).

Following is a summary of key requirements under the Language Access Ordinance for all city departments that provide information to the public.

MINIMUM REQUIREMENTS FOR ALL PUBLIC-SERVING CITY DEPARTMENTS (TIER 1 AND 2)

1. Inform Limited English Speaking Persons who seek services in their native tongue of their right to request translation services from all city departments.
2. Translate all publicly-posted documents related to (1) services provided and, or affecting a person's rights to, determination of eligibility of, award of, denial of, or decrease in benefits, or (2) services into the languages spoken by a Substantial Number of Limited English Speaking Persons.
3. Post notices in public areas of facilities.
4. Ensure translations are accurate and appropriate.
5. Designate a staff member for quality control.
6. Oral interpretation of any public meeting or hearing if requested at least 48 hours in advance.
7. Translate meeting minutes if (1) requested; (2) after the Legislative body adopts the meeting minutes; and (3) within a reasonable time period thereafter.
8. Allow complaints alleging violation of the LAO.
9. Document actions to resolve complaints and maintain copies of complaints for not less than 5 years. A copy shall be forwarded to the Immigrant Rights Commission and OCEIA within 30 days of receipt.

ADDITIONAL REQUIREMENTS FOR TIER 1 CITY DEPARTMENTS

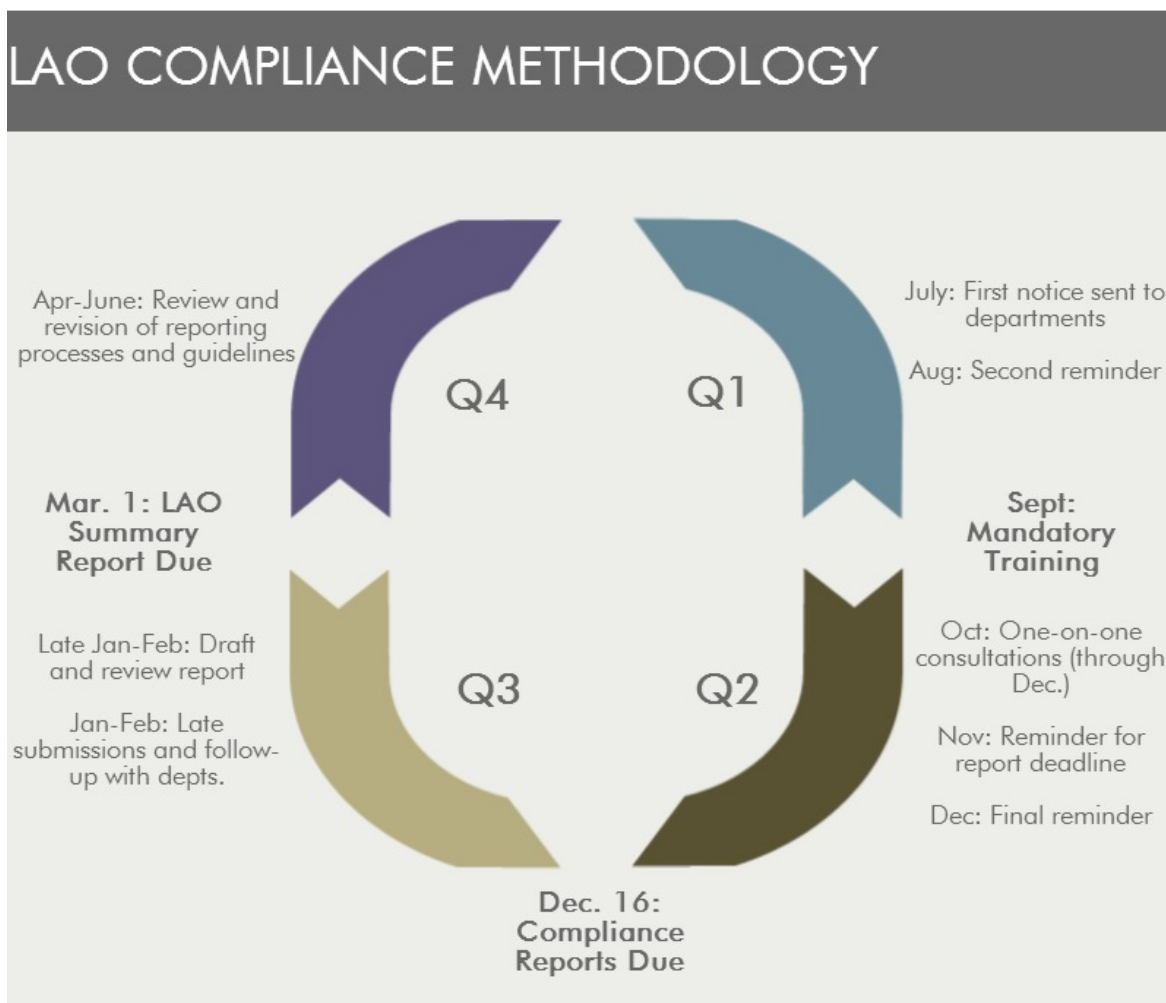
In addition to meeting the above minimum requirements, Tier 1 Departments must also track and provide the following information in their annual plans:

1. Total number and percentage of limited English speaking persons who use the department's services listed by language.
2. Total number and percentage of limited English speaking clients residing in the supervisorial district in which the department is located who use department services, listed by language.
3. A demographic profile.
4. Total number of public contact positions.
5. Bilingual public contact positions.
6. Language access liaison.
7. Telephone-based interpretation services.
8. Protocols to communicate with limited English-speaking clients.
9. Employee development and training strategy, and quality control protocols for bilingual employees and individuals in crisis situations.
10. An assessment of the adequacy of bilingual staff public contact positions.
11. List of all designated bilingual staff assigned to review accuracy and appropriateness of translation materials.
12. List of the department's written materials required to be translated by language.
13. Written copies on providing services to Limited English Speaking Persons.
14. Procedures for receiving and resolving complaints of any alleged violations of the ordinance.
15. Department goals for the upcoming year and a comparison to the previous year's goals.
16. Budget allocation and strategy.
17. Changes between previous Plan submittal and current submittal.
18. Any information requested by the Immigrant Rights Commission necessary for implementing listed requirements above.

IV. CITYWIDE COMPLIANCE REVIEW AND METHODOLOGY

As amended in 2009, the LAO requires OCEIA to ensure citywide compliance with language access laws and to provide a summary report each year to the Immigrant Rights Commission, Board of Supervisors and Mayor indicating which Tier 1 departments have filed their annual language access plans.

In 2009, OCEIA developed a standardized compliance plan form to simplify the reporting process and facilitate analysis across diverse Tier 1 Departments. This form is updated each year. The mandatory reporting form, which is based on Chapter 91 of the Administrative Code, is divided into three sections: 1) Departmental Results, 2) Language Access Planning and, 3) Language Access Documentation. Tier 1 Departments must complete the form and provide relevant attachments to supplement the information requested, including written policies, assessments, goals, and protocols for emergency situations. All compliance plans must be reviewed and signed by respective Department Heads.



Following is an overview of the LAO Process:

<p>Mandatory Training</p>	<p>Since 2010, departments have been required to attend mandatory training sessions. OCEIA developed the training to reinforce LAO requirements and rationale. Two levels of interactive training are provided:</p> <ul style="list-style-type: none"> ✓ Mandatory Tier 1 training to reinforce and clarify compliance reporting requirements. The trainings include information on collecting, monitoring and reporting language services for each department. Tier 1 departments are trained on LAO legal requirements, language access rights, complaint procedures and cost-effective methods of tracking data. ✓ General training to familiarize all departments providing information to the public (Tier I, Tier 2 and interested parties) with local, state and national legal requirements, LEP demographics, and an overview of San Francisco’s LAO. Departments are encouraged to participate in dialogue and share best practices, challenges and innovations. ✓ Since September 2012, a third component was added to the mandatory training to include community feedback panels and interactive discussion as well as a resource fair for city departments.
<p>Reporting Period</p>	<p>Compliance plans from Tier 1 departments are due on December 15 of each year (December 16 for 2013). Departments report data from the previous complete fiscal year (July 1 to June 30). Reminders are sent to department heads and liaisons several times during the year in advance of the filing date. The summary compliance report prepared by OCEIA is due on March 1 of each year to the Mayor, the Board of Supervisors and the Immigrant Rights Commission (IRC).</p>
<p>Submission of Annual Compliance Plans</p>	<p>Once individual Tier 1 department plans are submitted, they are reviewed by OCEIA staff for completeness and accuracy. Incomplete reports are not accepted and departments must first correct their plans before resubmitting.</p>
<p>Annual Plan Review and Analysis</p>	<p>OCEIA conducts a thorough analysis and comparison of all submitted data. Individual department reports are recorded and the annual summary report is prepared and reviewed several times. An IRC advisor reviews the data sections of the summary report in advance.</p>
<p>Immigrant Rights Commission Oversight</p>	<p>The IRC reviews citywide compliance with the LAO and may conduct a joint hearing with the Board of Supervisors. The Commission is responsible for conducting outreach to LEP persons about their rights under the law; reviewing complaints about alleged LAO violations; working with Departments to resolve complaints and maintaining records; coordinating a language bank for Departments that choose to have translation done outside the Department and need assistance in obtaining translators; and reviewing Annual Compliance Plans. Most of this work is conducted by OCEIA staff on behalf of the IRC.</p>
<p>Public Hearings on Language Access</p>	<p>By June 30th of each year, OCEIA may request a joint public hearing with the Board of Supervisors and the Immigrant Rights Commission to assess the adequacy of the City's ability to provide the public with access to language services. The Board of Supervisors may link LAO compliance to the annual budgeting process.</p>

V. DEPARTMENT COMPLIANCE DATA AND PLANS

The following section provides summary data provided by Tier 1 departments in their annual compliance plans for FY 2012-2013 (year ending June 30, 2013), submitted on or before December 31, 2013 as required by the LAO.

Each department was asked to respond to a standardized set of questions contained in the annual compliance plan form. For this reporting period and going forward, information is shown by Department rather than by individual question or data point.

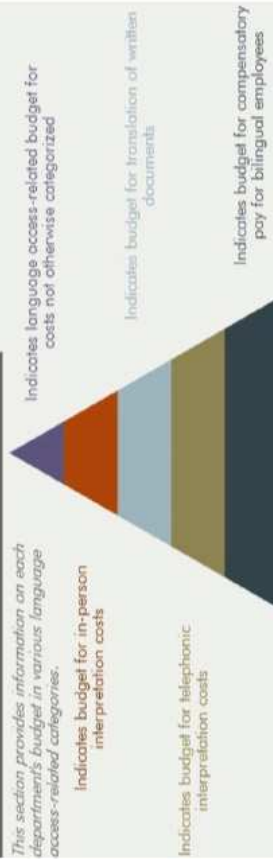
KEY: DEPARTMENTAL PAGES

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

This section details each department's language access goals for the upcoming fiscal year. For some departments, goals were omitted due to space constraints.

TOTAL DEPARTMENTAL BUDGET **TOTAL LANGUAGE ACCESS BUDGET**
 Indicates total FY 14-15 departmental budget **Indicates total FY 14-15 language access budget**
This section provides information on each department's total budget and language access budget for the upcoming fiscal year.

LANGUAGE ACCESS BUDGET CATEGORIES



LANGUAGE SERVICES OFFERED
This section provides information on the language services offered by each department. An icon in each category indicates the department provides that service.

- Telephonic Interpretation
- Translated Documents
- Recorded Message in Multiple Languages
- Oral Interpretation at Public Meetings

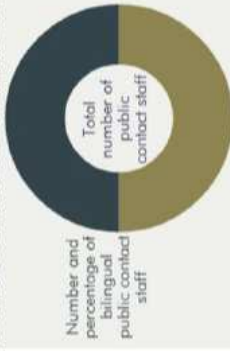
Indicates number of interpreted calls **Indicates number of translated documents** **Indicates languages in which recorded message is offered** **Indicates number of meetings in which interpretation was offered**

COMPLIANCE INDICATORS
This section provides information on how each department performed on LAO compliance indicators. A check mark indicates compliance.

