

Special Report

Language Access Follow-Up

May 2023

Can You Read This?

คุณอ่านออกไหม

이것을 읽을 수 있습니까?

您能閱讀這些內容嗎？

هل يمكنك أن تقرأ هذا؟

Вы можете прочитать это?

¿Puede leer esto?

Können Sie dies lesen?

您是否能够阅读此内容？

Pouvez-vous lire cela?

Quý vị có thể đọc nội dung này không?

This is a special report to follow up on three recommendations we issued from two audits about the City's language access services. While the City has developed a Citywide language access program compliant with federal laws and regulations, the City did not adequately execute certain components. Specifically, it is unclear if the Citywide language access program meets the needs of the limited English proficiency (LEP) community or efficiently allocates resources due to a lack of data collection. Additionally, language access is a critical component of effective emergency preparedness. Since 2021, we found that while HSEM and CPIO are working on revising and updating the coordination protocol of language services during an emergency, the City does not have a complete updated emergency language access plan. As a result, the City still needs to work on equitably and effectively communicating with LEP individuals during emergencies.

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Cover: OCA Recreation of Language Line Solutions Graphic used in Original 2016 Language Access Audit Report

Objective

The objective of this special report was to follow up on the City’s actions to implement two recommendations from the 2016 Language Access Audit and one recommendation relating to language access from the 2021 Disaster Preparedness Audit.

Background

The stated purpose of the City of Austin’s Language Access program¹ is to “provide equitable access to programs, activities, services, and information to all persons living in, working in, or visiting Austin, regardless of their ability to speak English.” This program is carried out by all public-facing departments providing direct or indirect services to the limited English proficiency (LEP) community.

In 2016, we conducted an audit of the City’s language access services. The objective was “to determine how the City manages language assistance services [to non-English residents], whether the services align with community needs, and how these services compare with similar entities.” The audit found the City may not be meeting the needs of all non-English speaking residents because written policies did not align with actual practice. Additionally, it was unclear whether language assistance programs were an effective use of City resources. We issued two findings and two recommendations.

Additionally, we conducted an audit of the City’s disaster preparedness for Winter Storm Uri at the request of Council in 2021. Though the audit was not explicitly about language access services, we found that the City did not effectively communicate with residents before and during the storm, especially in non-English languages. As such, these residents were left without information and were disproportionately impacted. We issued one finding related to language access and one recommendation.

Detailed related findings from both audits appear in Appendix A; recommendations appear in Appendix B. If you are interested in following the City’s progress to implement recommendations from audits on other topics, you can visit [the City’s Open Data portal page](#).

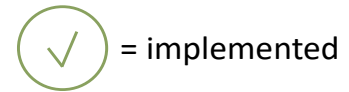
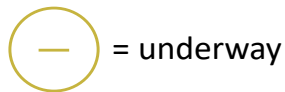
¹ The program is made up of Citywide policy and departmental language access plans and services.

What We Found

Summary

This is a special report to follow up on three recommendations we issued from two audits about the City’s language access services. While the City has developed a Citywide language access program compliant with federal laws and regulations, the City did not adequately execute certain components. Specifically, it is unclear if the Citywide language access program meets the needs of the LEP community or efficiently allocates resources due to a lack of data collection. Additionally, language access is a critical component of effective emergency preparedness. Since 2021, we found that while HSEM and CPIO are working on revising and updating the coordination protocol of language services during an emergency, the City does not have a complete updated emergency language access plan. As a result, the City still needs to work on equitably and effectively communicating with LEP individuals during emergencies.

What has the City done to address the issues we identified?



Implementation of recommendation #1 of the 2016 Language Access audit: Underway

This recommendation requires the following actions:

1. Develop a language access program in alignment with the Language Access Framework
2. Confirm compliance with Executive Order 13166² and other regulations
3. Meet the needs of the Austin community requiring language assistance services
4. Ensure efficient and effective use of resources to meet the needs of the community



Addresses and aligns with the components identified in the language access framework



Complies with the requirements of Executive Order 13166 and other regulations, as applicable



Meets the needs of the Austin community requiring language assistance services

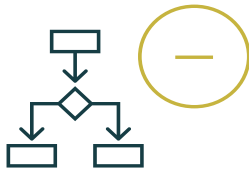


Ensures an efficient and effective allocation of resources

² EO 13166 is a federal directive that prohibits identity-based discrimination in state and local departments that receive federal funding.

