



SFPD DGO 5.20 Working Group
Membership Roster

Executive Sponsor: Capt. Arran Pera or Designee

Facilitator: Hitesh Bussie

Composition of Group:

	<u>Group Member</u>	<u>Organization</u>
1	Jesus Gabriel Yañez	San Francisco Police Commission
2	Jermain Jones	San Francisco Department of Police Accountability (DPA)
3	Hellena Ruiz	Office of Civic Engagement and Immigration Affairs (OCEIA)
4	Sgt. Tri Hoang	San Francisco Police Department (SFPD)
5	Ofc. Bary Marshall	San Francisco Police Department (SFPD)
6	Anisha Hingorani	Language Access Network (LAN)/Chinese for Affirmative Action (CAA)
7	Ofc. Milen Banegas	SFPD Policy Development Division
8	Jen Lo	San Francisco Human Resources Department (SF HRD)
9	Brandee Calagui	American Civil Liberties Union (ACLU) Northern California (Nor Cal)
10	Milli Atkinson	Bar Association of San Francisco (BASF)
11	David Cuadro	Community Member

SFPD Support Staff

Ofc. Jamie Garon (SME)
Steven Betz
Hitesh Bussie
Asja Steeves
Courtney Schreiner

Pursuant to DGO 3.01, 120-day deadline Date: 01/27/2025.

For questions and inquiries, contact Hitesh Bussie at Hitesh.bussie@sfgov.org or direct them to SFPD Working Groups Mailbox at SFPD.WorkingGroups@sfgov.org.

DGO 5.20 - SFPD Policy Working Group Recommendations and Discussion Tracking Grid (Updated Post-Public Comment)

#	Working Group Recommendations	Page Number	Meeting Date	Working Group Coordinator Response (2024)	WG Coordinator Explanation to Working Group (2024)	SFPD Post-Concurrence Updated Response (2025)	SFPD Post-Concurrence Explanation (2025)	Open/Closed
R1	A working group member proposed using the recent amendments to the Language Access Ordinance as a foundation for discussions on updating DGO 5.20.	N/A	7/30/24	Administrative Question and Answer-not for inclusion in DGO	The WG coordinator has scheduled a presentation by OCEIA for the next meeting on August 15, 2024.	Administrative Question and Answer-not for inclusion in DGO	n/a	Closed
R2	A working group member requested to agendize for the next working group meeting the discussion on a different time and location for the fourth and/or fifth working group meetings.	N/A	7/30/24	Administrative Question and Answer-not for inclusion in DGO	The Community Working Group Coordinator will explore alternative meeting locations that can effectively support hybrid meetings. Once confirmed, these options will be added to the agenda for the working group members to vote on.	Administrative Question and Answer-not for inclusion in DGO	n/a	Closed
R3	During Officer Panel Q/A , the following issues were discussed: 1. Certification Challenges: Inability to get SFPD members certified outside of the testing provided by the Department of Human Resources (DHR). 2. Restrictive DGO Language: The prescribed order of preference for interpretation services are too restrictive and result in delays. 3. Language Line Challenges: interpreter may not have the competency to handle complex issues; may not have someone available who speaks the language; can be cumbersome for officers.	N/A	8/15/24	Recommendation was partially included in WG draft	The working group will review any policy updates informed by issues raised during the Officer Panel Q&A in future meetings, as each relevant section of the policy is discussed.	Language modified based on public review comments	Language was modified for clarity; intent from working group recommendation was not changed. 1) Per the City and County of SF, DHR is responsible for certifying SF employees. In the event this ever changes, the DGO states a person must be certified by "a designated qualifying agency". 2) The DGO has been amended so there are two routes for determining what kind of interpretation should be used. These routes are dependent on whether the event is a criminal or non-criminal incident. This provides more discretion for employees to use more easily accessible tools when appropriate. 3) The department acknowledges that an in-person, sworn member is a preferred interpreter for criminal incidents (5.20.04(B)(1)).	Closed
R4	During the Officer Panel Q/A , working group members raised the following questions and concerns about the implementation of DGO 5.20, which may inform DGO 5.20 revisions: 1. The language in DGO 5.20 appears passive regarding the determination of an LEP person or an encounter with an LEP individual by an officer. 2. Clarification on how officers disseminate the right to Language Access Services during encounters with LEP individuals. 3. Challenges in using Language Line and whether these difficulties are tracked. 4. The application of DGO 5.20 in ongoing communications with victims and community members after the initial on-field contact.	N/A	8/15/24	Administrative Question and Answer - not for inclusion in WG draft	The working group will review any policy updates informed by issues raised during the Officer Panel Q&A in future meetings, as each relevant section of the policy is discussed.	Administrative Question and Answer - not for inclusion in the DGO	no additional comment.	Closed
R5	During the OCEIA presentation on recent LAO amendments , the following changes were discussed as potentially impacting DGO 5.20 revisions: 1. First Responder Departments must provide language assistance during emergencies 2. Translation requirements for vital information now extend to public signage and digital content 3. Departments must acknowledge receipt of translation requests provide an update on the anticipated completion time 4. Department's responsibility to make the "Know Your Rights" brochure available.	N/A	8/15/24	Administrative Question and Answer - not for inclusion in WG draft	The working group will review any policy updates informed by recent changes to San Francisco's Language Access Ordinance in future meetings, as each relevant section of the policy is discussed.	Administrative Question and Answer - not for inclusion in the DGO	no additional comment.	Closed
R6	The working group members recommended including citations for Title VI of the Civil Rights Act of 1964 and San Francisco’s Language Access Ordinance (SF Admin Code Chapter 91) in either the purpose or references section of DGO 5.20.	1	8/15/24	Recommendation has been included in WG draft	This recommendation will be discussed during the next working group session. Update: 9/5/24 - See response to R# 12. Update 11/19/2024: The footnotes for federal, state, and local law governing the provision of language access services in the City and County of San Francisco has been added to draft DGO 5.20.	Language was modified to comply with formatting mandates of PDD	The department has cited laws/regulations as appropriate within the body of the DGO. By following this policy, employees are compliant with all laws and regulations.	Closed

