

3/31/26 CAA OCEIA from Emails to PDD Post Community Meetings

Rec. #	Community Concern	SFPD Response	SFPD Discussion
R1	5.20.01 Purpose section: CAA submits a new revision request which slightly revises the LANSF Letter (12/16/25) request for revision. CAA requests adding, "Language barriers between LEP individuals and law enforcement can jeopardize safety, impede investigations, and prevent LEP individuals from understanding important rights and services available"	This recommendation will not be included in the draft DGO	As restated in the Community Meeting Rec. Grid, PDD prefers to frame policy language in terms of positive, actionable outcomes rather focusing on what could happen if officers don't follow policy. In addition, adding more language to this policy works in opposition of clear and concise direction for officers [See Community Meeting Rec. Grid R7 & Working Group Rec. Grid R9].
R2	5.20.01 Purpose section: CAA submits a new revision request to add the word "every" to the sentence, "Department employees should take [every] reasonable step to ensure timely and accurate language access services to all individuals".	This recommendation will not be included in the draft DGO	The word "every" implies that every potentially reasonable step must be identified, considered, and attempted which may not be necessary and can result in untimely language access service delivery. This opens the door for documenting every step taken in order to confirm that an officer has met that goal which is not practical. This request parrots the 2007 language which is almost 20 years old.
R3	5.20.03 Policy section: CAA submits a revision request from the LANSF Letter (12/16/25) and community meeting 3 (3/24/26) to add state and federal laws.	This recommendation will not be included in the draft DGO	As restated in the Community Meeting Rec. Grid, the Language Access Ordinance is the mechanism for City agencies to comply with state (Dymally-Alatorre Act) and federal law (Title VI). Title VI applies to the conduct of all officers and City employees and is not specific to this DGO. The DGO 5.20 proposal submitted to the Commission in February of 2026 has procedures that specifically align with requirements in the Language Access Ordinance, which is why the Policy section cites the Language Access Ordinance. As federal and state law do not impact the SFPD field response to language access, PDD does not agree that this revision strengthens or clarifies the purpose of this DGO [See Community Meeting Rec. Grid R5].
R4	5.20.04.C.1 Criminal Incident section: CAA submits a new revision request to split the order of preference for interpretation services into in-person and telephonic, reverting to the 2007 version.	This recommendation will not be included in the draft DGO	The term "telephonic interpretation" is not in this policy. The definition of Certified Civilian Interpreter captures the vendors that would provide telephonic interpretation. As restated from community meeting 3, SFPD officers and leadership have informed PDD that the current organization of interpretation preference is much clearer [See Community Meeting 3 Transcript (3/24/26) & CAA Rec in Opposition to Working Group Rec. Grid R3].
R5	5.20.04.C.1 Criminal Incident section: CAA submits a new revision request to 1) delete "(in-person preferred)" and 2) replace with "preferred method for LEP services".	This recommendation will not be included in the draft DGO	This revision request is cumbersome as the section already says that "Employees should follow this order of preference for interpretation."
R6	5.20.04.C.1.b Certified Civilian Interpreter section: CAA submits a new revision request to add, "use when Certified Bilingual Members are unavailable".	This recommendation will not be included in the draft DGO	An "order of preference" is a ranked list of choices arranged from most desirable to least desirable. As written by the Department, it is already clear that a Certified Civilian Interpreter, including vendors, is the option AFTER a Certified Bilingual Member.

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R7	5.20.04.C.1 Criminal Incident section: CAA submits a new revision request to add, "Telephonic Interpretation Services - If in-person certified interpreters are unavailable, use professional language services via telephone as soon as practical."	This recommendation will not be included in the draft DGO	In 5.20.02.B, the definition of Certified Civilian Interpreter is "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." Telephonic interpretation is included in this definition and therefore, is part of the Certified Civilian Interpreter category and is second choice in the order of preference.
R8	5.20.04.C.1.d Restrictions section: CAA submits a revision request from the 2007 version to add, "and a more reliable interpreter is not available, especially for communications involving witnesses, victim and potential suspects, or in investigations, collection of evidence, negotiations or other sensitive situations".	This recommendation will not be included in the draft DGO	The Restrictions section (5.20.04.C.1.d) is under the Criminal Incident section (5.20.04.C.1). Officers are well aware that criminal incidents include witnesses, suspects, victims, investigations, collection of evidence, and negotiations. This revision is redundant and unnecessary.
R9	5.20.05 Exigent Circumstances section: CAA submits a new revision request to add, "Exigent circumstances are defined as situations that require deviation from procedures, such as a threat to life, safety, or property, a fleeing suspect, or the potential loss or destruction of evidence. (e.g., physical loss of property, witness or victim.)".	This recommendation will not be included in the draft DGO	The definition of an exigent circumstance is defined in SFPD's DGO 3.02, <i>Terms and Definitions</i> , which is the controlling policy for definitions for all DGOs that are updated after 3.02's effective date of March of 2026. The definition offered by CAA does not align with DGO 3.02. DGO 3.02's purpose is to reduce redundancy in other policies. Exigent circumstances are not specific to DGO 5.20.
R10	5.20.05 Exigent Circumstances section: CAA submits a revision request from the LANSF Letter (12/16/25) to add, "Once the exigency has passed, members are expected to revert to the procedures set forth in this general order".	This recommendation will not be included in the draft DGO	In 5.20.05 "Exigent Circumstances", the procedures in this section end when "a Certified Bilingual Member or Certified Civilian Interpreter is available". This is more strict than what CAA proposes as the Certified Bilingual Member or Certified Civilian Interpreter may be available before the exigency passes. CAA's proposal is weaker than what the Department proposes.
R11	5.20.06.A.2 Non-Required Language section of External Requests: CAA submits a new revision request to change the "should" to a "shall", in opposition to the LAO and OCEIA recommendations from community meeting 2 (3/12/26).	This recommendation will not be included in the draft DGO	This request conflicts with the LAO , which does not require vital documents to be translated in all non-required languages proactively [See Community Meeting Rec. Grid R25].
R12	5.20.07.A Training section: CAA submits a new revision request which slightly revises the LANSF Letter (12/16/25) request for revision. CAA requests adding, "The Department shall conduct such training for new recruits and for members at in-service training and during roll-call at least two years. Additionally, an initial training shall be conducted within a specified timeframe agreed upon by the Police Commission and the Department following the adoption of this General Order by the Police Commission".	This recommendation has been modified and included in the draft DGO	PDD has been in discussions with the Academy, officers, and leadership about training intervals and believes that every 2 years is agreeable and was planning on offering this edit at Commission. Each time they adopt a DGO, the Police Commission issues a Resolution that outlines the implementation timeline based on an allowance for initial training suggested by the SME (based on availability, staffing, and training materials) [See Community Meeting Rec. Grid R27 & CAA Rec Opposition to Working Group Rec. Grid R51].