The City of Austin’s current language access program generally aligns with the Language Access Framework and complies with the requirements of Executive Order 13166. However, the program’s ability to meet the needs of the LEP community through efficient use of allocated resources is unclear. While the City has initiated several programs that aid in the equitable delivery of services to residents, data on the specific impact of these services on the LEP community was not required until the November 2022 update to the Language Access Administrative Bulletin.

The City’s language access program generally aligns with the Language Access Framework



Addresses and aligns with the components identified in the language access

The City’s language access program has largely been developed by the Communications and Public Information Office (CPIO) with input from local nonprofits and the LEP community. According to CPIO staff, there never was a meeting of other City departments to aid in the development of the program. However, departmental single points of contact (SPOCs) have contributed to program revisions, like the 2022 update of the program’s primary policy³.

Our original audit used the U.S. Health & Human Services’ Language Access Framework as the standard to evaluate the City’s language access program. It is made up of five components, as shown in Exhibit 1. CPIO has addressed components 1, 3, and 4, but needs to do additional work to assess needs and services and evaluate program effectiveness.

CPIO uses a variety of methods to identify the languages spoken by Austin’s LEP community, as well as which districts these community members reside in. This information is available for all City departments on the Language Access internal portal, and updated data is regularly shared with SPOCs.

Exhibit #1: There are five components of best-practice language access programs



Source: U.S. Health & Human Services, January 2016

³ The term “primary policy” refers to the Language Access Administrative Bulletin.

The City's language access program complies with the requirements of Executive Order 13166 and other regulations



Complies with the requirements of Executive Order 13166 and other regulations, as applicable

The language access program is compliant with the requirements of Executive Order 13166, which prohibits recipients of federal funds from discrimination based on aspects including, but not limited to, limited English proficiency. Departments' individual language access plans must include certain elements in order to be deemed compliant, and the Language Access Coordinator reviews and helps edit each plan to meet this requirement. According to CPIO, the Language Access Coordinator also makes sure that the language access program is compliant with Title VI of the Civil Rights Act.

For clarification, we use the term "Language Access Coordinator" throughout this report to reflect the language referenced in the original audit and the responsibilities this position entails; the official title for this staff member is "Community Engagement Consultant." Similarly, "language access team" refers to the Community Engagement division of CPIO.

The City's language access program's efficiency and ability to meet the needs of the community is unclear



Meets the needs of the Austin community requiring language assistance services

It is unclear if the language access program meets the needs of the LEP community, largely due to the lack of data collection on the outcomes of services. CPIO has made progress in aiding the community, such as recruiting City employees to use non-English language skills to assist in delivering services, contracting local and out-of-state translators and interpreters in a variety of languages, requiring iSpeak Austin materials⁴ to be visible in public-facing departments, and collaborating with local community groups to improve awareness of services.

However, it is still unclear if needs are being met. CPIO has compiled ample population data and shared it with departments. According to CPIO staff however, departments could improve their use of data to tailor their services and share information with CPIO. Public-facing departments were not required to collect data on services to LEP individuals until the most recent policy update in November 2022. Many departments needed time to rework their plans to be compliant with this new policy, and thus will not start collecting data and sharing it with CPIO until June 2023.

Additionally, data from a SPOC survey⁵ we conducted indicates that 63% (12 of 19) of responding departments had not been collecting data before the November 2022 policy change. Those that have collected relevant data rarely share this information with CPIO according to the Language Access Coordinator, hindering CPIO's ability to evaluate the success of services. Similarly, departments still are not required to develop a formal process to collect community feedback on their services. Of the responding

⁴ iSpeak Austin is an initiative to help public-facing departments to quickly determine the language needs of the community members they assist through language identification cards and posters.

⁵ The survey was sent to 38 departments. We received 21 total responses, though not every respondent answered every question.

departments, 65% (11 of 17) said that they are not collecting this feedback at their own initiative. Without a formal mechanism for collecting feedback for each department, community members might not know how to provide input on whether their needs are being met and the City may not be able to adapt to meet community needs.

Exhibit #2: Most departments do not collect data or feedback on their language services

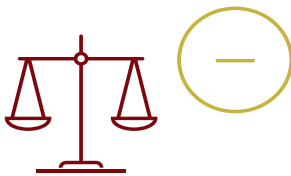


63% of departments do not collect data on number of non-English speaking individuals



65% of departments do not have a process to obtain feedback from the Limited English Proficiency community.