- Submitted Plan on Time
- Attended LAO Training
- Tracks LEP Client Interactions
- Written LAO Policy
- Annual Goals, Budget & Strategy
- LAO Complaint Process

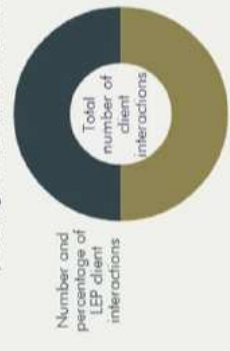
PUBLIC CONTACT STAFF

This graph indicates the Departments total number of public contact staff, as well as the number and percentage of bilingual and non-bilingual staff.



CLIENT INTERACTIONS

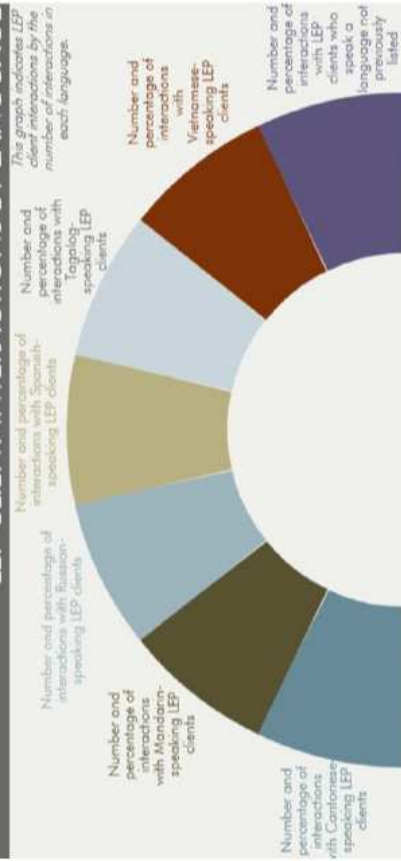
This graph indicates the Departments total number of client interactions, as well as the number and percentage of LEP and non-LEP interactions.



BILINGUAL STAFF- LANGUAGES SPOKEN

Each icon represents a language
Number and percentage of Cantonese-speaking bilingual staff
Number and percentage of Mandarin-speaking bilingual staff
Number and percentage of Spanish-speaking bilingual staff
Number and percentage of Tagalog-speaking bilingual staff
Number and percentage of Vietnamese-speaking bilingual staff
Number and percentage of Russian-speaking bilingual staff
Number and percentage of bilingual staff who speak a language not previously listed

LEP CLIENT INTERACTIONS BY LANGUAGE



Legend:
 Cantonese (Blue), Mandarin (Green), Spanish (Yellow), Tagalog (Light Blue), Vietnamese (Red), Russian (Light Green), Other (Purple)

This key indicates which colors represent which languages in the graphs above.

ADULT PROBATION DEPARTMENT

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Renew and update posted LAO information in reception areas
- ✓ Update recorded greeting to include English, Spanish and Cantonese
- ✓ Provide training on LAO policy and bilingual premium to all staff
- ✓ Adhere to the Department's Bilingual Premium Policy to ensure compliance with labor Memorandum of Understanding and City policies

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$33M

\$20K

LANGUAGE ACCESS BUDGET CATEGORIES



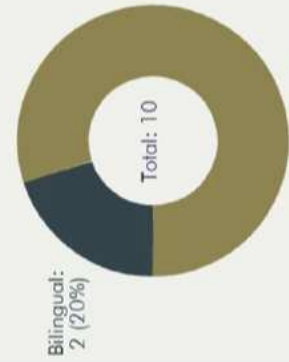
LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
Language Line	18 Documents	English, Spanish and Cantonese	None

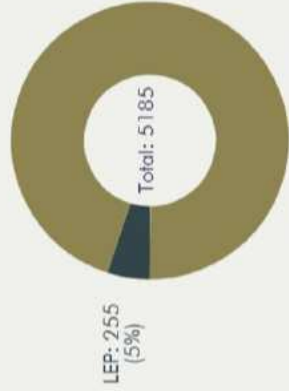
COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Attended LAO Training
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



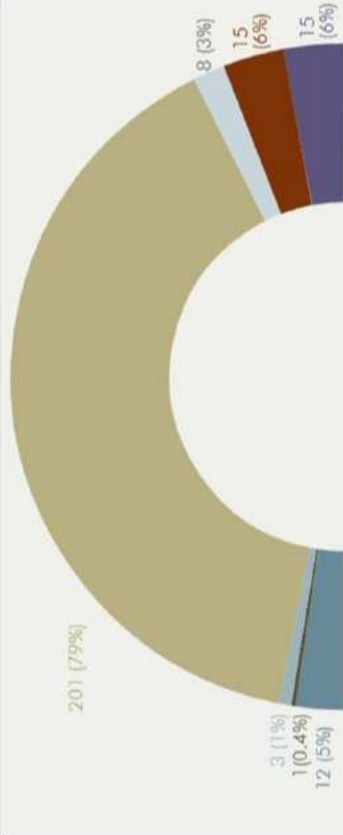
CLIENT INTERACTIONS



BILINGUAL STAFF- LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

DEPARTMENT OF BUILDING INSPECTION

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Identify/make available sufficient bilingual staff to meet LEP customer needs
- ✓ Work with City, DT to ensure accurate Google Translation of key materials posted on the DBI website
- ✓ Develop/update informational brochures in Chinese and Spanish, and make these available both online and as hard-copy handouts during community outreach events throughout the fiscal year

TOTAL DEPARTMENTAL BUDGET **\$51M** TOTAL LANGUAGE ACCESS BUDGET **\$30K**

LANGUAGE ACCESS BUDGET CATEGORIES

Not Provided

LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
6645 Calls	Number of documents unknown	Chinese & Spanish	As needed

COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Attended LAO Training
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

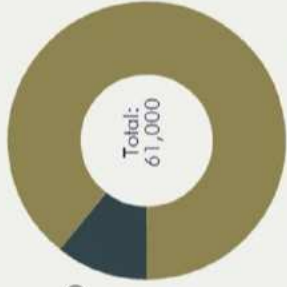
PUBLIC CONTACT STAFF

Bilingual: 24 (100%)*



CLIENT INTERACTIONS

LEP: 6,500 (11%)



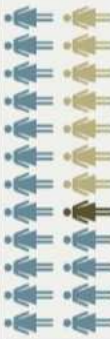
Total: 61,000

Non-LEP: 54,500 (89%)

Non-Bilingual: 0 (0%)

*DBI staff were instructed to confirm ethnicity of the client, but did not respond.

BILINGUAL STAFF - LANGUAGES SPOKEN



Cantonese: 16 (67%)

Spanish: 7 (29%)

Mandarin: 1 (4%)

LEP CLIENT INTERACTIONS BY LANGUAGE



5275 (78%*)

1500 (22%)

*DBI report indicated serving 4500 LEP clients, however the language aggregation indicated the Department served 6775 LEP clients. DBI staff were instructed to confirm the identity of the calls but did not respond.

- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

CITY HALL BUILDING MANAGEMENT

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

Implementation of digital, touch-screen interactive multi-lingual building directories



TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

Not Provided Not Provided

LANGUAGE ACCESS BUDGET CATEGORIES

Not Provided

LANGUAGE SERVICES OFFERED

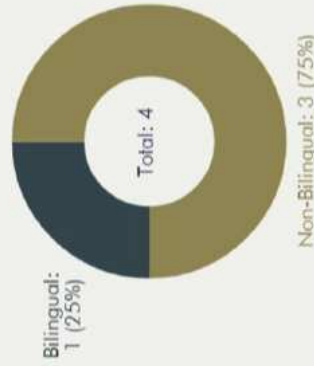
Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
N/A	2 Documents	No	None



COMPLIANCE INDICATORS

Submitted Plan on Time	Tracks LEP Client Interactions	LAO Complaint Process
Attended LAO Training	Written LAO Policy	Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS

N/A:
Not Tracked

BILINGUAL STAFF- LANGUAGES SPOKEN



Cantonese: 1 (100%)

LEP CLIENT INTERACTIONS BY LANGUAGE

N/A:
Not Tracked



DISTRICT ATTORNEY

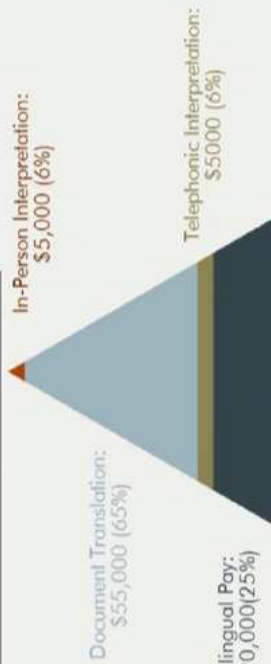
2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Continue to provide the dissemination of agency policies, information and enhance public outreach processes to all LEP clients
- ✓ Continue to place a priority on language proficiency in the hiring process
- ✓ Ensure public information materials are translated into core languages: Spanish, Cantonese and Mandarin

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$42.7M **\$85K**

LANGUAGE ACCESS BUDGET CATEGORIES



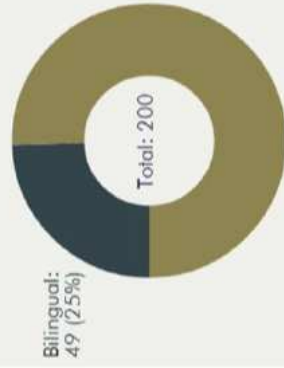
LANGUAGE SERVICES OFFERED

- ✓ Telephonic Interpretation
 - ✓ Translated Documents
 - ✓ Recorded Message in Multiple Languages
 - ✓ Oral Interpretation at Public Meetings
- 204 Calls 35 Documents Spanish & Cantonese 8-10 Hearings

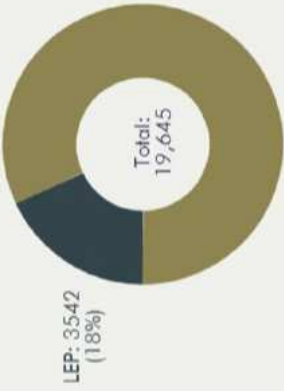
COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Attended LAO Training
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



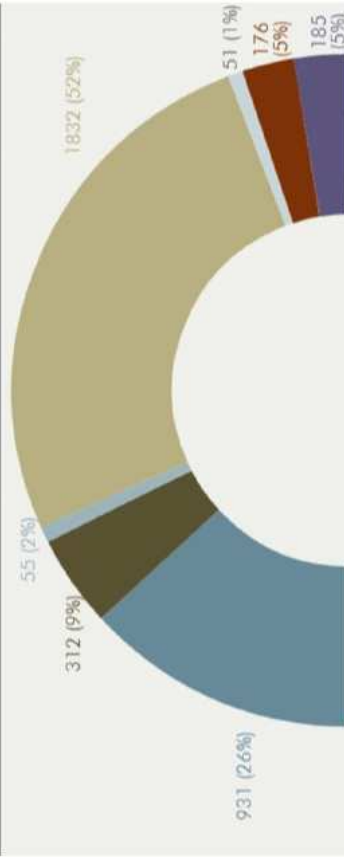
CLIENT INTERACTIONS



BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

DEPARTMENT OF EMERGENCY MANAGEMENT

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

Continue to provide fast and accurate oral translation services for 9-1-1 callers, as well as accurate written materials in multiple languages.

