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City of Aurora, Colorado

Language Access Study

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SECTION I.

STAFF SURVEY ANALYSIS

SECTION I.
Staff Survey Analysis

As part of the language access needs assessment, City of Aurora staff members participated in an online survey about their interactions with Limited English Proficiency (LEP) residents. LEP status indicates that a resident does not speak English as their primary language and has a limited ability to read, speak, write, or understand English[1]. The survey collected staff opinions about how best to meet the needs of these residents to improve communication and access to information. This section focuses on respondents' experiences, needs, and suggestions.

Methodology

The 2018 Aurora LAP Staff Survey is comprised of 24 questions, many of which allow for the selection of multiple responses as well as for the ability for staff members to write in unique individual responses. Individual responses that best represent the sentiment of survey respondents overall are shared in this section.

The survey was open to all City of Aurora staff from November 9, 2018 to December 21, 2018. Overall, 635 City staff members responded to the LAP Staff Survey.
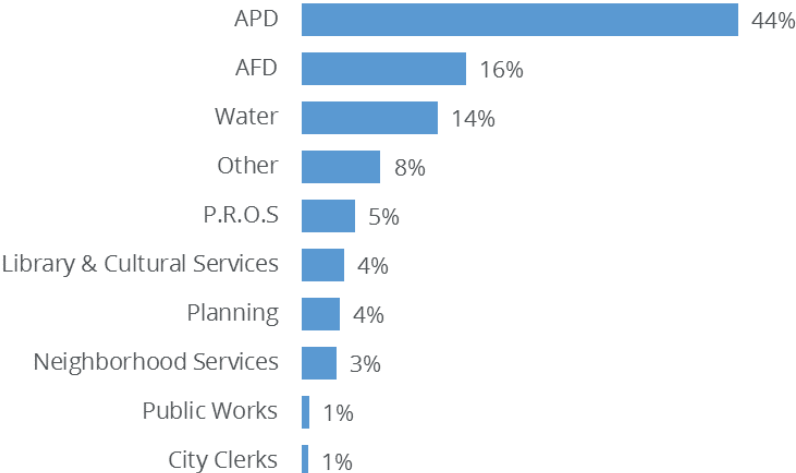
Respondents

The City of Aurora staff members who participated in the survey work in a variety of departments within the City, as shown in Figure I-1. Departments with the highest response rates are the Police Department, the Fire Department, and the Water department.

**Figure I-1.
Staff Respondents by Department**

Note:
n=633.

Source:
2018 Aurora LAP Staff Survey.

| Department	Percent
APD	44%
AFD	16%
Water	14%
Other	8%
P.R.O.S	5%
Library & Cultural Services	4%
Planning	4%
Neighborhood Services	3%
Public Works	1%
City Clerks	1%

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[1] https://www.lep.gov/faqs/faqs.html#OneQ1

Staff Member Interactions with LEP Residents

How frequently do staff members come into contact with LEP residents? Staff interaction with LAP residents in Aurora is quite common: two in five staff members (41%) interact with LEP residents daily, one in four staff members (26%) interact with LEP residents on a weekly basis, and nearly one in three staff members (28%) interact with LEP residents on a monthly basis.

What are the most common languages that staff members are encountering in their LEP interactions? As shown in Figure I-2, more than nine in 10 staff members (94%) indicate that Spanish is the most commonly encountered language. One in four staff members (26%) identify an "Other" language as the second most commonly encountered language. These "Other" languages were most frequently identified as Russian, Nepalese, or French, followed by a variety of other languages. Staff members identify Korean (21%) and Mandarin (20%) as the third and fourth most commonly encountered languages, respectively. As reflected in the figure below, Amharic is identified as another commonly encountered language.

