



AGENDA REPORT

TO: Jestin D. Johnson
City Administrator

FROM: Mary Hao
Director of Human
Resources Management

SUBJECT: Equal Access to Services Ordinance
Annual Compliance Report

DATE: September 26, 2025

City Administrator Approval:


Jestin Johnson (Oct 6, 2025 13:20:36 PDT)

Date: 10/06/2025

RECOMMENDATION

Staff Recommends That The City Council Receive An Informational Report Regarding The Annual Equal Access To Services Ordinance Compliance Report For Fiscal Year 2024-25.

EXECUTIVE SUMMARY

This report serves as the City Administrator's Annual Compliance Plan and Report on the implementation of the Equal Access to Services Ordinance (EAO) for the period July 1, 2024, through June 30, 2025, with detailed reporting of the City's compliance activities.

BACKGROUND/ LEGISLATIVE HISTORY

Title VI of the Civil Rights Act of 1964 provides, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Title VI regulations require recipients of federal funding to take reasonable steps to ensure meaningful access to benefits, services, and information for individuals with Limited English-speaking Proficiency (LEP), to facilitate engagement by LEP, to establish complaint procedures, and to develop Language Assistance Plans.

California Government Code §11135 prohibits discrimination by agencies that receive state funds and requires them to provide equal access without regard to sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, and sexual orientation. The Bilingual Services Act, CA. Gov. Code §7290 et seq., requires that every local public agency provide language access services to persons who are LEP.

The City of Oakland's Title VI Plan and Language Access Plan establish standards and procedures for promoting meaningful access to City programs and activities to persons, including LEP persons. These plans supplement, but do not supersede, Equal Access to Services Ordinance ([No. 12324](#)), Municipal Code Chapter 2.30, or the requirements of the City's

Settlement Agreement in Family Bridges et al. v. Lindheim, Case No. RG 08049445 and Echo, et al. v. City of Oakland, et al., Case No. RG 08409443.

ANALYSIS/ POLICY ALTERNATIVES

The City's language access policy provides that everyone living, working, visiting, or doing business with the City is provided with fair and equal opportunity to access City programs and services, regardless of what language one speaks. Language Access helps advance Citywide priorities in all areas, including 1) **holistic community safety**, 2) **housing, economic, and cultural security**, 3) **vibrant, sustainable infrastructure**, and 4) **responsive, trustworthy government**. It is of paramount importance that all people accessing or engaging in City programs, including limited-English-speaking persons, have the opportunity to participate meaningfully. Our language access policy establishes standards and procedures for promoting meaningful civic engagement.

Chart 1: Citywide Compliance Snapshot FY 2024-2025

Total City population*	414,757
% of Oaklanders speaking English only at home*	58%
% of Oaklanders speaking non-English language at home*	42%
#1 most common non-English language*	Spanish
#2 most common non-English language*	Chinese
Total number of public contact staff	2,494
Total number of public contact staff who is bilingual	598
Number of language access complaints received	0
Document translation produced	412
Hours of live professional interpretation provided	308
Number of compliance poster & I-speak card location reported	99

*US Census Bureau, American Community Survey, Table: Table: ACSDT1Y2023.C16001

1. City Of Oakland Implementation of A Four Factors Analysis

The City of Oakland provides meaningful access to programs and activities to members of the public who are limited English-speaking through the use of qualified bilingual employees, interpreters, and translators; telephone, internet, or video interpretation; and translated materials. "Limited English Proficient (LEP) Person" means an individual who does not speak English as their primary language and has a limited ability to read, speak, write, or understand English. Every department appoints a Language Access Coordinator to coordinate language access with the Equal Access Office. Language services are offered at no cost to the public.

In addition to City Ordinance requirements, Federal & State financial assistance recipients are required to take reasonable steps to provide meaningful access to LEP persons, and a four-factor analysis is commonly used. The City of Oakland is committed to providing meaningful access, which starts with an assessment that balances four factors, as shown in **Chart 2**.