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$47.6M **\$46K**

LANGUAGE ACCESS BUDGET CATEGORIES



Bilingual Pay:
\$46,030 (100%)

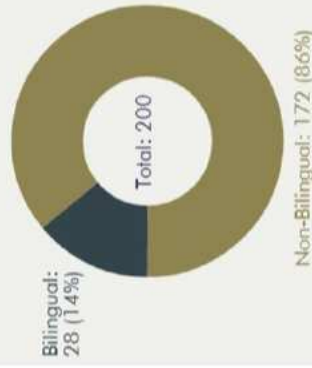
LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
16,226 Calls	1 Document	Spanish & Cantonese	6 Meetings

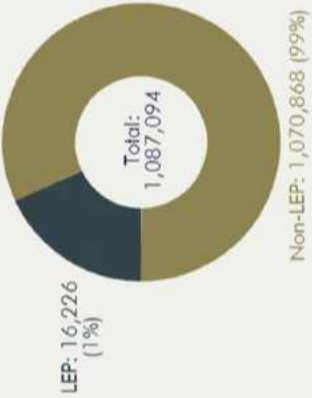
COMPLIANCE INDICATORS

- Submitted Plan on Time ✓ Tracks LEP Client Interactions ✓ LAO Complaint Process
- Attended LAO Training ✓ Written LAO Policy ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



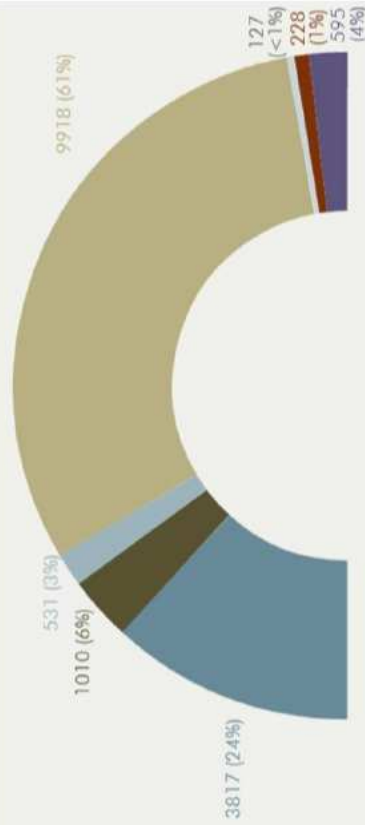
CLIENT INTERACTIONS



BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



HUMAN SERVICES AGENCY

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- Continue to develop web content for HSA's main webpage in threshold languages
- Continue to develop telephonic messages in multiple languages

TOTAL DEPARTMENTAL BUDGET **\$737.9M** TOTAL LANGUAGE ACCESS BUDGET **\$690K**

LANGUAGE ACCESS BUDGET CATEGORIES



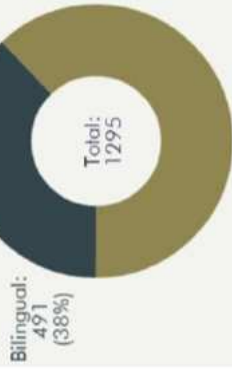
LANGUAGE SERVICES OFFERED

- Telephonic Interpretation: 1813 Calls
- Translated Documents: 164 Documents
- Recorded Message in Multiple Languages: Spanish, Russian, Vietnamese, Tagalog & Cantonese
- Oral Interpretation at Public Meetings: 127 Meetings

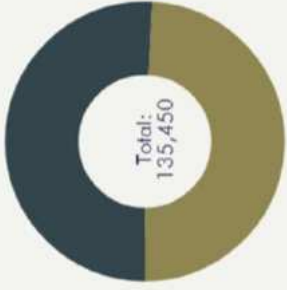
COMPLIANCE INDICATORS

- Submitted Plan on Time ✓
- Tracks LEP Client Interactions ✓
- Attended LAO Training ✓
- Written LAO Policy ✓
- LAO Complaint Process ✓
- Annual Goals, Budget & Strategy ✓

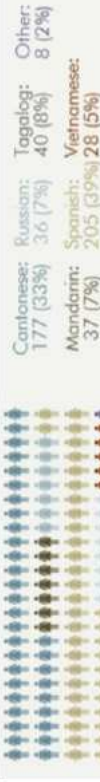
PUBLIC CONTACT STAFF



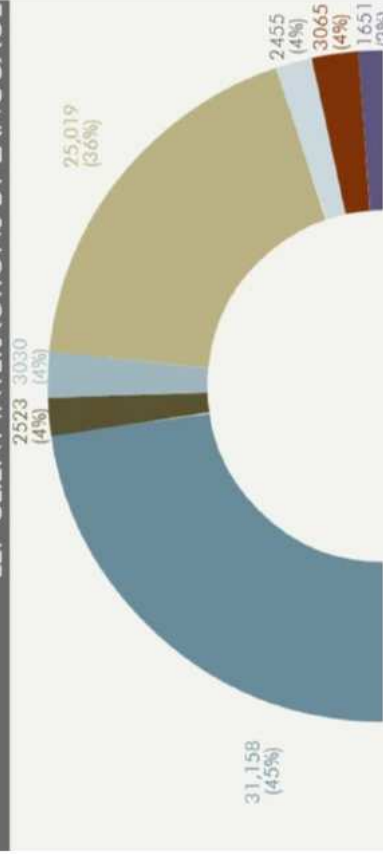
CLIENT INTERACTIONS



BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

MUNICIPAL TRANSPORTATION AGENCY

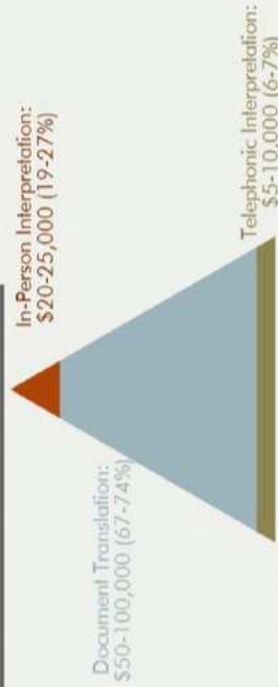
2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Increase bilingual capabilities in the Community Outreach group.
- ✓ Continue providing language sensitivity training for public contact staff
- ✓ Continue surveying existing English-only SFMTA documents and prioritizing for translation; utilize in-house and external resources for translations and include "311 Free Language Assistance" tagline on all appropriate SFMTA documents
- ✓ Continue efforts to establish a major agency wide contract with community ambassadors that will allow all access for all SFMTA divisions to bilingual ambassadors in a variety of languages
- ✓ Continue to maintain strong partnerships with Community Based Organizations (CBOs) that serve LEP populations in San Francisco

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$851.1M **\$75-135K***

LANGUAGE ACCESS BUDGET CATEGORIES



*SFMTA provided budget ranges estimates for language services

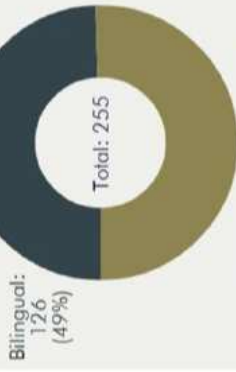
LANGUAGE SERVICES OFFERED

- ✓ Telephonic Interpretation
- ✓ Translated Documents
- ✓ Recorded Message in Multiple Languages
- ✓ Oral Interpretation at Public Meetings
- ✓ 1179 Calls
- ✓ >400 Documents
- ✓ Spanish & Cantonese
- ✓ 25-50 Meetings

COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Tracks LEP Client Interactions
- ✓ LAO Complaint Process
- ✓ Attended LAO Training
- ✓ Written LAO Policy
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS

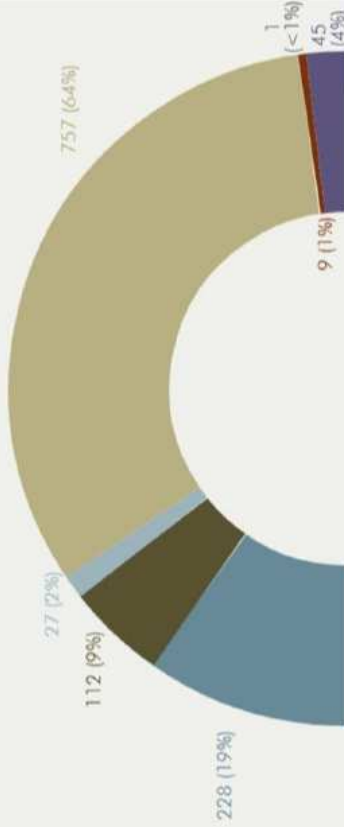


*SFMTA serves more than 200 million customers per year. LEP client data reflects Language Line usage of LEP calls.

BILINGUAL STAFF- LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

PLANNING DEPARTMENT

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- Continue to provide the dissemination of agency policies, information and enhance public outreach processes to all LEP clients
- Utilize the SF Planning website to provide information in Chinese, Spanish, Russian and Tagalog on the department's free language services, basic information about the Planning Department, and a glossary of planning related terms

TOTAL DEPARTMENTAL BUDGET **\$31.4M** TOTAL LANGUAGE ACCESS BUDGET **\$10.5K**

LANGUAGE ACCESS BUDGET CATEGORIES



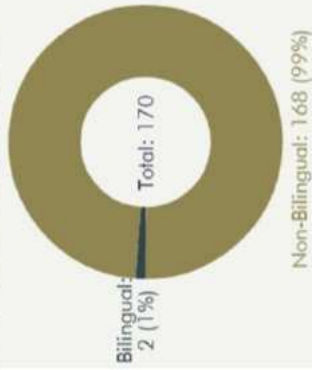
LANGUAGE SERVICES OFFERED

- Telephonic Interpretation
- Translated Documents
- Recorded Message in Multiple Languages
- Oral Interpretation at Public Meetings
- 11 Calls
- 549 Documents
- Spanish & Chinese
- 6 Meetings

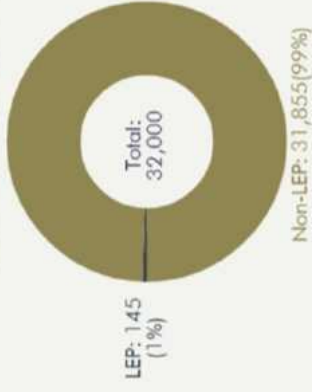
COMPLIANCE INDICATORS

- Submitted Plan on Time
- Attended LAO Training
- Tracks LEP Client Interactions
- Written LAO Policy
- LAO Complaint Process
- Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



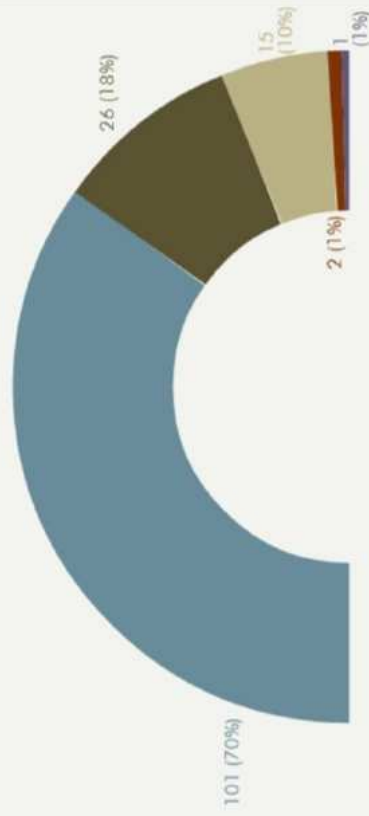
CLIENT INTERACTIONS



BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

PUBLIC DEFENDER

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- Translate written notices of rights into Chinese