Figure I-2.
Commonly Encountered Languages
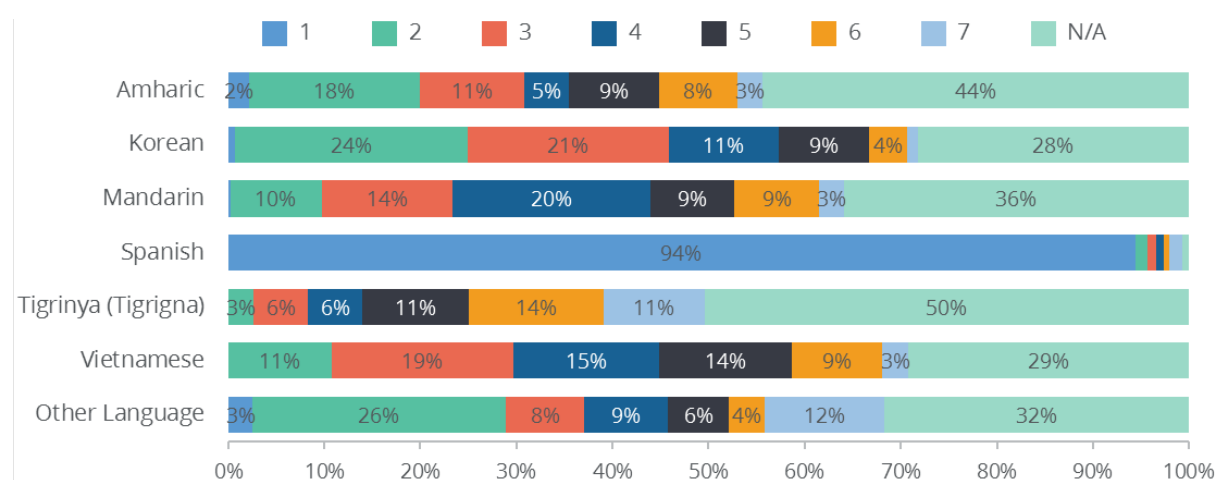
Note: n=621.
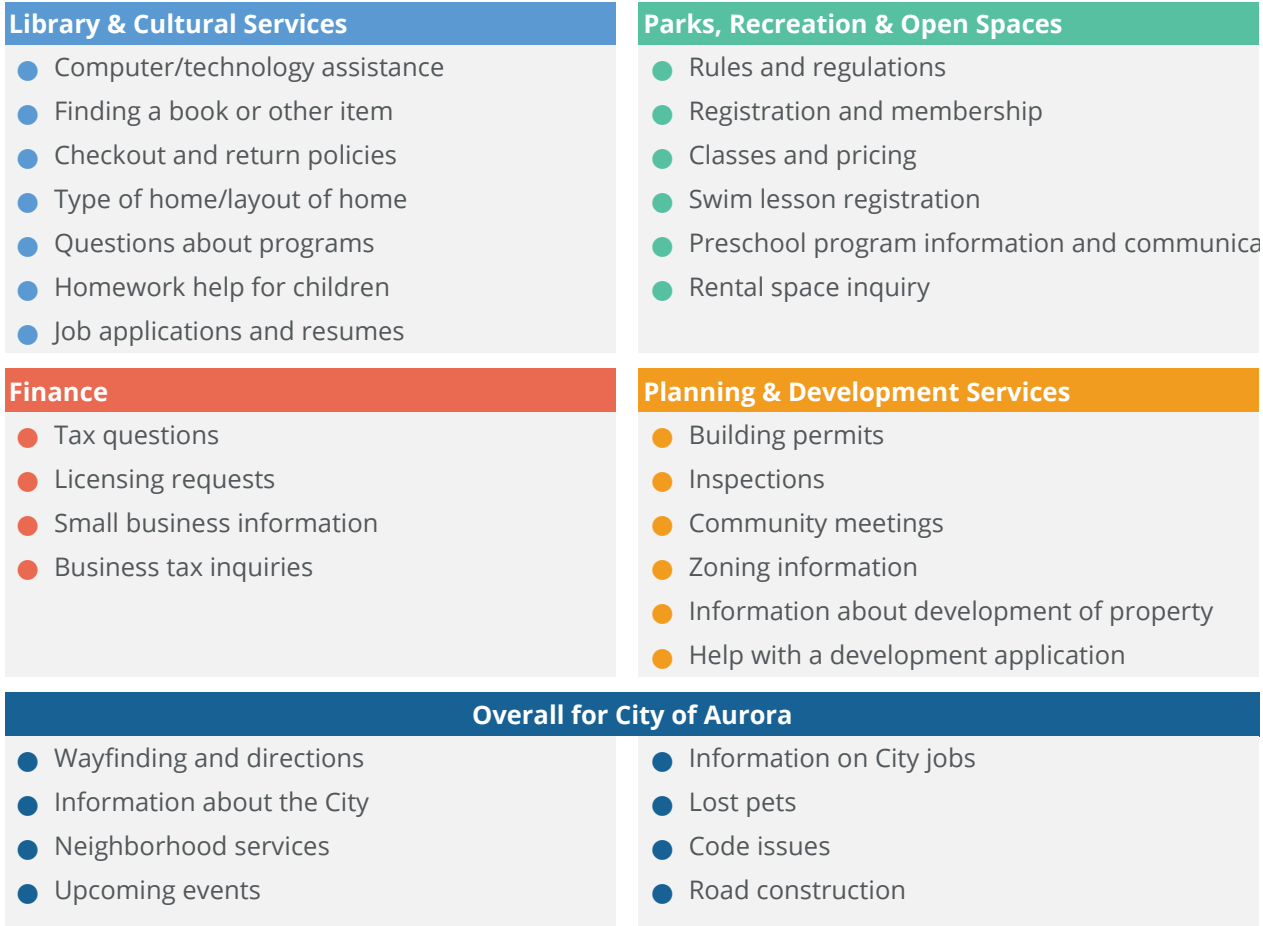
Source: 2018 Aurora LAP Staff Survey.

In what part of the City do staff members usually encounter LEP residents? Just over half of staff members (51%) report that they usually encounter LEP residents north of Colfax Avenue and west of I-225. Forty percent of staff members usually encounter LEP residents in Central Aurora. Nearly one in three staff members (28%) usually encounter LEP residents north of Colfax Avenue and east of I-225. One in four staff members (26%) identified an "Other" location in the City, with 25 percent of these staff members indicating that they encounter LEP residents in all parts of the City.

How are staff members contacted by LEP residents? Two in three staff members (66%) come into contact with LEP residents in person, in the field. Of these staff members who

encounter the LEP residents in person, in the field, 50 percent are from the Police Department, 21 percent are from the Fire Department, and 13 percent are from the Water Department. Two in five staff members (40%) are contacted by LEP residents via telephone. Nearly one in three staff members (28%) interact with LEP residents in person, in an office setting. Five percent of staff members communicate with LEP residents via email.

What do LEP residents typically need from staff members? LEP residents have a wide variety of needs. Staff members indicate that LEP residents frequently contact them in emergency situations (911 calls and when in need of police, fire, or medical assistance); to get general information on City programs, projects, or services; with questions regarding water services and other utilities; and to get assistance with other department-specific needs. Examples of these other department-specific needs can be seen below in Figure I-3.

Figure I-3.
Other Department-Specific Needs

Library & Cultural Services	Parks, Recreation & Open Spaces
● Computer/technology assistance	● Rules and regulations
● Finding a book or other item	● Registration and membership
● Checkout and return policies	● Classes and pricing
● Type of home/layout of home	● Swim lesson registration
● Questions about programs	● Preschool program information and communica
● Homework help for children	● Rental space inquiry
● Job applications and resumes	

Finance	Planning & Development Services
● Tax questions	● Building permits
● Licensing requests	● Inspections
● Small business information	● Community meetings
● Business tax inquiries	● Zoning information
	● Information about development of property
	● Help with a development application

