



City of Boulder

Language Access Plan



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Summary

The City of Boulder recognizes that effective and accurate communication between city staff members and the community they serve is critical to ensuring understanding and empowering community members to leverage all the resources of, and participate fully in, their local government. This Language Assistance Plan is intended as a resource for City of Boulder departments, staff, elected officials, members of boards and commissions, and volunteers. It provides guidelines, recommendations, and processes to ensure that individuals with Limited English Proficiency (LEP) have meaningful access to information, services, programs, activities, and decision-making processes at the City of Boulder. This plan meets the federally mandated guidelines for Language Access and incorporates recommendations from the City of Boulder's Racial Equity Plan.

I. Introduction

a. The LEP population in Boulder

The U.S. Census Bureau, through the American Community Survey, collects data on languages other than English spoken in a household, as well as the English-language proficiency of those who live in a household that speaks a language other than English. The U.S. Census Bureau collects this data for many reasons, among those is allowing public and private organizations to comply with the [policies and regulations](#) established under Executive Order 13166.

The term Limited English Proficient (LEP) refers to any person age 5 and older who reported speaking English less than “very well” as [classified by the U.S. Census Bureau](#). The term English proficient refers to people who reported speaking English only or “very well.” In Boulder, 4,470 community members, 4.1% of the population over age 5, have Limited English Proficiency, according to the 2019 American Community Survey. In Boulder County, 13,566 community members, 4.4% of the population over age 5, have Limited English Proficiency, according to the 2019 American Community Survey.

b. Mandates/City commitment to language equity and LEP services

The City of Boulder defines itself as a welcoming and inclusive city. In 2015, City Council adopted a resolution re-affirming Boulder’s status as, and commitment to be, an inclusive community. This commitment includes working with local partners to improve support for, and inclusion of, diversity and encouraging other jurisdictions and their elected leaders to do the same. In 2021, City Council adopted the city’s first [Racial Equity Plan](#).

This Language Access Plan contributes to outcomes outlined in the Racial Equity Plan, and specifically the following goals: the city will take action to end racial disparities in city services; the city will build and maintain trust, expanding the influence of community members of color through inclusive and responsive engagement; and the city will eliminate barriers and create opportunities to build a diverse workforce across the depth and breadth of local government. One way to ensure non-English speakers feel welcome and included in our city is to provide access to programs, services and information in their language.

Furthermore, as a recipient of federal aid, the City of Boulder must comply with specific language access requirements as established by Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits recipients of federal financial assistance from discriminating based on national origin, among other things. Title VI and Executive Order 13166 – Improving Access to Services for People with Limited English Proficiency [require](#) that recipients of federal financial assistance take reasonable steps to provide LEP individuals with meaningful access to programs, services, and activities.

c. What is “meaningful access”?

Meaningful access is provided when Limited English Proficient (LEP) individuals can access City of Boulder-provided information, programs, services, and activities in a way that is not significantly restricted, delayed or of inferior quality than those provided to English-proficient individuals.

d. How was this plan created?

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- June 2018:** Various Public Information Officers attended countywide presentation on communicating with non-English speaking populations, including best practices on Language Access.
 - 2019:** Communication Director leads research on current language access services at the City of Boulder.
 - September-October 2019:** Staff presentation to City Council advocating for a Language Access manager; council approves two-year funding for position.
 - April 2020:** City hires first Language Access manager, amid first months of pandemic.
 - 2020-2021:** Language Access Program Manager launches a review of federal laws and regulations, a comparison of Language Access plans from other municipalities and county governments, as well as data collection around languages spoken in the City of Boulder. Language Access Program Manager creates draft plan.
 - September-December 2021:** Presentation to various city departments and the Engagement Coordinators Committee for feedback.
 - March 2022:** Plan is share with the City Manager’s office, content of Plan is finalized.
 - April 2022:** Plan is designed, adopted, and shared with city colleagues and external partners.

e. Languages spoken in Boulder and Boulder County

City of Boulder

According to the 2020 U.S. Census, **the city of Boulder has a population of 108,250**. Data from the 2019 American Community Survey, point to 61 languages spoken at home by the Boulder community and a foreign-born population of 11.1%. A total of 16,781 residents (15.5% of the population) speak a language other than English at home and 4,470 of them report that they speak English less than very well. 6.3% of the Boulder population speaks Spanish, making it the most spoken language after English.