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R7	A working group member inquired whether a non-expired version of Department Notice (DN) 21-072 exists or if the Department intends to re-issue it.	N/A	8/27/24	Administrative Question and Answer-not for inclusion in DGO	<p>The Department Representatives provided a response during the working group meeting that officers typically refer to the most recent DN for guidance on a specific issue and that it is willing to re-issue DN 21-072 in the near future.</p> <p>Update 9/10 - The Department incorporated the following elements of DN 21-072 into the newly added section “Identifying LEP Individuals” in draft DGO 5.20:</p> <ul style="list-style-type: none">- “Common Indicators of Language Barrier”- “Additional Factors Hindering Effective Communication with an LEP Individual”	Administrative Question and Answer - not for inclusion in the DGO	<p>The section on "Identifying LEP Individuals" has been modified for clarity and includes potential indicators of an LEP individual.</p> <p>The purpose of a DGO is to provide general policy statements, not include detailed procedures.</p> <p>The intent of the working group remains in the amended language.</p>	Closed
R8	A working group member recommended that some definitions that were updated in the Language Access Ordinance are included	1	8/27/24	Recommendation has been included in WG draft	The Department has updated the draft DGO 5.20 with additional applicable definitions derived from the recently amended San Francisco's Language Access Ordinance.	Language modified based on public review comments	All definitions in WG draft were kept, with language modifications based on public review comments and to ensure alignment with DGO 3.02 <i>Terms & Definitions</i> . Two definitions were also added: 'Language Access Liaison' and 'Office of Civic Engagement and Immigrant Affairs (OCEIA)'.	Closed
R9	The working group members discussed refining the language in the “Purpose” section to avoid redundancies.	1	8/27/24	Recommendation has been included in WG draft	WG draft Language - Purpose: This order establishes language access procedures, consistent with federal, state, and local law, for San Francisco Police Department (SFPD) members to follow when encountering a Limited English Proficient (LEP) person. It also defines the importance of effective and accurate communication between SFPD members and the communities they serve. Language barriers can sometimes inhibit or even prohibit LEP individuals from accessing and/or understanding important rights, obligations, and services, or from communicating accurately and efficiently in different situations. Hampered communication with LEP victims, witnesses, suspects, and community members can jeopardize safety and create evidentiary and investigative challenges.	Language modified based on public review comments	<p>The purpose statement has been reworded for clarity. The intent from the working group remains. The purpose statement now states "This order establishes language access procedures to guide employees in providing service to Limited English Proficient (LEP) individuals, fostering clear communication and reducing barriers that may otherwise limit access to critical rights, obligations, and services while ensuring communication is accurate, respectful, and effective.</p> <p>Department employees should take reasonable steps to ensure timely and accurate language access services to all individuals."</p>	Closed
R10	The working group discussed refining the language in the "Policy" section to avoid redundancies.	1	8/27/24	Recommendation has been included in WG draft	WG draft language - Policy: SFPD members shall take every reasonable step to ensure timely and accurate communication and access to all individuals regardless of national origin or primary language. When performing law enforcement functions, members shall provide free language assistance to LEP individuals they encounter or whenever an LEP person requests it. The Department’s policy is to inform the public that language assistance services are available free of charge to LEP persons, and that the Department will provide these services as part of the Department’s community policing and enforcement efforts.	Language modified based on public review comments	The policy statement has been reworded for clarity and length. The intent from the working group remains. The policy statement now says "Employees shall inform LEP individuals of their right to request free language access services, and will provide these services when requested or as needed."	Closed
R11	A working group member inquired about the definition of a qualified civilian interpreter and whether officers actually utilize their services.	2	8/27/24	Administrative Question and Answer-not for inclusion in DGO	The Department Representatives informed WG members that a qualified civilian interpreter is either an employee from another city department or from an outside agency contracted to provide language interpretation services. When an officer initiates a call for an interpreter, it is sent to all interpreters, including qualified civilian interpreters. However, these interpreters seldom come out to the field and are mainly utilized for investigations rather than by patrol officers.	Administrative Question and Answer-not for inclusion in DGO	No additional comment.	Closed
R12	A working group member asked whether SFPD Members are required to inform people about the availability of LEP services and how they identify someone as an LEP person, especially in cases when the person claims to speak English and it is not apparent that they may be an LEP person.	1	8/27/24	Administrative Question and Answer-not for inclusion in DGO	The current DGO requires members to inform members of the public about LEP services. There is no clear procedure for officers on what to do if a public member insists they can speak English.	Administrative Question and Answer-not for inclusion in DGO	The proposed DGO provides officer guidance to employees in 5.20.04(A)(1), "Employees should err on the side of providing language assistance when unsure of LEP status."	Closed
R13	A working group member recommended changing the word “Proficiency” to “Proficient” within the definition of an LEP Person.	1	8/27/24	Recommendation has been included in WG draft	The term “Proficiency” was replaced with “Proficient” in the expanded form of the LEP acronym.	Working Group language was not changed	No additional comment.	Closed

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R14	<p>A WG member recommended including detailed procedures to guide members in identifying limited English proficient (LEP) individuals and determining their primary language.</p> <p>Update 9/24 - a WG member recommended that the language be clarified and expanded to allow for the use of AI or translation apps.</p> <p>Update 10/22 - A working group member recommended replacing the last sentence in this section with language similar to Oakland's.</p> <p>Update 12/17 - a working group member recommended separating the last two paragraphs.</p>	2	9/10/24	<p>Recommendation has been included in WG draft</p>	<p>The WG draft includes sections on "Identifying LEP Individuals" as well as "Identifying Primary Language" in draft DGO 5.20 in response to DPA's recommendation.</p> <p>Update 9/24 - This section was updated to read in part as follows: (5.20.04.A(1))"When encountering individuals who may be LEP, members shall use any reasonable methods to ascertain their LEP status". In addition, the following statement was added at the end of this section, "Members shall follow proper procedures to ensure appropriate language access services are provided if requested or required after identifying an LEP individual". (5.20.04.A(2)) "Members can use various tools to identify the primary language or specific dialect of a LEP individual and request a suitable interpreter. These tools include but are not limited to maps, country flags, language access cards, artificial intelligence, apps like Google Translate, family members, friends, neighbors, volunteers, bystanders, children, or by contacting DEM or a professional interpretation service".</p> <p>Update 10/22 - Members shall follow proper procedures to ensure appropriate language access services are provided to LEP individuals if assistance is requested or required, and when feasible, inform them that these services are available free of charge.</p> <p>Update 12/17 - WG draft Language: "An accent alone does not imply language barriers. Additionally, members may use their communication skills and other available resources to gather information, ensure public safety, control scenes, identify issues, and provide basic information.</p> <p>If an individual has difficulty speaking or understanding a question in English, members shall take appropriate steps, when feasible, to inform them that free language access services are available upon request. If language access services are requested or required, members shall follow proper procedures to provide these services".</p>	Language modified based on public review comments	<p>The sections on identifying LEP persons and the language have been combined into one section (5.20.04(A), "Identify Primary Language". The intent of the working group remains in the amended language.</p> <p>The section now reads, "A. Identify Primary Language – When an employee believes language access services are needed, or as requested, employees will determine the individual’s primary language by asking the person their primary or preferred language, using department language identification cards, translation apps, artificial intelligence, nearby people, DEM, a professional interpretation service, etc.</p> <p>1. Employees should err on the side of providing language assistance when unsure of LEP status.</p> <p>2. Potential indicators of LEP individual – Misuse of language, inability to answer questions sufficiently, confusion with intricate enforcement procedures or language, cannot respond to open-ended questions, etc."</p>	Closed
R15	<p>During the public comments period of the working group, a comment relating to the purview of the working group was made to ensure that DGO 5.20 complies with the recently passed San Francisco Language Access Ordinance, as well as applicable state and federal language access laws.</p>	N/A	9/10/24	<p>Administrative Question and Answer - not for inclusion in WG draft</p>	<p>The Department is committed and mandated to create policies that align with the legal requirements and overall objectives of the City and County of San Francisco. This goal remains unchanged throughout all phases of policy development, including the Working Group Phase, for departmental policies.</p>	<p>Administrative Question and Answer - not for inclusion in the DGO</p>	<p>No additional comment.</p>	Closed

