#	Public Comment	Date Received	SFPD response	SFPD Explanation	DPA Explanation
R1	The purpose is very wordy and cites sources unlike any other DGO	2/5/25	Recommendation has been included in draft DGO	The purpose section has been revised for clarity and conciseness and the citations removed.	agree w/ sfpd.
R2	the definition for certified bilingual member, the second sentence does not make sense here, as this is the definitions section about already trained members and not about training	2/5/25	Recommendation has been included in draft DGO	The definition for certified bilingual member has been amended to state "A sworn member who is certified by DHR or other designated qualifying agency to provide interpretation services."	agree w/ sfpd.
R3	A lot of this DGO uses vague language that makes it not concise. For example: "Members can use various tools to identify the primary language" Just list the tools.	2/5/25	draft DGO	The draft has been updated to remove vague and expansive language where possible.	agree w/ sfpd.
R4	procedures for specific scenarios section should be more concise	2/5/25	draft DGO	The draft has been updated to remove vague and expansive language where possible.	agree w/ sfpd.
R5	translation of documents, digital content, and training sections all are way too wordy	2/5/25	Recommendation will be modified and included in the draft DGO	The draft has been updated to remove vague and expansive language where possible. The wording in this section has been modified so its intent and direction for SFPD employees is clear.	agree w/ sfpd.
R6	Recording and Tracking of LEP should not be in a DGO, it is specific to ONE person in the Department and is administrative. Also, LEP should stay under CED as Language Access Services have a direct impact on the San Francisco community.	2/5/25	Recommendation will be modified and included in the draft DGO	Requirements for reporting and tracking need to be in policy so the Department can ensure the work is completed. The reporting	agree w/ sfpd.
R7	Many iPhone translations apps are easy and effective in both direction cost effective	2/5/25	Recommendation will be modified and included in the draft DGO	Idictionary naner etc) interpretation accistance in limited non-evidentiary instances	agree w/ sfpd. This issue was discussed extensively in the working group and the determination was that apps are not yet able to translate at a level required by courts.
R8	revise the definition of LEP. remove "individual" from the term as the acronym is not LEPI. use "individuals whose primary language is not English and who have a limited ability to read, write, speak or understand English"	2/24/25	Recommendation will be modified and included in the draft DGO	I The definition of LEP was modified for clarify and now states "A nerson whose nrimary or preferred language is not English and	agree w/ sfpd.
R9	This has too much detail for a DGO and should be included in a unit order or or other document. Patrol does not need to know about this section.	2/24/25	Recommendation will be modified and included in the draft DGO	The Language Access Liaison and Reporting procedures have been reduced with the intent of the Unit to provide more detail to the necessary party(ies) in a Unit Order.	agree w/ sfpd.
R10	I suggest deleting any reporting not required by law. The only report should be the one that is already required by admin code.	2/24/25	Recommendation has been included in draft DGO	The Department will provide one fiscal year report, as required by Admin Code 91 and in full compliance with Admin Code 961.	agree w/ sfpd, however the Police Commission may expand SFPD's reporting requirements by resolution.
R11	Every paragraph/section should be revised for brevity. for instance, the section about "bilingual member list" should simply say that Staff Svc keeps the list and shares it with DEM	2/24/25	Recommendation has been included in draft DGO	The section on certified bilingual employee list has been modified and now reads "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."	agree w/ sfpd.
R12	the purpose section is too long - it should only be the purpose	2/25/25	Recommendation has been included in draft DGO	See R1 for response.	agree w/ sfpd.
R13	the policy statement is too long. what is the standard for officers to follow? It seems like this should be maybe the first and second sentence.	2/25/25	Recommendation has been included in draft DGO	Policy statement has been amended to state "Employees shall inform LEP individuals of their right to request free language access services, and will provide these services when requested or as needed."	agree w/ sfpd.
R14	[Definition section] E and F should be shortened. G should be removed entirely.	2/25/25	Recommendation will be modified and included in the draft DGO	TAIL DEFINITIONS have been modified to be more clear and concise. The only definition that has been removed is Exipent	agree w/ sfpd.
R15	[procedures] the paragraph before III.A should be removed ("SFPD members are to follow these procedures in all encounters absent exigent circumstances; however, exigent circumstances may require some deviation. In such situations, SFPD members shall use the most reliable, temporary interpreter available. Once the exigency has passed, members are expected to revert to the procedures set forth in this general order.") III.A is not necessary	2/25/25	Recommendation will be modified and included in the draft DGO	This language has been removed from this section and incorporated into 5.20.05, Exigent Circumstances.	agree w/ sfpd.