Top 10 languages spoken at home in Boulder, 2019 American Community Survey Five-Year Estimates

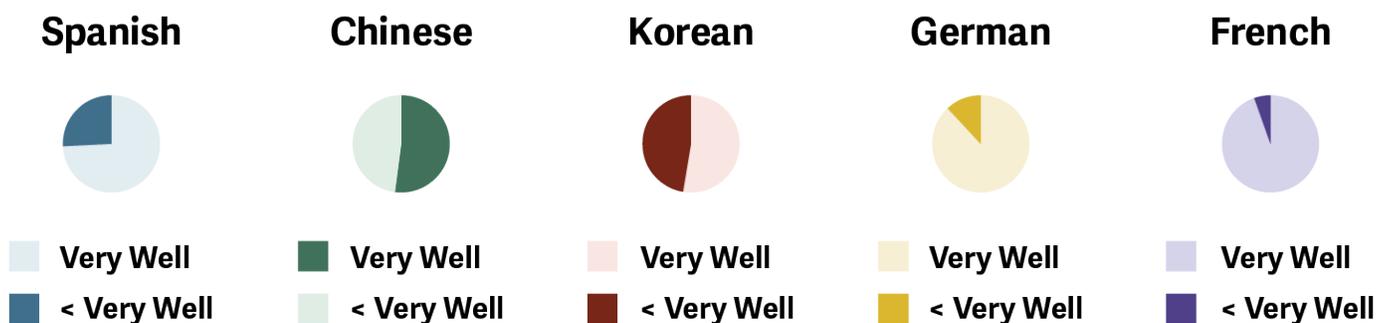
It is important to note that while some languages, such as French and German, have high numbers of speakers, the number of Limited English Proficient speakers within those language groups is small. The analysis here shows the top languages spoken in Boulder that have over 200 speakers and for which over 45% of the community is LEP. Spanish is also included. Although not nearly as large a percentage of the Spanish-speaking community is LEP, it greatly outnumbers other language groups, and LEP speakers surpass the 1000 people Safe Harbor Threshold established by the U.S. Department of Housing and Urban Development.

Language	Population	% Total Population*	Limited English Proficiency**
Spanish	6,819	6.3%	2,046
Chinese	2,269	1.7%	895
German	1,202	1.1%	154
French	906	0.8%	38
Korean	828	0.7%	400
Arabic	408	0.4%	58
Hebrew	380	0.4%	113
Mandarin	355	0.3%	65
Japanese	286	0.3%	39
Hindi	272	0.3%	69

*Percentages are based on city population in [2019 American Community Survey](#)

**People age 5 and older who said they speak English less than "very well" in the [2019 American Community Survey](#)

Top 5 languages spoken at home in Boulder County with LEP rates above 25% of the population, 2019 American Community Survey Five-Year Estimates



Boulder County

While a great majority of services provided by the City of Boulder are for City of Boulder residents, some are available to nearby residents in unincorporated Boulder County (Boulder Public Library, Parks and Recreation, for example), and others are open to users from Boulder County and beyond (Open Space and Mountain Parks). Therefore, we have also included a breakdown of the Boulder County population that speaks a language other than English at home and is Limited English Proficient. This amounts to a population of 321,030, according to the U.S. Census Bureau. In Boulder County, 16% of the population speaks a language other than English at home and 10.8% of the population was born outside the U.S., according to the 2019 American Community Survey. 9.4% of people speak Spanish in Boulder County, making it the most commonly spoken language after English.