TOTAL DEPARTMENTAL BUDGET **\$29M** TOTAL LANGUAGE ACCESS BUDGET **\$95.5K**

LANGUAGE ACCESS BUDGET CATEGORIES



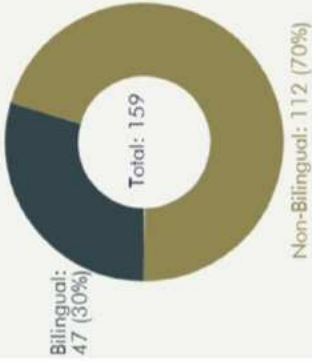
LANGUAGE SERVICES OFFERED

- Telephonic Interpretation: 11,000 Calls
- Translated Documents: 3 Documents
- Recorded Message in Multiple Languages: Spanish, Cantonese & Mandarin
- Oral Interpretation at Public Meetings

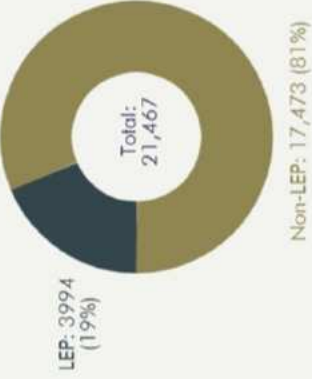
COMPLIANCE INDICATORS

- Submitted Plan on Time
- Attended LAO Training
- Tracks LEP Client Interactions
- Written LAO Policy
- LAO Complaint Process
- Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS



BILINGUAL STAFF- LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



DEPARTMENT OF PUBLIC HEALTH

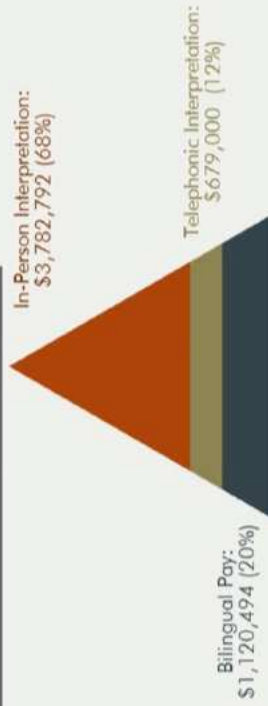
2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Improve the quality of interpreter services available to patients, clients and residents
- ✓ Continue to expand VMI to Laguna Honda Hospital and the Health Centers
- ✓ Continue to review the language needs of clients and add language waivers to vacant positions, as appropriate

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$1.95B **\$5.6M**

LANGUAGE ACCESS BUDGET CATEGORIES



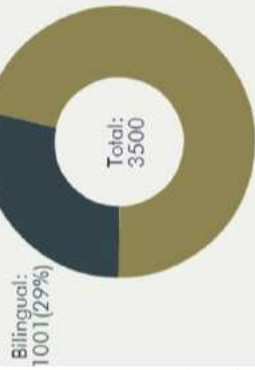
LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
1,117 Calls	178 Documents	Spanish, Cantonese, Tagalog, Russian & Vietnamese	1 Meeting

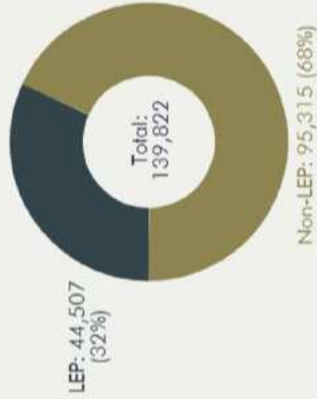
COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Attended LAO Training
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS



BILINGUAL STAFF- LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

PUBLIC LIBRARY

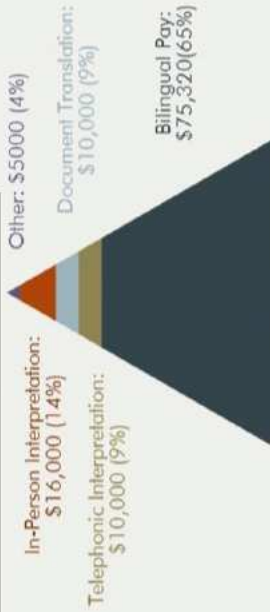
2013-14 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Analyze US Census and community demographic data to reflect additional priority languages
- ✓ Implement outreach strategies to improve service based on library users' voluntary language preference identification methods
- ✓ Further increase access to library resources and services through enhanced translation and interpretation services

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$102M **\$116.3K**

LANGUAGE ACCESS BUDGET CATEGORIES



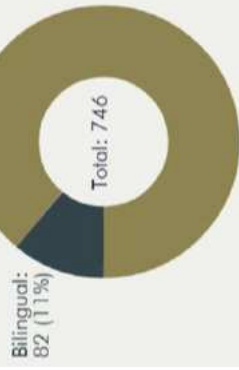
LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
5 Documents	Spanish, Cantonese & Mandarin	Spanish, Cantonese & Mandarin	11 Hearings

COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Attended LAO Training
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS

N/A:
Not Tracked

BILINGUAL STAFF- LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE

N/A:
Not Tracked



PUBLIC UTILITIES COMMISSION

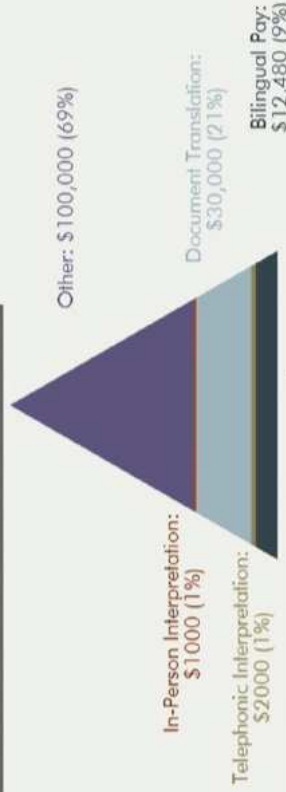
2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Implementation of Language Line Service agency-wide
- ✓ Expand telephonic interpretation to be available to field personnel
- ✓ Continue to enhance outreach methodology to include use of social media, innovative technology and current usage of various mediums to LEP clients
- ✓ Explore the possibility of implementation of Multilanguage audio and virtual tours of 525 Golden Gate to LEP population
- ✓ Utilization of the Digital wall in the SFPUC Headquarter' lobby "Snowfall to Outfall"
- ✓ Conduct advertising campaigns in three languages

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$874M **\$145.5K**

LANGUAGE ACCESS BUDGET CATEGORIES



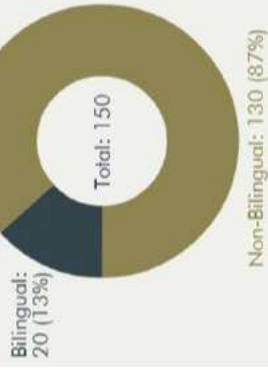
LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
38 Calls	16 Documents	Chinese & Spanish	12 Meetings

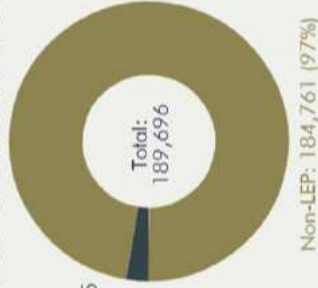
COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time ✓ Tracks LEP Client Interactions ✓ LAO Complaint Process
- ✓ Attended LAO Training ✓ Written LAO Policy ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



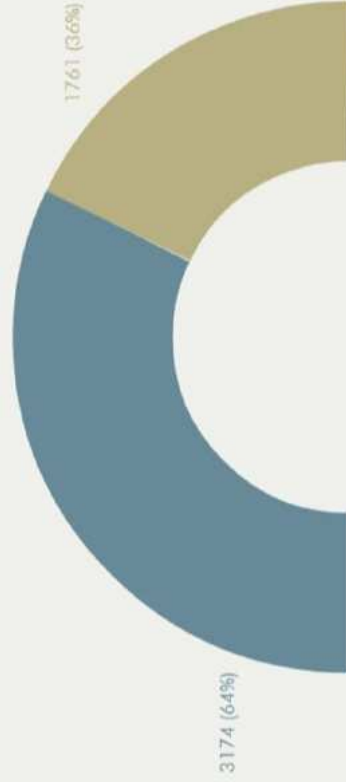
CLIENT INTERACTIONS



BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Chinese (Cantonese & Mandarin)
- Russian
- Tagalog
- Other
- Spanish
- Vietnamese

DEPARTMENT OF PUBLIC WORKS

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ Invite OCEIA staff to visit the department to discuss departmental needs and how to exceed LAO compliance measures
- ✓ Work with training department to combine Title VI training with an LAO training as a requirement for employee performance goals.
- ✓ Increase the number of multi-lingual documents available on departmental webpage
- ✓ Continue to develop targeted "in-language" education and outreach campaigns

TOTAL DEPARTMENTAL BUDGET **\$203.7M** TOTAL LANGUAGE ACCESS BUDGET **\$36.5K**

LANGUAGE ACCESS BUDGET CATEGORIES



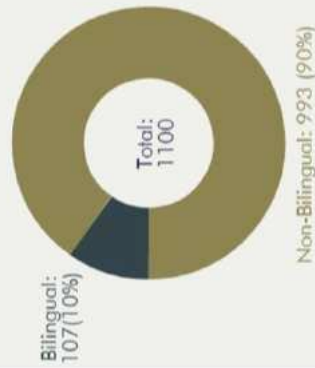
LANGUAGE SERVICES OFFERED

- ✓ Telephonic Interpretation
 - ✓ Translated Documents
 - ✓ Recorded Message in Multiple Languages
 - ✓ Oral Interpretation at Public Meetings
- 1,204 Calls 46 Documents Spanish & Cantonese 14 Meetings/Hearings

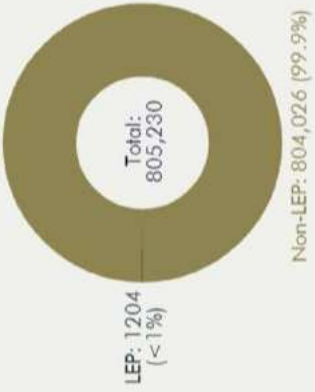
COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Attended LAO Training
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS



BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

RENT STABILIZATION & ARBITRATION BOARD

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

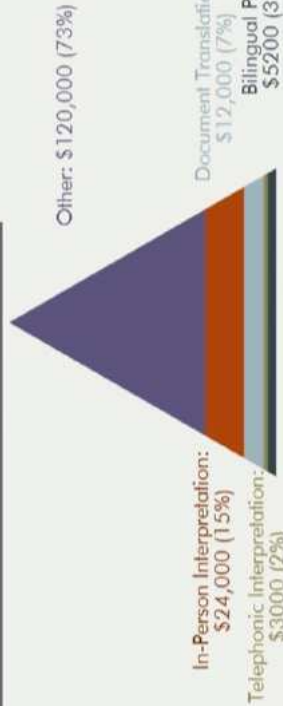
Continue to translate documents and increase availability through multiple sources- goals of 41.6 translated documents, translated documents available in 830 locations

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$6M

\$164.2K

LANGUAGE ACCESS BUDGET CATEGORIES



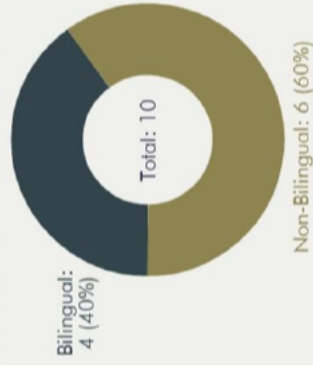
LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
49 Calls	390 Documents	Cantonese & Spanish	45 Hearings

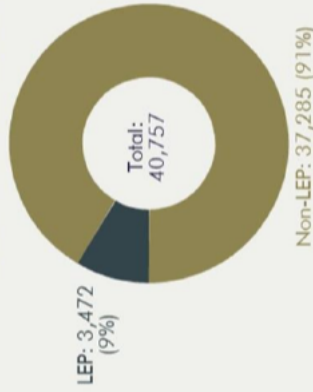
COMPLIANCE INDICATORS

- Submitted Plan on Time ✓
- Tracks LEP Client Interactions ✓
- Written LEO Policy ✓
- Attended LEO Training ✓
- LAO Complaint Process ✓
- Annual Goals, Budget & Strategy ✓

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS

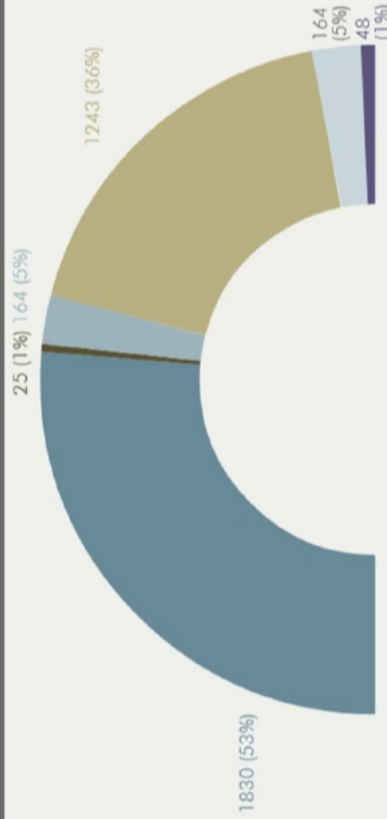


BILINGUAL STAFF- LANGUAGES SPOKEN



Cantonese: 3 (60%)
Spanish: 1 (20%)
Mandarin: 1 (20%)

LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

SHERIFF'S DEPARTMENT

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

✓ None. Business will be status-quo.