R16	this seems longer than the current version, it should be shorter. All sentences should be shorter and easier for officers to read/understand (especially if they arein the field)	2/25/25	Recommendation will be modified and included in the draft DGO	The draft has been updated to make sentences shorter and easier to read/understand.	

#	Public Comment	Date Received	SFPD response	SFPD Explanation	DPA Explanation
R17	nowhere in this procedure does it say how an officer is supposed to request the help of translation services	2/25/25	Recommendation has been included in draft DGO	How to request translation services has been added to the DGO and now states "C. Requesting Interpretation Assistance 1.To Request a Certified/Non-Certified Bilingual Member – Ask Dispatch if there are certified (or Non-Certified, if appropriate based on incident) members available. 2. To Request a Certified Civilian Interpreter – Employees may use the designated language access app on their Department phone or call the direct number."	agree w/ sfpd.
R18	[use of interpreters] Could be shortened to just say something about "contact in this order:" and then list in order of preference. Explanations not needed.p	2/25/25	Recommendation will be modified and included in the draft DGO	The Use of Interpretors section has been modified and broken into two sections: one for criminal incidents and one for non-criminal incidents. The language has been modified to state "members should follow this order of preference for interpretation	agree w/ sfpd.
R19	the 1a seems confusing to read for an officer. there are sentences in there that aren't procedures.	2/25/25	Recommendation will be modified and included in the draft DGO	The language for scheduled interviews and custodial interrogations has been separated and the language amended for clarity.	agree w/ sfpd.
R20	the parts that aren't directed toward officers (I.3, K.1, O) should be removed - they don't fit within the scope of the stated policy. [signage, transcribing tapes and evidence, recording and tracking]	2/25/25	Recommendation will be modified and included in the draft DGO	This feedback might be related to the current active DGO, and not the draft DGO for public comment. Former I3 was regarding signage, K1 was regarding transcribing tapes and evidence, and O was about recording and tracking langauge access efforts. Information about signage will stay in the DGO to remain compliant with SF Admin Code 91. Transcription of evidence was drastically reduced to contain only the information relevent to officers. A section about reporting is in the amended draft to maintain compliance with the Admin Code.	agree w/ sfpd.
R21	There are too many definitions. Also J doesn't even provide a definition.	2/25/25	Recommendation will be modified and included in the draft DGO	J (exigent circumstances) has been removed. The other definitions were shortened for clarity.	agree w/ sfpd.
R22	Do officers really need a whole section on how to identify someone? Is it not apparent when they cannot communicate effectively with them?	2/25/25	Recommendation will be modified and included in the draft DGO	This section on identifying LEP Invidivuals has been removed and the section now begins with 'Identify Primary Language'. There is a subsection that provides employees with potential indicators of LEP individuals.	Disagree w/ SFPD response. The section on identifying an LEP individual comes directly from the Department Bulletin on Providing Langauge Access Services. Section 5.20.04.A.2. should be replaced with bulleted list in 12.13.24 version of this DGO.
R23	I don't see anything that tells an officer how to access the language access services	2/25/25	Recommendation has been included in draft DGO	See R17 for response.	
R24	why would the department-provided card not be first? Using a "map" or "country flag" is ridiculous and also doesn't necessarily help determine language	2/25/25	Recommendation has been included in draft DGO	Asking the person what their primary language is has been included as the first way to determine a person's primary language. Using the department card has been moved to second.	agree w/ sfpd.
R25	Could be made shorter. Telephonic and Non-certified don't need an whole explanation. The section already says "order of preference"	2/25/25	Recommendation has been included in draft DGO	Non-procedural language has been removed from the Use of Interpreters section. The language has been amended so it is clear that the order the interpreter options are listed in the order of preference for contact.	agree w/ sfpd.
R26	so much of this policy is in paragraph format which would make it hard for an officer on the street to determine what they are supposed to do in a given circumstance	2/25/25	Recommendation will be modified and included in the draft DGO	The proposed draft has been updated to remove vague and expansive language as well as paragraph formatting.	agree w/ sfpd.
R27	not applicable to most people in the department - shouldn't be in this policy [signage].	2/25/25	Recommendation will be modified and included in the draft DGO		agree w/ sfpd.
R28	some parts of 6 shouldn't be in policy [translation of documents].	2/25/25	Recommendation will be modified and included in the draft DGO		agree w/ sfpd.