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R16	During the working group meeting, the Police Commission representative emphasized that the Good Government Guide limits discussions among working group members only when a majority are present. They questioned the rationale behind the broad statement on open meeting laws made by the Working Group Facilitator/Analyst in the previous meeting, describing it as “forceful” and having a “chilling” effect on members to not discuss language access matters among themselves outside the working group or engaging with the community to provide public comments.	N/A	9/10/24	Administrative Question and Answer-not for inclusion in DGO	Per Cal. Govt. Code § 54952.2(b) and Admin. Code §§ 67.3(b)(2), (3), <i>"Even if a majority of members are not present in one place at one time, an unlawful meeting can still occur"</i> . Admin. Code §§ 67.3(b)(2) states, <i>“A series of gatherings, each of which involves less than a majority of a policy body, to hear, discuss or deliberate upon any item that is within the subject matter jurisdiction of the City, if the cumulative result is that a majority of members has become involved in such gatherings .”</i> Accordingly, members are permitted to having discussions outside of the group, so long as those discussions do not rise to the level of a majority meeting. Additionally, the Working Group Facilitator/Analyst does not discourage members from discussing Language Access issues within their organizations or communities or from facilitating public comments.	Administrative Question and Answer-not for inclusion in DGO	No additional comment.	Closed
R17	During the working group meeting, the Police Commission representative expressed concerns about the statement made by the Working Group Facilitator/Analyst in the previous meeting regarding the elimination of voting on individual recommendations.	N/A	9/10/24	Administrative Question and Answer-not for inclusion in DGO	As an advisory body, there is no legal requirement that the working group vote on any item for discussion. The Department’s policy of not voting on individual recommendations during the working group stems from its commitment to valuing ALL recommendations equally, regardless of majority support.	Administrative Question and Answer-not for inclusion in DGO	No additional comment.	Closed
R18	The working group recommended using the word "certified" and revising the definition of “Qualified Bilingual Member” to include all certifying agencies, in addition to DHR, that the department uses to certify bilingual members for providing interpretation services.	2	9/10/24	Recommendation has been included in WG draft	WG draft language - "Qualified Bilingual Member" to read as follows: <i>"SFPD Members certified by the city or another designated qualifying agency to provide language interpretation services in one or more languages other than English. The Department will train all members in interpreting techniques, roles, and ethics to ensure they understand and adhere to confidentiality and impartiality rules "</i> .	Language modified based on public review comments	This definition has been amended for clarity to read "Certified Bilingual Member - A sworn member who is certified by DHR or other designated qualifying agency to provide interpretation services."	Closed
R19	The working group recommended adding the definition of “Non Certified Bilingual Member” to the “Definitions” section of DGO 5.20.	2	9/10/24	Recommendation has been included in WG draft	WG draft language - <i>"NON CERTIFID BILINGUAL MEMBER: SFPD Members identifying themselves as having ability to provide language interpretation services in one or more languages other than English but not certified by the city or another designated qualifying agency to do so"</i> .	Language modified based on public review comments	This definition has been amended to read "Certified Civilian Interpreter – A non-sworn individual or contracted service (e.g. Language Line or body worn system) who is certified by a designated qualifying agency to provide interpretation services."	Closed
R20	A working group member inquired whether the Department keeps a list of bilingual members, both certified and non-certified, who can provide interpretation services.	N/A	9/10/24	Administrative Question and Answer-not for inclusion in DGO	The current DGO has a section that details that the Department will provide DEM a copy of the Department's Bilingual Personnel list monthly.	Administrative Question and Answer-not for inclusion in DGO	This landuage was updated in the proposed draft based on comments from the public and now states "Staff Services Division maintains a list of all certified and Non-Certified Bilingual Members and Certified Civilian Interpreters, and notifies DEM when there are updates."	Closed
R21	The working group recommended changing the term “DHR Certified” to “Certified” in the "Language Proficiency Report" maintained by the Department.	N/A	9/10/24	Administrative Question and Answer-not for inclusion in DGO	The published report is outside the scope of this DGO.	Administrative Question and Answer-not for inclusion in the DGO	No additional comment.	Closed
R22	A working group member recommended updating the definition of “Exigent Circumstances” to ensure it aligns with the recently passed San Francisco Language Access Ordinance, which mandates language access services in emergencies.	2	9/10/24	Recommendation was partially included in WG draft	The definition of Exigent Circumstances is in DGO 3.02, Terms & Definitions, and is the controlling definition for all DGOs. A reference to DGO 3.02 is included in the definitions in the WG draft.	No change from WG response	No additional comment.	Closed
R23	A working group member asked for a copy of the Department of Justice’s (DOJ) Language Access Initiative or model policy is available.	N/A	9/10/24	Administrative Question and Answer-not for inclusion in DGO	As detailed in the supporting materials previously shared with the working group members, all public-facing resources resulting from DOJ's Language Access Initiative are regularly updated and posted at https://www.lep.gov/law-enforcement , including recent settlements and other law enforcement resources.	Administrative Question and Answer-not for inclusion in DGO	No additional comment.	Closed

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R24	A working group member inquired whether the Department would benefit from incorporating definitions of “Interpreter,” “Translator,” and “Sight Translation” as outlined in the Denver Language Access Plan and Policy shared with the group.	2	9/10/24	Recommendation was not included in WG draft	The recommended terms and their definitions are not applicable and/or included in other defintions in draft DGO 5.20.	No change from WG response	No additional comment.	Closed
R25	During the working group meeting, the Police Commission representative raised the following questions: 1. Why were the procedures for “Identifying Primary Language” removed from the current draft compared to the active DGO 5.20? 2. Why are the changes from the recently passed San Francisco Language Access Ordinance not reflected in the Stage I Draft of DGO 5.20? 3. Why was the redlined version of the Stage I Draft not shared with the working group members before the meeting?	N/A	9/10/24	Administrative Question and Answer-not for inclusion in DGO	<p>Response to Question 1: During the working group meeting, the Department’s Language Access Liaison explained that the section on “Identifying Primary Language” in the current DGO 5.20 restricts members to using only language access cards. Since members receive training on using various tools and effectively employ them at their discretion to identify primary languages and provide services to LEP individuals, this section was removed during the Stage I draft development of DGO 5.20.</p> <p>Response to Question 2: During the working group meeting, the Facilitator responded that, as previously mentioned at the introductory meeting, recent changes to the San Francisco Language Access Ordinance were passed after the Stage I draft for DGO 5.20 was developed.</p> <p>Response to Question 3: During the working group meeting, the Facilitator responded that the redlined version of the Stage I draft was distributed to members, including the Police Commission representative, and posted on the Department’s website 72 hours before the previous meeting held on 8.27.2024.</p>	Administrative Question and Answer - not for inclusion in the DGO	No additional comment.	Closed
R26	A working group member suggested reinstating the “Identifying Primary Language” section in draft DGO 5.20, which had been removed in the Stage I version.	2	9/10/24	Recommendation was partially included in WG draft	The WG draft has a “Identification of Primary Language” section that includes all tools members may use at their discretion.	Language modified based on public review comments	The language in the proposed draft has been modified based on public comment, but the intent of the working group remains - including examples of methods employees may use to determine the language being used (or that they prefer be used) by the individual.	Closed
R27	A working group member recommended condensing the following sections under the “Procedures” to avoid duplicating information throughout the DGO: General Interviews, Formal Interviews, Interrogations, Custodial Interrogations and Crime Victim Interviews, Field Contacts, Enforcement, and Investigations, and Notification of nterpretation services to LEP Individuals.	4 & 5	9/10/24	Recommendation has been included in WG draft	Revised the recommended subsections in the “Procedures” section of draft DGO 5.20 to eliminate redundant information.	Language modified based on public review comments	The procedures section was further refined based on public review comments. The intent of the working group to condense the sections and avoid duplication of information through the DGO remains.	Closed
R28	DPA inquired whether officers would benefit from adding clarification on members’ responsibilities to provide language assistance in draft DGO 5.20, such as: “A member’s duty is satisfied by:...”.	N/A	9/10/24	Recommendation was not included in WG draft	The officers in the working group stated that draft DGO 5.20 provides adequate guidance on their responsibilities for offering language access services to LEP individuals.	No change from WG response	No additional comment.	Closed
R29	A working group member proposed that guidance on language access procedures and deviations during exigent circumstances should be placed in a separate section, rather than embedded in a narrative.	2	9/10/24	Recommendation has been included in WG draft	Guidance on language access procedures for exigencies was relocated and consolidated into a new section titled “Deviation from Language Access Procedures” within draft DGO Section 5.20.04 (Procedures).	Language modified based on public review comments	<p>The language was modified for clarity and is now under 5.20.05. The intent of the working group remains in the modification. The section is titled 'Exigent Circumstances' and states "In exigent circumstances, members may use the most reliable, temporary interpreter until a certified bilingual member or certified civilian interpreter is available (e.g. if someone is assaulted and a member needs the description of the suspect before interpretation services are available, they may use a family member or bystander to get a physical description).</p> <p>1.For evidentiary communications – Members shall have a certified bilingual member or certified civilian interpreter confirm or supplement the translation or interpretation as soon as practical."</p>	Closed