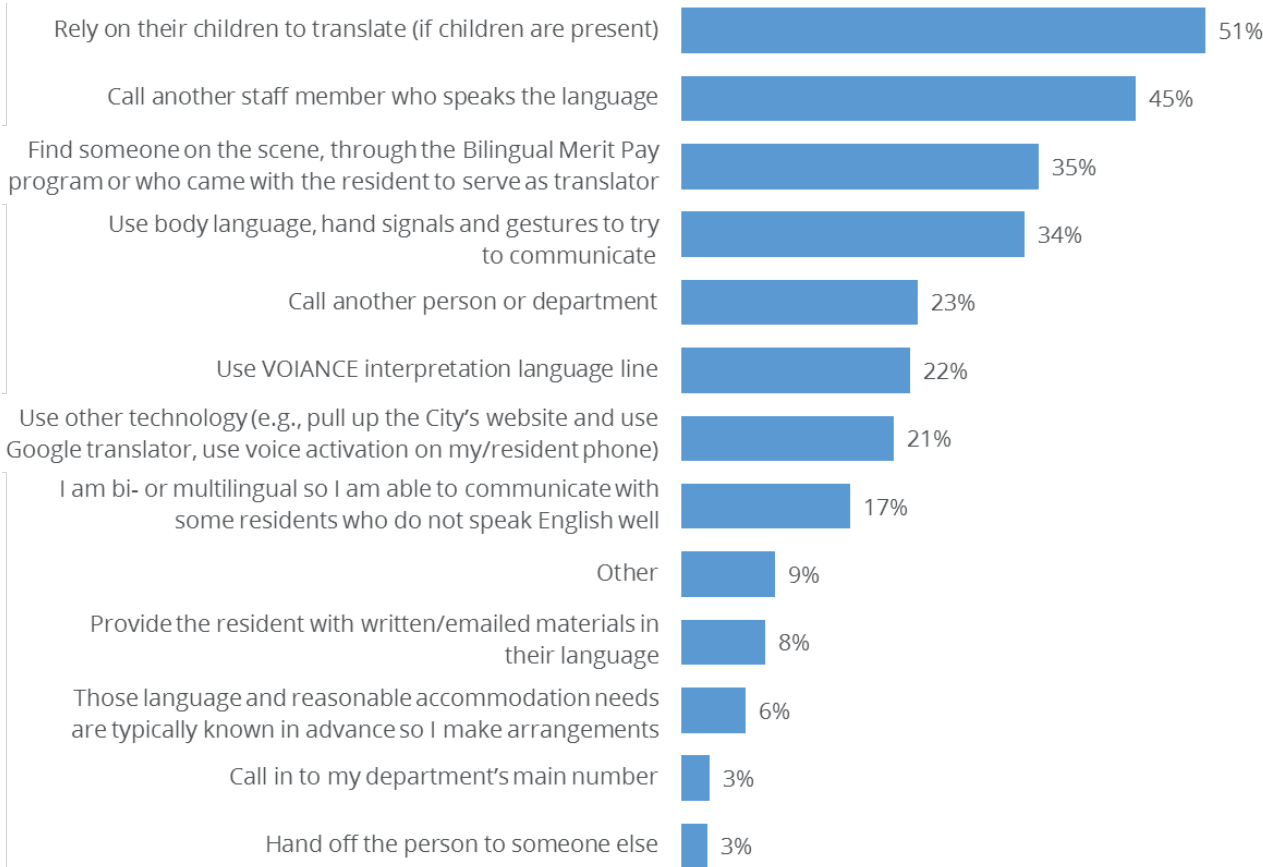| Overall for City of Aurora	
● Wayfinding and directions	● Information on City jobs
● Information about the City	● Lost pets
● Neighborhood services	● Code issues
● Upcoming events	● Road construction

Note: n=416.
Source: 2018 Aurora LAP Staff Survey.

What do staff members do when they need to communicate with a LEP resident? As shown in Figure I-4, staff members employ a range of options when communicating with LEP residents. Less than one in 10 of these interactions (6%) are known in advance; as such, the vast majority of LEP resident communication needs are addressed on-the-spot. Not surprisingly, the three options most commonly utilized by staff members rely upon an informal translator. Of the staff members who indicate that they are bi- or multilingual, the vast majority (approximately 76%) speak Spanish. Technology is used in one in five interactions (21%). Respondents who indicate that they use technology report a variety of types of technology (e.g. language line, phone apps, etc.); notably, 38 percent of these respondents indicate that they utilize Google translate.

Figure I-4.
How Staff Members Communicate with LEP Residents

Method	Percentage
Rely on their children to translate (if children are present)	51%
Call another staff member who speaks the language	45%
Find someone on the scene, through the Bilingual Merit Pay program or who came with the resident to serve as translator	35%
Use body language, hand signals and gestures to try to communicate	34%
Call another person or department	23%
Use VOIANCE interpretation language line	22%
Use other technology (e.g., pull up the City's website and use Google translator, use voice activation on my/resident phone)	21%
I am bi- or multilingual so I am able to communicate with some residents who do not speak English well	17%
Other	9%
Provide the resident with written/emailed materials in their language	8%
Those language and reasonable accommodation needs are typically known in advance so I make arrangements	6%
Call in to my department's main number	3%
Hand off the person to someone else	3%

Note: n=513.
Source: 2018 Aurora LAP Staff Survey.

Do the methods of communication available to staff members meet Spanish-speaking LEP residents' needs? Staff were asked about how they accommodate Spanish speaking residents in particular, as Spanish is the most common language other than English spoken by Aurora residents. As shown in Figure I-5, two in three staff members (66%) feel that

they meet Spanish-speaking LEP residents' needs all or most of the time. Furthermore, only 4% feel that they rarely or never meet Spanish-speaking LEP residents' needs.

**Figure I-5.
Meeting the Needs of
Spanish-Speaking LEP
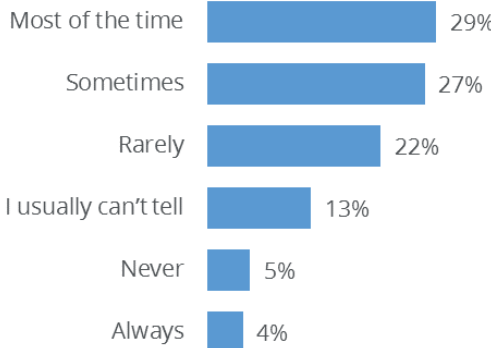Residents**

Note:
n=472.

Source:
2018 Aurora LAP Staff Survey.

