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President C. Don Clay
San Francisco Police Commission
1245 3rd Street, 6th Floor
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**RE: SFPD Response to the Language Access Network of SF Recommendations to DGO 5.20
Language Access Services**

On December 17, 2025, the Department was made aware of a letter, dated December 16, 2025, sent to the Commission Office from the Language Access Network of San Francisco (LANSF). This letter outlined several concerns relating to the proposed update to Department General Order (DGO) 5.20, *Language Access Services*, and a request to postpone any Commission hearing to allow time to resolve LANSF concerns. While LANSF has not defined what it means to resolve its concerns in this context, we are hopeful that this response will demonstrate that there is no longer a need to delay moving this policy forward to the Police Commission.

According to publicly available documents, LANSF is managed by the Chinese for Affirmative Action (CAA) and funded by the Office of Civic Engagement & Immigrant Affairs (OCEIA) to provide community input to OCEIA. The LANSF letter, while not signed, was emailed by Anisha Hingorani, the CAA Policy Manager and one of the 11 SFPD DGO 5.20 Working Group members. The LANSF letter, however, does not represent the opinions or the work product of the Department's Working Group, as (a) only two of the organizations listed in the letter were members of the Working Group, and (b) many of the letter's recommendations directly contradict the wants of or were already addressed by the Working Group. The Working Group included representatives from the Department of Police Accountability (DPA), OCEIA, the Department of Human Resources, the ACLU of Northern California, the Bar Association of San Francisco, community members, and patrol officers.

Pursuant to DGO 3.01, *Department Written Directives*, the Working Group's product is a **recommendation grid** that informs the Department's DGO draft. The DGO then goes through two additional development phases, during which the draft will change based on operational, administrative, and/or legal recommendations, reflecting input from ALL San Francisco community members and Command Staff (the Department's leadership with the greatest law enforcement expertise). This process is explained to every Working Group. LANSF has had many opportunities to provide input on the Working Group during Public Review and, now with this letter, has more opportunities than the entire membership of the Department, including Command Staff and the Chief. This letter serves as our formal response to LANSF's recommendations.

A General Order is characteristically known in military and paramilitary organizations for its simplicity and clarity. General Orders must be simple, clear, and concise. If an order is too complex, officers cannot rapidly adjust to changing variables necessary to protect the public's safety. These policies provide parameters and mission objectives so that the newest and most junior Department member can understand the order and execute effectively. In the public safety sector, complex or discursive policies can lead to confusion or critical errors, making the General Order's clarity the most critical component.

The Policy Development Division (PDD) has been tasked with reinforcing this concept while balancing the important feedback from the communities the Department serves. Therefore, almost all the DGO 5.20 Working Group's recommendations were retained, but written in a clearer, more concise manner, as requested **multiple** times during the public input period. PDD is committed to synthesizing community feedback and translating it into language that is clearly understood and implemented by end users (sworn and non-sworn members of the Department). PDD has found that the current catalogue of DGOs (109) includes policies that are overly complex, slowing implementation or confusing officers in the field. While specific policies may not be written in the exact language that outside stakeholders may desire, their intentions are captured to the greatest extent possible and reasonable. As a policy team, we must prioritize evidence-based, or evidence-informed, policy decisions over unverifiable data points or rhetoric. We hope to continue partnering with the communities we serve to improve public safety services while considering the Department's primary role in addressing crime.

The LANSF letter presents 16 policy recommendations, many of which were submitted and responded to during the Working Group process and have been addressed in the [publicly posted Working Group grid](#). LANSF's letter includes contradictions to the Working Group's recommendations or were not discussed at all during the Working Group sessions. Therefore, LANSF's letter is inaccurately presented as having been provided on behalf of the Working Group. The LANSF letter declares that the Department is non-compliant with SF Admin Code 91, does not acknowledge LEP individuals' rights, and has removed much of the Working Group's requested language. However, SF Admin Code 91 is cited throughout DGO 5.20, and the Department continues to acknowledge and protect all LEP individuals' rights through policy and through practice. The proposed DGO has not removed Working Group intent and has expanded officers' access to LEP resources during non-criminal incidents.

LANSF cites DPA data and claims that "22% of the complaints it [DPA] investigated relating to language access resulted in findings of 'improper conduct'." This assertion lacks an identifiable foundation. LANSF does not specify the number of complaints investigated, the correct time frame examined, or the criteria used to classify a complaint as "language access-related". We have been unable to find data supporting this 22% figure in published DPA complaint reports, on the SFPD IAD report page, or through internal verification requests. DPA provided complaint data to the Department for inclusion in the [SFPD LEP Annual Reports](#) from 2019 through 2023. In 2023, DPA reported receiving five (5) complaints concerning language access. That calendar year, the Department reported 6,655 calls for service involving LEP individuals for which an incident report was required. The complaints represent 0.0751% of those interactions. Given the absence of verifiable data supporting LANSF 22% claim, the Department rejects LANSF's

characterization. Without substantiated data, no meaningful connection can be drawn between department policy and the alleged failure to serve San Francisco's LEP community.