Source: OCA analysis of survey administered to language access SPOCs, February 2023



Ensures an efficient and effective allocation of resources

It is also unclear whether resources are being used in an efficient manner. CPIO has methods to determine whether departments are compliant with the primary policy, as well as whether translation and interpretation vendors are providing the services they are paid for. However, without knowing whether needs are being met in the community and services are adequate, it is difficult for CPIO to determine whether the City is using resources as efficiently as possible.

Implementation of recommendation #2 of the 2016 Language Access audit: Underway

This recommendation requires the following actions:

1. Designate a Language Access Coordinator
2. Ensure they have the authority to coordinate implementation of the language access program
3. Ensure they monitor the program for compliance with applicable policies and regulations
4. Ensure they periodically update the program based on changing conditions, public input, and performance measurement and analysis



Hire a designated language access coordinator



Authority to coordinate implementation of the City's language access program



Monitor the program for compliance with applicable policies and regulations



Periodically update the program based on changing conditions, public input, and performance measurement and analysis

CPIO has a designated Language Access Coordinator who works effectively with department SPOCs to broadly oversee the City's language access program and ensure that the department plans are compliant with regulations. However, CPIO staff indicated that they are not currently monitoring departments' individual language programs and services. This limits their ability to confirm that the services provided by these programs meet the needs of the community.

The City has a designated Language Access Coordinator with many program responsibilities



Hire a designated language access coordinator

According to CPIO, the staff working on the language access program prior to 2018 were not officially hired as Language Access Coordinators, and the work was ad-hoc.

The City appointed the current Language Access Coordinator in 2018. Prior to her hiring, some progress was made for the implementation of the recommendation and the progress was reported to Council in 2017. In 2018 after the hiring of the Language Access Coordinator, CPIO's efforts to address the recommendation were renewed.

The Language Access Coordinator is responsible for overseeing the infrastructure and implementation of the language access program, evaluating department plans for compliance with applicable regulations, and training staff on best practices in language services. According to CPIO, the Language Access Coordinator works with department SPOCs to update each department's language access plans based on the needs of each department and the LEP community they serve.

Designated staff face challenges with effective implementation of the language access policy

The Language Access Administrative Bulletin (AB) is the primary source of language access policy. The AB states that departments which provide direct services, indirect services, and information to the public on behalf of the City must adhere to the AB and develop a language access plan. According to CPIO staff, the first AB was released in 2014 and was subsequently updated in November 2022. However, we found several issues with effective implementation of the policy.



Authority to coordinate implementation of the City's language access program

CPIO staff indicated that there are City language services that are not part of the language access program. An example of this is the Human Resources Department's (HRD) Bilingual Pay program; CPIO indicated that HRD and CPIO do not collaborate to determine whether the language skills of employees receiving stipends match the language needs of the community the department serves. HRD directs individual departments to determine their own need for language skills in daily operations; the Coordinator has no authority to assess whether this self-determined need is consistent with each department's plan or the overall language access program. CPIO named the training of Austin Police Department's volunteer interpreters for ride-alongs and the approval of activation of Shared Voices interpreters during emergencies as other programs outside their jurisdiction.

The Language Access Coordinator noted that it is difficult for them, as CPIO employees without a greater degree of authority, to establish a

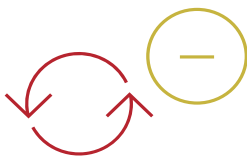
system of accountability and responsibility for departments to effectively implement the language access policy. CPIO staff indicated that the issues related to authority also stem from the lack of proper titles. “Language access” is not included in the official titles for these staff who work on the language access program. According to CPIO, including “language access” in job titles aligns with best practices of other cities’ language programs⁶.



Monitor the program for compliance with applicable policies and regulations

According to CPIO staff, the Language Access Coordinator is one individual responsible for the supervision of language plans, updates, and training for many departments. While the Coordinator appears to have been effective and has put much effort into her role, additional resources may be needed for more thorough oversight. Similarly, while the language access team which the Coordinator is a part of has put much effort into conducting community outreach, developing vendor contracts, and creating iSpeak materials, the small size of the team may not be sufficient for the City’s language service needs.