Chart 2: Four Factor Analysis

Factor #1: City of Oakland assesses the number and proportion of LEP persons.	Factor #2: The frequency with which LEP persons come into contact with the City's programs and services.
- US Census Data & American Community Survey (16001) is reviewed. - Both community-based (population based on zip code) and Citywide analysis are conducted.	Citywide Language Access Survey is used for assessment. Demographic data is analyzed for language use and contact with City's program and activities. Survey gathers feedback and suggestion gathered from LEP persons.
- Citywide Language Access Survey is conducted every two years to assess the number and proportion of LEP persons in Oakland. - The 10,000 LEP Group & the 1,000 LEP Group are identified and reported to City Council.	- Evaluation meetings with contracted vendors who routinely work with the City of Oakland's clients and employees. - Training and discussions with City staff who regularly work with LEP persons.
Factor #3: The nature and importance of the program or activity.	Factor #4: The resources available and costs to the City.
- Summary of each department's organization structure, and programs are reviewed. - Each department assigns a management level employee as Language Access Coordinator. to assess the importance of its programs to LEP persons and coordinate service access. - The list of vital documents and notices advising LEP persons of the availability of free language assistance is assessed. - Input from contracted translators and interpreters, service partners, and Language Access Coordinators is collected.	- Summary of language resources is available to all City employees. - Over-the-phone interpretation instruction, compliance poster and I- speak card is available at all service locations. - Actual expenses on translation and interpretation are reviewed annually and use as a guideline for budget for the next year. - Contract agreements are publicly available information accessible through our City Clerk's office. Languages list, cost structure, and scope of service are included in the contract. All language service contracts are presented publicly at City Council meetings and available for public comment.

2. Language Groups Identified

Threshold Language Group -- (also known as "Substantial Number of LEP Group") means a group of at least 10,000 LEP residents of the City who speak a shared language other than English. The City will annually issue guidance identifying the Threshold LEP Language Groups.

LEP Language Group -- means at least 1,000 limited English-speaking residents of the City who speak a shared language other than English.

The City of Oakland Language Access Plan's guideline for the 10,000 threshold language group is that translation for vital documents must be provided in a timely manner in threshold LEP languages, while translation of vital documents into 1,000 LEP language groups is upon request. In the City of Oakland, the two language groups that meet the 10,000 threshold requirement are Spanish and Chinese. Population data is applied as a minimal goal for bilingual employee recruitment: 10% Spanish and 4% Chinese. Unless otherwise noted, "bilingual employees" mentioned in this report refer to those who are bilingual in English/Spanish languages or English/Chinese languages; this report does not include an account of employees who may be bilingual in other non-English languages. The City of Oakland relies on the US Census Bureau's American Community Survey (C16001). Data is summarized in **Chart 3**.

Chart 3: Threshold LEP Groups and LEP Groups, Oakland, CA

		Estimate	% of Population
Oakland Population		414,757	100%
10,000 Threshold LEP Groups	Spanish	42,863	10%
	Chinese (inc. Mandarin, Cantonese)	16,455	4%
1,000 LEP Groups	Vietnamese	4,870	1%
	Tagalog (inc. Filipino)	1,955	0.5%
	Arabic	1,506	0.4%

American Community Survey C16001. LEP data refers to "Speak English less than very well" data.
Guideline to be used for FY2025-2026 Compliance Review

3. Oral Communications

3. (a) Bilingual Employees

The City is committed to hiring bilingual employees in Public Contact Positions (PCP). PCP is defined as "a position, whether of a clerical, service, professional, or sworn nature, that emphasizes greeting, meeting, contact, or provision of information and/or services to the public in the performance of the duties of that position." The Equal Access Office works with the Human Resources Recruitment Unit to ensure that prior to recruiting, departments determine whether any positions are PCPs and if there are a sufficient number of bilingual employees. Staff reviews all recruitment requisitions and applies quantitative and qualitative analysis as specified in Administrative Instruction #145. **Chart 4** compares population data to bilingual employee data.

Chart 4: Compare Population Data & City Bilingual Public Contact Employee Data

Threshold LEP Group	% of Oakland Population GOAL	% of City PCP Employee ACTUAL
Spanish	10%	18%
Chinese	4%	6%
Total	14%	24%

Chart 5 below summarizes the Citywide status of the provision of major compliance areas across departments. Areas of concern are noted in the chart. All City of Oakland departments submitted a compliance report as required by City ordinance. The City Administrator's Office, City Council Offices, Community Police Review Agency, Mayor's Office, Fire Department, Planning & Building Department, and Violence Prevention Department did not meet the City's minimal percentage goal for bilingual employees working at public facing positions.