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R30	Public comments were made. The working group discussed the following based on those comments: - Follow the Language Access Ordinance. - Ensure timely service to LEP individuals. - Include Non-Certified Bilingual Members in definition and provide direction when they can be used (Dist. 10 Supervisor's Office) -	N/A	9/24/24	Recommendation was modified and included in WG draft	There was robust discussion about the mentioned topics.	Language modified based on public review comments	1) The policy statement was modified for clarity. 2) The procedures section has been modified so expectations of SFPD employees is clear and easy to follow to ensure service is provided in a timely manner. 3) The department has been and continues to be compliant with the language access ordinance, and exceed the requirements of the ordinance by providing documents in more than just the required languages set forth in the ordinance as of September 2025. 4) For 'Non-Certified Bilingual Member' - the proposed draft clarifies who can provide interpretation assistance for non-criminal incidents.	Closed
R31	A working group member suggested to change the order of sections in DGO 5.20, specifically recommending that the "Deviation from Language Access Services" section be placed after the "Identifying Primary Language" section.	2 & 3	9/24/24	Recommendation was partially included in WG draft	The procedures to provide language access services during exigent circumstances were removed as a separate section and reinstated at the beginning of the Procedures section. Update 10/22: Upon further discussion, the WG draft has been amended with section 5.20.04 (Procedures) being reorganized reorganized, and a new section titled "Procedures During Exigencies" being added following the general procedures.	Language modified based on public review comments	The DGO has been further reodered for clarity. The intent of the working group remains. 5.20.01 Purpose 5.20.02 Definitions 5.20.03 Policy 5.20.04 Procedures A. Identify Primary Language B. Use of Interpreters C. Requesting Interpretation Assistance D. Scheduled Interviews and E. Custodial Interrogations F. Miranda Admonition G. Forms/Documents H. Incident Reports 5.20.05 Exigent Circumstances 5.20.06 Translation of Documents and Other Content A. External Requests B. Internal Requests 5.20.07 Training 5.20.08 Certified Bilingual Employee List 5.20.09 Language Access Liaison A. Reporting B. Signage	Closed
R32	Draft DGO 5.20 SEC -"Identifying Primary Language": A working group member recommended to include the use of Artifical Intelligence and apps like Google Translate as well as the use of family members, neighbors, friends, volunteers, bystanders, or children as appropriate in this section.	3	9/24/24	Recommendation has been included in WG draft	The use of Artifical Intelligence and apps like Google Translate as well as the use of family members, neighbors, friends, volunteers, bystanders, or children has been added to this section.	No change from WG response	No additional comment.	Closed
R33	A working group member had a question whether this DGO needs to include information for Deaf and hard of hearing members of the public.	N/A	9/24/24	Administrative Question and Answer-not for inclusion in DGO	There is a DGO (5.23) that speaks directly to procedures for interacting with Deaf and hard of hearing members of the public.	Administrative Question and Answer-not for inclusion in DGO	No additional comment.	Closed
R34	A working group member inquired how the Draft DGO 5.20 would incorporate the newly amended state law that mandates first responder departments to provide crisis-related information in threshold languages during crisis situations. Update 10/24: A working group member recommended that the draft DGO should include a broader mention of the Dymally-Alattore Bilingual Services Act. The ensuing discussion considered adding this act as a reference in either the "Purpose" section or under "References."	N/A	9/24/24	Recommendation has been included in WG draft	The footnotes for federal, state, and local law governing the provision of language access services in the City and County of San Francisco has been added to draft DGO 5.20.	Language was removed from DGO	The adhered-to formatting for DGOs does not allow footnotes. Per this proposed DGO, it is the responsibility of the Language Access Liaison to ensure compliance with Admin Code 91, which includes provisions relating to communication with LEP individuals during crisis situations. Additionally, per Admin Code 91.9(c), "...OCEIA shall develop strategies for department to use in deploying rapid response Languages Access Services to advise First Responders serving the public in crisis situations."	Closed

