

**To:** Chair Souza, Vice Chair Chaudhary  
Members, Immigrant Rights Commission  
Jorge Rivas, Executive Director, OCEIA

**From:** Ana I. De Carolis, Language Access and Policy Manager, OCEIA

**Re:** Quarterly Report - Language Access Complaints

**Date:** November 10, 2025

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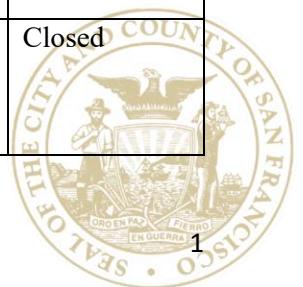
### Language Access Ordinance Quarterly Report

As mandated by the Language Access Ordinance, the Office of Civic Engagement and Immigrant Affairs (OCEIA) must provide a quarterly report to the Immigrant Rights Commission regarding language access complaints received by OCEIA.

#### Reporting Period (July 2025 – September 2025)

OCEIA received five (5) language access complaints during the reporting period.

Complaint Number	Department	Summary of Allegations	Language(s)	Status
1	Mayor's Office on Housing and Community Development	Complaint addressed to the Mayor's Office of Housing and Community Development, alleging that the San Francisco Housing Authority does not have an interpreter or translator in Tongan.	Tongan	Closed
2	Office of the Sheriff	A community member submitted to OCEIA a news article published on July 11, 2025 in the Davis Vanguard stating that a man missed his preliminary hearing scheduled for July 9, 2025, after jail staff failed to provide interpretation services and instead had another incarcerated person translate an admonishment to him.	Spanish / cultural dialect	Closed
3	Department on the Status of Women	Community member's inquiry on whether the San Francisco Department on the Status of Women's July 2025 newsletter	Chinese, Spanish, Filipino	Closed



		complied with the Language Access Ordinance (LAO).		
4	Rent Board	Complaint regarding the quality of Spanish-language interpretation at a Rent Board hearing.	Spanish	Closed
5	San Francisco Police Department (SFPD) via Department of Police Accountability (DPA)	OCEIA provided recommendations to the DPA on a complaint DPA received regarding an SFPD specialized unit's voicemail not being translated into Spanish.	Spanish	Closed

OCEIA closed three (3) complaints received during the previous reporting period.

6	Department of Homelessness and Supportive Housing (HSH)	No posted information in Chinese at the temporary shelter at 1050 S Van Ness Ave, San Francisco.	Chinese	Out of Jurisdiction
7	Department of Homelessness and Supportive Housing (HSH)	Community member was not provided with Chinese language services at the Department's headquarters.	Chinese	Closed
8	Department of Homelessness and Supportive Housing (HSH)	Complainant visited the department during work hours and requested assistance in Chinese. A security guard responded, in English, that no services were available and asked the complainant to leave.	Chinese	Closed

#### Number of complaints filed, year-to-date.

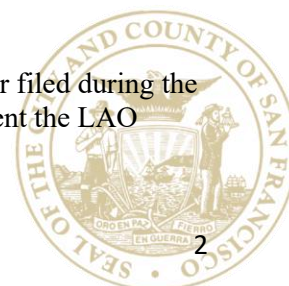
Time Frame	Total Complaint(s) received
January 2025 – September 2025	12 complaints were filed with OCEIA during this time frame.

#### Comparison with the filings for the previous year

Time Frame	Total Complaint(s) received
July 2024 – September 2024	0

#### Trends and Analysis

The upward trend in the number of complaints received persists, compared to the number filed during the same period last year. We have anticipated higher numbers of complaints as we implement the LAO amendments, passed last year, and enhance our community outreach.



The LAO complaints received highlight the importance of:

- Regular internal training and reminders on departmental language access policy, requirements, and protocols for all public-facing personnel.
- Developing and updating departmental language access protocols.
- Translating into the City's required languages (and into any language by request) digital content that constitutes vital information, is of public interest, or contains information that affects the community.
- Become familiar with potential indicators of interpreter performance issues and intervene when appropriate.