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$157.5M **\$109.9K**

LANGUAGE ACCESS BUDGET CATEGORIES



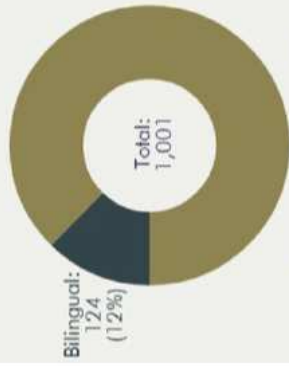
LANGUAGE SERVICES OFFERED

- ✓ Telephonic Interpretation
- ✓ Translated Documents
- ✓ Recorded Message in Multiple Languages
- ✓ Oral Interpretation at Public Meetings
- ✓ 59 Calls
- ✓ 164 Documents
- ✓ Spanish & Cantonese

COMPLIANCE INDICATORS

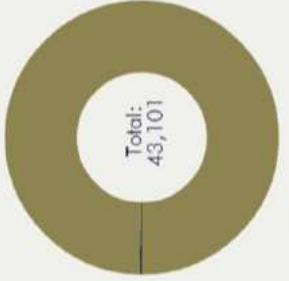
- ✓ Submitted Plan on Time
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



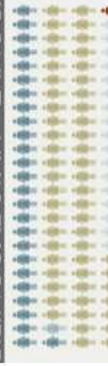
Non-Bilingual: 877 (88%)

CLIENT INTERACTIONS



Non-LEP: 42,980 (100%)

BILINGUAL STAFF- LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

TREASURER & TAX COLLECTOR

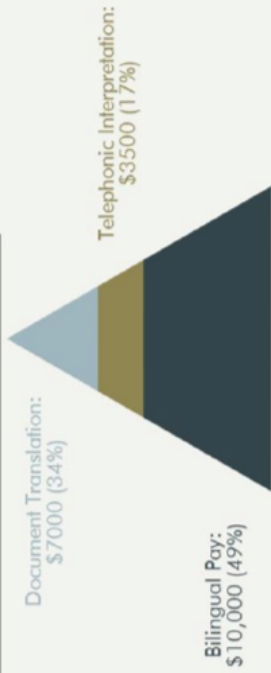
2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

- ✓ A continued and farther-reaching internal campaign of awareness regarding LAO requirements
- ✓ Upon the completion of the translation of "first tier" of most widely used documents, a second tier of documents will be translated
- ✓ New multilingual signage for public service areas will be produced
- ✓ Introduce and implement a more formalized approach to fielding and responding to complaints (or compliments!) on service offerings related to LAO
- ✓ Determine and implement a formalized standard of training and a set of quality controls for bilingual staff, and develop a guideline of written protocols for communication with LEP clientele

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$28M **\$20.5K**

LANGUAGE ACCESS BUDGET CATEGORIES



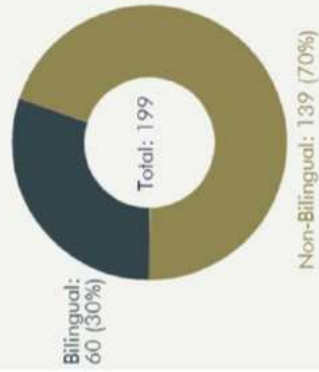
LANGUAGE SERVICES OFFERED

Telephonic Interpretation	Translated Documents	Recorded Message in Multiple Languages	Oral Interpretation at Public Meetings
104 Calls	14 Documents	Spanish, Cantonese & Mandarin	

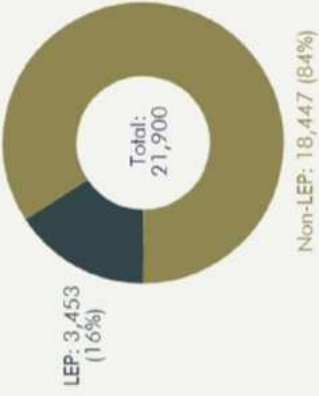
COMPLIANCE INDICATORS

- ✓ Submitted Plan on Time
- ✓ Tracks LEP Client Interactions
- ✓ Written LAO Policy
- ✓ LAO Complaint Process
- ✓ Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



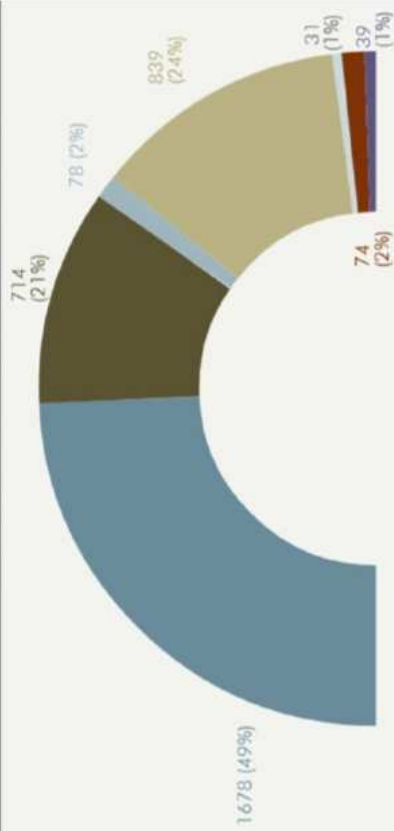
CLIENT INTERACTIONS



BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE



- Cantonese
- Mandarin
- Russian
- Spanish
- Tagalog
- Vietnamese
- Other

ZOO

2014-15 DEPARTMENTAL LANGUAGE ACCESS GOALS

Complete written protocol for handling LEP requests, complaints, and emergency services

TOTAL DEPARTMENTAL BUDGET TOTAL LANGUAGE ACCESS BUDGET

\$16.8M **\$0**

LANGUAGE ACCESS BUDGET CATEGORIES

Not Provided

LANGUAGE SERVICES OFFERED

Telephonic Interpretation Translated Documents Recorded Message in Multiple Languages Oral Interpretation at Public Meetings

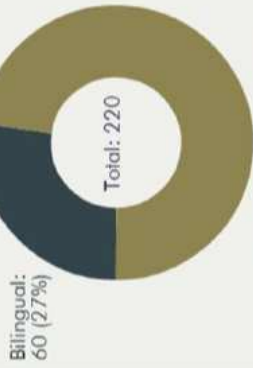


2 Documents

COMPLIANCE INDICATORS

Submitted Plan on Time Tracks LEP Client Interactions LAO Complaint Process
 Attended LAO Training Written LAO Policy Annual Goals, Budget & Strategy

PUBLIC CONTACT STAFF



CLIENT INTERACTIONS

N/A:
Not Tracked

BILINGUAL STAFF - LANGUAGES SPOKEN



LEP CLIENT INTERACTIONS BY LANGUAGE

N/A:
Not Tracked



En enero de este año, yo acudí a Mujeres Unidas y Activas para pedir ayuda porque estaba sufriendo acoso sexual. El personal de MUA llamó a la policía y pidió que enviaran un oficial a la oficina de MUA para hacer un reporte. Cuando llamamos a la policía, seleccionamos la opción en español y pedimos un oficial que hablara español. Después de esperar 3 hrs., llegaron dos oficiales, pero ninguno hablaba español. Nos pidieron que fuéramos con ellos a la estación de la calle Valencia, donde encontraríamos apoyo en español. Allí fui yo, acompañada por una miembro del personal de MUA, pero tampoco había nadie que hablara español en la estación. Recién a las 3 hrs. llegó un policía que me tomó el reporte en español. En total, tuve que esperar 6 hrs. para ser atendida. Yo me sentí muy impotente, sentí que no querían hacer nada por mí y todo iba a quedar en la nada. Yo estoy dando mi testimonio para que esto no le suceda a otra mujer en el futuro.

—Una miembro de Mujeres Unidas y Activas³⁶

[Translation: In January of this year, I went to Mujeres Unidas y Activas (MUA) to ask for help because I was suffering sexual harassment. MUA staff called the police and asked them to send an officer to MUA's office to make a report. When we called the police, we chose the Spanish option and requested a Spanish speaking officer. After waiting for three hours, two officers arrived but none of them spoke Spanish. They asked us to go with them to the Valencia Street station, where we would find support in Spanish. There I was, accompanied by a staff member of MUA, but there was no one at the station who could speak Spanish. Three hours later a police officer came and took my report in Spanish. In total, I had to wait six hours to receive services. I felt very helpless, I felt that they did not want to do anything for me and it would all come to nothing. I am giving my testimony so that this does not happen to another woman in the future. A member of Mujeres Unidas y Activas.]

³⁶ Actual Written Language Access Complaint received by OCEIA in January 2014

VI. APPENDICES

- A. San Francisco Language Access Ordinance
- B. Standardized Annual Compliance Plan Form
- C. Glossary

APPENDIX A: SAN FRANCISCO LANGUAGE ACCESS ORDINANCE

CITY AND COUNTY OF SAN FRANCISCO SAN FRANCISCO ADMINISTRATIVE CODE, CHAPTER 91: - LANGUAGE ACCESS

SEC. 91.1. - PURPOSE AND FINDINGS.

(a) Title. This Chapter shall be known as the "Language Access Ordinance."

(b) Findings.

(1) The Board of Supervisors finds that San Francisco provides an array of services that can be made accessible to persons who are not proficient in the English language. The City of San Francisco is committed to improving the accessibility of these services and providing equal access to them.

(2) The Board finds that despite a long history of commitment to language access as embodied in federal, state and local law, beginning with the landmark Civil Rights Act of 1964, there is still a significant gap in the provision of governmental services to limited-English language speakers.

(3) In 1973, the California State Legislature adopted the Dymally-Alatorre Bilingual Services Act, which required state and local agencies to provide language services to non-English speaking people who comprise 5% or more the total state population and to hire a sufficient number of bilingual staff.

(4) In 1999, the California State Auditor concluded that 80% of state agencies were not in compliance with the Dymally-Alatorre Act, and many of the audited agencies were not aware of their responsibility to translate materials for non-English speakers.

(5) In 2001, in response to these findings, the San Francisco Board of Supervisors enacted the Equal Access to Services Ordinance, which required major departments to provide language translation services to limited-English proficiency individuals who comprise 5% or more the total city population.

(6) Eight years later, the Board finds that differential access to City services still exists due to significant gaps in language services, lack of protocols for departments to procure language services, low budgetary prioritization by departments for language services.