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R35	Draft DGO 5.20 SEC - "Use the Services of Bilingual Members" and "Order of Preference": A working group member inquired about the procedures for utilizing non-certified bilingual members to provide language access services and recommended including this information in these sections.	3	9/24/24	Recommendation has been included in WG draft	WG draft Language: "Depending on the severity of the crime and specific situations (excluding instances requiring court testimony or formal statements), members may utilize a non-certified bilingual member."	Language modified based on public review comments	This language was further refined by providing two lanes depending on whether the incident is criminal in nature. If it is a non-criminal incident, the language has been amended to state "Non-Criminal Incident – These are situations that do not involve a violation of the law and are unlikely to result in court proceedings or legal scrutiny. Employees should determine the appropriate level of interpretation needed, which may include certified or non-certified bilingual members or civilians, neighbors, family members, friends, bystanders, or the use of digital or non-digital tools (translation apps, dictionaries, etc.)."	Closed
R36	A working group member inquired about the training offered by the Language Access Services Liaison and whether officers have a specific timeframe to wait before transitioning to Language Line. Update 10/22: The WG recommended including the phrase "as soon as practical" instead of specifying an exact timeframe for using Language Line services in the appropriate section of draft DGO.	N/A	9/24/24	Recommendation has been included in WG draft	The Language Access Liaison stated during the working group meeting that the training includes scenarios like violent felony investigations or formal statements, which require certified bilingual members. It was explained that there is no strict timeframe to transition to Language Line when certified bilingual members are unavailable, as circumstances and needs vary. Update 10/22: The phrase,"as soon as practical" was added to the "Telephone Interpretation Services" section under the "Order of Preference"	Language was removed from DGO	This language was removed to conform to the Policy Development Division's mandate to make policy clear, concise, and general instead of having overly prescriptive procedural language. Employees understand an order of preference and that if the first preferred option is not available, they should move to the next available option.	Closed
R37	A working group member asked a question about the difference between interviews and custodial interrogations.	4	9/24/24	Administrative Question and Answer-not for inclusion in DGO	The Language Access Liaison and other sworn members clarified that custodial interrogations are with individuals who are not free to leave. Individuals are free to leave when interviewed.	No change from WG response	No additional comment.	Closed
R38	A working group member recommended reinstating the previously removed information emphasizing the importance of accuracy during formal interviews.	4	9/24/24	Recommendation has been included in WG draft	The language in this section was update to include the following: "Effective communication and accuracy of victim and witness statements is a priority in criminal investigations. Failure to protect the rights of LEP individuals during arrests and custodial interviews may present a risk to the integrity of the investigation and prosecution".	Language was removed from DGO	Members are aware of the importance of custodial interrogations and scheduled interviews. Because of the importance of these interviews and interrogations, the options for using non-certified members is not available. The use of telephonic interpretation is limited. Scheduled interviews language in the proposed draft: "Members will use in-person interpretation by a Certified Bilingual Member where possible, unless the LEP individual consents to the use of telephonic interpretation by a Certified Bilingual Member or a Certified Civilian Interpreter, or exigent circumstances exist. Members may also seek qualified assistance from another law enforcement agency when practical. 1. Members should proactively arrange for an interpreter when possible." Custodial interrogations language in the proposed draft: "Members will use in-person interpretation by a Certified Bilingual Member where possible. If an in-person interpreter is not available, members may use telephonic interpretation by a Certified Bilingual Member or a Certified Civilian Interpreter."	Closed
R39	A working group member recommended to use the following language for procedures related to the use of non-certified bilingual members, "SFPD members may utilize non-certified bilingual members during an exigency or to facilitate non evidentiary communication such as initial contact or general information gathering".	3	10/22/24	Recommendation has been included in WG draft	WG draft Language: "Non-Certified Bilingual Members can be used for in-person or telephonic services during exigencies or for facilitating non-evidentiary communication such as during initial contacts or to provide and/or gather general information".	Language modified based on public review comments	The DGO has been further clarified so that employees may determine the best interpretation service to use for non-criminal incidents, including non-certified bilingual members. Members are also given discretion in exigent circumstances which states "In exigent circumstances, members may use the most reliable, temporary interpreter until a certified bilingual member or certified civilian interpreter is available (e.g. if someone is assaulted and a member needs the description of the suspect before interpretation services are available, they may use a family member or bystander to get a physical description). 1.For evidentiary communications – Members shall have a certified bilingual member or certified civilian interpreter confirm or supplement the translation or interpretation as soon as practical."	Closed

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R40	The working group recommended removing the following language from the Draft DGO Section 5.20.04 E (b) Order of Preference , "The Language Access Liaison Officer coordinates the interpretation or translation services with a Certified Civilian Interpreter during business hours. If a Certified Civilian Interpreter is needed outside of business hours, the Department of Operations Center will contact the Language Access Liaison Officer to arrange services".	3	10/22/24	Recommendation has been included in WG draft	The language was removed as recommended.	No change from WG response	No additional comment.	Closed
R41	A working group member suggested not including examples of "Artificial Intelligence (AI)" in the "Restrictions" section of the draft DGO, as AI might evolve over the next 5-10 years to aid in language access services. However, another member countered that even if AI advances, courts may still not accept it for evidentiary communication, so it should remain in the "Restrictions" section for now.	4	10/22/24	Recommendation has been included in WG draft	The Department has added the following language within the "Restrictions" section of draft DGO: "The use of Artificial Intelligence and translation apps for interpretation purposes should be in accordance with City and County of San Francisco guidelines."	Language modified based on public review comments	The restrictions section has been removed based on feedback received from the public review comments. Artificial intelligence is mentioned under 5.20.04(A) "Identify Primary Language – When an employee believes language access services are needed, or as requested, employees will determine the individual’s primary language by asking the person their primary or preferred language, using department language identification cards, translation apps, artificial intelligence, nearby people, DEM, a professional interpretation service, etc."	Closed
R42	A working group member recommended incorporating language that details procedures and specifies a timeframe for identifying and planning the need for Language Access Services prior to any formal investigative procedures, such as formal interviews.	4	10/22/24	Recommendation has been included in WG draft	The Department has added the following language within the "Formal Interviews and Custodial Interrogations" section of draft DGO: "Members shall proactively arrange for an interpreter when s/he has reason to believe the witness is an LEP individual".	Language modified based on public review comments	This language has been further modified to state "members should proactively arrange for an interpreter when possible."	Closed
R43	A working group member recommended to replace the phrase, "apps like Google Translate" with more generic phrase, "translation apps" throughout the draft DGO.	3 and 4	10/22/24	Recommendation has been included in WG draft	The phrase, "Apps like Google Translate' was changed to "translation apps" throughout the Draft DGO wherever it was mentioned.	No change from WG response	No additional comment.	Closed
R44	The working group recommended consolidating the directions for using language access services in specific scenarios into one or two short sections. Additionally, they recommended reorganizing and consolidating redundant language from other sections of the DGO.	4 and 5	10/22/24	Recommendation has been included in WG draft	The Department has restructured the DGO to create two distinct sections, each outlining procedures to follow during specific circumstances: one section covers Scheduled Interviews and Custodial Interrogations, while the other addresses Miranda Admonition and Written Forms.	Language modified based on public review comments	These have been made into three sections, based on public review comments. They are 'Secheduled Interviews and Custodial Interrogations', 'Miranda Admonition', and 'Forms/Documents'. The DGO has been reorganized and consolidated to remove redunances and increase clarity.	Closed
R45	<p>Draft DGO 5.20.04 SEC - Notification of Language Access Services to LEP Individuals: A working group member recommended updating this section to align with the recent amendments in the San Francisco Language Access Ordinance to include the following:</p> <ol style="list-style-type: none"> "Departments shall inform LEP Persons who seek services, in their native tongue, of their right to request Language Access Services and their right to file a complaint as well as create a process where all persons may provide feedback on the Department’s Language Access Services". "Departments shall prominently post in main entrance or reception areas the availability of Language Access Services and OCEIA’s know-your-rights brochure translated in the required languages". <p>They also suggested including guidance in the draft DGO regarding the provision of language access services beyond the initial contact, referencing feedback received during the Sworn Member Panel Q/A. The specific recommendation was to update the posted signs, as mentioned in this section, to include information about the provision of language access services beyond the initial contact and the ability to file crimes online in different languages.</p>	4	11/7/24	Recommendation was partially included in WG draft	<p>The following changes were made to different sections of draft DGO in response to different parts of this recommendation:</p> <p>1. WG Draft DGO 5.20.04 (A) General Language: "<i>The following procedures shall apply to members who encounter LEP individuals while performing law enforcement functions, including initial contact through subsequent investigation, absent exigent circumstances</i>".</p> <p>2. WG Draft DGO 5.20.04 (A) SUB SEC Identifying LEP Individuals: Added the following language in this section: "<i>If an individual has difficulty speaking or understanding a question in English, members shall take appropriate steps, when feasible, to inform them that free language access services are available upon request</i>".</p> <p>3. WG Draft DGO 5.20.04 SUB SEC Notification of Interpretation Services to LEP Individuals Language: "<i>Notification of Language Access Services to LEP Individuals. Signs shall be posted in the main public entry or lobby of each SFPD facility in required languages containing the following information:</i></p> <ol style="list-style-type: none"> <i>Availability of language access services (interpretation and translation), including ability to report certain crimes online in different languages, at no cost to LEP individuals.</i> <i>“Know Your Rights” brochure developed by the Office of Civic Engagement and Immigration Affairs (OCEIA), including information about OCEIA’s Complaint Process, once available</i>". 	Language modified based on public review comments	<p>5.20.04(A) has been modified for clarity based on public review comments. The intent of the working group remains. This section now states "Identify Primary Language – When an employee believes language access services are needed, or as requested, employees will determine the individual’s primary language by asking the person their primary or preferred language, using department language identification cards, translation apps, artificial intelligence, nearby people, DEM, a professional interpretation service, etc.</p> <ol style="list-style-type: none"> Employees should err on the side of providing language assistance when unsure of LEP status. Potential indicators of LEP individual – Misuse of language, inability to answer questions sufficiently, confusion with intricate enforcement procedures or language, cannot respond to open-ended questions, etc." <p>Regarding signage, the language has been modified for clarity based on public review comments. The intent of the working group remains. The language states "Signage – The Department will post the following in publicly accessible lobbies, in all required languages (per OCEIA determination):</p> <ol style="list-style-type: none"> Signage noting the availability of free language access services. Signage relating to and/or providing vital information about Department services or programs. OCEIA’s Know-Your-Rights brochure, when available, or other required published materials." 	Closed