The COVID-19 pandemic has also caused complications in implementing the AB. For example, since the pandemic began in 2020, CPIO staff have reported that they were temporarily unable to perform site visits to public-facing departments to determine whether they’re in compliance with iSpeak Austin requirements. As a result, the Language Access Coordinator must rely on department SPOCs to accurately self-report department compliance. According to CPIO, a new member of the language access team will be restarting these site visits.



Periodically update the program based on changing conditions, public input, and performance measurement and analysis

While CPIO helps departments develop language access plans and reviews these plans annually, departments are not required to share the outcomes of their plans with CPIO. CPIO solicits internal feedback from departments in an annual survey, which has been their main source of data and feedback. The new data collection and sharing requirement may improve departmental coordination and CPIO’s familiarity with the success of language services in individual departments, but we cannot determine the success of these efforts until CPIO begins to receive this data in June 2023.

Data-driven updates to the language access program are also impacted by the lack of performance measures. According to staff, CPIO has created internal performance measures to evaluate the development of the language access program but has not yet created performance measures to evaluate the success of the program. Staff mentioned that the creation of performance measures is one of CPIO’s priorities moving forward.

⁶ San Antonio, Dallas, and Cambridge are examples of cities that use “Language Access” in official titles.

Implementation of recommendation #8 of the 2021 Disaster Preparedness audit: Underway

This recommendation requires the following actions:

1. HSEM and CPIO to coordinate during emergencies
2. Create and implement a language access plan for emergencies
3. Prepare in advance for communication during emergencies
4. Ensure the community receives vital and critical information in an equitable manner



HSEM and CPIO are working on revising and updating the coordination protocol of language services during an emergency, including working on preparedness information campaigns prior to emergencies and ensuring relationships with out-of-state translation vendors that can be deployed during emergencies. However, resource constraints have prevented the completion of an updated plan for communicating with LEP individuals during emergencies. As evidenced by communication during Winter Storm Mara, the City still needs to work on equitably and effectively communicating with all LEP individuals during emergencies.

HSEM and CPIO are coordinating emergency language services



Both HSEM and CPIO staff indicated they are working on revising the coordination protocol for language service efforts during emergencies. Currently, the Language Access Coordinator and CPIO's language access team are supporting HSEM's communications team in these efforts. According to HSEM staff, this is because they have been unable to hire additional communications staff despite budget approval. HSEM staff state that they use CPIO's contracted language vendors during emergencies. However, current contracts do not include clauses for "emergency time periods," meaning that vendors are not required to provide translated information at the pace an emergency might require. CPIO staff stated that they plan to rework these contracts to include language for speeding up vendor services during an emergency when the current contracts expire in 2024.

There is not a complete updated plan for communication with LEP individuals during emergencies partially due to department resource constraints

Though HSEM and CPIO have been tasked with developing a new emergency language access plan, staff have been unable to implement one. The most current finalized plan is the Public Information Annex of the City



Create and implement a Language Access Plan for emergencies

Emergency Operations Plan, which was last updated in September 2020 prior to Winter Storm Uri in 2021.

Progress has been made towards developing a plan. The Interim City Manager highlighted emergency communication as a priority in an April 2023 memo to Council and stated that multiple departments (including HSEM, CPIO, and Austin Energy) are collaborating on a draft plan for communicating with LEP individuals during an emergency. HSEM staff indicated that they have hired a new employee whose primary responsibility will be finalizing and implementing this plan. Once this dedicated position is onboarded, HSEM staff expect the process of completing the emergency language access plan to speed up. They noted that they have faced many limitations due to reduced staffing while attempting to implement this recommendation. The team responsible for implementation is small and has many job responsibilities outside of language access emergency communications.



Prepare for communication during emergencies

The City still needs to work on equitably communicating with LEP individuals during emergencies

Though the newest Language Access AB indicates that critical information, vital documents, and public messages should be distributed in the City's "threshold" languages⁷, this is considered guidance policy and is not a formal action plan.

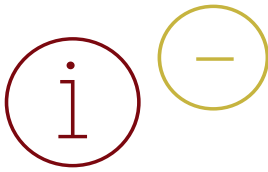
HSEM has developed an extensive emergency preparedness ad campaign called Get Ready Central Texas. The campaign highlights four pillars of emergency preparedness – make a plan, build a supply kit, know your neighbors, and stay informed – and is available in 12 non-English languages. According to HSEM, these 12 languages were selected based on CPIO's list of threshold (priority) languages for translation. HSEM has also established the Accessible Hazard Alert System (AHAS), which sends out emergency alerts in American Sign Language.

