



Seattle Office for Civil Rights

Julie Nelson, Director

June 29, 2011

TO: Councilmember Conlin
Councilmember O'Brien
Councilmember Licata

FROM: Julie Nelson, Director

SUBJECT: Response to 2011-2012 Statement of Legislative Intent: Interpretation Coordination

Statement of Legislative Intent summary

As part of the 2011 budget process, the City Council issued a Statement of Legislative Intent (SLI) that directed SOCR to work with City departments to recommend improvements to the City's interpretation and translation policy.

Specific elements of the SLI include:

- **Performance Measures:** Recommend timely and cost-effective best practices for the City of Seattle to provide interpretation and/or translation services to the public, including:
 - Identify best practices of other models in the nation for coordination of interpretation and translation services.
 - Identify languages that are most interpreted and translated.
 - Identify how much money departments spend on interpretation and translation.
 - Review current demographic information about the City.
- **Language Bank:** Make proposals to strengthen the City's existing Language Bank as a resource for City staff, including possible incentives for employees and other strategies to increase use.
- **Community Partnerships:** Assess potential opportunities to partner with other community institutions and organizations, including schools.
- **Citywide practices:** Review the City's current departmental standards for the quality of interpretation and translation, and provide recommendations for revision and training.

Introduction

Although the SLI focused specifically on the City's translation and interpretation policies, a critical question is this: *What role does translation and interpretation play in creating meaningful public engagement between Seattle's immigrant and refugee communities and Seattle City government?* Because of the scope of the SLI, our response does not comprehensively address this larger issue of public engagement, but work group members recognize that translation and interpretation are only one small part of the City's implementation of the Race and Social Justice Initiative's comprehensive public engagement strategies, which include immigrant and refugee communities.

The City's translation and interpretation policies should support its broader immigrant and refugee engagement strategies. In turn, those strategies should form an integral part of the City's overall inclusive outreach and public engagement efforts as part of RSJI.

Many of the recommendations in this SLI response would require increased funding to implement. We recognize the unlikelihood of increased funding due to the current budget situation, so we have clearly delineated improvements possible under existing funding, as well as recommendations if a small increase in funding and a more moderate increase in funding are available.

Background

In 2007, the City of Seattle launched the Immigrant and Refugee Initiative (IRI) to ensure that immigrant and refugee community members could access and benefit from City programs and services and engage with the City more broadly. As part of IRI, the City drafted and implemented a Citywide translation and interpretation policy that provided guidance to departments on the use of translated materials and language interpreters. In addition to this work, the City also:

- Conducted a community needs assessment in 2007 with immigrant and refugee communities. One of the outcomes was the creation of the Immigrant and Refugee Advisory Board (renamed the Immigrant and Refugee Commission in 2011).
- Created tools and resources (demographic data, language maps, list of vendors who can provide translation and interpretation services, staff training) that could be used by departments to improve their engagement with immigrant and refugee communities.
- Hired a strategic advisor to provide support to the Advisory Board, provide technical assistance to departments, and work with the Immigrant and Refugee Interdepartmental Team and translation and interpretation department liaisons to implement the goals of IRI.
- Strengthened the City's Employee Language Bank.

As part of the 2011 budget process, responsibility for the Immigrant and Refugee Initiative was transferred from the Department of Neighborhoods to the Seattle Office for Civil Rights (SOCR). This move created greater alignment between IRI and the Race and Social Justice Initiative (RSJI).

To develop a response to the SLI, SOCR assigned RSJI Core Team members Desiree Tabares (Parks) and Michael Davis (SPU) to co-chair a work group consisting of department representatives. The work group met on a monthly basis; members also met in subcommittees to focus on specific work areas. The subcommittees reviewed Performance Measures, Community Partnerships, Employee Language Bank, Demographics and Best Practices. Each committee conducted its own research.

The Performance Measures Committee held a series of candid "focus group" conversations with knowledgeable representatives to assess departments' implementation of current translation and interpretation policies and to identify opportunities for improvement. The committee grouped departments into six clusters based on similar services and functions to stimulate cross-department dialog: Infrastructure, Life Enrichment, Public Safety, Community and Human Services, Internal Customer Services, and Elected Officials. City Council staff, the Mayor's Office and the City Attorney's Office all participated in the conversations.