R29	shouldn't be in policy [digital content]	2/25/25	Recommendation has been included in draft DGO		agree w/ sfpd.
R30	duties of language access liaison shouldn't be in a general policy	2/25/25	Recommendation has been included in draft DGO	of documents and materials."	agree, this information should be in a unit order or placed on the general sfpd website.
R31	too specific. If these are actual requirements, then details should be somewhere else. [reporting]	2/25/25	Recommendation has been included in draft DGO	Reporting requirements have been modified to align with Admin Codes 91.11 and 96I.2(b). This section now states "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. 1.The report shall be submitted to the Police Commission and OCEIA upon approval by the Chief."	

#	Public Comment	Date Received	SFPD response	SFPD Explanation	DPA Explanation
R32	This definition adds zero guidance and had no practical application. Please delete. [5.20.03 D]	2/27/25	Recommendation will be modified and included in the draft DGO	The definition of Required Languages is kept; but has been modified for clarity and states "Languages the Department must provide interpretation and translation services for, and have vital information available in, per SF Admin Code §91."	Agree
R33	Why is national origin mentioned? Should be deleted as this is a bout language not origin.	2/27/25	Recommendation has been included in draft DGO	The reference to national origin has been removed.	agree.
R34	A definition that just refers to another DGO? Just delete this definition, totally unhelpful.	2/27/25	Recommendation has been included in draft DGO	This definition [exigent circumstances] has been removed. It is included in the newly revised DGO 3.02 (Terms and Definitions).	agree.
R35	There needs to be a line that allows officers to ask about language "do you speak" without getting in trouble. Officers have been in trouble for assuming. In the spirit of this DGO, officers have to be protected.	2/27/25	Recommendation has been included in draft DGO	modified to include asking a person their primary language.	Agree that officers should feel comfortable asking someone if they speak a language. However, DPA is unaware of discipline cases stemming from our office where someone was asked if they speak a language.
R36	"Code-switching" isn't common vernacular and should be changed to a common language alternative.	2/27/25	Recommendation will be modified and included in the draft DGO	This term is not commonly used in SFPD. To make it more clear, the term has been modified to "switching between languages" and included in the section 'Potential indicators of LEP individual'.	Agree w/ comment but disagree w/ SFPD's solution. This concept should remain as a common indicator by removing "code".
R37	This policy fails to meet its basic purpose which is to "establish language access procedures," The audience for this DGO is clearly not police officers but the special interests that wrote it. Entire thing should be scrapped as ineffective.	2/27/25	Recommendation will be modified and included in the draft DGO	more clearly outlines procedures for officers while ensuring meaningful access for all communities.	This comment is dissapointing as SFPD members from multiple ranks and stations participated as working group members or on a panel to explain issues with language access.
R38	We are a worldwide destination. The importance of language is obvious to us all. The "Purpose" statement is insulting and unnecessary. Do you even realize how much "training" we receive in Community Groups and Communication?	3/3/25	Recommendation will be modified and included in the draft DGO	Thank you for sharing your input. We've updated the Purpose statement to read: "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. Department employees should take reasonable steps to ensure timely and accurate language access services to all individuals."	
R39	OVERLY VAGUE LANGUAGE! " EVERY REASONABLE step to ensure TIMELY and ACCURATE communication and access to ALL individuals" Really, "every?" What's "reasonable?" What's "timely and accurate? Define "ALL."	3/3/25	Recommendation will be modified and included in the draft DGO	These words are from the Policy statement, which has been reworded to provide clear direction for SFPD employees. It now states, "Employees shall inform LEP individuals of their right to request free language access services, and will provide these services when requested or as needed."	Agree w/ comment and SFPD's direct and proactive langauge.
R40	"This order establishes language access PROCEDURES" So, this isn't a GO. It's a procedure guideline, not a General Order, and should be in a manual. Why are there seven pages of a procedure?	3/3/25	Recommendation will be modified and included in the draft DGO	and an analysis and an aride to a some with an analysis and an aride this and CF Admin Code	Agree w/ SFPD.
R41	"The Department's policy is to inform the public that language assistance services are available free of charge" Then make a media release. Why are you making this a DGO? This is a policy to inform the public. How are Cops responsible for that?	3/3/25	Administrative Question and Answer-not for inclusion in DGO		Agree w/ change to simplify 5.20.03 as this is a direct and proactive approach.