Top 5 languages spoken at home in Boulder County with LEP rates above 40% of the population (plus Spanish), 2019 American Community Survey Five-Year Estimates

Language	Population	Limited English Proficiency**
Spanish	34,697	32%
Chinese	4,434	41%
Korean	1,688	41%
Vietnamese	1,616	48%
Telugu	725	44%
Nepali	648	40%

*Note: Percentages are based on county population in [2019 American Community Survey](#)

**People age 5 and older who said they speak English less than "very well" in the [2019 American Community Survey](#)

f. Primary language for document translation

A total of 1,765 Spanish speakers in Boulder are also Limited English Proficient (LEP), reaching the **LEP Safe Harbor Threshold** (5% or 1,000 people, whichever is less, of the eligible population or beneficiaries of services) for translation of vital documents into Spanish. The current data indicates that only Spanish has reached this threshold and, therefore, Spanish is the single primary language for the purposes of this Language Access Plan.

Vital documents are those that affect access to, retention in, termination of, or exclusion from services or benefits. A list of vital documents is included in Appendix A.

Current American Community Survey (ACS) Public Use Microdata Sample (PUMS) data shows that Chinese-speaking residents of the City of Boulder who are Limited English Proficient are approaching the LEP Safe Harbor Threshold. For the purposes of this Language Access Plan, Spanish is the sole Primary Language for Document Translation. However, data for the Chinese-speaking LEP population should be evaluated during the plan's next revision.

g. How to use this plan

This plan includes recommendations and procedures to help staff implement language access in their day-to-day work to assist the LEP population in Boulder. Each section includes the recommendations and procedures for providing notice on language services, interpreting, translation, and training.

We recognize that until our community understands and trusts that the city is committed to language access, participation numbers may remain low, requiring a reasonable cost-benefit analysis.

This plan also incorporates guidance that complies with Title VI of the Civil Rights Act, specifically as it relates to non-discrimination based on country of origin/language. Many of the recommendations for interpreting also apply to the Deaf and Hard of Hearing community, should they rely on American Sign Language for oral/signed communication. The Americans with Disabilities Act (ADA) has its own comprehensive guidelines and requirements and should be consulted in addition to this Plan.

h. Current (2019) levels of language services at the City of Boulder

The City of Boulder has limited data on the language services it provides, which is an issue this Language Access Plan seeks to address. The city conducted a non-statistically valid questionnaire in 2019 (see Appendix B) to better assess translation and interpretation services utilized by departments. Of the 1,600 potential participants, 187 employees participated in the questionnaire. When asked which language was requested most often after English by constituents, Chinese, German, French and Japanese each received one response. Spanish was the predominant language requested, according to survey respondents, with 171 participants indicating the department receives constituent requests for Spanish translation and interpretation.

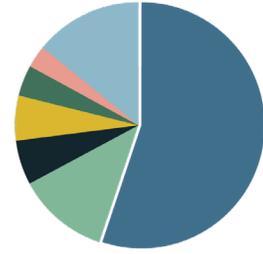
Police, Housing and Human Services, and Parks and Recreation departments indicated a strong need for both in-person interpretation and written translation services, which may reflect the frequency of face-to-face contacts between staff and constituents. Other departments such as Communications, Fire-Rescue and Innovation and Technology indicated a greater need for written translation than in-person interpreters, although some of the virtual and hybrid engagement approaches that became prevalent since the survey was completed, as a result of the pandemic, provide some interesting inclusivity options related to interpretation. **See Appendix B for complete questionnaire details.**

Across the city organization, the questionnaire showed that many employees have a lack of awareness about legal requirements to provide language access, available resources to departments, or what the current cost is to provide interpretation and translation services. This study was limited by the small response rate in some departments and by sampling a mixed population of city employees, so additional engagement with departments and research, as well

as improved data collection, is needed to better assess the current state of language services offer at the City of Boulder.

The city currently has a contract with Language Link for on-demand phone interpretation services. The top requests for Language Link interpreters in the last five years have been for Spanish, Mandarin, Tibetan, Nepali, and Russian.