The Community Partnerships Committee contacted eighteen local non-profit organizations and five ethnic community organizations to discuss the City's services to immigrant and refugee communities, and the potential for stronger partnerships with community organizations. The Best Practices committee members surveyed best practices nationwide.

Work group chairs met twice with the Immigrant and Refugee Commission to update Commissioners on the process, findings and recommendations, and to receive their input.

Key Findings and Recommendations for City Action

The remainder of the SLI response is organized into findings and recommendations in the following categories: overall, performance measures, employee language bank, community partnerships, and city-wide practices.

A: Overall

Findings: Overall

Departments' adoption and implementation of best practices for inclusive outreach and public engagement (IOPE) and implementation of the interpretation and translation policy and use of tools is currently not centrally coordinated and spread throughout city departments. Access to services for immigrant and refugee communities suffers from the City's uncoordinated efforts. In addition, the City's public engagement efforts tend to isolate immigrant and refugee communities by treating them as separate entities from the neighborhoods in which they live, rather than as a valued member of a larger community.

Recommendations: Overall

A1. Use existing tools and resources to support the Immigrant and Refugee and Race and Social Justice Initiatives – The City should align Race and Social Justice Initiative best practices and tools for racial equity – including the Racial Equity Toolkit and IOPE Toolkit – in all its service delivery, outreach and public engagement.

- The process should begin at the top with management's use of these tools for planning, budgeting and programming.
- Departments should strive to allocate at least 17% (the approximate percentage of Seattle immigrant and refugee community residents) of their communication budgets for immigrant and refugee communities, depending on the project and situation.

A2. Increase coordination between departments – A dedicated half or full-time staff person could be used to coordinate and support Citywide translation and interpretation activities. This position would be responsible for providing technical support to departments, coordinating resources such as the Employee Language Bank, and reporting progress and issues to Mayor and City Council.

A3. Build relationships between “welcoming” communities and immigrant and refugee communities – The City's IOPE efforts should include an examination of the role of Seattle's “welcoming communities” (i.e. existing, dominant communities) and develop strategies to ensure that community involvement is an active two-way street.

A4. Integrate translation and interpretation with broader immigrant and refugee engagement strategy – The City's translation and interpretation policies should support its broader

immigrant and refugee engagement strategies. In turn, those strategies should form an integral part of the City's overall inclusive outreach and public engagement efforts in order to:

- Ensure greater cross-departmental collaboration and information-sharing in all outreach and engagement efforts.
- Ensure greater cultural relevancy for limited English speaking people and families in all City programs and projects.

A5. Improve organizational infrastructure and organization of Immigrant and Refugee and IOPE Interdepartmental Team – The City should integrate the Immigrant and Refugee IDT, Translation and Interpretation and IOPE liaison work groups into a single workgroup.

- Departments' PIOs should coordinate translation and interpretation responsibilities. Other departmental liaisons should be selected based on appropriate alignment with current job responsibilities. This assignment should be formalized as part of the work plan.

B: Performance Measures

The needs and use of translation and interpretation vary greatly by department; in larger departments this can even vary from one division or work unit to another. In general, departments have implemented the City's translation and interpretation policies since the policies were adopted in 2007, especially departments with a focus on external customers. Practically all departments utilize some form of "language line" system to allow telephone-based communication between English-speaking City staff and limited-English speaking customers.

Implementation, however, has not always been approached as thoughtfully as possible. The current policy sometimes has discouraged innovation at the department level, resulting in some unproductive or unnecessary translation work.

Findings: Performance Measures

Best practices around the nation:

- Cities such as New York, NY, Chicago, IL, Houston, TX, Richmond, VA and San Francisco, CA have established some sort of "Office of Immigrant and Refugee Affairs." While the scope varies, all are mandated to coordinate both translation and interpretation services and broader public engagement strategies.
- Cities such as Boston, MA, New York, NY, San Francisco and Oakland, CA make use of electronic web-based translation programs (e.g. Google Translator) to provide immediate translation of government web pages.
- Drawing on the City of Seattle's translation policy, in 2010 King County issued its own Executive Order governing written language translation. King County's research and analysis were conducted by the Seattle-King County Public Health Department, which has long and extensive experience engaging with limited-English speaking communities. King County is in the process of drafting a policy for interpretation similar to Seattle.