In addition, HSEM has a bank of some basic "canned," or pre-translated, messages for weather warnings and emergency alerts in all threshold language. These translated messages can be found on the [austintexas.gov/alerts](https://www.austintexas.gov/alerts) website during emergencies.

HSEM staff stated that they work with community groups with ties to LEP populations to inform them of the translated emergency information available on HSEM's website during emergencies. During an emergency, these community groups are able to notify the people they serve in their preferred language of where to find this translated information; they might share this information through their own social media networks. HSEM and CPIO staff indicated that they try to get these messages out to community partners prior to the start of emergencies, as these notifications can be difficult to deliver during emergencies.

While HSEM staff emphasized that City social media networks are not

⁷ These languages currently are Spanish, Simplified Chinese (Mandarin), Vietnamese, Arabic, Korean, French, Hindi, Nepali, Swahili, Pashto, Burmese, and Tigrinya.



Ensure that affected communities receive vital and critical information in an equitable manner

the only way important information is conveyed to LEP individuals, an analysis of City tweets⁸ during the 2023 Winter Storm Mara indicated deficiencies in equitable communication during an emergency. Many vital and critical tweets were not translated at all. Those that were translated generally were only available in Spanish. While many tweets provided links to webpages that included translated information in the 12 threshold languages, only English was used in the original tweet. If tweets do not indicate in non-English languages that linked information is translated, LEP individuals may not know that the link will be helpful. HSEM staff noted that their current capacity limitations make timely translations in languages other than Spanish unfeasible. Staff also stated that while it's the City's practice to translate all vital and critical information to Spanish, even this is difficult during an emergency.

Additional Observation

The City's Bilingual Pay program still exhibits issues identified in the 2016 Language Access audit

As observed in the 2016 Language Access Audit, HRD administers the City's Bilingual Pay program and individual departments are responsible for monitoring employee language skills

In the 2022 budget, the City spent \$2.2 million on the Bilingual Pay program. We conducted an analysis of languages for which a stipend is received by the City's staff compared to the City's threshold languages. We noted that it is challenging to determine whether languages receiving stipends align with the City's threshold languages as HRD staff have only been electronically tracking stipend and language data for two years. As a result, they only have electronic records for 24.5% (270/1100) of stipend recipients. Staff indicated the rest of the data would have to be manually retrieved or was never recorded.

In addition, employees with the stipend are not required to track when or how they use their language skills as part of their job function. This limits the City's ability to evaluate whether their skills are necessary to their department. Similarly, staff receiving stipends are not required to periodically re-evaluate their language proficiency to ensure their skills are adequate. These issues were observed in the original audit. According to HRD, it is the responsibility of departments to monitor their employees' receiving stipends and assess whether their skills are adequate and necessary.

⁸ The analysis included the City's main account, as well as the accounts of HSEM and Austin Energy.

Management Response



MEMORANDUM

TO: Corrie Stokes, City Auditor

THROUGH: Veronica Briseño, Assistant City Manager 
Bruce Mills, Interim Assistant City Manager 

FROM: Jessica King, Director, Communications & Public Information Office 
Ken Snipes, Special Assistant, Homeland Security & Emergency Management 

DATE: May 17, 2023

SUBJECT: Response to Language Access Follow-Up (Special Report)

On behalf of the Communications and Public Information Office (CPIO) and Homeland Security & Emergency Management (HSEM), we appreciate working with the City Auditor to evaluate the City's progress implementing language access practices across the organization and identifying areas for needed growth and enhancements.

The Language Access Follow-Up (Special Report) updates the progress of three recommendations issued from two audits about the City's language access services – the [2016 Language Access Audit](#) and the [2021 Disaster Preparedness Audit](#). In general, CPIO and HSEM concur with the assessment and the findings from the Auditor's Office.

Specific to the 2016 Audit, CPIO has worked diligently since 2016 to address and align the City's language access efforts with the components identified in the language access framework and ensure the City complies with existing laws and regulations. CPIO is pleased with the progress achieved and the recognition outlined in this report.

For the past few years, CPIO's Language Access Program worked with all City departments to significantly improve departmental performance regarding language access by providing guidance, technical assistance, training, and creating resources for staff to serve limited English proficient (LEP) persons better. Some of that work includes:

- The identification of community members with LEPs and the languages spoken in the City using both qualitative and quantitative data. With this information, CPIO creates and adapts the priority threshold languages.