Chart 5: Citywide Assessment FY 2024-2025

		Public Contact Positions (PCP)							
	Total Employee (FTE)	Total PCP Employee (PCP FTE)	SPANISH-SPEAKING BPCP	%	CHINESE-SPEAKING BPCP	%	# Vital Documents Translated	# of Multi-lingual Messages	Language Service Notices Posted
MINIMUM GOAL				10%		4%			
ANIMAL SERVICES	33	15	5	33%	1	7%	52	1	1
CITY ADMINISTRATOR	44	17	1	6%	1	6%	0	2	1
CITY ATTORNEY	78	7	1	14%	1	14%	6	1	1
CITY AUDITOR	9	4	1	25%	0	n/a	4	1	2
CITY CLERK	14	7	1	14%	1	14%	3	1	1
CITY COUNCIL	39	39	2	5%	1	3%	0	2	1
COMMUNITY POLICE REVIEW	18	13	0	0%	2	15%	2	1	1
ECONOMIC WORKFORCE	47	18	6	33%	2	11%	9	1	5
FINANCE	156	66	11	17%	5	8%	35	1	4
FIRE	542	478	21	4%	3	1%	46	6	2
HOUSING	67	53	8	15%	4	8%	11	3	2
HUMAN RESOURCES	39	4	2	50%	1	25%	19	3	2
HUMAN SERVICES	235	114	11	10%	4	4%	26	7	18
INFORMATION TECH	76	0	0	n/a	0	n/a	0	0	1
MAYOR	15	15	3	20%	0	0%			
OFFICE OF INSPECTOR GENERAL	4	4	2	50%	0	n/a	3	1	1
PARKS RECREATION & YOUTH	221	213	78	37%	34	16%	8	3	21
PLANNING & BUILDING	152	93	15	16%	3	3%	25	5	2
POLICE	901	844	170	20%	35	4%	44	6	4
POLICE COMMISSION	1	1	0	n/a	0	n/a	2	1	1
PUBLIC WORKS	744	31	6	19%	2	6%	136	6	3
PUBLIC ETHICS COMMISSION	9	4	1	25%	0	n/a	2	1	1
PUBLIC LIBRARY	311	288	82	28%	38	13%	11	8	18
RACE & EQUITY	5	0	0	n/a	0	n/a	1	4	2
TRANSPORTATION	438	113	14	12%	6	5%	19	3	2
VIOLENCE PREVENTION	41	38	9	24%	0	0%	2	1	1
WORKPLACE & EMPLOYMENT	15	15	2	13%	2	13%	13	2	1
TOTAL	4,254	2,494	452	18%	146	6%	479	71	99

Employee data is analyzed based on the Full Time Equivalent (FTE) position.

FTE = Full Time Equivalent BPCP = Bilingual Public Contact Position PCP = Public Contact Position

□ = Area of concern n/a = Not applicable due to no or low # of public contact position

Chart 6 plots out the number of bilingual PCP employees reported in a ten-year span. Data shows the City's consistent effort in hiring a sufficient number of bilingual employees that is proportional to Oakland's LEP population statistics. The raw number presents a drop in the number of bilingual employees. During FY 2024-25, the City went through a period of hiring freezes and layoffs, and as a result, there was a drop in the overall number of employees and employees working in public contact positions. The percentage of bilingual PCP employees over the total number of PCP employees has increased despite a drop in raw numbers, as shown in **Chart 7**.