Costs:

- In 2009, the City of Seattle spent a total of \$162K on translation/interpretation. The Human Services Department (HSD) was responsible for more than half of that amount (\$87K), since

several of its programs require extensive intake procedures with non-English speaking clients. Seattle Public Utilities (SPU) was the next highest purchaser of translation and interpretation services at \$46K.

- In 2010, the City of Seattle spent \$382K on translation and interpretation. The following departments spent significant amounts (figures are approximate): HSD – \$195K; SPU – \$67K; DON – \$25K; SPD – \$20K; SCL – \$14K; Library – \$10K; Parks – \$9K; SDOT – \$8K; Legislature – \$8K; Executive – \$5K.
- In general, City costs for translation were significantly higher in the first years of policy implementation; costs for interpretation have risen in recent years.
- The City vendor certification system and required use of City-approved vendors has been a barrier to effective implementation by departments. Some departments have established relationships with community-based organizations that provide translation and interpretation and therefore prefer to use them instead of City approved vendors. In addition, some quality control issues have arisen with translations prepared by city approved vendors.

Demographics:

- New demographic data shows no significant changes in our understanding of Seattle’s ethnic composition. Seattle is 66.3% Non-Hispanic White; 14.1% Asian or Pacific Islander; 7.7% Black or African American; 6.6% Hispanic or Latino (can be any race); 4.4% two or more races; 0.6% American Indian and Alaska Native; 0.2% some other race.
- Approximately 17% of Seattle residents are from immigrant and refugee communities.
- Spanish is the language most frequently interpreted for customers, followed by Chinese (Mandarin and Cantonese), Vietnamese, Russian, Somali and Korean.
- The City’s ability to collect and interpret data is hampered by the diversity and limitations of available data streams – particularly regarding ethnicity and language. The Census’s current racial categories, for example, fail to tabulate people of Middle Eastern origin or descent (who generally are classified as “White”), and so we have no accurate figures for these communities. The same is true for immigrant communities from Africa.

Recommendations: Performance Measures

B1. Train managers and public information officers on IOPE and immigrant and refugee access to services – Training should be provided for managers and public information officers on incorporating racial equity in planning processes for IOPE, and racial equity should be incorporated into decision-making processes involving translation and interpretation and other related issues.

B2. Track community demographics – The City’s demographics coordination group should assemble and share demographic information from other sources (American Community Survey, Seattle Public School, DSHS, etc.) to provide more accurate information about immigrant and refugee communities in Seattle. This group should work closely with the Mayor’s Outreach Subcabinet and the new IOPE workgroup that includes immigrant and refugee access to services and translation and interpretation.

B3. Collect better demographic data on participants in City programs – The City should explore ways to allow community members to self-identify when supplying program-related

demographic information to the City, in order to develop accurate demographic information that current Census data does not provide (e.g. the number of Middle Eastern residents and the ethnicities of African immigrants in Seattle).

C: Employee Language Bank

Findings: Employee Language Bank

The Employee Language Bank (ELB) has been in existence for more than ten years. It was evaluated and reorganized in 2007, but it has never had the benefit of City-wide coordination and support. ELB participants' language skills and areas of expertise have not been assessed, and the City has not clarified the use and scope of the ELB. As a result, departments are unsure when and how to use the service, as well as whom to call for specific needs. Consequently, departments' use of the ELB is inconsistent at best.

- In general, staff would rather rely on co-workers in their own department, rather than turn to the ELB. Employees feel awkward asking for a 'favor' from someone they neither know nor have a departmental relationship with – especially when they are unable to compensate them for their work, or rely on the quality of interpretation and translation.
- Staff in some departments informally barter or trade their services back and forth to support one another with translation and interpretation needs.
- Many times requests to the ELB go unanswered, or the same (few) bilingual staff provide the service. These responsive staff can become overwhelmed with requests.
- Departments use and maintain their own informal internal language bank when possible.
- In departmental focus groups, some departments expressed an interest in offering "premium pay" for multilingual staff, but classification rules make it unclear if that is permissible.

