

## **Complaint Summary Report**

**Reporting Period: April 2025 – June 2025** 

## SUMMARY OF ALLEGATIONS

A digital Free Muni Pass Extension form was not translated into the City's required languages (Chinese, Spanish, and Filipino). The complaint requested to please provide a translation of the digital form, and include Spanish, Chinese, and Filipino.

## **FINDINGS**

Per the Language Access ordinance (LAO) Section 91.5(a), Departments shall translate public-facing written materials that provide vital information to the public about the Department's services or programs into the required languages spoken by a Substantial Number of Limited English Proficient (LEP) Persons, including applications or forms to participate in a Department's program or activity or to receive its benefits or services. The requirement to translate vital information applies to digital content including websites. Upon request, an LEP Person may request written materials that provide vital information to the public about the Department's services or programs into a language not captured by the required languages.

OCEIA reviewed the Free Muni Pass Extension form and concluded that it required translation into the City's required languages per Sec. 91.5. OCEIA met with the Department Liaison to go over the complaint and provide recommendations. OCEIA learned that this digital form cannot be translated due to technical constraints. The Department initially took the following actions to remediate the issue:

- Removed the Free Muni Pass Extension form from the Free Muni website.
- Added a Program Extension notice on the Free Muni webpage in plain language, reflecting some of the content in the form. Added machine translation options above the fold to access the information in multiple languages, including the City's required languages. A language dropdown is also available on the top right of the page.
- Added a notice of free language assistance via phone through 311.

The Department has since reinstated the form on the Free Muni website. The Department added to their Free Muni website a description of the purpose of form, available in multiple languages, including the City's required languages. The <u>Free Muni Pass Extension Form</u> itself — its title, description, and fields — appear solely in English. The form includes the sentence "311 Free language assistance" in multiple languages.

## RECOMMENDATIONS

- Translate and make available to the public the Free Muni Pass Extension form into the City's required languages per Administrative Code Section 91.5 (a).
- Have written translations of vital information reviewed by bilingual employees certified by the
  Department of Human Resources, as recommended in the City's <u>Digital Accessibility and Inclusion Standard</u>. If the department does not have multilingual staff available, they may reach out to OCEIA for additional guidance on how to conduct quality and accuracy checks.



• When feasible, host City website content on SF.gov., which ensures that digital content is compliant with language access requirements. Departments that manage their websites in-house or through a third -party vendor must also ensure that all of their public-facing, vital information is compliant with the LAO's translation requirement.