Chart 6: Number of Bilingual Employees Working at Public Contact Positions

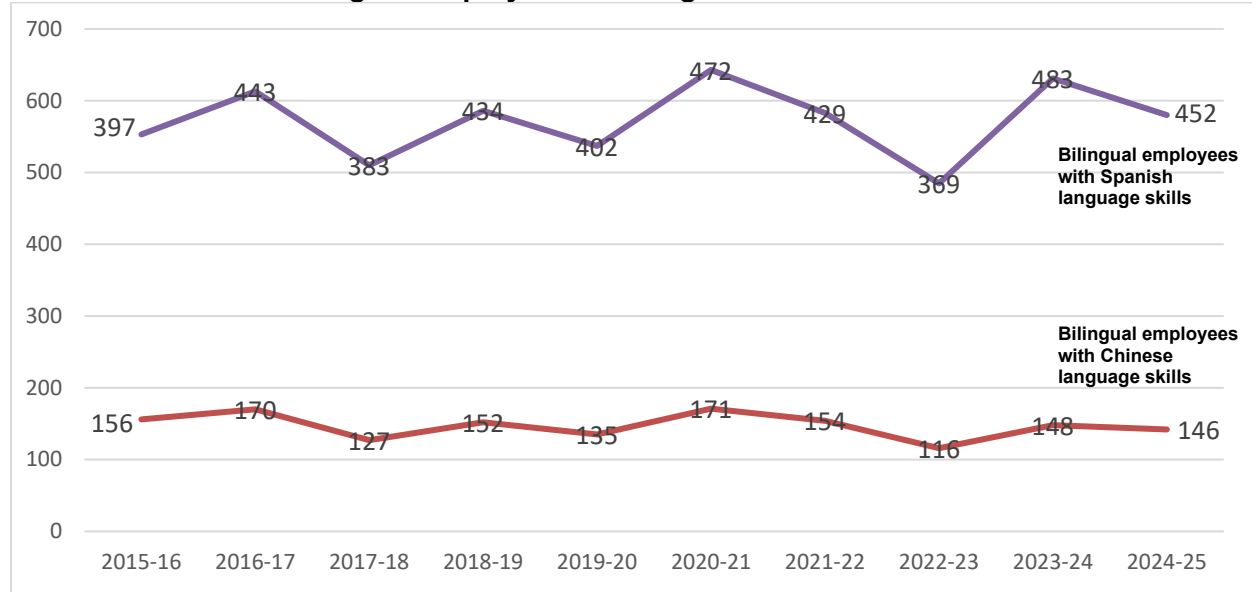


Chart 7: BPCP Data Comparison Between 2024 & 2025

	June 2024		June 2025	
Bilingual PCP employees with Spanish language skills	483	16%	452	18%
Bilingual PCP employees with Chinese language skills	148	5%	146	6%
Total number of PCP employees	3,006	100%	2,494	100%
Total number of employees (Filled positions in FTE count)	5,184		4,254	

3. (b) Contracted Language Partners

The City's Equal Access Office contracts with five language service companies to meet the City's language needs. Contractors provide American Translator Association certified translators, court-certified translators, on-site interpreters, over-the-phone interpreters, and more. Every language partner has the ability to cover over a hundred languages. Verbal interpretation hours displayed are live, simultaneous, or consecutive interpretations provided by professional interpreters dispatched to a service location in Oakland, or to a specific virtual meeting hosted by the City of Oakland. The most requested languages for verbal interpretations are Spanish (49%), Cantonese (41%), Vietnamese (6%), and Mandarin (3%). In addition, all City of Oakland service locations have access to an over-the-phone interpretation service, which is available 24 hours a day. The connection time to a popular language

interpreter is ten to fifteen seconds. Pre-scheduled service is available for rare languages. **Chart 8** summarizes professional language service data.

Chart 8: Professional Translation & Interpretation Data FY 2024-2025

Written Translation (translations produced)	412
Verbal Interpretation (live interpretation hours provided)	308

3. (c) Multilingual Telephonic Messages

City policy requires that departments maintain telephonic messages in threshold LEP languages that cover basic information such as its operation and service availability. Several City departments have updated their multilingual messages this year, including the Mayor's Office, Human Resources Management Department, and Office of the Inspector General. A total of 99 City telephone numbers are equipped with multilingual messages.

4. *Translation of Written Materials*

4. (a) Vital Document Translations

The City arranges for the translation of written materials into languages spoken by threshold LEP language groups and into LEP language groups. Much of the materials translated are intended for public dissemination, such as vital documents. Vital documents refer to written information that contains information critical for obtaining City services and/or benefits, including applications, intake forms, complaint forms, posters, and fact sheets. Per City policy, each department submits a list of its vital documents and identifies if materials are translated into threshold languages. Vital documents are to be translated in a timely manner upon English publication into threshold LEP languages (Spanish and Chinese), and into LEP languages upon request. There were 479 vital documents identified and reported to have threshold language translation available. The City Administrator's Office and the City Council Offices, however, reported no vital documents available. Staff recommends that these two departments conduct a thorough review of their respective department's written documents intended for public circulation and include findings in the next compliance report.

