



CITY OF MILPITAS

Revision	Date

CITY ADMINISTRATIVE POLICY

Policy No: 1.1.3	Translating Written Documents into Other Languages	Effective Date: 3/4/2021
Revision No: Click or tap here to enter text.	Policy Administrator: Recreation and Community Services	Next Review Due: Click or tap to enter a date.
Related Policies and Procedures: Click or tap here to enter text.	Approved by: Steve McHarris, City Manager	Date Approved: 3/4/2021

1. PURPOSE

1.1 The purpose of this Administrative Policy is to establish guidelines and conditions for translating written documents into languages other than English.

2. POLICY

2.1. It is the policy of the City to make important written announcements available in other languages that are spoken by a significant number of Milpitas residents.

The City recognizes that many of our residents are not native English speakers and may have difficulty reading and understanding printed announcements in English. The City recognizes that it is in the public interest to make announcements regarding public safety, City policy, City services and outreach and engagement efforts as widely available as possible to facilitate community participation. However, the City also recognizes that it is impractical to translate and disseminate printed information in every requested language.

Goals of this policy:

- To make important information that is disseminated by the City available to as many residents as is possible.
- To assist residents who are not comfortable with written English by providing the information in native languages whenever practical.
- To assist staff throughout the City in getting messages accurately translated in a timely fashion.
- To obtain translations in the most efficient and cost-effective manner possible.

Policy # - Translating Written Documents

3. DEFINITIONS

3.1. **Auto-translate/auto-translation** – Using computer software to translate materials from English into another language. Written material that has been translated using software.

Proofread – Comparing translated material against the original English text and making any necessary corrections to ensure the non-English version accurately reflects the information and tone of the original message.

Translate/translation – Converting written materials from English into another language. Written material originally drafted in English, now presented in a language other than English.

4. PROCEDURE

4.1. General Conditions

4.1.1. Any Department may request translation of messages that its director deems to be an important announcement related to safety, City policy, City services or outreach and engagement efforts. All messages selected for translation must be translated into all languages designated as “standard for translation.”

4.1.2. Languages deemed “standard for translation” are determined by the City Manager’s Office, with input from staff. “Standard” translation languages are those that are most prevalent among non-English speaking residents, as determined by the U.S. Census and in consultation with other agencies serving non-English speaking residents in Milpitas. The City does not regularly translate other languages which, while prevalent, are spoken primarily by residents who are also fluent in English.

4.1.3. Currently, the languages considered “standard for translation” are: Simplified and/or Traditional Chinese, Spanish and Vietnamese. (Traditional Chinese is always used for any materials that will be distributed through Chinese language media and formal documents.)

4.1.4. Materials can be translated into other non-standard languages on a case-by-case basis, if staff determines a need.

4.1.5. Translation requests will be prioritized/handled as follows:

Category 1 - Short, Routine, Non-Controversial Items (including social media posts, flyers, postcards, electronic sign messages, etc.) – Auto-translated with native-speaker level proficient staff or volunteers proofreading.

Category 2 - Short, Non-Routine or High-Profile Items (including talking points for staff and elected officials, emergency communication messages) – Auto-translated with native-speaker level proficient staff proofreading. Volunteers will not be used.

Category 3 - Lengthy, Complex, Controversial or High-Profile Items (including press releases, FAQs, Economic Development items) – Professionally translated.

4.2. Responsibility of the Requesting Department

Policy # - Translating Written Documents

- 4.2.1. Departments must request translation services using the Translation Services Request form, available on Mint.
- 4.2.2. Department must draft its own message and thoroughly proofread for accuracy, spelling and grammatical errors.
- 4.2.3. Departments must obtain approval of the Department Head or designee before submitting message to the Community Engagement and Inclusion Administrator for translation. If the item requires City Manager approval, it is the Department's responsibility to obtain approval of the message before requesting translation.
- 4.2.4. Departments must submit the text in Microsoft Word with minimal formatting. Bold, italics, underlines are acceptable, but Departments should refrain from using non-standard fonts and fully designing the printed piece until after translation. This is both for the convenience of those doing the translations and the Department.
- 4.2.5. Departments must indicate at the time of the request when the final translations are needed. Departments should normally allow five or more business days for translation. In emergency situations, it may be possible to obtain translations faster.
- 4.2.6. Departments must indicate a charge code, if it is determined that a professional translation service must be used.
- 4.2.7. When outside consultants are preparing the public engagement materials, it is the consultant's responsibility to arrange for translation into the standard languages. Translation should be included in the contract scope of work.