Most of the time	50%
Sometimes	27%
Always	16%
Rarely	4%
I usually can't tell	2%
Never	1%
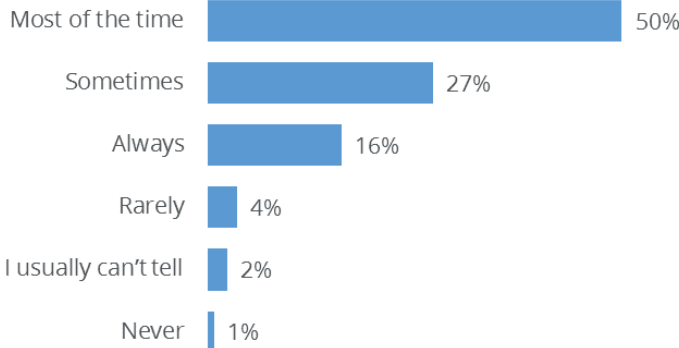
Do the methods of communication available to staff members meet the needs of LEP residents who speak languages other than English and Spanish? Staff have varying degrees of confidence in the methods of communication used to accommodate LEP residents who speak languages other than English or Spanish, as shown below in Figure I-6. While one in three staff members (33%) indicate that they meet the needs of these LEP residents all or most of the time, another one in three staff members (35%) feel that they rarely or never meet these LEP residents' needs. More than one in ten staff members (13%) are unsure if they are meeting the needs of LEP residents who speak languages other than English and Spanish. Several staff members indicate that it would be helpful to have a tool to aid in the identification of the language being spoken by an LEP resident.

**Figure I-6.
Meeting the Needs of LEP
Residents Who Speak
Languages Other Than Spanish**

Note:
n=472.

Source:
2018 Aurora LAP Staff Survey.

|	
Most of the time	29%
Sometimes	27%
Rarely	22%
I usually can't tell	13%
Never	5%
Always	4%

How much time do staff members spend in interactions with LEP residents relative to time spent in interactions with English-speaking residents? More than three in four staff members (77%) indicate that they spend more time in encounters with LEP residents than in encounters with English-speaking residents. One in six staff members (17%) feel that they spend the same amount of time on LEP interactions as they do on interactions with English-speaking residents. Seven percent of staff members indicate that encounters with LEP residents take less time than interactions with English-speaking residents.

Of the staff members who indicate that LEP interactions take more time, 59 percent feel that LEP interactions take twice as much time, 26 percent indicate that they take less than twice as

much time, and 15 percent indicate that they take more than twice as long as interactions with English-speaking residents.

In what cases do staff members feel improvements in translation are most needed? Staff members have a lot of insight into improvements in translation that would make communication easier. As shown in Figure I-7, there are a wide variety of improvements in translation that staff members suggest. Nearly one in four staff members (24%) feel that the translation of department forms explaining complex procedures or information collection would be the top priority for improvement in translation. Another nearly one in four respondents (22%) indicate that the translation of the most commonly used forms in their department are the second highest priority for improvement in translation. One in six staff members (17%) identify the translation of the most common citations/enforcement documents as the third highest priority for translation improvement.

**Figure I-7.**
Priority Translation Needs
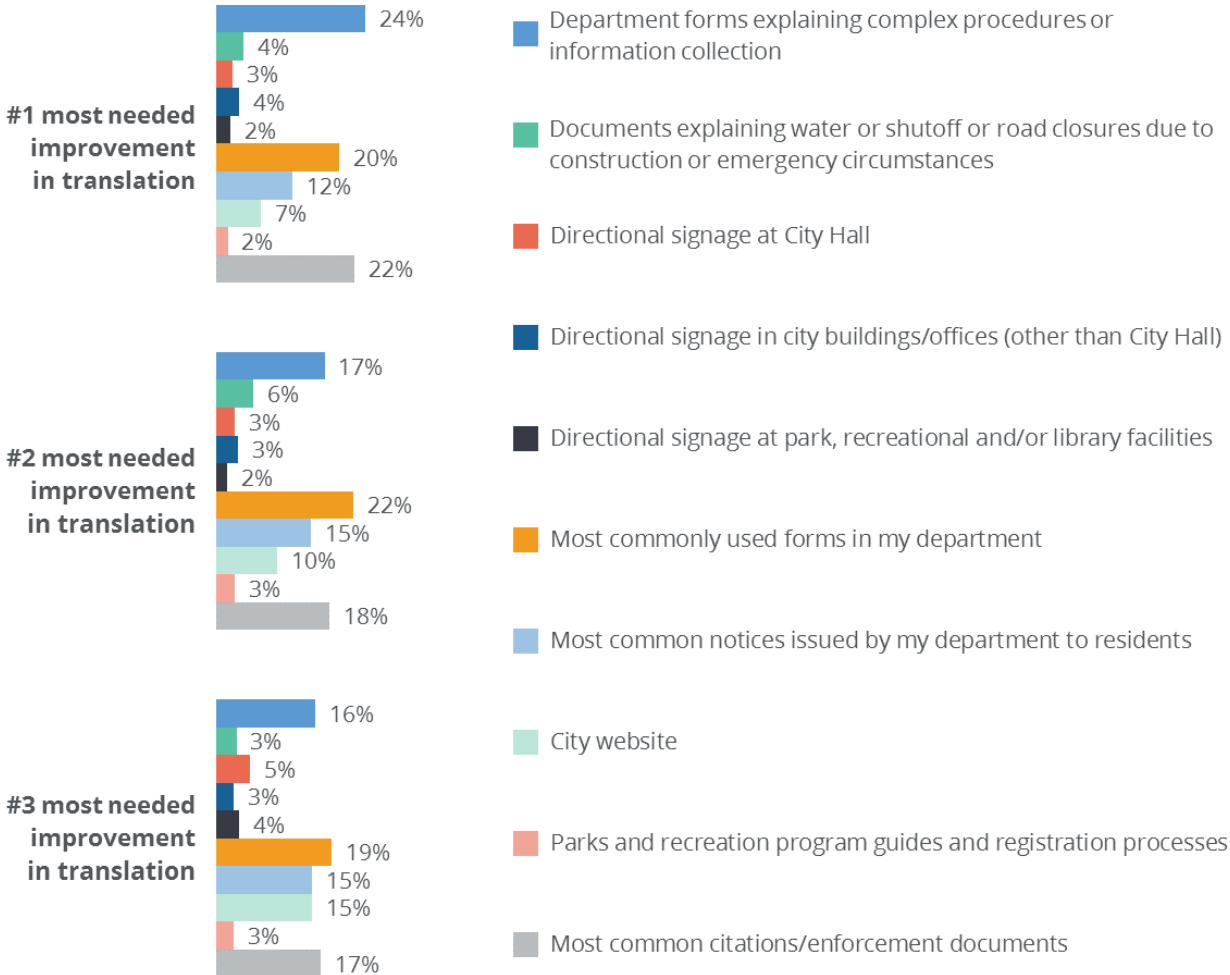
Note: n=278.
Source: 2018 Aurora LAP Staff Survey.

