

**Olivehurst Public Utility District**  
**Proposed Policy Outline and Objectives**

**POLICY**

**THRESHOLD LANGUAGE(S)**

**Background**

Establishing Threshold Language parameters sets objective, unbiased criteria for which languages the organization should prioritize. By setting Threshold Languages, the organization is not favoring one language, or group of people, over another, but rather setting parameters and providing enhanced services to any language or group of people that meet that criterion. Additionally, it removes the decision as to whether something should be translated or not, hired for or not, etc. from any one individual. Once the criteria are set, what languages meet the criteria can be reassessed periodically.

**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 policy, as other proposed policies will refer to this policy to identify which languages need additional support (such as translated materials, bilingual staff, etc.)

**Policy**

- Based on the latest US Census Bureau data, identifies 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 policy 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).
- Threshold Languages identified in this policy are the specific languages to be used when other policies reference "Threshold Language(s)."
- At the first meeting of every calendar year, 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 policy goals.

## **POLICY**

### **TRANSLATION AND INTERPRETATION STANDARDS**

#### **Background**

To maintain consistency and remove individual preference or bias, it is important to identify which materials, or types of materials must be translated to Threshold Languages; where bilingual and bicultural interpreters are needed most and how to ensure their availability; 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.

#### **Policy**

- Notices, in the form of posters, flyers or other conspicuous formats informing the reader that translation and interpretation services are available free of charge shall be visibly displayed in all areas of the OPUD building that are accessible to the public and where there is a chance for interaction with OPUD staff. The announcement will include information in at least all the identified Threshold Languages.
- “I Speak...” cards shall be printed and made available in all areas of the OPUD building that are accessible to the public and where there is a chance for interaction with the OPUD staff. The cards facilitate non-English speakers to identifying which language they speak.
- If interpretation services are needed, OPUD staff will use the following resources in order of priority:
  - In-person bilingual staff (goal is to guarantee this for Threshold Languages)
  - Over-the-phone bilingual staff (goal is to guarantee this for threshold languages)
  - Contracted phone translation services
  - Bilingual adult accompanying customer

- OPUD staff shall not use customer-accompanied minors to interpret for the customer.
- The following public information materials must be translated into at least all Threshold Languages:
  - Safety Materials (Printed, on Website and on Social Media), such as CCRs, 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.
  - Community Education Materials (Printed, on Website and on Social Media), such as water conservation information, etc.
- Additional materials may be translated at OPUD staff and management discretion.
- Online or other forms of automatic translators, such as Google Translator, shall not be used as the primary tool to translate any materials.
- Staff identifying as bilingual shall be tested 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, a minimum ILR Scale Writing score of 3 (General Professional Proficiency) is required.
  - For interpreting Board meetings, community meetings or other more consequential events, a minimum ILR Scale Speaking score of 3 (General Professional Proficiency) is required.
- Bilingual staff must meet at least one of the minimum requirements listed above to receive their bilingual pay incentive.

## **POLICY**

### **BILINGUAL STAFF RECRUITMENT AND STAFF TRAINING**

#### **Background**

Developing in-house language competencies through a bilingual workforce that reflects the community it serves is the ideal and most cost-effective way to ensure the community is properly served. When these competencies permeate throughout the organization, issues and solutions are identified promptly, saving the organization time, problems and valuable resources.

#### **Objective**

Expand and diversify the employee candidate pool, thus increasing the likelihood of attracting qualified candidates who also possess desired language skills. Train new and existing staff to ensure knowledge of and compliance with language and equity policies.

#### **Policy**

- 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).
- For those job positions, include language skill preference (specifically Threshold Languages) in the job description and job postings.
- Any language skill preferences apply to new job openings and new hiring, not existing workers.
- 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.
  - Placing job announcements in language-specific media, such as Spanish newspapers or radio.
  - 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.

- Include a training module into the new employee onboarding process that includes information about the Threshold Languages policy and the Translation and Interpretation Standards policy.
- Provide initial training to existing staff on the Threshold Languages policy and the Translation and Interpretation Standards policy 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. Periodically (annually?) review these policies with existing staff, through incorporation into existing training or communication from management.