Recommendations: Employee Language Bank

- C1. Improve Employee Language Bank coordination, quality and consistency** – The ELB should be reorganized under a City-wide coordinator to triage requests and assign appropriate staff. (ELB requests were not tracked, so the number of requests cannot be determined.) It makes sense to utilize City employees' language capacity, but only if the City can provide enough support to create a workable system.
- C2. Establish Employee Language Bank policy** – Use of the ELB should be limited to departments' program-based customer service requests, not longer-term public engagement work. ELB listings should be limited to a relatively small number of employees (25-50) with demonstrated skills, expertise and capacity. Managers of ELB staff need to be part of the decision-making process to avoid workload tension.
- C3. Reward and recognize Employee Language Bank staff** – ELB staff should be recognized for their efforts, either through Personnel policy non-compensatory recognition (e.g. an annual event, noted in personnel files, etc.) or through premium pay or flex/compensated time-off. City policies should make it clear that ELB staff members are working when providing ELB services.

C4. Develop metrics to monitor and improve the effectiveness of the Employee Language Bank – Identify and implement evaluation metrics to assess both qualitative and quantitative result of services provided by Language Bank staff and vendors.

C5. Provide infrastructure tools to support the Employee Language Bank – the City should investigate the effectiveness and cost of providing ELB staff with appropriate translation software and other tools available in this rapidly-evolving area of technology..

D. Community Partnerships

Findings: Community Partnerships

Some City departments have utilized community based organizations for translation and interpretation services. Departments have worked with community partners more extensively in IOPE, such as in SPU's public education efforts and the City's neighborhood planning efforts in Southeast Seattle.

Community-based organizations contacted for this SLI response indicated that they lack the capacity to contract to provide translation and interpretation services on a routine basis for City departments. These organizations prefer that the City engage their services on specific projects where translation and interpretation is tied to broader shared goals.

- Departments sometimes pay community organizations to develop translated materials regarding select topics or projects. This has had the added benefit of helping community agency staff become more knowledgeable about particular topics or services, rather than just hand out information.
- Departments that partner with community-based organizations for events use those organizations' language capacity for translation and interpretation services as a built-in IOPE cost. Community partnerships also are valuable to teach City staff to include cultural norms and competencies in materials, program design, and outreach methods.
- Though it takes more time and money, results and turnout are better when departments use community representatives to help coordinate meetings, as opposed to just translating a flyer and expecting people to show up. When a department does take the time to communicate directly with native speakers to explain a project, City staff can see the difference in comfort and participation levels.

Recommendations: Community Partnerships

D1. Continue to build partnerships with immigrant and refugee community based organizations and other institutions working with immigrant and refugee communities – The City should cultivate strong partnerships with community based organizations to conduct inclusive outreach and public engagement with immigrant and refugee communities. Ideally, immigrant and refugee community-based organizations should be compensated for their engagement. Engage other agencies (Harborview, Seattle King County Public Health, Housing Authority, Courts, etc.) to identify partnership opportunities.

D2. Communicate interpretation and translation policies more broadly – The City should communicate its translation and interpretation policies to community-based organizations, so that those organizations can share them with their clients and hold the City accountable for effective service delivery and engagement.

D3. Utilize the expertise of the Immigrant and Refugee Commission – The City should work closely with the Seattle Immigrant and Refugee Commission to ensure ongoing collaboration in decision-making regarding the future direction of immigrant and refugee engagement.