Language Link Over-the-Phone Interpretation (OPI)



II. Definitions

a. Language access

Pursuant to Title VI of the Civil Rights Act, Language Access refers to the right of Limited English Proficient (LEP) individuals to have meaningful access to participate in, and benefit from, programs and activities that receive federal financial assistance. When language access practices are in place, language is no longer a barrier for residents of Boulder to meaningfully participate in, and benefit from, information, programs, services, and activities, including civic engagement and decision-making processes. While receipt of federal funds drives the city's obligations to comply with Title VI, we also strive to being an inclusive and welcoming place; providing LEP community members with language access services fulfils our values of customer service and respect and is in line with our Racial Equity Plan's Goal 4 strategies.

b. Limited english proficient (LEP)

The term LEP refers to a person's ability to speak, read, write and/or understand the English language at a level that allows them to interact effectively with City of Boulder elected and appointed leaders, staff, and volunteers.

c. Notice

Proactively informing the community of language services available; this can be in written and/or verbal form.

d. Identification of need

The collection of relevant information that helps identify needs for LEP community in the city of Boulder that allows us to effectively inform residents and provide programs, services, and activities. Some data will apply generally to the city of Boulder; other data will be specific to the programs and services of each department.

e. Interpreting

The oral rendering of one spoken language into another, preserving the meaning and intent of the original message. Interpretation also refers to the signed rendering of a spoken language into American Sign Language (ASL) and vice versa. Interpretation can occur in the following modes: simultaneous, consecutive, and sight translation.

f. Translation

The conversion of text that is written in one language to another, always in written form. An accurate translation maintains the essential meaning of the original text and considers the dialect(s) of a non-English language that is spoken locally. It may or may not reflect verbatim the English words.

g. Training

The process by which staff, elected/appointed leaders, and volunteers of the City of Boulder are made aware of the mandates and the desire to provide meaningful access, the existence of this plan and where it is stored for future reference, as well as receive training and support on how to secure language services. Training also refers to any department-specific related policies and procedures.

h. Culturally sensitive

Interpreters and translators are familiar with the language variants, customs, and history of the specific LEP community in Boulder.

i. Vital documents

Vital documents are those that affect access to, retention in, termination of, or exclusion from services or benefits. These include, but are not limited to, any:

- Application form
- Consent form
- Complaint form
- Intake form with potential for important consequences related to basic needs, such as health or housing
- Letters or notices pertaining to eligibility for benefits
- Letter or notices pertaining to rights and the reduction, denial or termination of services or benefits or that require a response
- Actions affecting parental custody or child support
- Written tests that assess competency for a particular license, job or skill for which knowing English is not required
- Notices regarding the availability of free language assistance services for LEP individuals

Any document that requires a signature is always considered a vital document. A more detailed list can be found in Appendix A.

III. Notice

Recommendations

The City of Boulder will proactively notify LEP individuals of their right to language services, and these notifications shall be prominently displayed in areas where services are provided. City departments must ensure that LEP individuals in our community are aware that they have a right to language services that are free of charge and timely.

Notices will include (at a minimum):

- Information about available language services.
- Assurance that service is both free and provided in a timely manner.
- Instructions on accessing services, including directions on how to contact city offices and what to expect if an interpreter is needed.

Notice of services will be provided in many ways, including, but not limited to:

- Multilingual signs posted in appropriate areas, such as entrance to certain buildings, waiting rooms, reception/intake/registration areas, and other points of contact.
- Informational and outreach materials, such as I Speak Cards, flyers, brochures, and utility bill inserts.
- Through partnership and collaborative efforts with local community organizations led by and/or serving immigrant communities, so that they may inform their clients of their language access rights.
- Notices broadcast on non-English language radio and television stations, as well as through the city's Channel 8 TV station, Channel 8 TV show Noticiero Boulder and Somos Boulder podcast.
- Through the city's social media sites, particularly on the Facebook page dedicated to Spanish language content.

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Notice must be provided in the City of Boulder's non-English primary language(s)

Currently, the Language Access Plan identifies Spanish as the single primary spoken language in the City of Boulder. As a result, notices must be provided in Spanish. There is evidence of other language needs, specifically Chinese, Korean, Russian, and Nepali. Further research and data are needed to determine if they reach the primary language threshold. City departments may choose to provide notice in these additional languages if they wish.

Notices must be provided in the primary non-English language(s) as established by this plan, in addition to English, and presented in a way that is easily read or heard by speakers of the primary non-English language (for example, text in the non-English language should not be in a smaller size font than the English text). Locations where notices should be posted can include, but are not limited to, websites, flyers and brochures, meeting agendas and signs posted in reception areas.