Below are our responses to the LANSF requests for revision:

1. **5.20.01 Purpose** (see Working Group Rec. Grid R6, R9, R15, R34) – LANSF claims that verbiage referencing federal, state, and local law, LEP barriers, and the importance of services has been removed. The proposed DGO 5.20, however, cites SF Admin Code 91 throughout and uses more concise language about LEP barriers and the importance of services. SF Admin Code 91 is the mechanism by which all city agencies comply with the relevant state law, specifically Gov. Code § 7290 (commonly known as the Dymally-Alatorre Bilingual Services Act). SF Admin Code 91 names OCEIA as the primary city agency responsible for coordinating with every city agency to comply with SF Admin Code 91, effectively Gov. Code 7290. Thus, naming state law is redundant in this policy, and no action is needed from the Department.
2. **5.20.02 Definitions - Certified Bilingual Member** (see Working Group Rec. Grid R18) – LANSF claims the Department removed the Working Group's language regarding how the Department will train Certified Bilingual Members in the definition. The Working Group language was not removed from the DGO, but is included in Sec 5.20.07 Training as is appropriate. Therefore, no action is needed from the Department.
3. **5.20.02 Definitions - Limited English Proficiency (LEP) Individual** (see Working Group Rec. Grid R8) – LANSF claims that the definition provided in the proposed DGO is inconsistent with SF Admin Code 91. While the Department did not copy verbatim the definition directly from the legislation, it is consistent with SF Admin Code 91, matches the "key terms" on the OCEIA Language Access and Rights webpage, and aligns with the newly adopted DGO 3.02 *Terms & Definitions*. Therefore, no action is needed from the Department.
4. **5.20.02 Definitions - Required Languages** (see Working Group Rec. Grid R8, R65) – LANSF claims that the definition in the Department's proposed draft is inconsistent with SF Admin Code 91 while they propose language sourced from an entirely separate part of the legislation (SEC 91.4 Utilization of Bilingual Employees), which is not relevant to the definition of Required Languages. In response to this, however, the Department has revised this definition to align more closely with the SF Admin Code 91 definition of "Required Languages".
5. **5.20.03 Policy** (see Working Group Rec. Grid R10) – LANSF claims that the language in the policy statement removes the Department's key civil rights responsibilities. This is inaccurate, as both the Purpose Section (p. 1) and the Policy Section (p. 2) refer to the requirements for upholding the critical rights of LEP individuals. LANSF also claims that the Policy Section conflicts with existing LEP Bulletins. The Department Bulletins LANSF cites have expired, while all necessary procedures from current Department Notices have been concisely included in the DGO. As Department Notices/Bulletins

expire three (3) years after issuance and become inactive, this recommendation is unnecessary. Additionally, LANSF's recommendation introduces new language not discussed during the Working Group. Therefore, we do not concur.

6. **5.20.04 Identifying LEP Individuals** (see Working Group Rec. Grid R7, R14) – LANSF claims that this entire section from the Working Group version has been removed. This is inaccurate as the information from this section has simply been concisely incorporated into section 5.20.04.A. Identify Primary Language. Additionally, LANSF's recommendation proposes adding language that was not discussed during the Working Group but was added by the Department ahead of submission to the Commission. As DGO 5.20 already addresses LANSF's concern, this recommendation is unnecessary. Therefore, no action is needed from the Department.
7. **5.20.04.B.1.c Non-Certified Bilingual Member** (see Working Group Rec. Grid R30) – LANSF claims that the words “non-evidentiary” and “gather information” are too vague, even though this language was supported by the Working Group. We do concur that Non-Certified Bilingual Members will not gather information during criminal incidents, unless it's an exigent circumstance, so this has been removed from this section of the proposed DGO.
8. **5.20.04.D Scheduled Interviews** (see Working Group Rec. Grid R38, R42) – LANSF requests to add non-policy, non-procedural considerations to this section that apply to all victims, not specifically LEP individuals. LANSF also wants to add a requirement to record LEP interrogations, which applies to all interrogations; hence, this language is not necessary in this specific policy. The Department has removed the words “exigent circumstances” from the Scheduled Interviews section.
9. **5.20.04.F Miranda Admonition** – LANSF claims that the phrase “when required” in this section is confusing for officers. However, LANSF's recommendation to remove “when required” would mandate Miranda Admonitions in all instances. As the Miranda Admonition is given only under specific criteria and not for every interaction, “when required” is appropriate and will remain in the proposed DGO. LANSF's recommendation was not discussed during the Working Group. Therefore, we do not concur, and no action is needed from the Department.
10. **5.20.04.H Incident Reports** (see Working Group Rec. Grid R46) – LANSF claims that the policy requires incident report guidance. As the Department's incident report system, known to all sworn members of the Department, provides guidance through drop-down menus and boxes specific to LEP reporting, this recommendation is unnecessary. Additionally, how incident reports are completed is an administrative process outside of the Working Group's scope. Therefore, we do not concur, and no action is needed from the Department.
11. **5.20.05 Exigent Circumstances** (see Working Group Rec. Grid R35) – LANSF claims that the procedures during exigent circumstances have been broadened following the

