

**Olivehurst Public Utility District**  
**Proposed Guidelines and Objectives**

**GUIDELINE**

**THRESHOLD LANGUAGE(S)**

**Background**

Establishing Threshold Language parameters sets objective, unbiased criteria for which languages the organization should prioritize (outside of State of California language requirements). By setting Threshold Languages, the organization is providing enhanced services to any language or group of people that meet that criterion. Once the criteria are set, what languages meet the criteria can be reassessed every other year.

**Objective**

Set Threshold Language parameters for OPUD that identify languages spoken by significant numbers of the agency's service population. This serves as a foundational guideline to identify which languages need additional support.

**Guideline**

- Based on the latest US Census Bureau data, identify any language as a **"Threshold Language"** if spoken at home by at least 10% of the population (5 years and over) or 1,500 people, whichever number is lowest.
  - Data referenced for this guideline shall be drawn from the latest "American Community Survey" report, titled "Language Spoken at Home," on the US Census Bureau website [data.census.gov](http://data.census.gov).
  - Census data lumps all Asian and Pacific Islander languages together under one category. Based on observation and anecdotal evidence, references to "Asian and Pacific Islander" languages in Census data will be understood to mean Hmong for the purposes of this guideline.
- Threshold Languages identified in this guideline are the specific languages to be used when other guidelines reference "Threshold Language(s)."
- Every two years, OPUD General Manager will report to the OPUD Board any changes in identified Threshold Languages (per the latest US Census Bureau data) along with any impact these changes may have on the organization's ability to meet its language-related guideline goals.

### **Additional Guidelines to Consider in the Future**

- The addition of Emerging Languages—languages that do not meet the Threshold Language designation but are still spoken by enough community members to merit special efforts. Emerging Language designation allows the agency to identify and prepare for language usage trends, so if a language eventually reaches Threshold Language level, the agency has had ample time to begin preparing materials and building in-house capabilities to respond to the demographic shift. Emerging Language designation could be set at any language spoken at home by at least 5% of the population (5 years and over).

## GUIDELINE

### TRANSLATION AND INTERPRETATION STANDARDS

#### Background

To maintain consistency, it is important to identify which materials, or types of materials should be translated into Threshold Languages; where bilingual interpreters are needed most; how to ensure translators and interpreters are qualified to provide translation support; and how to best meet the needs of Limited-English-Proficiency customers.

#### Objective

Set minimum levels of interpretation and translation standards for Threshold Languages.

#### Guideline

- Notices, in the form of posters, will be posted in the business office lobby and other publicly accessible areas informing the reader that documents may be available in other languages and that interpreters are available should they need help conducting OPUD-related business. The posters will include information in the identified Threshold Languages.
- If interpretation services are needed, OPUD staff will use the following resources, preferably in the order of priority listed below:
  - In-person bilingual staff (goal is to provide this for Threshold Languages)
  - Over-the-phone bilingual staff (goal is to provide this for threshold languages)
  - Bilingual adult accompanying customer
- OPUD staff shall not use minors to interpret for the non-English-speaking customers, especially when dealing with contractual, legal or financial issues.
- The following public information materials, as applicable, should be translated into all **Threshold Languages** and made available in either printed form or on the website:
  - Safety Materials (Printed, on Website and on Social Media), such as the CCR Guides, contamination alerts, scheduled maintenance that affects water quality, etc.
  - Advisories and Notices (Printed, on Website and on Social Media), such as late payment notices, shutoffs, etc.