While the city encourages notices as often and as broadly as possible, there may be resource implications to this. Recognizing this reality, this plan proposes a method of prioritizing the importance of providing notice, as well as the underlying translation or interpretation needed. This method uses four factors:

- The number or proportion of LEP persons served or encountered in the eligible service population;
- frequency with which LEP persons come into contact with the program;
- importance or urgency of service; and
- resources available and costs of providing the service.

Procedure

Departmental staff shall contact the Language Access Program to request notices of service. The Language Access Program manager will work collaboratively with the department to determine the form(s) of notification needed (directional, instructional, etc.) and the location(s) where the notification should be posted. In some cases, the Language Access Program manager or staff may be able to provide the correct translation for the notice; in other cases, departments may be required to contract with an approved vendor at the department's expense.

IV. Identification of need

Recommendations

The city, specifically through the Language Access Program, will review publicly available data (and self-collected data, as appropriate) about the LEP population in our area to provide, at a minimum, all legally mandated services. The city should establish, at minimum, how many Boulder residents primarily speak a language other than English, and which languages they speak. This number should be recalculated periodically. The first recalculation should be two years after the approval of this plan, after which staff shall determine the appropriate intervals, not to surpass five years between recalculations.

The city will adopt a common understanding that all LEP individuals are eligible for services, regardless of immigration status. Information on immigration status is not relevant in determining if a resident is eligible for the services outlined in this plan; city employees must refrain from asking LEP individuals about their immigration status, unless required by federal or state law.

City staff at the departmental level will be responsible for tracking language requests and services and share that data with the Language Access Program on an annual basis. A template will be provided to departments to make this as consistent and convenient as possible. The purpose is to measure any changes or trends to help plan for and allocate needed resources.

Procedure

The Language Access Program will collect data from various sources, including but not limited to, the decennial Census and American Community Survey, language needs data from city partners at Boulder County, Boulder Valley School District, and relevant not-for-profit organizations. Specifically, the Language Access Program will:

- Track number of Language Link telephone interpretation requests for each language.
- Track number of requests for translated material, including information on departments making the request and distribution of translated materials.
- Track number of requests for interpreter services not through Language Line, such as for online videoconference meetings and/or in-person meetings.
- Develop and work with departments to adapt current city databases to include clients' preferred language.
- Analyze data related to the access of translated content on the city website and social media platforms.
- Conduct surveys, focus groups, and interviews with staff from organizations serving the LEP community.
- Collect the total number of translation and interpretation requests made of approved vendors, along with the dollar amounts associated with these requests.
- Produce an annual report that provides this information.

V. Interpreting

Recommendations

The city must provide interpretation in a timely manner whenever required by law or when requested, and these services must be free of charge to the recipient.

In compliance with Title VI of the Civil Rights Act of 1964, the City of Boulder will provide an interpreter, free of charge, to LEP community members so that they may access information and services or participate in programs or activities.

Access to an interpreter provided by the City of Boulder must be timely and may not be limited to a certain schedule. Nobody shall be denied services because of the lack of interpreter availability.

The City of Boulder will use the services of competent, trained and culturally sensitive interpreters.

Language interpreting requires in-depth knowledge of both languages, but also additional skills that are gained through training. Furthermore, trained interpreters abide by known Code of Ethics and Professional Standards of Practice. For these reasons, the City of Boulder employs only trained interpreters. This applies to both contract interpreters and city staff performing duties of an interpreter. Additionally, for any legal proceedings interpreters must be court-certified in the State of Colorado. A list of approved interpreters will be developed through a procurement process, to be repeated every three years.

Some examples of demonstration of competence include:

- Evidence of competence in 2nd language, as evaluated by a third party language testing agency.
- Successful completion of a 40-hour interpreter training program, such as Bridging the Gap or The Community Interpreter, or a degree in interpretation from a higher education institution.
- Valid certification by a federal or state certifying body, such as U.S. Federal Court, the National Center for State Courts, the Certification Commission for Healthcare Interpreters, or the National Board for Certified Medical Interpreters.