4. (b) Other Translations

In addition to vital documents, other documents are also translated throughout the year. These may include translations requested by the public or letters prepared for one individual, or letters received by the City. The Equal Access Office functions as a central hub, taking in service requests from all City departments and providing necessary coordination with Language Access Coordinators. A total of 412 translated materials were produced through the Equal Access Office this year. Popular languages requested for translation are Chinese (40%), Spanish (37%), Vietnamese (13%), and Arabic (4%). 30% of the translation requests submitted to the Equal Access Office are for "rush" service. Rush projects are produced in one to two business days. Very urgent messages may be translated within hours, such as emergency information. The statistics presented here do not include any City department that uses its internal bilingual employee(s), contracted consultant, or services provided by community partners, or dissemination of bilingual materials provided by other public entities.

5. Citywide Language Access Survey

Chart 9: Spoken Languages

1. What language(s) do you speak (check all that applies)? ¿Qué idioma(s) habla (marque todos los que corresponda)? 你會說甚麼語言 (勾選所有合適選項)?

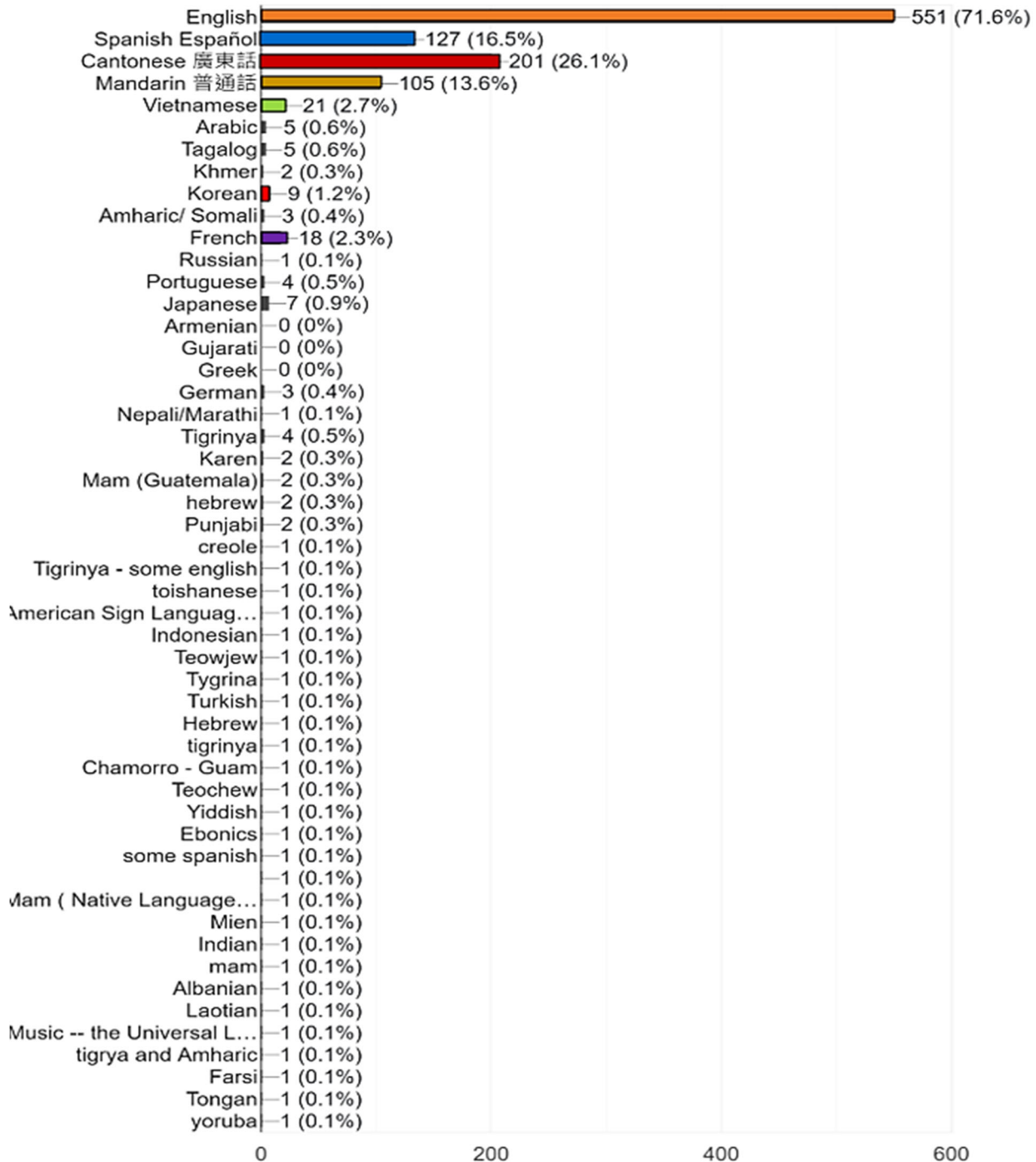


Chart 10: Ability to Speak English

2. How would you describe your ability to speak English? ¿Cómo describiría su habilidad para hablar inglés? 你會如何評價你說英語的能力？