4.3. Responsibility of the Community Engagement and Inclusion Administrator

- 4.3.1. The Community Engagement and Inclusion Administrator (Administrator) will manage the translation process, track jobs and keep the Department informed of any possible delays.
- 4.3.2. If the translation project is **Category 3** – lengthy (2+ pages), complicated or sensitive in nature, or requires a rush – a professional translation service will be used. The Administrator will obtain a quote for professional translation and handle arrangements with the translation service. The requesting department will pay for the translation if an outside service is used.
- 4.3.3. For all other projects – or if the requesting Department specifically declines to use a professional service – the Administrator or designee will use software to auto-translate.
- 4.3.4. The Administrator will arrange for all translated documents to be proofread by native speakers of the respective language. The Administrator will maintain lists of City employees and volunteers who are able to serve as proofreaders. **Category 2** items will be translated only by City employees or a translation service. **Category 1** items may be translated by volunteers.
- 4.3.5. When arranging proofreading, the Administrator will first contact City employees who receive bilingual pay. If multiple employees respond, the Administrator will give the translation job to an employee from the requesting department, or the first bilingual pay employee to respond. The Administrator will make every attempt to spread the work evenly among bilingual employees. The Administrator will include the corresponding Department Head(s) when requesting proofreading assistance.
- 4.3.6. If no bilingual-pay employees respond with availability, the Administrator will reach out to any City employee who reads and writes the language and has

Policy # - Translating Written Documents

expressed interest in helping. These are typically part-time staff. If an employee who does not receive bilingual pay is interested, the Administrator will confirm with the employee's manager that he or she has permission to take time from regular duties to assist. If the job is extensive or requires overtime, the requesting department will be requested to provide a charge code for the proofreader's time; otherwise time is charged to the employee's normal department.

- 4.3.7. If no City employees have availability to proofread within the required time frame, the Administrator will contact the list of volunteer translators and arrange for the first responding volunteer to proofread.
- 4.3.8. The Administrator will maintain records on who proofread which jobs, and any issues involving missed deadlines or proofing errors reported by the public.
- 4.3.9. The Administrator will return all translations to the requesting Department at one time, unless the Department has indicated a need to receive the translations as they are finished.
- 4.3.10. The Administrator will update records of bilingual employees with Human Resources at least twice a year.
- 4.3.11. The Administrator will update records of volunteer translators at least twice a year.
- 4.3.12. The Administrator will recruit volunteer proofreaders as needed and ensure that volunteer proofreaders are appropriately recognized for their contributions.

4.4. Request of Bilingual Employees

- 4.4.1. Bilingual employees receiving supplemental pay shall inform the Administrator if they are not able to proofread written documents in their additional language(s). If the bilingual employee does not indicate that they can only assist with spoken language, they may be requested to assist with translation items within their department.
- 4.4.2. Bilingual employees who do not receive supplemental pay, including part-time employees, are also encouraged but not expected to assist. Translation assistance is recorded, and the employee's cooperation will be acknowledged to the employee's supervisor and shall be considered when evaluating the employee's customer service.
- 4.4.3. Upon receiving a request to proofread auto-translated documents, the bilingual employee will respond with his or her availability. Given that the City's mission includes superior customer service, it is hoped that bilingual employees who have reading/writing skills in their additional language(s) shall make a concerted effort to assist whenever possible, understanding that this is part of providing superior customer service.
- 4.4.4. If the bilingual employee is available to proofread and agrees to do so, he or she will complete the task on schedule and return a corrected document to the Administrator via email.

Policy # - Translating Written Documents