In what cases do staff members feel improvements in interpretation are most needed? Staff members offer many suggestions for improvements in interpretation that they feel would positively impact communication.

Staff members were first asked to prioritize improvements in interpretation for interactions that happen on the telephone. As shown in Figure I-8, nearly half of staff members (46%) identify emergency response situations as the top priority for improvement in interpretation over the telephone. One in three respondents (33%) indicate that public safety situations are the second highest priority for improvement in telephone interpretation. One in five staff members (21%) identify time sensitive situations as the third highest priority for translation improvement for interactions that happen over the telephone.

Figure I-8.
**Priority Interpretation Needs: Phone**
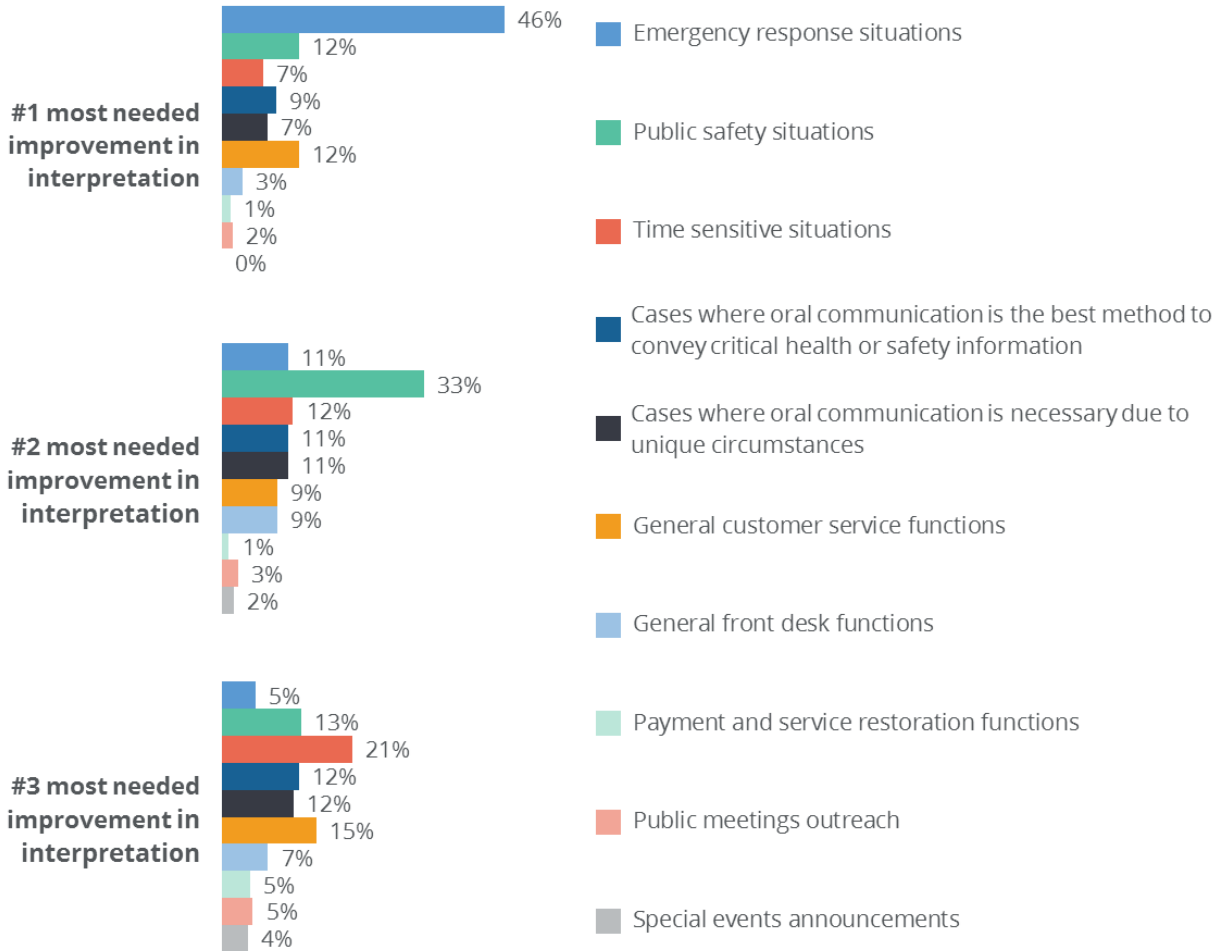
Note: n=297.

Source: 2018 Aurora LAP Staff Survey.

Staff members were also asked to prioritize improvements in interpretation for face-to-face interactions. It is notable that the top three priorities for interpretation improvements for

interactions that happen face-to-face are the same as those identified for interactions that happen over the telephone. As shown below in Figure I-9, nearly two out of five staff members (38%) identify emergency response situations as the top priority for improvement in face-to-face interpretation. Thirty-three percent indicate that public safety situations are the second highest priority for improvement in face-to-face interpretation. More than two out of five staff members (43%) identify time sensitive situations as the third highest priority for interpretation improvement for face-to-face interactions.

