

City of Santa Maria
Attn: Mayor Alice Patino and members of the City Council
Email: CityCouncil@cityofsantamaria.org

Dear Mayor Patino and members of the City Council:

I am writing in my capacity as president of the American Translators Association (ATA), the largest professional association of interpreters and translators in the United States, with more than 8,500 members working in over 50 languages. I am also a professional translator and a small business owner in California. Having started my career as an interpreter, I read with interest the article in the *Santa Maria Sun* published on July 20, 2022, entitled "Santa Maria City Council decided against adding live interpretation to its meetings, a barrier for those whose first language isn't English."

As mentioned in the article, the City's efforts to improve language access by subtitling various YouTube videos are laudable. However, these efforts do not go far enough and do not meet the standards set out in the City of Santa Maria's own language access policy. We understand that while arranging for multilingual city services and interpreting council meetings is not always easy or inexpensive, the Council should be aware that the following federal and state laws clearly require the provision of language access:

- Title VI of the Civil Rights Act
- The Americans with Disabilities Act
- Section 1557 of the Patient Protection and Affordable Care Act
- The Dymally-Alatorre Bilingual Services Act (California Government Code §§7290-7299.8)

Given the high percentage of Spanish-speaking residents in Santa Maria—a number that easily meets HUD thresholds—a case may be made that the City should do more to adhere to the spirit of these laws and its own language access policy. This would mean removing barriers to participation for its residents in governance that affects their lives and livelihoods. In addition, failure to provide meaningful language access, such as qualified interpreters at City Council meetings, could expose the City to potentially expensive legal action under the aforementioned laws.

The cities of Long Beach, Oakland, and others have sound policies that may serve as models for the City of Santa Maria to update its language access policy. Links to these policies are below:

- https://www.migrationpolicy.org/sites/default/files/language_portal/Oakland%20Equal%20Access%20Ordinance%20on%20Language%20Access_0.pdf
- <https://longbeach.gov/globalassets/health/media-library/documents/healthy-living/office-of-equity/language-access-resolution-and-policy-update-2018---english>

Other California cities' language access policies and both federal and state agencies also strongly advise against using machine translation (MT), which includes freely available online resources like Google Translate, which was cited in the *Santa Maria Sun* article and appears to be used for the City's website. Machine translation is unable to produce reliably accurate translations, and its use may violate privacy

protections. We suggest consulting the federal government's website on limited English proficiency at LEP.gov, in particular concerning the use of MT (p. 5 of https://www.lep.gov/sites/lep/files/media/document/2021-12/2021_12_07_Website_Language_Access_Guide_508.pdf#page=5), as well as the resources at <https://www.lep.gov/digital-services-and-websites>.

ATA would be happy to provide all the information we can to help you implement a sustainable, meaningful language access policy that suits the needs of your residents. Please do not hesitate to contact me for questions and input.

Sincerely,



Madalena Sánchez Zampaulo
President
American Translators Association