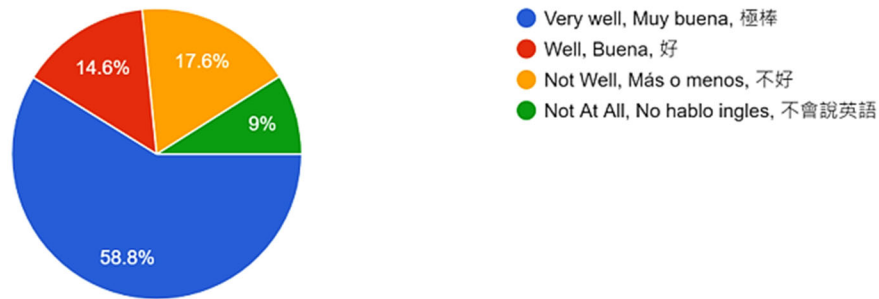
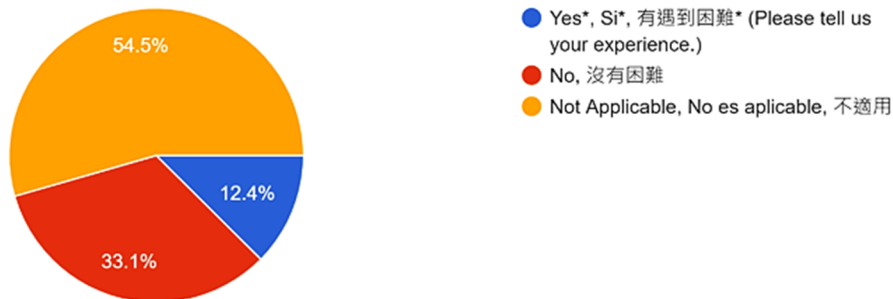


Chart 11: LEP Feedback on Using City Services

3. If you speak limited or no English, did you have trouble using City services during your recent visit? Si habla más o menos o nada de inglés...時, 曾否因為不說英語或英語有限而遇到困難？



The Citywide language access survey is conducted biennially, with the most recent one launched in the Fall of 2024. Surveys were available in English, Spanish, and Chinese languages, and were available in digital and print formats. Surveys were disseminated to City public contact locations, reception desks, and service counters through coordination with Language Access Coordinators. A total of 795 responses were collected in 2024.

Survey gathers demographic data and feedback from LEP persons. **Chart 9** shows that more than 45 languages were identified and spoken by survey responders. The most common spoken languages identified are English (71.6%), Cantonese (26.1%), Spanish (16.5%), Mandarin (13.6%), Vietnamese (2.7%), French (2.3%), and Korean (1.2%).

In terms of English-speaking ability, **Chart 10** shows that 58.8% respondents stated they can speak English very well. Other responses included Well (14.6%), Not Well (17.6%), and Not At All (9%). **Chart 11** shows 12.4% of respondents self-identify as speaking limited or no English and have experienced trouble using City services during a recent visit.

6. Training, Resources, Bilingual Test & More

The City has a robust employee training program that fosters a culture for building equity and inclusion. Over a dozen different classes are offered each month, in addition to hundreds of on-demand virtual classes. All employees receive language access training and resources during new employee orientation, which is a mandatory training for all employees. Supervisors receive information during Supervisory Academy training. A Frequently-Asked-Question (FAQ) page is disseminated at all language access training.

The City is committed to ensuring language access at all levels. Each City department is required to designate a management-level employee as its Departmental Language Access Coordinator, who is responsible for implementing language access services at its department locations. Language Access Coordinators meet regularly and provide feedback and suggestions to the Equal Access Office for quality assurance and assessment.