OCEIA will continue to engage with Departments through technical assistance tools, periodic reminders, and/or training on these and other best practices.



## Complaint Summary Reports

**Reporting Period:** July-September 2025

### Complaint #1

#### *Summary of Allegations*

The complaint, addressed to the Mayor's Office of Housing and Community Development, indicated that the San Francisco Housing Authority does not have an interpreter or translator in Tongan. As a result, the complainant has had to interpret or translate to help people navigate resources in San Francisco.

OCEIA reached out to the complainant but did not receive a response to confirm whether the complaint was directed to the Mayor's Office of Housing and Community Development (MOHCD), a City department, or to the San Francisco Housing Authority (SFHA). The SFHA has its own Language Access Plan and complaint process but is not a City department and, therefore, is out of scope of the LAO and OCEIA's jurisdiction.

MOHCD responded to the complaint immediately and explained that it does not have an interpreter onsite, but if the public request an interpreter, they use the telephonic language service LanguageLine Solutions at their receptionist desk and throughout their department.

OCEIA does not have enough information to determine whether the LAO is implicated in this case. As a general reminder, OCEIA provides the following recommendation:

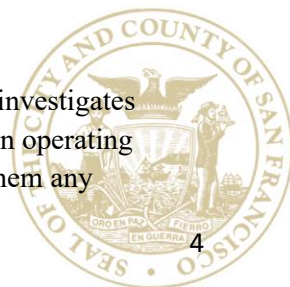
- Inform LEP Persons who seek services, in their native tongue, of their right to request Language Access Services.

### Complaint #2

#### *Summary of Allegations*

A member of the public submitted to OCEIA a news article published on July 11, 2025, in the Davis Vanguard titled "Court Watch: San Francisco Court Grapples with Cultural Dialect Translation Challenges". The article states that, in San Francisco Superior Court Department 9, a man missed his preliminary hearing scheduled for July 9, 2025, after jail staff failed to provide interpretation services and instead had another incarcerated person translate an admonishment to him. The article states that the judge ultimately decided the matter should continue, stating there was no relevance to cultural differences in the translator's ability, despite the Defense Attorney's argument that there was a lack of proper translation services.

OCEIA first referred the complaint to the Office of Police Accountability (DPA), which investigates complaints against sworn members of the San Francisco Sheriff's Office (SFSO) under an operating agreement. The DPA reviewed the complaint and was unable to find a basis that grants them any



authority to investigate. OCEIA staff followed up with the SFSO's Language Access Liaison to inquire about their language access protocols and SFSO's Internal Affairs investigation process.

In response to OCEIA's inquiry regarding the Department's language access protocols, SFSO shared that their staff are trained to use certified bilingual staff members to provide language assistance and, if a certified staff member is not available, the next step is to use Language Line. Additionally, the Liaison explained that information and instructions for using Language Line are available to staff and that use of an inmate as an interpreter in official communications is not an acceptable practice.

The SFSO further informed that, since the individual was not named in the complaint, they cannot conduct further investigation into the specifics of the complaint. Nonetheless, SFSO would issue a training bulletin to all staff regarding language access protocols and working with LEP individuals by the end of September. The bulletin would include the department's language access policy. The Department would instruct supervisors to cover the training bulletin during briefings before each shift. Documents reviewed at briefing are reviewed for 3 consecutive days. The Department would also work with their Human Resources staff to ensure the LAO is covered during the onboarding for new hires.

OCEIA did not have enough information on the specifics of this complaint to continue its investigation. However, OCEIA provides the following recommendations:

- Conduct onboarding as well as periodic staff training on departmental language access policy and protocols. Cover language access in practical training, such as how to apply language access protocols to concrete scenarios.
- Consider enhancing departmental language access policy to include specific guidance on how to identify Limited English Proficiency (LEP) and assess an LEP individual's language needs.