E. City-wide Practices

Findings: City-wide Practices

- Departments have made great strides to comply with the City’s translation and interpretation policies, but they lack ongoing coordination and technical assistance.
- Departments that have large immigrant and refugee customer bases tend to designate resources to translate documents (including the use of community service provider agencies), give more thought to how these materials will be used, and cultivate a group of interpreters who know the subject and the communities.
- The implementation of the City’s translation and interpretation policies overemphasize the need for translation of written documents, and do not allow departments to exercise good judgment to meet specific business needs.
- There can be a disconnect between translation and the related need to provide customers with language interpretation. Some departments have created and distributed translated materials, but have not set up a clear protocol for communicating with limited-English speaking customers if they respond to the materials. In some instances, translated materials are seldom used due to a lack of outreach and engagement planning to distribute the materials.
- Other than for receptionists, many departments do not provide staff training on how to access the language line. This lack of staff capacity is an internal barrier to non-English customer engagement.
- Some departments have bilingual web pages, but they don’t know if their intended audiences use this translated web-based information.
- The City lacks overall coordination of resources for interpretation at public meetings. Several departments have access to or own simultaneous-interpretation headsets, but other departments remain unaware of their availability.
- Some departments’ community engagement strategies have improved greatly over the past five years. “If we have a target neighborhood, we take the time to get out and engage the neighborhood by going door to door,” said one focus group participant. “This is time consuming and we can’t do it for every project, so we are selective in choosing neighborhoods where there is high non-English speaking community that may not be engaged through more typical outreach methods.” While interpretation for public meetings and events is offered broadly, the City’s public engagement efforts with limited-English speaking residents are not consistent. Departments generally post ‘interpretation available’ on flyers, but seldom get requests for interpreters or for translated documents.

- There are scattered efforts to hire multilingual staff, but in most cases multilingual City employees are not in positions where their language capability can be fully utilized. Some departments try to hire multilingual staff by listing language skills as a “highly desired” skill.

Recommendations: City-wide Practices

E1. Update the Translation and Interpretation Policy to allow greater flexibility – The translation and interpretation policy should be rewritten to allow greater flexibility for departments to serve non-English speaking customers as appropriate for their particular lines of business.

Guidelines for translation and interpretation should be clarified for departments as follows:

- Translation should be restricted in most situations to basic program information (unless it is necessary for program participation) – i.e. to inform City residents that services are available and that free interpretation will be provided on request.
- Translation and interpretation policies should be rewritten and shared with departments to allow greater flexibility for departments to serve non-English speaking customers appropriate for their lines of business. Guidelines for translation and interpretation should be clarified to reduce departments’ use of translation and to ensure departments’ full provision of free language interpretation on request.
- Obligation to provide free interpretation on request should be emphasized as part of basic City policy and expectations for all City departments and services.
- Public Information Officers’ communication expertise should be tapped for in-house support of departments’ translation and interpretation services.
- The vendor registration system for translators and interpreters should be simplified and made accessible and flexible for departments’ needs. City vendor certification should be expanded and better technical support provided to potential vendors.
- The City’s policy should make clear departments’ financial obligations for translation and interpretation.
- The City should provide clear step-by-step guidelines on use of translation and interpretation services, including the use of paid interpretation services. King County’s new policy guidelines can serve as a useful reference for implementation.

E2. Develop policies to increase hiring of multilingual staff – Citywide personnel policies should be developed and promoted that encourage departments to hire and promote more multi-lingual staff, create job-specific roles to utilize them for their ability, and compensate them accordingly. The City should set an aspirational goal of 17% of City staff to be multi-lingual within a set time.

E3. Identify and use technology tools to help improve access and engage communities – Research and identify technology options that will increase community access to City programs and services and help engage Seattle’s immigrant and refugee communities (e.g., Web page with a language translation tool, etc.).

E4. Launch collaborative neighborhood-based approaches to increasing access to services for and engaging immigrants and refugees – Departments should explore innovative approaches such as scheduling outreach and intake activities by language in neighborhoods on designated days (e.g., City staff who speak Somali scheduled to do outreach at Rainer Valley Community Center on Wednesdays).

E5. Continue to integrate immigrant and refugee access to services with RSJI – The City’s translation and interpretation policies should support its broader immigrant and refugee engagement strategies. In turn, those strategies should form an integral part of the City’s overall inclusive outreach and public engagement efforts as part of RSJI. As part of this overall coordination, the City should:

- Ensure greater cross-departmental collaboration and information sharing in all outreach and engagement efforts.
- Ensure greater cultural relevancy for limited and non-English speaking persons and families in all City programs and projects.
- Focus more effort on educating and engaging receiving communities about immigrant and refugees – the focus should not rest solely on immigrant and refugee communities.
- Continue to provide inclusive outreach and public engagement training for all staff that includes sections on working with immigrant and refugee communities.
- Create a single Citywide repository of translated documents (including graphics).
- Assess web-based technologies for use as translation and interpretation tools.
- Increase multi-lingual signage in public places.