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R46	Draft DGO 5.20.04 SUB SEC - Incident Reports: A working group member asked whether the specific information required in an Incident Report, as outlined in this section, is summarized by the reporting officer or if there are designated boxes or sections to remind officers about including this information when writing incident reports. They also asked whether it would be beneficial to specify in the draft DGO that language access services can be requested at any time during the investigation, even if the initial contact did not identify the involved person as an LEP.	4	11/7/24	Recommendation has been included in WG draft	The following language was added the WG Draft DGO 5.20.04 (A) General: " <i>The following procedures shall apply to members who encounter LEP individuals while performing law enforcement functions, including initial contact through subsequent investigation, absent exigent circumstances.</i> "	Language was removed from DGO	This language was removed to conform to the Policy Development Division's mandate to make policy clear, concise, and general.	Closed
R47	Draft DGO 5.20.04 SUB SEC - Restrictions: A working group member recommended removing the newly added sentence about using artificial intelligence and translation apps for interpretation purposes, as per the City and County of San Francisco guidelines, from the restrictions section. The rationale was that this sentence could be problematic for officers who may not be fully aware of the detailed guidelines, which primarily pertain to generative AI and come with other mandated requirements.	4	11/7/24	Recommendation has been included in WG draft	The following language was removed from the "Restrictions" sub-section of the draft DGO: " <i>The use of Artificial Intelligence and translation apps for interpretation purposes should be in accordance with City and County of San Francisco guidelines.</i> ".	Language was removed from DGO	The 'Restrictions' section was removed from the proposed DGO based on public comment and the incorporation of the intended language into 5.20.04(B) 'Use of Interpreters', which only allows the use of family and friends, etc. during non-criminal incidents. The additional intention of exigent circumstance allowances was incorporated into 5.20.05 'Exigent Circumstances'.	Closed
R48	Draft DGO 5.20.04 SEC - Translation of Documents: A working group member recommended updating this section to align with the recent amendments in the San Francisco Llanguage Access Ordinance to include the requirement that all departments shall acknowledge receipts of a translation request within 48 hours and share an update about anticipated completion time.	5	11/7/24	Recommendation has been completely included in draft DGO	The following information was added to this section, " <i>SFPD shall translate all written materials providing vital information to the public into the required languages. If written material providing vital information to the public is requested in a language not covered by required languages, member receiving the request shall acknowledge the request within 48 hours, excluding weekends and holidays, and make good-faith efforts, in coordination with Language Access Liaison Officer, to translate the requested materials within a reasonable amount of time and provide the requester with a due date.</i> ".	Language modified based on public review comments	The language was modified for clarity based on public review comment. The intent of the working group remains. The modified language says "Non-Required Language – Any employee receiving a request for vital written information not in a required language will: a. Provide acknowledgement to the requester within 48 business hours, b. Send the request to the Language Access Liaison for translation, and c. Make an effort to provide the requester with a date they can expect the materials. The employee receiving the request is responsible for communicating with and providing the final product to the requester."	Closed
R49	Draft DGO 5.20.04 SEC - Translation of Documents: A working group member recommended rephrasing the language to ensure there are no barriers for LEP individuals to receive the necessary assistance in obtaining police forms and documents in different languages.	5	11/7/24	Recommendation has been included in WG draft	WG draft Language: " <i>If there is a police form or document that needs to be translated, the person requesting the document can send it to the Language Access Liaison Officer via email. The Language Access Liaison will send the form to the Department's vendor to process...</i> "	Language modified based on public review comments	The directions for internal requests of documents to be translated into a non-required language was modified for clarity based on public review comments and now reads (5.20.06.B(2)) "Documents not related to an SFPD Investigation – The employee will email the document to the Language Access Liaison, who will coordinate the translation. Translation may take up to two weeks."	Closed
R50	Draft DGO 5.20.04 SEC - Translation of Documents: A working group member recommended to change the phrase, "The Department" to "Receiving Members" when it comes to procedures relating to transcribing tapes and other evidence into English.	5	11/7/24	Recommendation has been included in WG draft	WG draft Language: " <i>Receiving members shall translate tapes, documents, or any other evidence submitted by LEP individual(s) into English when such evidence is necessary to continue the investigation and/or prosecution of a criminal case or a Departmental administrative investigation.</i> ".	Language modified based on public review comments	The directions for evidence translation request has been modified for clarity based on public review comments and now reads (5.20.06.B(1)) "Evidence – Evidence shall be translated by a Certified Bilingual Member or Certified Civilian Interpreter into English when necessary for an investigation, prosecution of a criminal case, or a Departmental administrative investigation. Employees may request assistance from Certified Bilingual Members or the Language Access Liaison." The intent of the working group remains.	Closed
R51	Draft DGO 5.20.04 SEC Training: A working group member mentioned that the timeframe for providing initial training after the adoption of the DGO is not consistently 180 days from the date of adoption. In practice, this timeframe is usually negotiated between the Police Commission, the Subject Matter Expert, and the Chief of Police. They recommended updating this section to reflect the typical practice.	5 and 6	11/7/24	Recommendation has been included in WG draft	WG draft Language: " <i>Initial training shall be conducted within a designated timeframe negotiated between the Police Commission and the Department after the adoption of this General Order by the Police Commission...</i> "	Language was removed from DGO	When the revised DGO is approved by the Commission, they will include a period of time before the DGO is effective so department members may be trained on any new procedures. This does not need to be in the DGO, as it is about training PRIOR to the effectiveness of this DGO, and the timeline for implementation is mandated by Resolution.	Closed
R52	Draft DGO 5.20.04 SEC Training: A working group member asked about how the participation of officers in in-service training on language access is tracked. They specifically recommended removing the phrase "In an effort" and starting the section with "To ensure all SFPD Members..."	5 and 6	11/7/24	Recommendation has been included in WG draft	WG draft Language: " <i>To ensure all SFPD public facing employees are properly trained in these guidelines, the SFPD will provide...</i> "	Language modified based on public review comments	The training section (5.20.07) has been amended for clarity to read "The Department will provide all public-facing employees with periodic training on LEP policies and procedures, interpreting techniques, roles and ethics."	Closed