Figure I-9.
Priority Interpretation Needs: Face-to-Face
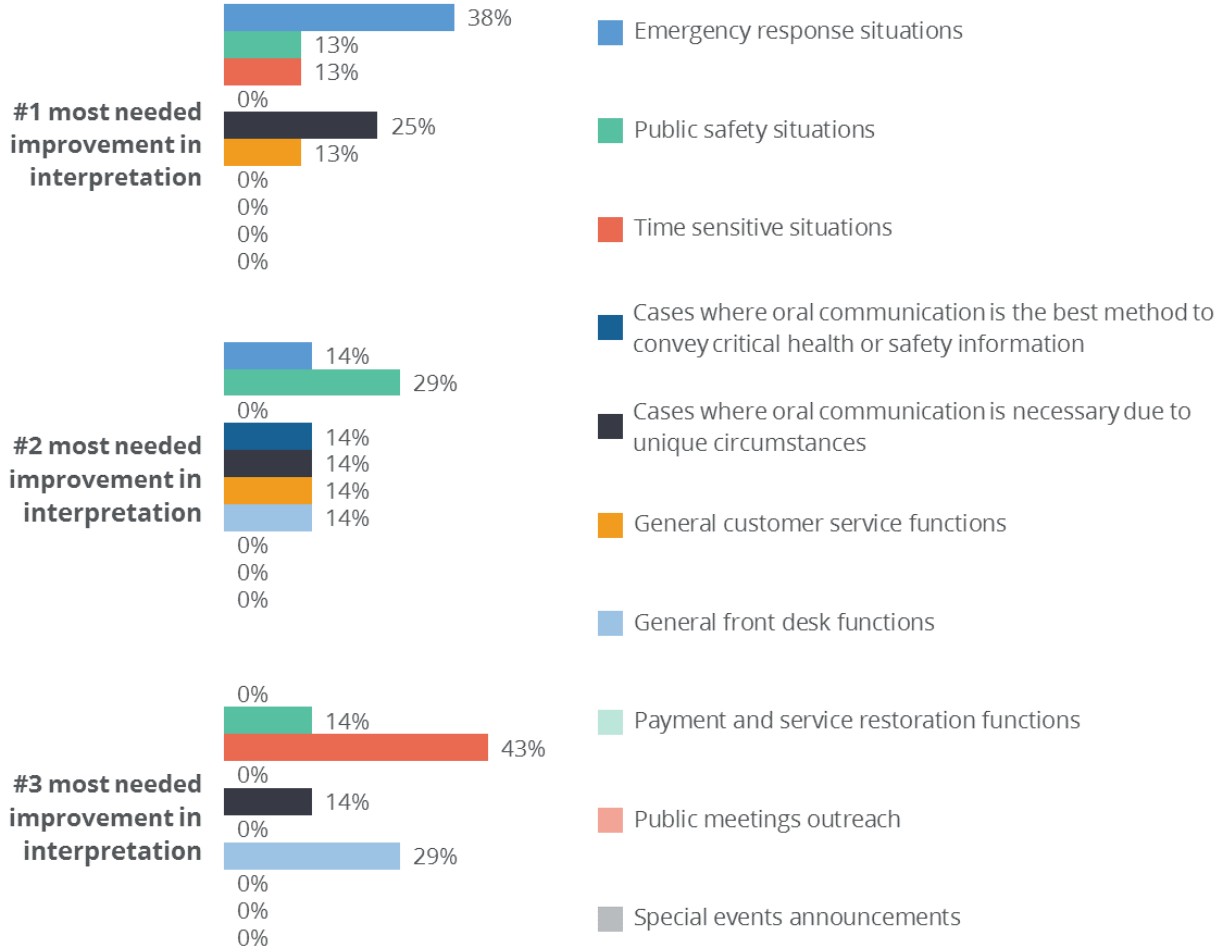
Note: n=297.

Source: 2018 Aurora LAP Staff Survey.

Would these improvements in translation and interpretation save staff members time or increase their efficiency? Nearly half of staff members (47%) feel that improvements in translation would definitely save them time or increase their efficiency while 58 percent of staff members feel improvements in interpretation would save them time or increase their efficiency.

Furthermore, staff members identify an importance in providing these improvements that goes beyond time-saving and efficiency:

- *"It would serve to provide greater understanding between ourselves and the community."*

- *"The biggest benefit is to those that we serve, making their life easier."*

- *"It would make our services more accessible to patrons and change and enrich lives."*

- *"We can truly understand what they need and want so that we can provide better customer service."*

SECTION II.

LEADERSHIP SURVEY AND FOCUS GROUP ANALYSIS

SECTION II.
Leadership Survey and Focus Group Analysis

As part of the language access needs assessment, City of Aurora departmental leadership participated in either an online survey or a department-specific focus group about their interactions with Limited English Proficiency (LEP) residents. LEP status indicates that a resident does not speak English as their primary language and has a limited ability to read, speak, write, or understand English[1]. The survey and focus groups collected departmental leadership's opinions about how best to meet the needs of these residents to improve communication and access to information. This section focuses on respondents' experiences, needs, and suggestions.

Methodology and Respondents

The 2018 Aurora LAP Leadership Survey is comprised of 27 questions, many of which allow for the selection of multiple responses as well as for the ability for departmental leadership to write in unique individual responses. The survey was open to City of Aurora departmental leadership from November 9, 2018 to December 21, 2018. Overall, 66 members of departmental leadership responded to the LAP Leadership Survey from the following departments: Water; Library & Cultural Services; Parks, Recreation, and Open Spaces (P.R.O.S.); Public Works; Planning; Human Resources; Finance; General Management; and OIIA.

In addition to the survey, the consultant team convened department-specific focus groups with the Fire, Police, and Neighborhood Services Departments. The leadership survey was used as a discussion guide for the focus groups.

Interactions with LEP Residents

What are the most common languages that departments are encountering in their LEP interactions? Departmental leadership indicates that Spanish is overwhelmingly the most common language encountered. This is followed by Korean, Vietnamese, Mandarin, Amharic, and Russian. Several members of departmental leadership indicate that Spanish is the only language that they encounter.

How are departments interacting with LEP residents? The majority of department interactions with LEP residents happen in-person, both in office settings and in the field.

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[1] https://www.lep.gov/faqs/faqs.html#OneQ1

There are many interactions that take place over the telephone. It is also common for these interactions to take place electronically (e.g., via the website, via email). Finally, a relatively smaller yet still significant number of LEP interactions take place via written correspondence.

What types of language assistance services do departments provide? Departmental leadership indicated that departments provide a variety of language assistance services including interpretation services from the language line, interpretation services from bi- or multi-lingual employees, in-person interpretation through professional interpreters, and translation of written materials. Many departments are relying heavily on the skills of multi- and bilingual staff members in order to successfully communicate with LEP residents.