(7) The Board finds that the lack of language services seriously affects San Francisco's ability to serve all of its residents. A 2006 survey by the United States Census Bureau found that 45% of San Franciscans are foreign-born and City residents speak more than 28 different languages. Among the 24% of the total population who self-identify as limited-English speakers, 50% are Chinese speakers, 23% are Spanish speakers, 5% are Russian speakers and 4% speak Tagalog.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.2. - DEFINITIONS.

As used in this Chapter, the following capitalized terms shall have the following meanings:

(a) "Annual Compliance Plan" is set forth in Section 91.10 of this Chapter.

(b) "Bilingual Employee" shall mean a City employee who is proficient in the English language and in one or more non-English language.

(c) "City" shall mean the City and County of San Francisco.

(d) "Commission" shall mean the Immigrant Rights Commission.

(e) "Concentrated Number of Limited English Speaking Persons" shall mean either 5 percent of the population of the District in which a Covered Department Facility is located or 5 percent of those persons who use the services provided by the Covered

Department Facility. The Office of Civic Engagement and Immigrant Affairs shall determine annually whether 5 percent or more of the population of any District in which a Covered Department Facility is located are Limited English Speaking Persons who speak a shared language other than English. The Office of Civic Engagement and Immigrant Affairs shall make this determination by referring to the best available data from the United States Census Bureau or other reliable source and shall certify its determination to all City Departments and the Commission no later than December 1 of each year. Each Department shall determine annually whether 5 percent or more of those persons who use the Department's services at a Covered Department Facility are Limited English Speaking Persons who speak a shared language other than English using either of the following methods specified in Section 91.2(k) of this Chapter.

(f) "Covered Department Facility" shall mean any Department building, office, or location that provides direct services to the public and serves as the workplace for 5 or more full-time City employees.

(g) "Department(s)" shall mean both Tier 1 Departments and Tier 2 Departments.

(h) "Districts" shall refer to the 11 geographical districts by which the people of the City elect the members of the City's Board of Supervisors. If the City should abandon the district election system, the Commission shall have the authority to draw 11 district boundaries for the purposes of this Chapter that are approximately equal in population.

(i) "Limited English Speaking Person" shall mean an individual who does not speak English well or is otherwise unable to communicate effectively in English because English is not the individual's primary language.

(j) "Public Contact Position" shall mean a position, a primary job responsibility which consists of meeting, contacting, and dealing with the public in the performance of the duties of that position.

(k) "Substantial Number of Limited English Speaking Persons" shall mean either 10,000 City residents, or 5 percent of those persons who use the Department's services. The Office of Civic Engagement and Immigrant Affairs shall determine annually whether at least 10,000 limited English speaking City residents speak a shared language other than English. The Office of Civic Engagement and Immigrant Affairs shall make this determination by referring to the best available data from the United States Census Bureau or other reliable source and shall certify its determination to Departments and the Commission no later than December 1 of each year. Each Department shall determine annually whether 5 percent or more of those Limited English Speaking Persons who use the Department's services Citywide speak a shared language other than English. Departments shall make this determination using one of the following methods:

(1) Conducting an annual survey of all contacts with the public made by the Department during a period of at least two weeks, at a time of year in which the Department's public contacts are to the extent possible typical or representative of its contacts during the rest of the year, but before developing its Annual Compliance Plan required by Section 91.10 of this Chapter; or

(2) Analyzing information collected during the Department's intake process. The information gathered using either method shall also be broken down by Covered Department Facility to determine whether 5 percent or more of those persons who use the Department's services at a Covered Department Facility are Limited English Speaking Persons who speak a shared language other than English for purposes of Section 91.2(e) of this Chapter; or

(3) Analyzing and calculating the total annual number of requests for telephonic language translation services categorized by language that Limited English Speaking Persons make to the Department garnered from monthly bills generated by telephonic translation services vendors contracted by Department.

(l) "Tier 1 Departments" shall mean the following City departments: Adult Probation Department, Department of Elections, Department of Human Services, Department of Public Health, District Attorney's Office, Department of Emergency Management, Fire Department, Human Services Agency, Juvenile Probation Department, Municipal Transportation Agency, Police Department, Public Defender's Office, Residential Rent Stabilization and Arbitration Board, Sheriff's Office. Beginning July 1, 2010, the following departments shall be added to the list of Tier 1 Departments: San Francisco International Airport, Office of the Assessor Recorder, City Hall Building Management, Department of Building Inspection, Department of the Environment, San Francisco Public Library, Mayor's Office of Economic and Workforce Development, Planning Department, Department of Public Works, Public Utilities Commission, Recreation and Park Department, Office of the Treasurer and Tax Collector, and the San Francisco Zoo.

(m) "Tier 2 Departments" shall mean all City departments not specified as Tier 1 Departments that furnish information or provide services directly to the public.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; amended by Ord. 187-04, File No. 040759, App. 7/22/2004; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.3. - ACCESS TO LANGUAGE SERVICES.

(a) Utilizing sufficient Bilingual Employees in Public Contact Positions, Tier 1 Departments shall provide information and services to the public in each language spoken by a Substantial Number of Limited English Speaking Persons or to the public served by a Covered Department Facility in each language spoken by a Concentrated Number of Limited English Speaking Persons. Tier 1 Departments comply with their obligations under this Section if they provide the same level of service to Limited English Speaking Persons as they provide English speakers.

(b) Tier 1 Departments need only implement the hiring requirements in the Language Access Ordinance by filling public contact positions made vacant by retirement or normal attrition. Nothing herein shall be construed to authorize the dismissal of any City employee in order to carry out the Language Access Ordinance.

(c) All Departments shall inform Limited English Speaking Persons who seek services, in their native tongue, of their right to request translation services from all City departments.

(Added by Ord. 128-01, File No. 011051, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.4. - TRANSLATION OF MATERIALS.

(a) Tier 1 Departments shall translate the following written materials that provide vital information to the public about the Department's services or programs into the language(s) spoken by a Substantial Number of Limited English Speaking Persons: applications or forms to participate in a Department's program or activity or to receive its benefits or services; written notices of rights to, determination of eligibility of, award of, denial of, loss of, or decreases in benefits or services, including the right to appeal any Department's decision; written tests that do not assess English language competency, but test competency for a particular license or skill for which knowledge of written English is not required; notices advising Limited English Speaking Persons of free language assistance; materials explaining a Department's services or programs; complaint forms; or any other written documents that have the potential for important consequences for an individual seeking services from or participating in a program of a city department.

(b) Tier 2 Departments shall translate all publicly-posted documents that provide information (1) regarding Department services or programs, or (2) affecting a person's rights to, determination of eligibility of, award of, denial of, loss of, or decreases in benefits or services into the language(s) spoken by a Substantial Number of Limited English Speaking Persons.

(c) Departments required to translate materials under the provisions of this Section shall post notices in the public areas of their facilities in the relevant language(s) indicating that written materials in the language(s) and staff who speak the language(s) are available. The notices shall be posted prominently and shall be readily visible to the public.

(d) Departments required to translate materials under the provisions of this Section shall ensure that their translations are accurate and appropriate for the target audience. Translations should match literacy levels of the target audience.

(e) Each Department shall designate a staff member with responsibility for ensuring that all translations of the Department's written materials meet the accuracy and appropriateness standard set in Subsection (d) of this Section. Departments are encouraged to have their staff check the quality of written translations, but where a Department lacks biliterate personnel, the responsible staff member shall obtain quality checks from external translators. Departments are also encouraged to solicit feedback on the accuracy and appropriateness of translations from bilingual staff at community groups whose clients receive services from the Department.

(f) The newly added Tier 1 Departments as set forth in Section 91.2(l) shall comply with the requirements of this Section by January 31, 2011.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.5. - DISSEMINATION OF TRANSLATED MATERIALS FROM THE STATE AND FEDERAL GOVERNMENT.

If the State or federal government or any agency thereof makes available to a Department written materials in a language other than English, the Department shall maintain an adequate stock of the translated materials and shall make them readily

available to persons who use the Department's services.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001)

SEC. 91.6. - PUBLIC MEETINGS AND HEARINGS.

(a) City Boards, City Commissions and City Departments shall not automatically translate meeting notices, agendas, or minutes.

(b) City Boards, City Commissions and City Departments shall provide oral interpretation of any public meeting or hearing if requested at least 48 hours in advance of the meeting or hearing.

(c) City Boards, City Commissions and City Departments shall translate meeting minutes if: (1) requested; (2) after the legislative body adopts the meeting minutes; and (3) within a reasonable time period thereafter.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.7. - RECORDED TELEPHONIC MESSAGES.

All Departments with recorded telephonic messages about the Department's operation or services shall maintain such messages in each language spoken by a Substantial Number of Limited English Speaking Persons or where applicable a Concentrated Number of Limited English Speaking Persons. Such Departments are encouraged to include in the telephonic messages information about business hours, office location(s), services offered and the means of accessing such services, and the availability of language assistance. If the Department is governed by a Commission, the messages shall include the time, date, and place of the Commission's meetings.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001)

SEC. 91.8. - CRISIS SITUATIONS.

All Tier 1 Departments involved in health related emergencies, refugee relief, disaster-related activities all other crisis situations shall work with the Office of Civic Engagement and Immigrant Affairs to include language service protocols in the Department's Annual Compliance Plan.

(Added by Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.9. - COMPLAINT PROCEDURE.

(a) Departments shall allow persons to make complaints alleging violation of this Chapter to the Department in each language spoken by a Substantial Number of Limited English Speaking Persons. The Complaints may be made by telephone or by completing a complaint form.

(b) Departments shall document actions taken to resolve each complaint and maintain copies of complaints and documentation of their resolution for a period of not less than 5 years. A copy of each complaint shall be forwarded to the Commission and the Office of Civic Engagement and Immigrant Affairs within 30 days of its receipt.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.10. - ANNUAL COMPLIANCE PLAN.

Each Tier 1 Department shall draft an Annual Compliance Plan containing all of the following information:

(a) The number and percentage of Limited English Speaking Persons who actually use the Tier 1 Department's services Citywide, listed by language other than English, using either method in Section 91.2(k) of this Chapter;

(b) The number and percentage of limited English speaking residents of each District in which a Covered Department Facility is located and persons who use the services provided by a Covered Department Facility, listed by language other than English, using either method in Section 91.2(k) of this Chapter;

- (c)** A demographic profile of the Tier 1 Department's clients;
- (d)** The number of Public Contact Positions in the Tier 1 Department;
- (e)** The number of Bilingual Employees in Public Contact Positions, their titles, certifications of bilingual capacity, office locations, the language(s) other than English that the persons speak;
- (f)** The name and contact information of the Tier 1 Department's language access liaison;
- (g)** A description of any use of telephone-based interpretation services, including the number of times such services were used and the language(s) for which they were used;
- (h)** A narrative assessment of the procedures used to facilitate communication with Limited English Speaking Persons, which shall include an assessment of the adequacy of the procedures;
- (i)** Ongoing employee development and training strategy to maintain well trained bilingual employees and general staff. Employee development and training strategy should include a description of quality control protocols for bilingual employees; and description of language service protocols for Limited English Speaking individuals in crisis situations as outlined in Section 91.8;
- (j)** A numerical assessment of the additional Bilingual Employees in Public Contact Positions needed to meet the requirements of Section 91.3 of this Chapter;
- (k)** If assessments indicate a need for additional Bilingual Employees in Public Contact Positions to meet the requirements of Section 91.3 of this Chapter, a description of the Tier 1 Department's plan for filling the positions, including the number of estimated vacancies in Public Contact Positions;
- (l)** The name, title, and language(s) other than English spoken (if any) by the staff member designated with responsibility for ensuring the accuracy and appropriateness of translations for each language in which services must be provided under this Chapter;
- (m)** A list of the Tier 1 Department's written materials required to be translated under this Chapter, the language(s) into which they have been translated, and the persons who have reviewed the translated material for accuracy and appropriateness;
- (n)** A description of the Tier 1 Department's procedures for accepting and resolving complaints of an alleged violation of this Chapter consistent with Section 91.9;
- (o)** A copy of the written policies on providing services to Limited English Speaking Persons;
- (p)** A list of goals for the upcoming year and, for all Annual Compliance Plans except the first, an assessment of the Tier 1 Department's success at meeting last year's goals;
- (q)** Annual budget allocation and strategy, including the total annual expenditure for services that are related to language access:
 - (1)** Compensatory pay for bilingual employees who perform bilingual services, excluding regular annual salary expenditures;
 - (2)** Telephonic translation services provided by City vendors;
 - (3)** Document translation services provided by City vendors;
 - (4)** On-site language interpretation services provided by City vendors;
 - (5)** The total projected budget to support progressive implementation of the Department's language service plan;
- (r)** Summarize changes between the Department's previous Annual Compliance Plan submittal and the current submittal, including but not limited to: (1) an explanation of strategies and procedures that have improved the Department's language services from the previous year; and (2) an explanation of strategies and procedures that did not improve the Department's

language services and proposed solutions to achieve the overall goal of this Language Access Ordinance; and

(s) Any other information requested by the Commission necessary for the implementation of this Chapter.
(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.11. - COMPLIANCE PLANS SUBMITTALS AND EMERGING LANGUAGE POPULATIONS.