Summary of Proposed Options – Budget Implications

The City will continue to improve its translation and interpretation services with existing resources. Many of the recommendations in this SLI response, however, would require increased budget expenditures to implement. This section indicates implementation under three scenarios: status quo, small increase in funding, and a moderate increase in funding.

Option A: Improvements with existing resources (status quo)

- Implement the following recommendations:
 - A1. Use existing tools and resources to support the Immigrant and Refugee and Race and Social Justice Initiatives.
 - A3. Build relationships between “welcoming” communities and immigrant and refugee communities
 - A4. Integrate translation and interpretation with broader strategies for immigrant and refugee engagement.
 - A5. Improve organization and infrastructure of Immigrant and Refugee and IOPE Interdepartmental Team.
 - B2. Track community demographics.
 - D1. Continue to build partnerships with immigrant and refugee community based organizations and other institutions working with immigrant and refugee communities.
 - D2. Communicate interpretation and translation policies more broadly.
 - D3. Utilize the expertise of the Immigrant and Refugee Commission.
 - E5. Continue to integrate immigrant and refugee access to services with RSJI.

Option B: Small increase in funding

- Add a 0.5 FTE Planning and Development Specialist I (increase the staff person for the Immigrant and Refugee Commission from half-time to full-time) to develop and help coordinate interpretation and translation policies across departments. This position would be responsible for providing

technical support to departments, coordinating resources, developing ELB policy, and reporting progress and issues to the Mayor and City Council. (increase position from half-time to full-time – \$35,000).

- Train managers and staff on increasing immigrant and refugee access to services (\$20,000 to develop, print and implement new curriculum and resources).
- Implement the following recommendations:
 - A2. Increase coordination between departments.
 - B1. Train managers on IOPE and immigrant and refugee access to services.
 - C1. Improve Employee Language Bank coordination, quality and consistency.
 - C2. Establish Employee Language Bank policies.
 - E1. Update the Translation and Interpretation Policy to allow greater flexibility.

Option C: Moderate increase in funding

In addition to the half-time position and training resources listed above in Option B:

- Add a Planning and Development Specialist II to improve the City's collection of demographic information on participants in City programs; develop an ELB staff recognition program, metrics to monitor and improve the effectiveness of ELB, and tools to support ELB; develop and implement policies to increase hiring of multilingual staff; and launch new and innovative approaches to increasing access (\$92,000).
- Develop a partnership fund to strengthen outreach and public engagement with immigrant and refugee community-based organizations (\$100,000).
- Purchase translation tools and software for ELB staff (cost tbd).
- Implement the following recommendations:
 - B3. Collect better demographic data on participants in City programs.
 - C3. Reward and recognize Employee Language Bank volunteers.
 - C4. Develop metrics to monitor and improve the effectiveness of the Employee Language Bank.
 - C5. Provide infrastructure tools to support the Employee Language Bank.
 - D1. Continue to build partnerships with immigrant and refugee community based organizations and other institutions working with immigrant and refugee communities, including compensation of community based organizations.
 - E2. Develop policies to increase hiring of multilingual staff.
 - E3. Identify and use technology tools to help improve access.
 - E4. Launch collaborative neighborhood-based approaches to increase access to services for immigrants and refugees.

Conclusion

The City should reframe its understanding of the role and utility of translation and interpretation services. Translation and interpretation are tools that help limited English speaking residents access basic City services; they also permit people to participate in the City's outreach and public engagement efforts. Translation and interpretation, however, are merely tools – they are no substitute for in-depth public engagement efforts. To increase immigrant and refugee community members' civic participation, then we must look past translation and interpretation and implement comprehensive public engagement strategies.

Briefing memo: Response to Statement of Legislative Intent on Interpretation Coordination

Page 12

June 24, 2011

Work group leads Michael Davis and Desiree Tabares, RSJI manager Glenn Harris and I would be happy to meet with you to discuss this response in more detail and to answer any questions that you may have. Please contact me at 233-7822 or Glenn at 255-7556.

Cc: Councilmember Harrell
Sahar Fathi, Councilmember O'Brien's Office
Deputy Mayor Darryl Smith
Candice Inagi, Mayor's Office
Joe Regis, Budget Office
Glenn Harris, RSJI Manager
Interpretation and Translation SLI work group