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R53	Draft DGO 5.20.04 SEC Training: A working group member recommended updating this section to include the following language, aiming to provide general guidance on training content: <i>"In an effort to ensure all SFPD public facing employees are properly trained in these guidelines, the SFPD will provide periodic training in member awareness of the LEP policies, how to access both in-person and telephone interpreters, how to work with interpreters, how to contact and effectively work with certified bilingual personnel, demographics, how to identify whether a person is LEP and their primary spoken language including training on language identification tools, communicating effectively with an LEP person using a telephone, video, or in-person interpreter, anti-bias training related to interactions with different communities, documenting interactions with LEP persons with the SFPD system".</i>	5 and 6	11/7/24	Recommendation was partially included in WG draft	WG draft Language: <i>"To ensure all SFPD public facing employees are properly trained in these guidelines, the SFPD will provide periodic training in member awareness of the LEP policies and any other policies related to Departmental Bias-Free Policing and Community Policing Strategic Plans, how to identify whether a person is LEP and their primary spoken language including training on language identification tools, how to access both in-person and telephone interpreters, and how to effectively work with interpreters. The Department shall conduct such training"</i>	Language modified based on public review comments	The language in the training section was modified for clarity and to remove any mention of training that is under the purview of another written directive (such as community policing). The full text of the training section states "The Department will provide all public-facing employees with periodic training on LEP policies and procedures, interpreting techniques, roles, and ethics."	Closed
R54	Draft DGO 5.20.04 SUB SEC - Language Access Liaison Officer's Duties: A working group member recommended to expand on Language Access Liaison Officer's duty regarding coordinatng language access training beyond just at the Academy to be inclusive of language access training provided at other points in time such as roll call, in-service, and initial training after adoption of DGO.	6	11/7/24	Recommendation has been included in WG draft	WG draft Language: <i>"Coordinating language access training at the Academy and PowerDMS".</i>	Language modified based on public review comments	The training duties of the Language Access Liaison were broaded so it can include a variety of training mediums. The duties are included in the definition of the Language Access Liaison, which states "A sworn member responsible for managing the Department's language access services, including: assistance with coordinating training and bilingual certification processes, managing translation and interpreting services, overseeing signage posting, coordinating reporting, and ensuring compliance with SF Admin Code 91. The Liaison may also be used as a resource to assist in coordinating the translation of documents and materials."	Closed
R55	Draft DGO 5.20.04 SUB SEC - Language Access Liaison Officer's Duties: A working group member recommended updating the bullet point related to coordination with the Department of Police Accountability (DPA) and community groups to discuss and resolve language access complaints with the following changes: 1. Change "discuss and resolve language access complaints" to "improve responsiveness to the community's language access needs." 2. Include the Office of Civic Engagement and Immigrant Affairs (OCEIA) in addition to the DPA and community groups in this bullet point. Another working group member suggested keeping the "resolution of complaints" in this bullet point in addition to the recommended language. The ensuing discussion included a point regarding development of a plan between OCEIA and DPA to coordinate with each other to communicate and address any language access services related complaints against the Department.	6	11/7/24	Recommendation was partially included in WG draft	WG Draft Language: "Coordinating as needed meetings with the Department of Police Accountability, OCEIA, and community groups to improve SFPD’s responsiveness to language access needs of the community". Additionally, DPA responded during the meeting regarding citizen complaints against sworn members, including language access complaints, stating that there is a state law governing complaints about sworn members. These complaints are confidential and are handled through internal affairs and the chief's office, which is why the resolution of such complaints does not fall under the purview of the Language Access Liaison Officer. Furthermore, there was a discussion among the Police Commissioner, DPA, and OCEIA about potentially developing and implementing a process to communicate any language access-related complaints against the department, specifically concerning non-sworn members, between OCEIA and DPA. The development of this process is beyond the scope of this working group.	Language was removed from DGO	The Language Access Liaison is not the appropriate rank to manage complaints. DPA works with the Department's Internal Affairs office and the Discipline Review Board to provide recommendations to resolve complaints.	Closed
R56	During public comment, members of the public recommended that the language access ordinance be followed.	N/A	11/19/24	Administrative Question and Answer - not for inclusion in WG draft	This recommendation will be further discussed during the next working group meeting that's scheduled for Tuesday, December 17th, 2024.	Administrative Question and Answer - not for inclusion in the DGO	No additional comment.	Closed