Minors may not interpret for City of Boulder staff. Interpreting requires in-depth knowledge of both languages, but also a high level of preparation and cognitive skills beyond simply speaking two languages. Minor children of LEP community members do not, by default of being bilingual, meet the requirements of a competent and trained interpreter, as established in this plan.

An exception shall be made for a minor to interpret, if needed, for a family member on the scene of an emergency until a first responder can secure a professional in person or over the phone.

A City of Boulder staff member that wishes to act as an interpreter must first obtain qualification. This process requires passing a language examination, administered by a third party, and

successfully completing a 40-hour interpreter training. Further detail on this process is available in the Procedures subsection.

Volunteer interpreters. Volunteer interpreters may be appropriate in very limited circumstances and should be evaluated on a case-by-case basis. Acceptable uses include, but are not limited to, guided hikes, library activities or other small community events.

Automatic voice translation software (Google Pixel earplugs, VoiceTra) is not a substitute for a qualified human interpreter. Such software can be a tool for staff to gain a general understanding of an oral message, but interaction with the public should not take place using such software.

Procedure

Departmental staff shall determine the format of interpreting services needed, as described below, and proceed accordingly.

Telephone interpretation (Language Line)

For immediate service, staff should rely on telephone interpretation through Language Line. This service is appropriate for either on-site interactions between staff and LEP individuals and staff, such as direct services, front desk/reception, customer service desk, or in the field (such as Police/Fire Rescue departments) or if staff receive a phone call from an LEP individual regarding programs and/or services. These are typically unplanned interactions with LEP residents, and therefore, the city could not request an interpreter in advance. Telephone interpretation is billed by the minute, so it is also the most cost-effective option for interpretation sessions that are shorter than one (1) hour.

Online videoconference and/or in-person interpreting

For scheduled meetings, either online or in-person, where having an interpreter is deemed beneficial, staff can consider contracting with one of the city's list of local contract interpreters. This list includes interpreters in the primary non-English language(s) identified in this plan. In the case that an interpreter is needed in a language that is not a primary language, staff should contact the Language Services Provider companies listed in the Outreach Outpost internal website for the City of Boulder. In-person/videoconference interpretation is billed by the hour, so it is not recommended for short interpretation sessions, such as less than 30 minutes.

Bilingual city staff trained as interpreters

Bilingual city staff who have received training in interpreting may interpret for colleagues in their department as needed, and as determined through a prior agreement with their supervisors, so as not to place excessive demand on them that it may affect their job responsibilities. The city currently provides no additional compensation for this service, except that someone who is determined to be bilingual may be considered to have preferred qualifications if the job description outlined this desired qualification.

VI. Translation

Recommendations

The city must provide translation in a timely manner whenever required by law or when requested, and these services must be free of charge to the recipient.

In compliance with Title VI of the Civil Rights Act, the City of Boulder will translate certain materials (i.e., vital documents) and provide these free of charge, so that LEP community members may access information and services or participate in programs or activities.



Please see **Section II Definitions** for a list of documents that fall under the vital document category. For questions, please contact the Language Access Program Manager.

A City of Boulder staff member who wishes to be considered for translation work must first obtain qualification. This process requires passing a language examination administered by a third party. Further detail on this process is available below.

Machine translations should be relied on only for limited use. Automatic machine translation software (such as Google Translate or DeepL) cannot be used for translating vital documents or text for any print materials or presentation slides that will be shared with the public. Automatic translations can be utilized for web content, given the volume of pages on the city website, but priority content in the primary languages spoken in Boulder should be professionally translated whenever possible.

The Four-Factor Analysis

The Office of Civil Rights asks that recipients of federal funds take reasonable steps to ensure meaningful access to LEP persons. The “reasonableness” standard is intended to be flexible and based on data. To determine those reasonable steps and ensure meaningful access while not imposing undue financial burden, the federal government suggests using the Four-Factor Analysis.

1 Number of individuals with limited English proficiency.	2 Frequency with which the LEP population seeks services.
3 The nature and importance of the program, service or activity.	4 Resources available and cost of language services.

1. The number or proportions of LEP persons served or encountered* in the eligible service population.

2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service.
4. The resources available and costs to the recipient.