## **Complaint #3**

### *Summary of Allegations*

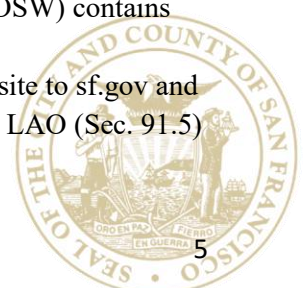
OCEIA received an email from a member of the public asking whether the San Francisco Department on the Status of Women's July 2025 newsletter complied with the Language Access Ordinance (LAO).

### *Findings*

The LAO (San Francisco Admin. Code Sec. 91.5) requires City Departments to translate written materials that provide vital information to the public about the Department's services or programs into the required languages and into any language by request. LAO Sec. 91.5(c) also states that Departments shall translate all public service announcements or information that raises awareness about an issue of public interest or affects the community that they publish on websites, social media platforms, third-party digital content providers, or various on-line mediums.

OCEIA reviewed DOSW's July 2025 newsletter, which was available solely in English. It is reasonable to conclude that the July 2025 newsletter of the Department on the Status of Women (DOSW) contains information on issues of public interest or that affect the community.

The DOSW Liaison informed OCEIA that they are in the process of migrating their website to sf.gov and include a newsletter archive. Sf.gov is compliant with the translation requirements in the LAO (Sec. 91.5) and the City's Digital Inclusion and Accessibility Standards (DAIS).



### *Recommendations*

- Translate newsletters that are of public interest or whose information affects the community into the City's required languages.
- Add in the newsletter a multilingual notice informing the public how to request a translation, especially if the newsletter is in the process of being translated or cannot currently be translated due to technical or platform constraints.

## **Complaint #4**

### *Summary of Allegations*

OCEIA received a complaint regarding the quality of Spanish-language interpretation at a Rent Board hearing.

### *Findings*

OCEIA contacted the Rent Board, which confirmed that it provides interpreters for hearings and mediations, free of charge, to any party who requests one through a contract with LanguageLine Solutions (LanguageLine). The Rent Board informed OCEIA that this interpreter had not been assigned to the Rent Board before and that, because the hearing was continued to a second day, the party would have a different interpreter and an opportunity to correct any testimony they believed was inaccurately interpreted. The Rent Board would also share their glossaries of terms with LanguageLine for future assignments.

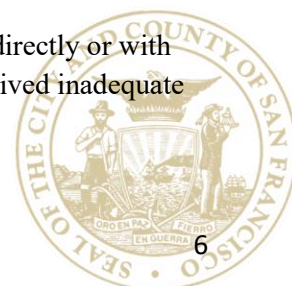
OCEIA filed a complaint with LanguageLine regarding the quality of this interpretation and requested that interpreters receive additional training on housing and rent control terminology, as well as on procedures for clarifying confusion during hearings.

LanguageLine responded that an interpreter making omissions, mistranslating terms or not asking for clarification when needed are in direct violation of their interpreter code of conduct and ethics.

LanguageLine informed that they will research and address this issue following their protocol and that they will remind and provide additional training to their interpreters on housing and rent control terminology and scenarios, as well as ensure that the proper procedures are followed for requesting clarification or repetition during hearings.

### *Recommendations*

- Develop glossaries of department-specific terms and share them with bilingual staff, OCEIA, and with the City's language services vendors. Departments can reach out to OCEIA for technical assistance on how to develop multilingual glossaries.
- Become familiar with potential indicators of interpreter performance issues such as an interpreter not stopping to correct an error or pausing the interpretation excessively, summarizing or omitting information, providing commentary or opinion, or having side conversations. If the issue persists and when appropriate, interrupt the interpretation to intervene.
- Departments may file a customer complaint with any language services vendor directly or with OCEIA. Anyone may file a complaint with OCEIA if they believe that they received inadequate language services when interacting with the City.





## **Complaint #5**

### *Summary of Allegations*

General phone number for an SPFD unit featuring a phone menu that did not provide an option in Spanish.

### *Findings*

OCEIA provided recommendations to the Department on Police Accountability and the San Francisco Police Department regarding the requirements in the Language Access Ordinance (SF Admin. Code Sec. 91.8).