Departmental Policies and Procedures

Departmental leadership is overwhelmingly supportive of additional resources and planning tools for addressing language access needs.

In general, departmental leadership is unsure of many of the current language access practices, procedures, and processes that are in place in their departments. There is lack of clarity among many of members of departmental leadership regarding the following:

- Data used to determine LEP communities in the departmental service area
- Departmental systems for tracking the type of language access services provided to LEP individuals at each interaction
- Departmental systems for tracking costs associated with language access services
- Departmental translation of signs or posters announcing the availability of language access services
- Translation of departmental updates on the City website
- Initial and or/periodic training of departmental staff members on how to access and provide language access services
- Inclusion of specific instructions related to providing language access services in the departmental staff manual or handbook
- Current methods of informing the public of the availability of free language access services
- Departmental advertisement on non-English media
- Communication with community groups about the availability of free language access services

This lack of clarity among departmental leadership is not indicative not of a lack of language access services provided but, rather, of a lack of formal citywide and departmental policies and procedures. Staff members are providing language access services; however, departmental leadership is not consistently aware of what is happening during these interactions. It is clear that departments and staff members are doing the best that they can to serve LEP residents with the resources that they have available to them.

Perceptions of Language Access Issues

Many of the interactions and communications between departments and LEP residents are going smoothly, with LEP residents' needs being addressed and departments indicating success. At the same time, there are circumstances where issues arise while departments and staff are working to meet the needs of LEP residents. Overall, there is a sense amongst departmental leadership, especially those with the greatest frequency of interaction with LEP residents, that formal policies and resources have not expanded in proportion with demand for language access services. There is also a lack of clarity between departments and the City in regard to the policies, procedures, and resources that are in place within individual departments in the City. This section explores departmental leadership's perceptions of language access issues within the City.

What is the formal protocol for providing language access service within the City? Members of departmental leadership indicate that it would be helpful to have more formal guidance on policy and procedure that should be adhered to when providing language access services. Departmental leadership shared the following examples of areas where it would be helpful to have more guidance:

- The steps that should be followed in an interaction or in communication with an LEP resident

    o Departmental leadership indicates that it would be helpful to have a universal tool to determine a resident's language.

    o Fire Department leadership notes that it would be nice to have a flow chart of steps and options for LEP interactions.

- The use of informal translators in critical situations (e.g., children, neighbors, and friends of LEP residents)

    o In the Fire Department, it is common protocol to immediately find a child to interpret and provide information when they arrive on a scene that involves LEP residents.

    o In the Police Department, while it is a last resort, they have had to rely on children, neighbors, of friends at a scene if there are not other resources

available and/or if access to the language line is prohibitively complicated in the field.

- In the Neighborhood Services Department, Code Enforcement leadership notes that code enforcement officers frequently rely on informal translators to communicate with LEP residents. While these interactions are rarely emergencies, they can include the communication of critical information.

■ The qualification that interpreters must fulfill for a variety of needs and circumstances

- Departmental leadership indicates that it would be helpful to have clarity regarding the circumstances where an informal interpreter is adequate (e.g., in non-critical, informational encounters).

- The Police Department is unsure of when external interpreters need background checks and when these interpreters run the risk of being subpoenaed for a court case (e.g., can external transcribers be subpoenaed?).

■ Training opportunities for departmental leadership and staff in meeting the needs of LEP residents

- In the Neighborhood Services Department, code enforcement officers frequently encounter LEP residents, often without advance notice. It would be helpful for them to receive additional training on how to best serve residents who speak non-English languages as well as those who have a need for another type of language accommodation (e.g., due to a disability).

- In the Neighborhood Services Department, departmental leadership noted that the majority of their LEP interactions are with Spanish-speaking residents. They noted that it would be beneficial to have the opportunity to take Spanish classes and/or to have access to Spanish-language learning software (e.g., Rosetta Stone). In particular, they noted that field staff would benefit greatly from weekly Spanish classes.

■ Logging and tracking of language access service information

- Several members of departmental leadership noted that it would be helpful to have logs that track the volume of interpretation and translation services that are provided both internally, by City staff, and externally, by other providers.

What resources are available for meeting language access needs within the City?
Members of departmental leadership indicate that it would be helpful to have more clarity regarding the language access resources available to them. Departmental leadership shared the following examples:

- The use of bi- and multilingual staff members that are available for interpretation
  - o Departmental leadership indicates that, while they are very dependent on the assistance of bi- and multilingual staff members, it is often a very informal process and there is no master list of these staff members.
  - o Departmental leadership indicates that it would be helpful to have additional bi- and multilingual staff members to support language access services within departments.

- Resources available for less common languages

  - o Departmental leadership indicates that it is generally easy to locate services for Spanish, Russian, and a variety of Asian languages but that it is much more difficult for obscure languages.

  - o The Victim Services unit had an issue when a victim knew the professional interpreter who arrived to assist with an interview. The victim did not feel comfortable sharing their story in front of a known community member.

  - o The Victim Services unit has had to bring a victim into the department and have them wait until adequate interpretation is available. This creates additional and unnecessary inconvenience and stress for a victim.

- Resources available for on-the-spot interpretation and translation

  - o Members of the Fire Department leadership indicate that they experience more language access issues in their day-to-day work than in their emergency work. Examples include LEP residents coming into headquarters, LEP families enrolled in the juvenile fire setter intervention program, inspections, and fire investigation interviews. These are situations where the language line is generally not an effective option.

  - o A member of the Fire Department leadership was put on the spot by a non-English media organization and did not have access to interpretation services to support the interview.

  - o Members of the Police Department leadership note that issues arise in critical, non-emergency interactions where the language line is not an effective option.
    - The investigation unit and victim services unit require interpreters that can handle the emotional toll of interpreting highly sensitive and disturbing content.

- The Police Department has just one bilingual Spanish-speaking staff member who handles all of the interpretation for investigations as well as requests from a variety of other units in the department. The demand for Spanish-language assistance far surpasses the staff member's capacity and, as such, there is a sizeable backlog in investigations that require Spanish language assistance. In their estimation, they would need three full-time staff members to adequately meet the need for the department. They have tried outsourcing some of the work but it has been very difficult to locate adequate service providers and it is not as cost-effective as hiring additional support internally.