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R13	Throughout the DGO, CAA submits a new revision request to remove the term "preferred language".	This recommendation will not be included in the draft DGO	The Commission Resolution 26-13 and the purpose of delaying the vote on DGO 5.20 was, in part, to consider elements of the draft that went to Public Review. This recommendation is counter to that as the expansion of preferred language came from the Working Group directly as it ties to the LAO. The LAO and DGO 5.20 state that an LEP individual may prefer to conduct their interaction in their native language. The expansion of language access includes the option for LEP individuals to use their <i>primary or preferred language</i> when interacting with SFPD. This new request opposes the 2024 work. While the Department will not make this revision, the Police Commission may consider.
R14	CAA submits a request from the LANSF Letter (12/16/25) to review of a Language Access Liaison Unit Order.	This recommendation will not be included in the draft DGO	As restated from the Department's response to the LANSF Letter, Unit Orders are procedural documents that fall under the authority of a specific unit's Commanding Officer. The Commanding Officer of the Community Engagement Division may initiate a Language Access Liaison Unit Order and shall follow the procedures in DGO 3.01, Department Written Directives, which does not allow for public input on Unit Orders [See Department's Response to LANSF Letter]
R15	5.20.01 Purpose section: OCEIA submits a revision request from the 2007 version to add, "It shall be the policy of the San Francisco Police Department to take every reasonable step to ensure timely and accurate communication and access to all individuals. When performing law enforcement functions, members shall provide free language access to LEP individuals whom they encounter or whenever an LEP person requests language assistance services".	This recommendation will not be included in the draft DGO	These sentiments are already captured in both the proposed Purpose and Policy sections. PDD has received feedback throughout development that the term "law enforcement functions" is vague, which is why it was removed. The purpose of this update is to modernize the policy and not to parrot language scripted 20 years ago.
R16	5.20.03 Policy section: OCEIA submits a new revision request to restore the language from the 2007 version Policy section.	This recommendation will not be included in the draft DGO	The purpose of this update is to modernize policy and make clear and concise procedures for the intended audience (officers) who are responsible for implementing this policy. It is not to parrot language that is almost 20 years old.
R17	5.20.04.A Potential Indicators of LEP Individual section: OCEIA submits a revision request to add expired Department Bulletin 18-185 into DGO 5.20.	This recommendation will not be included in the draft DGO	The common indicators are already in the proposal. This recommendation references an expired Bulletin which was revised again in 2021, but has since expired as it's tips were incorporated into training. Adding a 3 page Department Bulletin into policy is not helpful to officers looking for operational direction in the field.
R18	5.20.05 Exigent Circumstances section: OCEIA submits a new revision request to provide the definition of exigent circumstance from the 2007 version.	This recommendation will not be included in the draft DGO	See R9.

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R19	5.20.05 Exigent Circumstances section: OCEIA submits a new revision request to maintain the requirement to seek the assistance of a Qualified Bilingual Member, Qualified Civilian Interpreter, or other professional interpreter to confirm or supplement the initial translation or interpretation as soon as practical once the exigent circumstance ends.	This recommendation will not be included in the draft DGO	This is already in the proposal, but using accurate and updated terminology. OCEIA's recommendation does not align with when an exigency ends according to the Department's proposal.
R20	5.20.04.D Scheduled Interviews section: OCEIA submits a new revision request to remove the language, "Members may also seek qualified assistance from another law enforcement agency when practical" and replace it with the Interviews sections from the 2007 version.	This recommendation will not be included in the draft DGO	PDD seeks to expand language access services and delivery to LEP individuals and this provision allows for timely service and the preference for in-person interpretation and acknowledges the reality that SFPD commonly works with outside law enforcement agencies. The language about interviews in the 2007 version is outdated, does not align with best practices, and conflicts with other procedures in DGO 5.20 and the LAO.
R21	5.20.07 Training section: OCEIA submits a new revision request to require DGO 5.20 training annually, biannually, AND every 2 years.	This recommendation will not be included in the draft DGO	This recommendation is confusing as the OCEIA Director noted three different training timelines. See R12 for related response.