*“Served or encountered” means those persons that would be served or encountered by the recipient if LEP persons were provided adequate education and outreach and the organization provided sufficient language services.

Departments and programs can rely on the Four-Factor Analysis to help make decisions on when and how to take reasonable steps to ensure meaningful access.

Procedure

Aside from vital documents, translation services needs should be evaluated based on the established communication and engagement strategy. If in doubt, departmental staff should discuss translation needs with engagement staff in the early stages of a project. Consideration should be given to the target audience and the likelihood that effective outreach will draw them into the process and conversations. We recognize that until our community understands and trusts that the city is committed to language access, participation numbers may remain low, requiring a reasonable cost-benefit analysis.

Assistance from the Language Access Program manager for Spanish translations may be available if the following criteria are met:

- The information being translated is less than 500 words.
- The translation is needed urgently (tomorrow as opposed to several days).
- The information is one or more of the following:
 - related to a public health crisis, natural disaster, or other life-and-death safety issue
 - related to a targeted service for Spanish speakers or a service disproportionately utilized by Spanish speakers, with an emphasis on social safety net programs
 - related to an outreach or engagement effort designed primarily for and specifically targeting Spanish speakers
 - sensitive, confidential, or otherwise exposes the city to potential legal liability
 - required by state or federal law to be made available in Spanish
 - related to a high-priority issue as determined by the Communication and Engagement Director or City Manager.

For translation requests that do not meet the above criteria, a translation consultant should be hired. A list of approved translation consultants and companies can be found at <https://work.bouldercolorado.gov/city-manager/outreach-outpost>. Consultants must be utilized for translations to languages other than Spanish.

Document translation is highly time-intensive and requires a high level of knowledge of the target language, including proper spelling, grammar, and syntax. Therefore, bilingual staff should not be relied on for document translations. If a Spanish-English bilingual employee does engage in

document translation, they should consult and abide by the [City of Boulder's Spanish Style Guide](#) (currently in draft form). The Language Access Program Manager is available to review translations into Spanish by bilingual employees, as needed and based on availability. Turnaround time for reviews will depend on the length and complexity of the content, as well as the Language Access Program Manager's availability. Translations into other languages must be provided by a professional translator.

When requesting a translation from a consultant, every effort should be made to provide sufficient time to translate and then review the document. Depending on the size and complexity of a document, a translator may need to receive the source document up to two weeks in advance. In keeping with the Racial Equity Plan's *Goal 2: Doing It Justly*, this may mean that extra time must be planned into projects so that information about programs is made available in English and in the non-English primary languages at the same time. This is particularly important for programs and services that are subject to "first-come, first served" situations.

The English and non-English versions of all translations completed by consultants or city staff should be sent to translations@bouldercolorado.gov to help track the volume of translations being completed. Translations may be randomly reviewed and back translated for quality control. For questions about translations, contact Language Access Program Manager Manuela Sifuentes at sifuentesm@bouldercolorado.gov.

For content on the city website not defined as a vital document, the Communication and Engagement Department will help lead efforts to identify priority information that should be professionally translated to primary languages spoken in Boulder. Information will be prioritized for translation if it is highly trafficked, related to public safety, related to public participation in local government, related to programs/services highly relevant to the LEP audience, or otherwise determined to be highly relevant to the LEP audience.

VII. Training and development

Recommendations

All staff, elected/appointed officials and volunteers with the City of Boulder will receive general information regarding the city's language access obligations under Title VI of the Civil Rights Act. This may be in the form of a presentation (live or pre-recorded). The Language Access Program Manager is responsible for providing this information, and any training, as needed.

Frontline and other public-facing staff shall receive further training to ensure they know how to secure the services of an interpreter (either in person or via the phone through Language Link) and are aware of how to work with interpreters and/or translators. Public-facing staff will be encouraged to receive such training in 2022 and required to receive it by the end of 2023.

Bilingual Staff

Bilingual staff members who are expected to use their language skills as part of the duties should receive third-party certification based on the language skill(s) they are expected to use (speaking, listening, reading, and/or writing proficiency)

Staff that either needs to, or wishes to interpret, as part of their job duties must first obtain approval to do so.