- Additional materials may be translated at OPUD staff and management discretion.
- Online or other forms of document automatic translators, such as Google Translate, shall not be used as the sole tool to translate any materials. However, automatic translators may be used, if needed, but a person with the necessary skill set (see next bullet) must review the translation for accuracy.
- Staff identifying as bilingual shall be assessed using the Interagency Language Roundtable (ILR) scale.
  - For day-to-day interpretation (e.g. front desk), a minimum ILR Scale Speaking score of 2+ (Limited Working Proficiency, Plus) is required.
  - For material translation and review of materials translated using automatic translators (e.g. Google Translate or A.I.), a minimum ILR Scale Writing score of 3 (General Professional Proficiency) is required.
  - This guideline does not require interpretation for Board meetings or community meetings. However, if the agency chooses to use an interpreter for a meeting that will likely elicit extra interest from non-English-speaking groups in the community, the interpreter must have a minimum ILR Scale Speaking score of 3 (General Professional Proficiency).
- Bilingual staff must meet at least one of the minimum requirements listed above to receive their bilingual pay incentive. This requirement applies to new hires only, not individuals already working at the company at the time this guideline was adopted. However, if existing employees want to volunteer and take the test, OPUD will facilitate it. The test results for employees working for OPUD at the time these guidelines are adopted will not affect their bilingual incentive, but may help the agency better understand whom to use for different tasks.

### **Additional Guidelines to Consider in the Future**

- Expand materials to be translated to include Emerging Languages.
- Implementation of a language line—a service that provides on-demand interpreters for almost any language over the phone.
- If a language line is implemented, add the use of “I Speak...” cards, which help customers identify for staff what language they need assistance in with.

## GUIDELINE

### STAFF RECRUITMENT AND STAFF TRAINING

#### Background

The most efficient and cost-effective way to meet the language needs of non-English-speaking customers is to, over time, increase the number of staff who can speak Threshold Languages. It reduces the need and cost of interpreters when the agency has people in-house who can effectively communicate with the community. This guideline can provide a framework for offering language access services to non-English speaking customers, thereby guiding efforts to train staff, implement services and control cost.

#### Objective

Expand the employee candidate pool, thus increasing the likelihood of attracting qualified candidates who also possess desired language skills. Enhance position descriptions to include "bi-lingual preferred" in order to attract bilingual candidates. Train new and existing staff to ensure knowledge of and compliance with language and equity guidelines.

#### Guideline

- Identify which job positions have the highest level of interaction with the public and thus would benefit from in-house bilingual competency (e.g. front office, account clerk, field crew).
- All new positions will include "All bilingual applicants encouraged to apply—Spanish preferred" in the job description and job postings.
- Recruitment strategies and efforts should include non-traditional tactics to reach a more diverse candidate pool. These could include, but are not limited to:
  - Sending job postings to community-based organizations, such as the Alliance for Hispanic Advancement or the Hmong Outreach Center for dissemination to their constituents.
  - Participation in community events, as set forth in the Public Outreach Plan, where there is opportunity to talk to the community—prospective job candidates—and share and promote job opportunities.
- Provide initial training to all staff on the Threshold Languages guideline and the Translation and Interpretation Standards guideline to ensure they are aware of the minimum level of service guaranteed to Threshold Language-speaking customers and the resources available to the organization to meet those needs.

Include a reminder of these guidelines in the periodic training staff currently receive.

### **Additional Guidelines to Consider in the Future**

- Cost permitting, use Threshold Language-specific media to promote job openings.

## **Guideline**

### **Evaluation and Adoption**

#### **Background**

The Threshold Language(s), Translation and Interpretation Standards and Staff Recruitment and Staff Training guidelines were developed to assist OPUD to better communicate with and serve their non-English-speaking customers. As these guidelines build upon existing services, there are a number of unknown factors that could impact the effectiveness and cost of these guidelines.

#### **Objective**

Develop a process for evaluation and revision of the guidelines to ensure their effectiveness.

#### **Guideline**

- No later than two years after the Board adopts the guidelines, staff will provide the Board with feedback regarding the guidelines' effectiveness, recommended revisions and unforeseen costs, if any, associated with the guidelines.
- At the end of the initial two-year review period, the Board may determine if revisions to the guidelines are necessary. Additionally, the Board can then consider and whether to adopt the guidelines as policies.
- At any point, the Board can consider including in the guidelines any of the "Additional Guidelines to Consider in the Future" recommendations outlined at the end of each guideline, or any additional ideas the board may have.