(a) **Compliance Plans Submittals.** The Director of each Tier 1 Department shall approve and annually file electronic copies of the Annual Compliance Plan by December 31st with the Mayor's Office, the Commission, and the Office of Civic Engagement and Immigrant Affairs.

(b) **Inclusion of Emerging Language Populations in a written report to the Board.** By March 1st of each year, the Office of Civic Engagement and Immigrant Affairs shall compile and summarize in a written report to the Clerk of the Board of Supervisors all departmental Annual Compliance Plans. In the written report of the Clerk of the Board, the Office of Civic Engagement and Immigrant Affairs may recommend appropriate changes to all departmental Annual Compliance Plans in order to meet the needs of emerging language populations. Emerging language populations is defined as at least 2.5 percent of the population who use the Department's services or 5,000 City residents who speak a shared language other than English.

(c) By June 30th of each year, the Office of Civic Engagement and Immigrant Affairs may request a joint public hearing with the Board of Supervisors and the Commission to assess the adequacy of the City's ability to provide the public with access to language services.

(d) The Office of Civic Engagement of Immigrant Affairs shall keep a log of all complaints submitted and report quarterly to the Commission.

(Added by Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.12. - RECRUITMENT.

It shall be the policy of the City to publicize job openings for Departments' Public Contact Positions as widely as possible including, but not limited to, in ethnic and non-English language media.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.13. - COMMISSION RESPONSIBILITIES.

The Commission shall be responsible for monitoring and facilitating compliance with this Chapter. Its duties shall include: conducting outreach to Limited English Speaking Persons about their rights under this Chapter; reviewing complaints about alleged violations of this Chapter forwarded from Departments; working with Departments to resolve complaints; maintaining copies of complaints and their resolution for not less than 8 years, organized by Department; coordinating a language bank for Departments that choose to have translation done outside the Department and need assistance in obtaining translators; and reviewing Annual Compliance Plans.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.14. - OFFICE OF CIVIC ENGAGEMENT AND IMMIGRANT AFFAIRS' RESPONSIBILITIES.

Subject to the budgetary and fiscal provisions of the Charter, the City may adequately fund the Office of Civic Engagement and Immigrant Affairs to provide a centralized infrastructure for the City's language services. The Office of Civic Engagement responsibilities include the following:

(a) Provide technical assistance for language services for all Departments;

(b) Coordinate language services across Departments, including but not limited to maintaining a directory of qualified language service providers for the City, maintaining an inventory of translation equipment, providing assistance to Departments, Board of Supervisors, and the Mayor's Office in identifying bilingual staff;

(c) Compiling and maintaining a central repository for all Departments translated documents;

(d) Providing Departments with model Annual Compliance Plans; and

(e) Reviewing complaints of alleged violations with quarterly reports to the Commission.

(Added by Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.15. - RULES AND REGULATIONS.

In order to effectuate the terms of this Chapter, the Commission may adopt rules and regulations consistent with this Chapter.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.16. - ENFORCEMENT.

If after an investigation and attempt to resolve an incidence of Department non-compliance, the Commission is unable to resolve the matter, it shall transmit a written finding of non-compliance, specifying the nature of the non-compliance, to the Department, the Department of Human Resources, the Mayor, and the Board of Supervisors.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.17. - SEVERABILITY.

If any of the provisions of this Chapter or the application thereof to any person or circumstance is held invalid, the remainder of this Chapter, including the application of such part or provisions to persons or circumstances other than those to which it is held invalid, shall not be affected thereby and shall continue in full force and effect. To this end, the provisions of this Chapter are severable.

(Added by Ord. 126-01, File No. 010409, App. 6/15/2001; Ord. 202-09, File No. 090461, App. 8/28/2009)

SEC. 91.18. - DISCLAIMERS.


(a) By providing the public with equal access to language services, the City and County of San Francisco is assuming an undertaking only to promote the general welfare. It is not assuming, nor is it imposing on its officers and employees, an obligation for breach of which it is liable in money damages to any person who claims that such breach proximately caused injury.

(b) The obligations set forth in the Language Access Ordinance are directory and the failure of the City to comply shall not provide a basis to invalidate any City action.

(c) The Language Access Ordinance shall be interpreted and applied so as to be consistent with Title VI and VII of the Civil Rights Act of 1964, California's Fair Employment and Housing Act, and Article X of the San Francisco Charter and so as not to impede or impair the City's obligations to comply with any court order or consent decree.

(Added by Ord. 202-09, File No. 090461, App. 8/28/2009)

APPENDIX B: STANDARDIZED ANNUAL COMPLIANCE PLAN FORM



CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF CIVIC ENGAGEMENT & IMMIGRANT AFFAIRS
Naomi Kelly, City Administrator

**LANGUAGE ACCESS ORDINANCE (LAO)
TIER 1 DEPARTMENTS FY2012-13 ANNUAL COMPLIANCE PLAN**

General Instructions for Completing Annual Compliance Plan Filings:
Please complete all sections of this form and attach a cover letter and all required documents. All filings should be addressed to:
Isis Fernandez Sykes
Compliance Coordinator
Office of Civic Engagement & Immigrant Affairs
50 Van Ness
San Francisco, CA 94102

Filings may be transmitted electronically in Word format to civicengagement@sfgov.org and must be received no later than Monday, December 16, 2013.

DATE OF FILING:	
DEPARTMENT:	
LIAISON NAME/TITLE:	
Address:	
Telephone:	
Email:	
DEPARTMENT HEAD NAME:	
DEPARTMENT HEAD SIGNATURE:	
Address:	
Telephone:	
Email:	

CHECKLIST

I. Completed Section A: LAO Annual Compliance Plan

II. Completed Section B: Required Language Access Documentation

A. An attached written assessment of meeting FY2012-13 goals.

B. An attached list of the Language Access Ordinance goals for FY2013-14.

C. An attached copy of the Department's written policies on providing services to LEP persons.

D. A copy of the department's written procedures for handling complaints.

E. Written protocols for serving LEP persons in crisis or emergency situations.

OCEIA: Language Access Ordinance Compliance Plan (Form LAO.2012-13) Page | 1

**LANGUAGE ACCESS ORDINANCE (LAO)
ANNUAL COMPLIANCE PLAN
SECTION A: DEPARTMENT RESULTS**

Instructions for completing Section A:
Please enter required department information in all fields listed in Section A. Departments should include results for Fiscal Year 2012-2013 (July 1, 2012 to June 30, 2013) unless stated otherwise.

I. SUMMARY OF COMPLIANCE PLAN CHANGES

1. Please provide a summary of all changes made from the department's previous annual compliance plan.

A. List overall changes: Summarize changes made from previous Annual Compliance Plan:	
B. Strategies and procedures implemented since the Department previously submitted its compliance plan. Indicate which improved the department's language services and which did not.	
C. Indicate the key barriers that have prevented the department from achieving LAO goals and proposed solutions.	
D. Indicate how the department can redistribute resources to meet any language service gaps.	

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II. CLIENT INFORMATION

2. What kind of demographic information does the department currently track?

Describe the demographic information tracked (e.g., clients tracked by age, race, primary language and income):

Based on the demographic information currently captured by the department, please provide a snapshot of both primary and secondary clients served.

Primary Clients (i.e., the clients that the department serves as part of its core and essential functions):

Secondary Clients (i.e., clients that the department occasionally or indirectly serves):

3. What is the number and percentage of limited English proficient (LEP) persons who actually used the department's services citywide? *

Please provide the method you used to determine number LEP persons actually served.

Annual Survey Intake Number of telephonic translations
 * You may measure this information by: 1) conducting an annual survey during a period of at least two weeks; or 2) analyzing intake forms; or 3) analyzing and calculating the annual total number for telephonic translation services requested. See Language Access Ordinance Section 91.21(k)(1)-(3).

Total Clients Citywide	Number of LEP Clients	% of Total Clients who are LEP

Please indicate the number of LEP persons served in the following core languages:

NUMBER OF LEP CLIENTS BY CORE LANGUAGE						
CAN	MDRN	RUS	SPN	TAG	VIET	Other (specify)

Key: CAN = Cantonese MDRN = Mandarin RUS = Russian
 SPN = Spanish TAG = Tagalog VIET = Vietnamese

Please indicate the number of clients served in other languages:

Other Languages	Number of LEP Clients

* Please add additional rows as needed.

4. What are the number and percentage of limited English proficient (LEP) persons served in each supervisory district in which department offices are located?

LEP CLIENTS BY SUPERVISORIAL DISTRICT										
District	Total Number of Clients in District	Number of LEP Clients in District	% of total clients in District that are LEP	Indicate Number of LEP Clients by core languages spoken in the District						
				CAN	MDRN	RUS	SPN	TAG	VIET	Other
#1										
#2										
#3										
#4										
#5										
#6										
#7										
#8										
#9										
#10										
#11										
CITYWIDE										

If yes, list types of training:

If no, please explain:

IV. TRANSLATIONS & INTERPRETATION

10. How does the department translate all written materials required under the LAO?

Bilingual Personnel Approved Vendor Community Based Organization

Other (Please specify)

11. Please provide a summary of all translated materials by completing the table below. If the department selects "Other," provide the translation language(s) under "*Languages."

Required types of written materials	Number of translated materials	Mark by core language translation (Mark all boxes that apply)					
		CHN	RUS	SPN	TAG	VIET	Other* *Languages
Applications		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forms		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Written notices of rights		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Written tests		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notices		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Program material		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complaint forms		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Important written documents		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Key CHN = Chinese TAG = Tagalog RUS = Russian VIET = Vietnamese SPN = Spanish

12. How does the department ensure accuracy and cultural competency of its translated materials?

Bilingual Personnel Approved Vendor Community Based Organization

Other (Please specify)

13. Describe any telephone-based interpretation services used for Fiscal Year 2012-2013 (July 1, 2012 through June 30, 2013). Please include information on call volumes and language use. If the department uses multiple telephone-based interpretation services, which may include internal staff, please indicate each on a separate line.

What telephonic services did the department use?	Did the system track LEP clients (Y/N)?	Total Call Volume (All Clients)	Total call volume by core languages						
			CAN	MDRN	RUS	SPN	TAG	VIET	Other (specify)
Totals:									

Note: Add more rows or submit an additional list if necessary.