Compliance posters are available in print and digital versions. An “I-speak” card or language list is embedded into our compliance poster. By posting the compliance poster, the I-speak card is displayed at the same time. The compliance poster includes information about the right to file a complaint, and the message is shown in multiple languages. City departments go through an annual assessment process where compliance poster displays and locations are checked once a year and reported in the annual evaluation process. The Language Access Complaint Form is available on the City’s internet and intranet sites. The City did not receive any language access complaint during the reporting year.

The City of Oakland continues to support bilingual employees by administering standard bilingual tests and verifying language skills. The Equal Access Office administered 78 bilingual language fluency tests during FY 2024-25. We use a standardized Interactive Voice Response test for the level one verbal bilingual test and a multiple choice and writing test for the level two written bilingual test. Candidates who pass the test receive the City of Oakland’s bilingual certification. As of the pay period ending June 20, 2025, 601 City employees receive bilingual pay¹.

7. Conclusion

The intent of the Equal Access Ordinance is to create a service environment where every customer has full and equal access to all City services, including many basic and potentially life-saving City services, and where they are able to participate in City government, regardless of English language proficiency. Language Access helps advance Citywide priorities in all areas, including 1) **holistic community safety**, 2) **housing, economic, and cultural security**, 3) **vibrant, sustainable infrastructure**, and 4) **responsive, trustworthy government**. It is imperative that all people accessing or engaging in City programs, including limited-English-speaking persons, have the opportunity to participate meaningfully.

The City of Oakland recognizes its responsibility to ensure fairness, equal opportunity, and equity in all its programs, services, and activities. This annual review process continues to guide departments in developing practices required to meet the diverse population in Oakland

¹ Bilingual pay is a labor agreement provision and varies depending on the labor agreement.

and ensure that residents and visitors have full and equal access to City services. Every City department is asked to actively participate in this review process and submit a department compliance report. Each City department reviews and confirms the availability of compliance posters, I-speak cards, vital document translations, multilingual telephonic messages, employee resources, and training. Each City department's compliance reports are attached to this agenda report (**Attachment A**). The departmental Language Access Coordinator, in consultation with the department head, prepares the report. This report summarizes Citywide efforts and data for Fiscal Year 2024-25. This report examines population data and issues the LEP language list as a guideline.

The Equal Access Office recommends that City departments include LEP Language Groups in their overall public engagement strategies, including (1) scheduling meetings at times and locations that are convenient and accessible for LEP communities; (2) using different meeting sizes and formats, (3) coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach LEP communities; and (4) using advertisements placed through radio, television, newspaper, online, and other forums that serve or reach LEP populations. Language access resources, such as compliance posters, over-the-phone interpretation guide, frequently asked question page, and service request forms are disseminated to all City departments through Language Access Coordinators and City employee's SharePoint Intranet portal. The Equal Access Program office will continue to support City departments in its effort to engage all community groups, including the limited-English speaking population groups, in City programs.

FISCAL IMPACT

This is an informational report intended to provide an update on implementing the Equal Access to Services Ordinance. Acceptance of this report and its recommendations has no fiscal impacts or cost implications.

PUBLIC OUTREACH

No outreach was deemed necessary for the presentation of the information contained in this report beyond the standard City Council agenda noticing procedures.

COORDINATION

The Equal Access Unit of the Human Resources Management Department (HRM) coordinated the collection, compilation, and reporting of data with the Language Access Coordinators in each City department. Budget & the City Attorney's Office were consulted in the preparation of this report.

SUSTAINABLE OPPORTUNITIES

Economic: There is no economic opportunity associated with this report.

Environmental: There is no environmental opportunity associated with this report.

Race & Equity:

The Equal Access to Services Ordinance was enacted to provide equal access to City services to all Oakland residents, including those with limited proficiency in English. Language access policy requires City departments to provide equal access to services without regard to race, national origin, or ethnic group. These services and the ordinance close disparities and advance equity related to language access to information, policies, and processes that the community interacts with in the City of Oakland

ACTION REQUESTED OF THE CITY COUNCIL

Staff recommends that the City Council receive this informational report regarding the Annual Equal Access to Services Ordinance Compliance Report for Fiscal Year 2024-25.

For questions regarding this report, please contact May Tam, Program Analyst III, at (510) 238-3112.

Respectfully submitted,



MARY HAO
Director of Human Resources

Reviewed by:
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Prepared by:
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Equal Access Program of Human Resources

Attachments: (1)

(A) Comprehensive record for FY 2024-25