### *Recommendations*

- Record and maintain the Department's recorded telephonic messages about the Department's operation or services in the City's required languages, as required in the LAO (Admin. Code Sec. 91.8). Departments are encouraged to use their certified bilingual staff to record these multilingual phone messages, or they may reach out to OCEIA if supplementary support is needed.

## **Complaint #6**

### *Summary of Allegations*

Complaint directed to Homelessness and Supporting Housing (HSH). The location of the incident was listed as 1050 S Van Ness Avenue, San Francisco.

The complainant indicated that the door was closed; they waited at the door for 20 minutes without response and that there was no information posted outside in Chinese.

The complaint was submitted in Chinese and translated by OCEIA staff.

1050 S Van Ness Avenue is the location of the Dolores Shelter Site. This is a referral and walk-up shelter that is not operated directly by the City but is operated by a non-profit that contracts with the City and County of San Francisco.

OCEIA determined that this complaint is out of the LAO scope and OCEIA's jurisdiction to investigate.

### *Recommendations*

- While the LAO applies to City departments and programs that the City administers and does not apply in this case, HSH may work with their grantee to require that the grantee post multilingual signs on the shelter's door to address the concern highlighted in the complaint.
- Refer to Admin. Code Article XIII (Standards for Care for City Shelters), for translation requirements pertaining City shelters and well as complaint process.



## **Complaint #7**

### *Summary of Allegations*

A community member reported that they went to 440 Turk Street, and they were told that Chinese-language services were not available and that they needed an appointment to receive any service. The complainant reported that they were unable to make appointments over the phone and that they were never provided with services in Chinese.

The complaint was submitted in Chinese and translated by OCEIA staff.

### *Findings and Recommendations*

OCEIA met with Homelessness and Supportive Housing (HSH) to address two complaints involving 440 Turk Street. The findings for both complaints appear below, under Complaint #8.

## **Complaint #8**

### *Summary of Allegations*

A community member reported that they visited 440 Turk Street during business hours in May 2025. The main entrance was locked. They rang the doorbell and a security guard said in English that no staff were available. The community member asked for assistance in Chinese. The security guard responded in English that no services were available and asked them to leave.

The complaint was submitted in Chinese and translated by OCEIA staff.

### *Findings*

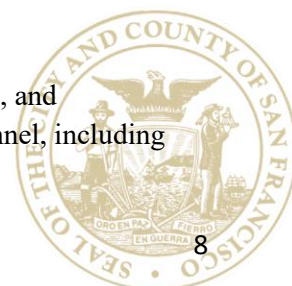
OCEIA met with Homelessness and Supportive Housing (HSH) to address the above-mentioned complaints.

HSH staff mentioned that staffing changes have resulted in fewer bilingual staff available at HSH, with only one staff member who speaks Chinese who is not onsite at 440 Turk Street. Staff also mentioned that there are no drop-in services being offered at 440 Turk Street, and that all services are by appointment. OCEIA staff shared with HSH training resources available on OCEIA's site for Liaisons. The HSH's Liaison was very cooperative in resolving the complaint and took the following actions to address the matters highlighted in the complaints:

- Spoke with front-desk staff to remind them of HSH's language access protocol and to gather their input on what types of resources they needed to better implement language access in their day-to-day work.
- Developed a resource folder for front desk staff and security guards that includes the department's protocol for contacting telephonic interpretation, as well as OCEIA resources such as multilingual signage and Language Services Card. Trained front-desk staff on how to use OCEIA's Language Services Card.
- Met with senior administrators to bring to their attention the issues in the complaints.

### *Recommendations*

- Provide regular internal training and reminders on language access requirements, and departmental protocols on language access provision for all public-facing personnel, including security guards and front desk staff.





- Translate into the required languages and post at the at 440 Turk Street’s door signage informing the public how to access department services.
- Inform LEP Persons who seek services, in their native tongue, of their right to request Language Access Services.