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R57	A working group member asked about the distinction between core and required languages, and whether this should be noted in the reporting matrix that was shared during the meeting by the Community Working Group Facilitator. A working group member inquired about the relationship between the reporting matrix that was shared during the meeting by the Community Working Group Facilitatorand the draft DGO.	N/A	11/19/24	Recommendation included in training, Department Manual, or other procedural or guidance document	The Community Working Group Coordinator will indicate on the "Reporting Matrix" that was shared during the meeting, the distinction between core and required languages. The reporting matrix includes information on the data that the Department can report in response to the Language Access Ordinance and the Police Commission's reporting requirements regarding language access services.	Administrative Question and Answer-not for inclusion in DGO	no additional comment.	Closed
R58	The working group recommended that draft DGO 5.20 include the requirements outlined in SF Admin Code Chapter 91, specifically regarding the translation of digital content.	5	11/19/24	Recommendation has been included in WG draft	WG Draft Language: <i>"Digital Content. SFPD shall translate digital content providing vital information to the public or public service announcement/information raising awareness about an issue of public interest or affecting the community, on digital platforms such as web sites, social media platforms, third-party digital content providers, or various on-line mediums".</i>	Language modified based on public review comments	Language was modified for clarity. The intent of the working group remains. This has been updated in 5.20.06(A)(1) to state "Required Language - Vital written materials and applicable digital content should be available to the public directly or will be made availabe by request."	Closed
R59	Draft DGO 5.20.04 SUB SEC - Reporting - The working group recommended providing a breakdown of the data reported to the Police Commission, categorized by language, regarding language access; including RIPA information; and to clearly outline all the data being collected for the Commission.	6	11/19/24	Recommendation was partially included in WG draft	WG Draft Language: "Preparing a fiscal year report for the Police Commission, which includes data on: 1. Calls for Service (as provided by DEM): a. Total number of calls for service. b. Number of calls for service involving LEP individuals i. Breakdown by language of provided interpretation services, if possible. 2. Incident Reports: a. Total number of incident reports. b. Number of incident reports involving LEP individuals: i. Breakdown by the method of interpretation services were provided (in-person or through Language Line). ii. Breakdown by language of provided interpretation services. 3. Racial Identity and Profiling Act (RIPA) Stops Data: a. Total number of stops. b. Number of stops where the individual stopped was perceived to have limited English proficiency. 4. Community Survey Responses: a. Total number of survey responses. b. Number of survey responses in non-English language 5. Language access services complaints forwarded by the DPA.	Language was removed from DGO	The department will follow the reporting requirements in Admin Code 91.11 The reporting language was amended in 5.20.09(A) to read "Reporting - The Language Access Liaison will coordinate the preparation of the fiscal year report as outlined in SF Admin Code 91.11, including the number and percentage of LEP individuals who used the Department's services, a roster of certified and non-certified bilingual employees, ongoing training strategy, etc." This makes it clear and also puts the department in compliance with SF Admin Code 96I.2(b). Additionally, community surveys are the responsibility of the Community Engagement Division, who has an annual report that details survey responses and will not be duplicated in the LEP report.	Closed
R60	Draft DGO 5.20.04 SUB SEC - Reporting - The working group recommended aligning the reporting periods for both language access reports—those submitted to OCEIA and the Police Commission—with the fiscal year.	6	11/19/24	Recommendation has been included in WG draft	The Department has updated the language in the reporting section of Draft DGO 5.20 to indicate that both Language Access Services reports—one submitted to OCEIA and the other to the Police Commission—will report data for a given fiscal year.	Language was removed from DGO	The department will follow the reporting requirements in Admin Code 91.11 The reporting language was amended in 5.20.09(A) to read "Reporting - The Language Access Liaison will coordinate the preparation of the fiscal year report as outlined in SF Admin Code 91.11, including the number and percentage of LEP individuals who used the Department's services, a roster of certified and non-certified bilingual employees, ongoing training strategy, etc." This makes it clear and also puts the department in compliance with SF Admin Code 96I.2(b).	Closed
R61	Draft DGO 5.20.04 SEC - Procedures During Exigencies - A working group member requested to rephrase the title of this section from "Procedures During Exigencies" to "Exigent Circumstances Procedures".	7	11/19/24	Recommendation has been included in WG draft	The phrase, "Procedures During Exigencies" was changed to "Exigent Circumstances Procedures" in Draft DGO 5.20.	Language was modified to comply with formatting mandates of PDD	The section has been renamed "Exigent Circumstances"	Closed

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R62	Draft DGO 5.20.04 SEC Training: A working group member suggested including demographics as one of the training topics within this section to ensure all public-facing employees are knowledgeable about the diversity of LEP residents in the city. This will help them better understand the range and breadth of different language needs within the community.	5	12/17/24	Recommendation was not included in WG draft	The Department already provides training on cultural diversity and demographics to all SFPD members as part of their "Community Policing Strategic Plan" and "Anti-Bias Strategic Plan" training.	No change from WG response	No additional comment.	Closed
R63	Draft DGO 5.20.04 SEC Training: A working group member recommended that the Department consider conducting training on LEP policies annually instead of biennially.	5	12/17/24	Recommendation was not included in WG draft	Given the numerous mandatory trainings and administrative tasks required by law, providing training on LEP policies annually instead of biennially contradicts the intent of SF Admin Code 961.2. SF Admin Code 961.2 aims to maximize the time officers spend on core law enforcement and crime prevention functions rather than administrative tasks. Therefore, this recommendation will not be included in the draft DGO 5.20.	No change from WG response	No additional comment.	Closed
R64	Draft DGO 5.20.04 SEC Digital Content: A working group member requested that a note be shared with the Police Commission upon submission of draft DGO 5.20, clarifying that the responsibility to create a detailed process for implementing the Department's digital content language access requirements falls outside the scope of this working group and any individual police officer. Instead, this matter should be discussed among SFPD Leadership, SFPD Media Relations, and OCEIA.	5	12/17/24	Administrative Question and Answer-not for inclusion in DGO	The working group faciliator plans to submit the requested note to the Police Commission upon submission of the Draft DGO 5.20 to them.	Recommendation is outside the scope of the DGO	This request is outside the scope of the DGO.	Closed
R65	Draft DGO 5.20.03 SEC Definitions: A working group member suggested removing the newly proposed definition of "Substantial Number of LEP Persons" as it is not referenced elsewhere in the document. Instead, they recommended incorporating the language about substantial numbers of LEP Persons into the newly proposed definition of "Required Languages," effectively combining the two definitions.	1	12/17/24	Recommendation has been included in WG draft	The newly proposed definition of "Subsequent Number of LEP Individuals" was removed and the newly proposed definition of "Required Languages" was updated to read as follows: <i>"Any non-English language spoken by a substantial number of LEP individuals in San Francisco, as defined by the thresholds in the San Francsico Administrative Code (SF Admin. Code) Chapter 91 or annually determined by the Office of Civic Engagement and Immigration Affairs (OCEIA)"</i> .	Language modified based on public review comments	The definition of Required Language was amended to state "Required Languages - Languages the Department must provide interpretation and translation services for, and have vital information available in, per SF Admin Code 91."	Closed
R66	Draft DGO 5.20.04 SUB SEC Incident Reports: A working group member suggested removing the last sentence in this section, as it appeared to be redundant.	4	12/17/24	Recommendation has been included in WG draft	The sentence ("All this information shall be indicated in the incident report") was removed.	No change from WG response	No additional comment.	Closed
R67	Draft DGO 5.20.04 SEC - Notification of Language Access Services to LEP Individuals: The working group recommends changing the title of this section to "Signage"	4	12/17/24	Recommendation has been included in WG draft	The title of this section was changed as recommended.	No change from WG response	This is now section 5.20.09(B) and is still titled "signage".	Closed
R68	Draft DGO 5.20.04 SUB SEC Formal Interviews and Custodial Interrogations: The working group recommends changing the title of this sub section to "Scheduled Interviews and Custodial Interrogations"	3	12/17/24	Recommendation has been included in WG draft	The title of this section was changed as recommended.	Recommendation has been completely included in draft DGO	This is now section 5.20.04(D) and is titled "Scheduled Interviews and Custodial Interrogations"	Closed
R69	Draft DGO 5.20.04 SUB SEC Scheduled Interviews and Custodial Interrogations: The working group recommends replacing the term "witness" with "subject"	4	12/17/24	Recommendation has been included in WG draft	WG draft Language: "Members shall proactively arrange for an interpreter when there is a reason to believe the subject is a LEP person".	Language modified based on public review comments	To make the DGO more clear and concise, the specific paragraph of the discussion was removed. Language is still included that says "Members should proactively arrange for an interpreter when possible."	Closed
R70	Draft DGO 5.20.04 SUB SEC Language Access Liaison Officer's Duties - Bullet Point V: The working group recommends replacing the phrase, "bilingual officer speaking the needed language" to "with a member skilled in the language services requested".	6	12/17/24	Recommendation has been included in WG draft	WG draft Language: "Working with the DEM to establish a system that immediately identifies LEP calls and promptly dispatches language assistance, preferably with a member skilled in the language services requested".	Recommendation is outside the scope of the DGO	This bullet point was removed. DEM is a separate Department from SFPD. If they begin testing a system that can identify the need for an interpreter, they will go through their chain of command to request an appropriate Department liaison.	Closed