R42	This entire DGO sounds like a procedural how-to. Most of this sounds like it should relate to Investigators and Admin. Plus, you didn't even provide the Telephonic Interpreter Service Number.	3/3/25	Recommendation will be modified and included in the draft DGO	The information in the DGO has been reduced to the information needed for most of the department staff. The information for requesting an interpreter has also been included.	
R43	So I can be given days-off for not providing a Miranda Admonition and all other written forms to a Suspect in their primary language when available? When available? How can the Telephonic Interpreter read the forms to the Suspect??	3/3/25	Recommendation has been included in draft DGO	The Miranda Admonsition section has been amended to state "When required, the Miranda Admonition shall be provided in the suspect's primary or preferred language." Language about the telephonic interpreter reading forms has been revised and moved under 5.20.04(G) which states, "Forms/Documents – Members will provide forms and documents in required languages. If a form/document is not available in the appropriate language and the LEP individual needs the information immediately, the member will use a Certified Bilingual Member or Certified Civilian Interpreter to read the form/document to the LEP individual. For translations that are not needed immediately, see 'Translation of Documents and other Content'."	Agree w/ SFPD decision to split into two sections.
R44	What does "code-switching" mean? What is an OCEIA?	3/3/25	Administrative Question and Answer-not for inclusion in DGO	removed from the proposed policy. Language has been included in 'Potential indicators of LEP individual, "switching between	Disagree w/ SFPD response. While "code-switching" may not be understood, "switching between language" should be included as an indicator of an LEP individual.
R45	Does this mean that we will be handling all transcription/translation services, even for the DA's Office? Who vets the Dept. vendor and will they be available to testify in Court? Shouldn't then we defer all translation services to the Vendor?	3/3/25	Recommendation will be modified and included in the draft DGO	Each City department is responsible for translating their own materials. 5.20.07 (translation of documents and other content) has been separated into External requests (required language and non-required language) and Internal requests (evidence and docments). This should make it clear that we do not transcription/translation services for all agencies. The vendor used for services	agree w/ sfpd.

#	Public Comment	Date Received	SFPD response	SFPD Explanation	DPA Explanation
R46	As a Patrol Officer, why do I need to know the Language Access Liaison's Duties? Seems oddly specific to be included in a GENERAL ORDER, for which every employee must maintain working knowledge of said Orders.	3/3/25	Recommendation has been included in draft DGO		Agree w/ SFPD, however, the Langauge Access Liason duties should exist somewhere in writing, whether in a unit order or on the SFPD website.
R47	The Policy statement is unclear. I understand that it is "to inform free of charge to LEP individuals," but are we also required to inform that the Dept will provide these as part of community policing and enforcement? Is it a two fold policy?	3/10/25	Recommendation has been included in draft DGO	The policy statement has been amended to read "Employees shall inform LEP individuals of their right to request free language access services, and will provide these services when requested or as needed."	Agree, see R.49.
R48	If someone can articulate what they believe is a "reasonable step," one which I had not though of, I can be held in violation of this policy. The policy states, "every reasonable step," which is all encompassing. There's no way this is valid/legal.	3/10/25	Recommendation has been included in draft DGO	inform LEP individuals of their right to request free language access services, and will provide these services when requested or as	Agree w/ comment and SFPD. New policy language mirrors the affirmative statement requested by many of the Working Group members (which included SFPD members).
R49	this title is too long - why do we need to say for LEP persons? can't it just be language access services? those services are for anyone who wants them, regardless of their ability to speak or read english.	3/12/25	Recommendation has been included in draft DGO		Agree w/ comment and SFPD.
R50	The terms of certified vs qualified interpreter, certified as through the courts as certified is more appropriate	3/15/25	Recommendation will not be included in Draft DGO	The commonst to unclear as llocalified interpreteril use not included in the nucleic commonst dueft	Agree w/ sfpd, unclear where qualified comes from.
R51	There is little to no guidance for members to use immediate means to ascertaining information on scene and by giving a specfic order, you are setting up memembers and LEP folks a severe disadvantage. ex: medical emergency and cannot use Langueline?	3/15/25	Recommendation will be modified and included in the draft DGO		Agree w/ sfpd.