Working Group's conclusion. Although LANSF's claim is true, the Department's proposed verbiage is based upon a collaborative decision by Command Staff, the Department of Police Accountability, and the City Attorney. Additionally, LANSF claims that there is no language for reverting to normal procedures once exigency has ended. Once the situation is no longer exigent, members will no longer need to use the procedures in this section. LANSF's recommendation introduces new language regarding Body Worn Cameras (BWC) that the Working Group did not discuss. The Department has a separate policy for BWCs: DGO 10.11, *Body Worn Cameras*. Therefore, we do not concur.

12. 5.20.06.A.1 **External Requests** (see Working Group Rec. Grid R58) – LANSF claims that this section incorrectly labels the required translation of vital documents as “external requests”. However, DGOs are directions for Department members to implement. “External requests” refer to requests that come from people who do not work for this Department, while internal requests refer to requests that come from people who do work for this Department. Additionally, LANSF claims that this section contradicts the law and has removed guidance on digital content. This claim is inaccurate, as this section incorporates digital content guidance and specifically cites the relevant code section on vital document translation (Admin Code 91.5(a)). Therefore, we do not concur.
13. 5.20.07 **Training** (see Working Group Rec. Grid R51, R53) – LANSF claims that this section has been weakened and does not require regular training. The execution of training by this Department is an administrative process outside the scope of this Working Group. Also, DGO 5.20 requires “periodic” training, meaning training that occurs at intervals. LANSF's recommended time frames directly contradict the Working Group Recommendation (R51). Therefore, we do not concur.
14. 5.20.09 **Language Access Liaison** (see Working Group Rec. Grid R45, R55) – LANSF claims that the Language Access Liaison's duties have been removed. This claim is inaccurate as the Language Access Liaison duties are included in the Definitions section on p. 1 of the proposed DGO. Additionally, LANSF requests that a Unit Order be drafted and publicly discussed before approval. 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*. As LANSF's recommendation is noncompliant with the Department's policy update process, codified in a separate DGO, we do not concur.
15. 5.20.09.A **Reporting** (see Working Group Rec. Grid R59) – LANSF claims that reporting requirements have been reduced in this section. The 2007 version of DGO 5.20 notes an SF Admin Code 91 report and an additional Police Commission report, which has caused an administrative burden and confusion. The secondary report has been removed to align with SF Admin Code 91. Also, LANSF's recommendation introduces language not present in the draft that resulted from Working Group feedback. In response

to this, however, the Department has added that the SF Admin Code 91 report will be posted on the Department's website for added transparency.

16.5.20.09.B **Signage** (see Working Group Rec. Grid R45) – LANSF claims that placing signage responsibilities under the Language Access Liaison is inconsistent with SF Admin Code 91. Yet SF Admin Code SEC 91.5(3)(e) assigns the responsibility for signage translation to a department's designated staff member. SFPD's designated staff member is the Language Access Liaison. LANSF recommends that the Department post information in multiple languages on its website. Many vital documents and forms are already translated into several languages on the Department's website, and the website itself can be translated into over 100 languages. This recommendation is already in practice.

The Department agrees with the context of LANSF's letter, but not with the specific language LANSF seeks to prescribe for law enforcement personnel. We agree that all individuals, including LEP individuals, should be protected under the law. We agree that a "DGO, with clear and concise direction on how to comply with language access responsibilities, is urgently needed". That is why the Department is updating DGO 5.20 to better serve and protect LEP individuals. As previously stated, we agree that conciseness is key to creating effective policies that allow officers to protect public safety.

LANSF's letter made statements that disregard this Department's professionalism, core function, and basic facts, such as:

- "SFPD does not care about [LEP individuals]."
- "The latest version of DGO 5.20 represents a slash and burn of the current 2007 policy. It rolls back almost two decades of departmental progress in serving LEP individuals."
- "If the latest draft of DGO 5.20 is adopted, LEP residents...will find their language rights ignored."

Further, we are concerned that some of LANSF's characterizations may create a misleading impression of the Department's approach to language access services. SFPD sworn staff proudly represent over 30 languages spoken in San Francisco and reflect the communities they serve. This Department, in practice, assists LEP individuals who visit or live in this city every day, and in many cases during highly stressful situations, including victims of crime or those in crisis. SFPD is proud of its officers and their consistent efforts to make public safety a reality for all.