Procedure

The Language Access Program Manager will work with relevant city departments to ensure general information regarding language access is provided to new hires and newly elected/appointed officials. The program manager will work with all city departments to identify and administer training to frontline and other public-facing staff on interpretation services. In addition, the program manager will maintain information on the city intranet, or other appropriate internal communications platform, about language access as an ongoing resource and share periodic reminders about resources and requirements with all city staff through established employee communication channels, such as all-employee newsletters.

Bilingual Staff

Staff members who are bilingual and expected to utilize their language skills as part of their work duties, or wish to be on call to interpret, must first take an oral and/or written language assessment test and complete a 40-hour training for interpreters (either The Community Interpreter or Bridging the Gap), or present proof of certification as a court or medical interpreter. This is coordinated with the Language Access Program Manager.

VIII. Implementation, monitoring and evaluation steps

Recommendations

2021: Plan Development

- Develop draft language access plan based on currently available language data, internal engagement with city departments and language access best practices from municipalities nationwide
- Share draft language access plan with directors, departments and highly relevant program staff for feedback
- Final review of updated language access plan by City Attorney's Office and City Manager's Office
- Share final draft of language access plan with City Council Engagement Subcommittee for direction on how best to engage and inform the broader council

2022: Initial Implementation

- Submit recommended city language access policies to City Attorney's Office for review and city manager for signage
- Work with departments that frequently serve limited English proficient community members to examine, standardize and, if needed, improve data collection processes around language access needs
- Develop and implement standardized process to track translation and interpretation services utilized citywide, including expenditures
- Work with Human Rights Manager to create mechanism to report language discrimination
- Develop printed materials for city facilities with information in multiple languages about language access resources available to the community, including "I speak cards"
- Develop language access resources and training materials for city staff, including information about "I speak cards," LanguageLine, interpretation resources and translation services
- Training frontline staff on language access requirements, resources and services; develop ongoing training for frontline staff to include as part of onboarding for new hires
- Facilitate presentations to community partners that frequently serve limited English proficient community members about the city's language access policies, services and resources
- Provide training in interpreting for bilingual staff and explore bilingual pay
- Develop and roll out a promotional campaign focused on Spanish-speaking community members about the city's language access policies, services and resources
- Develop multilingual best practices for city communication and engagement, including print and digital information as well as online, hybrid and in-person events.
- Partner with the Innovation and Technology Department to assist in developing a website accessibility plan, as required by Colorado law to the state by July 1, 2022, with the goal of implementation by July 1, 2024

2023: Ongoing implementation and data assessment

- Develop and administer annual survey of departments to evolving language access needs and awareness of existing resources, services and requirements
- Assess 2022 data on translation and interpretation services citywide and data collected from departments that frequently serve limited English proficient community members and create first annual report to document the city's delivery of language access services
- Evaluate and update training provided to frontline staff on language access requirements, resources and services; develop and implement a shorter, more general language access training for all city staff
- Work with departments to ensure language access is considered as part of the application process for and evaluation of city-issued grant funding
- Partner with the Innovation and Technology Department to, as appropriate, to implement website accessibility plan with a focus on language access
- Assess language access services and information offered through the city website and identify improvements, with a focus on Spanish, including the possibility of a Spanish microsite
- Evaluate language access resource needs based on newly available data about services being delivered and requests for services; develop 2023 budget request, if necessary, to address resource needs

2024: Update plan

- Administer annual survey of departments to evolving language access needs and awareness of existing resources, services and requirements
- Assess 2023 data on translation and interpretation services citywide and data collected from departments that frequently serve limited English proficient community members and create first annual report to document the city's delivery of language access services
- Revisit and update language access plan based on new data, with the possibility of broadening language access services focus to languages beyond Spanish if data supports it
- Develop language access goals and objectives for 2024 and 2025, with the next update of the language access plan planned for 2026
- Partner with the Innovation and Technology Department to, as appropriate, to implement website accessibility plan with a focus on language access

IX. Resources and references

Appendix A: Vital Documents

[Appendix B: Language Access Model Plan](#)

[Appendix C: City of Boulder Spanish Style Guide](#)