R52	We appreciate the inclusion of factors. These details are important in ensuring SFPD staff have the appropriate guidance needed to support LEP persons they encounter. These two elements are based on national best practices from the U.S. DOJ. [reference for the section on Identifying LEP invidiuals and ID of primary language]	3/26/25	Administrative Question and Answer-not for inclusion in DGO	Based on feedback received during the public comment period, these two sections have been combined into one section (Identify Primary Language) and condensed to make it easier for officers in the field to understand broad themes to help them identify people who may be LEP, instead of giving them a specific checklist which could result in missing a trait not listed. Potential indicators of an LEP individual are still provided "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."	Agree w/ comment and SFPD.
R53	The signage should specify that these language service requirements extend for the full life cycle of the case or investigation free of charge when LEP persons are involved.	3/26/25	Recommendation will not be included in Draft DGO	the CE Advite Code Code	Agree w/ SFPD
R54	We urge the Department to adhere to the requirement to post the OCEIA's Know Your Rights brochure to let residents know of their right to file a complaint, and work with OCEIA to resolve complaints in a timely manner.	3/26/25	Administrative Question and Answer-not for inclusion in DGO		Agree w/SFPD. Complaints are routed by OCEIA to DPA. DPA must follow POBRA rules to conduct investigations and cannot disclose results of the investigations in an identifiable form without a change to State law.
R55	It is critical that SFPD employees are regularly trained on topics including identifying primary language, communicating with a LEP person, working with bilingual personnel, understanding local and district station-level demographic information.	3/26/25	Recommendation included in training, Department Manual or other procedural or guidance document	Department employees are regularly trained in customer service. All employees are required to have a working knowledge of all directives, which includes DGO 5.20.	Agree w/ SFPD.
R56	Training should be offered to all employees that engage with LEP residents at least every calendar year. Initial training shall be conducted within 180 days of the Police Commission's adoption of this General Order.	3/26/25	Recommendation will not be included in Draft DGO	San Francisco is a diverse community - the Department has been conducting training regarding language access services since before a formal DGO was instituted in 2007. As such, there can be no "initial" training to conduct. Moving forward, training will be	The Police Commission sets timeline for initial training of this policy. DPA is aware of ongoing Language Access training occuring within SFPD.
R57	Reporting should include language-specific information, as well as utilization (or non-utilization) of language assistance services by district; usage and cost information for each method of interpretation service: in-person, video, phone, bilingual perso	3/26/25	Recommendation will not be included in Draft DGO	Reporting requirements have been modified to align with Admin Codes 96I.2(b) [Recordkeeping and reporting to minimize redundancy] and 91.11. This section now states "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	Disagree with comment. While the information would be helpful, it goes beyond the requirements set by the BOS. Commentor could likely request this information through PRA.
R58	Reporting should include: the number of employees and specific languages represented by the Bilingual Officer Program; and any complaints concerning language access, and SFPD's resolution of language access complaints.	3/26/25	Recommendation will be modified and included in the draft DGO	Reporting requirements have been modified to align with Admin Codes 96I.2(b) [Recordkeeping and reporting to minimize redundancy] and 91.11. This section now states "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."	DGO already covers the matters raised by the comment.

#	Public Comment	Date Received	SFPD response	SFPD Explanation	DPA Explanation
R59	Complaints: Every resident has the right to file a complaint if they feel their language rights have been violated. The DGO should explicitly specify how language access complaints will be handled and resolved through good faith cooperation with OCEIA.	3/26/25	Recommendation will not be included in Draft DGO	Complaints regarding sworn officers are handled by DPA, pursuant to their Charter authority.	Agree w/ SFPD. All complaints about SFPD are routed to DPA.
R60	The Department should publicize the number of language access complaints and the number of complaints resolved. This is the only way for the complaint process to be accessible and for community members to have trust in our public institutions.	3/26/25	Recommendation will not be included in Draft DGO	lfindings and recommendations	Agree w/ SFPD. As discussed in the working group, BOS has taked OCEIA with drafting language access reports.
	Include an 'Evaluation' section that commits the Department to gathering input on and regularly evaluating their performance and provision of language services by soliciting the experiences of LEP individuals, collecting data on language access utilizatio	3/26/25	Recommendation will not be included in Draft DGO	(https://www.sanfranciscopolice.org/community/community-surveys) already on the department website that are managed by the Community Engagement Division, and will comply with SF Admin Code §91.14(e).	Partially agree w/ commenter. If you look to 5.20.09.A "reporting", the first sentence is about preparation of the FY report, and includes collecting information on utilization, but then after the comma, includes other roles and responsiblities for the position. This section also previously included meeting with DPA, OCEIA, and community groups which would likely satisfy the second half of the comment.