- Neighborhood Services leadership indicates that the language line is often too cumbersome for code enforcement officers to use in the field (i.e., dropped calls, inefficient use of time) and that it is beneficial to have access to someone who can speak colloquial Spanish.

- The use of personal phones during emergency and/or critical situations.

  o Fire Department leadership reports that staff members do not have department-issued phones. Fire Department staff frequently use residents' phone at the scene to call the language line and then pass the phone back-and-forth between themselves and the resident.

  o Police Department leadership reports that staff members do not have department-issued phones. Many members of the police department use their personal phones, which opens them up to the possibility of their personal phones being subpoenaed as evidence. Other officers request that a supervisor come to the scene with a phone, which can create a long delay before service is provided.

  o Neighborhood Services leadership also notes that staff members do not have department-issued phones. While, relative to the Police and Fire Departments, code enforcement officers are not as frequently engaged in emergency and/or critical situations, they are performing a large proportion of their work in the field and are reliant on the use of their personal cell phones to access translation apps and to use the language line, when necessary.

SECTION III.

FINDINGS AND RECOMMENDATIONS

SECTION III.
Findings and Recommendations

This section outlines the consultant's findings and recommendations based on the research conducted for the City of Aurora LAP Study.

Aurora is the most diverse city in the state of Colorado and 19.9% of Aurora residents are foreign-born[1]. Residents come from more than 130 countries and speak more than 160 languages.[2] As such, there is a large demand for language access services. City leadership, departmental leadership, and City staff are dedicated to providing equitable service to LEP residents; however, it seems that the demand for language access services has surpassed the existing capacity and resources available to provide these services. Furthermore, there is a lack of formal structure, both within and among departments, as well as between the City and its departments, about how to leverage existing resources to meet growing translation and interpretation needs. It is the goal of the following recommendations to guide the City in bridging the gap between demand for language access services and the internal capacity to provide it.

Note: For the purposes of this section, Limited English Proficiency (LEP) residents refers to both non-English or limited English speakers and persons with disabilities who have alternative communication needs.

Short term strategies

Actions that build capacity

- The City should prepare a memo for departmental leadership that provides administrative-level guidelines for carrying out the City's LAP and addressing language access needs within departments (e.g., a definition of the data that should be used to determine LEP communities, information on how departments should request resources and services, guidance on what records should be kept of interactions with LEP residents, expectations for providing multilingual information on department pages of the website, etc). This would include protocol for providing front line staff with language identification cards (see below) and language to add to all documents and materials frequently accessed by LEP residents about how to access free language assistance. Orientation materials for new City employees should include language access training and protocol.

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[1] 2018 American Community Survey

[2] Aurora Public Schools 2017-18 demographic data

Additional topics to cover in the memo can be found in Section II of this report, in the "Departmental Policies and Procedures" subsection.

- As a first step—to communicate that language access challenges are a priority for the City and to "roll out" the LAP—the City should develop and hold a series of solutions-oriented internal LAP "town hall" meetings for departmental leadership and staff members.
    - o The initial meetings should provide opportunities for departments to share about experiences with other departments and City leadership. Leadership and staff should then divide into work groups to provide feedback and suggestions across departments as well.
    - o This should be followed by opportunities for department leadership and staff members to work internally on language access needs and issues.
    - o Additional meetings should provide training that covers best practices in interactions with LEP Spanish speakers, LEP speakers of other commonly encountered languages, American Sign Language speakers, non-verbal residents, and residents with cognitive disabilities. The training should be a combination of stories about the experiences of LEP residents, scenarios and role playing, and practical advice.
- Periodic, ongoing LAP training should be provided by the Office of International and Immigrant Affairs to departments, as needed.

Actions that make use of technology

- The City should create a language access page on the City website that can serve as a "one-stop" location for LEP residents. This could include resident language access rights, publicity associated with the LAP, helpful links, and FAQs, etc.

- For non-critical, front desk and field situations, the City should explore the possibility of utilizing portable technology to aid in communication (e.g., iPads with language apps). For critical and emergency situations, the City should explore funding from corporate partners or foundations to purchase devices that can be carried by first responders.

Actions that Enhance Materials

- The City should make these "quick fixes" to address access challenges:

    - ➢ Move the translation feature to the top of the City website, and
    - ➢ Provide language identification cards to all frontline City staff.

- The City should develop a LAP protocol document that frontline staff can use when interacting with LEP residents (including those with a need for a reasonable accommodation). This protocol document should walk staff members through the steps to take to obtain interpretation, translation, and language access support for LEP residents.

    ➢ Lists of translation and interpretation service options (internal and external) should be updated (and should include providers for ASL interpretation).

- All LAP materials for frontline staff should be available in a central location on the internal server or another location/format that is easily accessible to staff.

- The City should publicize the language access services provided by the City in multiple languages on the City website, at City Hall, on the City public access channel, and at Recreation Centers and Libraries. This information should also be distributed to community groups who work with LEP residents as well as to non-English media outlets.

Long term strategies

Actions that make use of technology

- The City should implement a policy that all critical prerecorded City messages and announcements should include alternate language options including Spanish and other languages as they grow to represent a larger proportion of primary languages spoken (representing 3-5% of languages spoken by LEP residents).

Actions that enhance materials

- The City should consider investing in additional multi-language and, when possible, icon-based wayfinding signage.

- After the LAP is implemented and has been active for 6-9 months, the City should examine the protocol staff are implementing for multi-step translation. The practice should ensure that if one step of a process (e.g., registration, event notification) is translated, either all of the consecutive steps in the process are translated or there are further instructions for obtaining translation or interpretation for the remainder of the process.

- The City should develop a Spanish style guide with commonly used Municipal and department-specific terms and phrases to ensure consistency in terminology and translation.

Actions that build capacity

- The City could consider setting goals for the strategic recruitment and hiring of bilingual employees in the most frequently encountered languages.

    o All job posting materials for bilingual hires should be translated into the targeted language(s).