In conclusion, the Department was encouraged to revise the Working Group version of DGO 5.20 based on the 61 public comments and additional input from Command Staff. We appreciate LANSF's continued concern, but believe it is adequately addressed in this letter.

Respectfully,

A handwritten signature in blue ink, appearing to read 'ASJA', with a stylized flourish extending to the right.

ASJA STEEVES
Policy Development Division Manager
Policy Development Division – Chief of Staff

Encl. Updated DGO 5.20 Language Access Services

Language Access Services

5.20.01 PURPOSE

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.

5.20.02 DEFINITIONS

- Certified Bilingual Member – A sworn member who is certified by DHR or other designated qualifying agency to provide interpretation services.
- 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.
- Interpretation – A live service that converts one language into another while retaining the same meaning.
- Language Access Liaison – An employee, preferably 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.
- Language Access Services – Translation and interpretation of information that enables communication with LEP individuals.
- Limited English Proficient (LEP) Individual – A person whose primary or preferred language is not English and who has a limited ability to read, write, speak, or understand English.
- Non-Certified Bilingual Member – A sworn member who can provide non-evidentiary interpretation services but is not certified by a designated qualifying agency. These members are prohibited from providing written translation services.

- Office of Civic Engagement and Immigrant Affairs (OCEIA) – A City department tasked with aiding in compliance with City language access requirements and notifying Departments when a new language meets the threshold to become a Required Language (SF Admin §91).
- Primary Language – The language in which an individual is most effectively able to communicate.
- Required Languages – Language Access Services **in Chinese, Spanish, Filipino, and any other language for which the requisite number of persons qualifies as a Substantial Number of LEP Persons, as determined by OCEIA** ~~the Department must provide interpretation and translation services for, and have vital information available in,~~ per SF Admin Code §91.
- Translation – For the purpose of this DGO, any written information converted from one language into another while retaining the same meaning (including American Sign Language).

5.20.03 POLICY

Employees shall inform LEP individuals of their right to request free language access services, and will provide these services when requested or as needed, **consistent with SF Admin §91**.

5.20.04 PROCEDURES

- 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 proactively 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.
 - 1. Employees should err on the side of providing language assistance when unsure of LEP status.
 - 2. Potential indicators of LEP individual – Misuse of language, switching between languages, inability to answer questions sufficiently, confusion with intricate enforcement procedures or language, cannot respond to open-ended questions, etc.
- B. Use of Interpreters** – Employees will determine the type of interpretation needed based on the incident.
 - 1. Criminal Incident – These are situations that may involve a violation of law that could lead to an arrest, citation, and/or result in judicial proceedings that require statements and evidence that will stand up to legal scrutiny. Members should follow this order of preference for interpretation unless there is an exigency:
 - a. Certified Bilingual Member (in-person preferred)
 - b. Certified Civilian Interpreter
 - c. Non-Certified Bilingual Member – May only be used for non-evidentiary communication (e.g. initial contact, to provide/information) unless there is an exigency.

2. **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.).

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 (800-880-1994, Client ID 501644).

D. Scheduled Interviews – 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.

E. Custodial Interrogations – 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.

F. Miranda Admonition – When required, the Miranda Admonition shall be provided in the suspect's primary or preferred language.

G. 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'.

H. Incident Reports – Members will complete the LEP section on the incident report. Members may include additional details in the narrative.

5.20.05 EXIGENT CIRCUMSTANCES

- A. In exigent circumstances, or if waiting for a Certified Bilingual Member or Certified Civilian Interpreter would delay critical actions, 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 **Non-Certified Bilingual member**, 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.

5.20.06 TRANSLATION OF DOCUMENTS AND OTHER CONTENT

A. External Requests

1. Required Language – Vital written materials and applicable digital content should be available to the public directly or will be made available by request (SF Admin Code §91.5(a)).
2. 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.

B. Internal Requests

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.
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.

5.20.07 TRAINING

- A. The Department will provide all public-facing employees with periodic training on LEP policies and procedures, interpreting techniques, roles, and ethics.

5.20.08 CERTIFIED BILINGUAL EMPLOYEE LIST

- A.** 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.

5.20.09 LANGUAGE ACCESS LIAISON

- A. 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.
1. The report shall be submitted to the Police Commission and OCEIA and posted on the SFPD website upon approval by the Chief.
- B. Signage** – The Department will post the following in publicly accessible lobbies, in all required languages (per OCEIA determination):
1. Signage noting the availability of free language access services.
 2. Signage relating to and/or providing vital information about Department services or programs.
 3. OCEIA’s Know-Your-Rights brochure, when available, or other required published materials.