14. Does your department have a recorded telephonic message? Please list all languages.

15. Did your department provide any oral translations at public meetings or hearings?

Yes No

If yes, how many hearings or meetings and what languages?

V. LANGUAGE SERVICE AND COMMUNICATION PROTOCOLS

16. Please provide a brief summary of the department's written policies for providing services to LEP persons and protocols for serving LEP persons in crisis situations.

Does the department have a written policy or policies for providing services to LEP persons? Please provide a brief summary of the written policy:	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
Does the department work with clients in crisis or emergency situations? If yes, please describe the nature of crisis or emergency situations (e.g., fire, domestic violence, other)	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
Does the department have a protocol for serving LEP persons in crisis or emergency situations? Is the protocol a written policy? Please provide a brief summary of the protocol for serving LEP persons in crisis or emergency situations:	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>

17. Please assess the department's current process used to facilitate communication with LEP persons and indicate whether this will be adequate for FY2014-15 and beyond.

Are the procedures used to communicate with LEP persons adequate by the department's assessment?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
Provide a brief narrative assessment of the department's process and/or protocols for communicating with LEP persons Explain any necessary improvements planned for FY2013-14 and beyond:		

18. Please provide the following information regarding the department's process for accepting and resolving complaints regarding alleged violations of the Language Access Ordinance.

Please indicate the methods for accepting complaints regarding LAO violations (mark all boxes that apply).	Please indicate the methods for resolving LAO complaints (mark all boxes that apply).
In person	In person
Via Telephone	Via Telephone
In Writing via US mail	In Writing via US mail
Complaint form	Via email
Website electronic submissions	Other (please explain):
Other (please explain):	

Please provide a brief description of the department's general complaint procedure.

--

COMPLAINT PROCEDURES	Written	Publicly posted
Are the department's LAO complaint procedures written and publicly posted? (Please mark all that apply)	<input type="checkbox"/>	<input type="checkbox"/>
Please provide a brief description of the department's LAO complaint procedure.		
If your complaint procedure is publicly posted please indicate where? (Please mark all that apply)		

Reception desk Bulletin Board Other (Please specify):

Please provide the following information on complaints received and resolved in FY2012-13. The objective of this question is to assess the number of LAO complaints as a share of total department complaints.

What percentage of all complaints are related to Language Access & Services?
 0 – 20% 21 – 40% 41 – 60% 61-80% 81-100%

Estimated total numbers of complaints (all types)	Estimated total number of resolved complaints* (all types)	Total number of LAO complaints	Total number of resolved LAO complaints*

*Resolved complaints are interpreted as following your department's internal complaint procedures to completion.

VI. DEPARTMENT FY2014-15 BUDGET FOR LANGUAGE ACCESS

19. What is the department's FY2014-15 budget allocation and strategy for meeting the needs of persons who are not English-language proficient, including the total annual expenditure for services that are related to language access services?

Language Access Services	Budget (\$)	Strategy
1. Compensatory pay for bilingual employees who perform bilingual services, excluding regular annual salary expenditures.		
2. Telephonic translation services provided by City vendors.		
3. Document translation services provided by City vendors.		
4. On-site language interpretation services provided by City vendors.		
5. Other costs associated with providing language access services (e.g., grants, special programs, other.)		
6. The total projected budget to support progressive implementation of the Department's language service plan.		
7. The Department's total budget		

**LANGUAGE ACCESS ORDINANCE (LAO)
ANNUAL COMPLIANCE PLAN
SECTION B: REQUIRED DOCUMENTATION**

Instructions for completing Section B:

The LAO requires that Tier 1 Departments provide documentation on specific policies and plans. Departments should attach all required documents with their annual compliance plan.

- A. A list of the department's Language Access Ordinance goals for FY2014-2015.
Please provide a description of the goals your department plans to achieve for FY2014-2015.
- B. An assessment of how the department is meeting FY2013-2014 goals.
Please provide an update on how your department is meeting your current goals. These are the goals that your department indicated in last year's plan.
- C. A copy of existing written policies on providing services to LEP Persons.
If your department does not have written policies please indicate when you plan on developing them.
- D. A copy of the department's written procedure for accepting and resolving complaints regarding the LAO.
If your department does not have written policies please indicate when you plan on developing them.
- E. A copy of written protocols for serving LEP persons in crisis or emergency situations.

APPENDIX C: GLOSSARY OF TERMS

American Community Survey	An ongoing survey conducted by the U.S. Census Bureau among a sample of the population that provides a detailed snapshot of various social, economic, and housing characteristics of the U.S. population. Data are analyzed and released in the form of 1-year, 3-year, and 5-year estimates.
Annual Compliance Plan	An annual written plan required of Tier 1 departments including information and data outlined in the LAO, due to OCEIA by December 31 of each year.
Bilingual Employee	A city employee who is proficient in the English language and in one or more non-English language(s).
Census	A population snapshot conducted every ten years on April 1 by the U.S. Census Bureau to provide an official count of the entire U.S. population to Congress. Data are used to determine congressional representation, community services, and distribution of federal funds. In the 2010 Census, the survey included ten questions.
Community Interpreting	A profession that facilitates access to community services for linguistically diverse clients who do not speak the language of service. A community interpreter is a professional interpreter, bilingual staff member or volunteer who interprets for healthcare, education or other community services. Services may be delivered in person, telephonically or by video.
Concentrated Number of Limited English Speaking Persons	Either 5 percent of the population of the District in which a Covered Department Facility is located or 5 percent of those persons who use the services provided by the Covered Department Facility. OCEIA determines annually whether 5 percent or more of the population of any District in which a Covered Department Facility is located are Limited English Speaking Persons who speak a shared language other than English. OCEIA makes this determination by referring to the best available data from the United States Census Bureau or other reliable sources and certifies its determination to all City Departments and the Immigrant Rights Commission no later than December 1 of each year (beginning 2011). Each Department shall determine annually whether 5 percent or more of those persons who use the Department's services at a Covered Department Facility are Limited English Speaking Persons who speak a shared language other than English using either of the methods specified in Section 91.2(k) of the LAO.
Covered Department Facility	Under the LAO, any Department building, office, or location that provides direct services to the public and serves as the workplace for 5 or more full-time City employees.
Crisis/Emergency Situation	A serious or unexpected event of intense difficulty or danger that requires an immediate response due to the impact on individual or public safety.
Cultural & Linguistic Competency	A set of behaviors, attitudes, and policies that come together in a system, agency, or among professionals that enables effective work in cross-cultural situations. The ability to provide services effectively across cultures and languages.
Districts	The 11 geographical districts by which the people of the City and County of San Francisco elect the members of the Board of Supervisors.
Interpreting/Interpreter	Interpreting is the act of accurately rendering oral or signed communication between two or more parties who do not share a common language in an appropriate and culturally competent manner. An interpreter is a person who accurately listens to and renders a message from a source into a target language.
Language Access Ordinance (LAO)	San Francisco's language access law, established in 2001 to ensure equal and meaningful access to information and services. Covers all city departments that provide information and services to the public, including 26 named Tier 1 departments. Amended in 2009 to strengthen compliance requirements.
Language Access Services	The full range of services used to ensure that individuals who are not English-language proficient have meaningful and equal access to information about city programs and services. Services include, but are not limited to 1) in-person, telephonic and video remote interpreter services, 2) translation of written materials, notices and documents, and 3) bilingual employee services.

Language Line	An authorized telephonic interpretation vendor that provides over-the-phone interpretation, among other services. OCEIA manages all citywide language service contracts.
Limited English Proficient (LEP)	An individual who does not speak English well or is otherwise unable to communicate effectively in English because English is not the individual's primary language.
Multilingualism	Language diversity, the use of multiple languages by an individual or community of speakers to communicate with others. Over 115 different languages are spoken in the San Francisco Bay area.
National Origin Discrimination	Discrimination as a result of a person's birthplace, ancestry, culture or language. This means people cannot be denied equal opportunity because they or their family are from another country, because they have a name or accent associated with a national origin group, because they participate in certain customs associated with a national origin group, or because they are married to or associate with people of a certain national origin (Source: U.S. Department of Justice).
Primary Language	An individual's preferred and/or strongest language for communication with others.
Public Contact Position	A position in which a primary job responsibility consists of meeting, contacting, and dealing with the public in the performance of the duties of that position.
Quality Control	Procedures or measures that ensure City departments' and agencies' services and materials are translated or interpreted accurately and consistently.
Substantial Number of Limited English Speaking Persons	Either 10,000 City residents, or 5 percent of those persons who use the Department's services. OCEIA determines annually whether at least 10,000 limited English speaking City residents speak a shared language other than English. OCEIA makes this determination by referring to the best available data from the United States Census Bureau or other reliable sources, and certifies this determination to Departments and the Immigrant Rights Commission no later than December 1 of each year (beginning in 2011). Each Department shall determine annually whether 5 percent or more of those Limited English Speaking Persons who use the Department's services Citywide speak a shared language other than English. Departments shall make this determination using one of the following methods: 1) surveys, 2) at the point of service, and/or 3) Language Line or other telephonic language translation vendors contracted by the department.
Telephonic Services	Contracted interpretation services to provide as-needed, toll-free 800 telephone number(s) or other means for participating City departments to access language interpretation services 24 hours a day and 365 days of the year. Core languages include: Cantonese (Chinese), Mandarin (Chinese), Spanish, Russian, Tagalog, and Vietnamese and a minimum of 20 additional languages and/or dialects approved in writing by the Office of Civic Engagement & Immigrant Affairs.
Tier 1 Department	Departments that must comply with the full extent of the LAO (including minimum requirements) and file annual compliance plans: Adult Probation, Airport, Assessor Recorder, Building Inspection, City Hall Building Management, District Attorney, Economic and Workforce Development, Elections, Environment, Fire, Human Services Agency, Juvenile Probation, Municipal Transportation Agency, Planning, Police, Public Defender, Public Health, Public Library, Public Utilities, Public Works, Recreation and Parks, Residential Rent Stabilization and Arbitration Board, Sheriff, Treasurer and Tax Collector, and Zoo.
Tier 2 Department	All city departments not specified as Tier 1 that furnish information or provide services directly to the public. Must meet basic requirements of the LAO.
Translation/Translator	Reading a document in one language and conveying the document's meaning in writing into another language in an appropriate and culturally competent manner. A translator is a person who professionally renders a written text into another language in writing.



CITY AND COUNTY OF SAN FRANCISCO

OFFICE OF CIVIC ENGAGEMENT & IMMIGRANT AFFAIRS

Edwin M. Lee, Mayor
Naomi Kelly, City Administrator

Adrienne Pon, Executive Director

OCEIA promotes civic participation and inclusive policies that improve the lives of San Francisco’s residents, particularly immigrants, newcomers, underserved and vulnerable communities. OCEIA seeks to bridge cultural, linguistic and economic barriers to ensure that San Francisco’s diverse residents have equal access to city services and opportunities to participate and contribute in meaningful ways to the success of the community and to the city.

Program Areas:

Community Ambassadors | Safety Program | Community Grants: Citizenship, DACA, Day Laborers, Language Access | Community Outreach & Education | Language Access & Services | Immigrant Affairs & Integration | Immigrant Rights Commission | SF WireUP! | Consumer Education

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Community Ambassadors:

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Jennifer Barrera
Alonna Ia
Georgia Malone
Kristian Marzett

Edward Munoz
Jessica Simmons
Rico Tiger
Brannen Tindell
Junior Tovio

District 10

Schevonne Baty, *Team Lead*
William Bender
Raymund Borres
Suafa Drake

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Author | Report Narrative & Concept
Chief Analyst & Researcher | LAO Compliance & Data Analysis
Project Manager | Graphics, Charts, Data Integrity & Verification
Production & Distribution | Factchecking & Proofing
Report Assistance | Graphics & Factchecking
IRC Advisor

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Agnes Li, Sandra Panopio, Richard Whipple
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