Management Response

- Updating the 2014 Language Access Administrative Bulletin with a more recent [2022 Administrative Bulletin](#) to take into consideration the availability of resources and community knowledge both locally and nationally.
- Creating and promoting iSpeak Austin language identification cards throughout the community, including using social media, posters at public places, participating at numerous outreach events, advertising via multilingual/multicultural media, and creating partnerships with local service providers.
- Establishing training programs to support and implement language access efforts:
 - Language Access 101, which trains City staff on the fundamentals of language access in the organization; and
 - Shared Voices Training, which partners with a community interpreter to offer advanced training and creates a pool of bilingual City employees who can serve as interpreters. Graduates from the training program support language access efforts during daily departmental activities and organizational emergency operations.
- Implementing an organizational and departmental structure where CPIO serves as the lead department in coordination with over 50 Language Access SPOCs that support their respective departments' needs to better serve our community.

In working with HSEM to also respond to the 2021 Disaster Preparedness Audit, CPIO, and HSEM implemented recommended action items such as:

- Developed and implemented the www.austintexas.gov/alerts page where emergency information is added and updated in 13 languages in real time.
- Preparing pre-translated emergency messages for each major hazard in 13 languages.
- Implementing a contract with Deaf Link and developing an Accessible Hazard Alerts System (AHAS) which shares emergency alerts in American Sign Language.

Additionally, the departments are actively working on the following:

- Updating the City and HSEM's Emergency Language Access Plan. HSEM hired a position at the beginning of May 2023 to focus on updating the plans with departments and obtaining input from community members on the plan.
- Clarifying authority to coordinate implementation of the City's language access program between lead department, other departments, and during emergency activations.

Management Response

- Researching avenues to assess City services and the correlation of language services requested.
- Creating a mechanism to review new data and information so staff can evaluate the effectiveness of the program, anticipate community needs, and evaluate the allocation of resources according to those actions' outcomes.
- Monitoring the language access program for compliance with applicable policies and regulations.
- Periodically updating the program based on changing conditions, public input, as well as performance measurement and analysis.

Based on direction from Interim City Manager Garza to utilize all organizational assets in response to an emergency, CPIO, HSEM, and HRD are working together to establish clear procedures that would allow the emergency response team to utilize bilingual paid staff in support of emergency communication efforts.

If you have any questions regarding this information, please contact either of us:

- Jessica King at 512-974-2406 or jessica.king@austintexas.gov; or
- Ken Snipes at 512-974-1926 or ken.snipes@austintexas.gov

cc: Jesús Garza, Interim City Manager
Rodney Gonzalez, Assistant City Manager
Rebecca Kennedy, Interim Director, Human Resources Department

Appendix A: Issued Findings

Audit	Finding
2016 Language Access Audit	Finding 1: The City may not be meeting the language assistance needs of all residents. While the City has policies and resources addressing language assistance services, current practices are not fully aligned with efforts identified in effective programs.
2016 Language Access Audit	Finding 2: City departments spend approximately \$2 million per year on bilingual pay programs, but inconsistent oversight limits their ability to know whether employees are providing effective language assistance services or the programs are an effective use of City resources.
2021 Disaster Preparedness Audit	<p>Finding 2: The City did not communicate effectively with Austin residents in the days leading up to or during Winter Storm Uri because the City was unprepared for such a severe winter storm. As a result, residents were left without critical information that may have helped them stay safe.</p> <ul style="list-style-type: none"> • The City communicated minimal information in non-English languages, and information that was communicated in non-English languages was often even less timely than messages sent in English.

Appendix B: Recommendation Status

Audit	Recommendation	Intended Implementation Date	Implementation Status
Language Access Audit 2016	<p>Recommendation #1: In order to address the first three components of the language access framework, the City Manager or designee should establish a stakeholder team including, but not limited to, representatives from the City Manager’s Office, the Law Department, HRD management, the public safety departments, and members of the public, to design a language access program that:</p> <ol style="list-style-type: none"> 1. addresses and aligns with the components identified in the language access framework; 2. meets the needs of the Austin community requiring language assistance services; 3. ensures an efficient and effective allocation of resources; and 4. complies with the requirements of Executive Order 13166 and other regulations, as applicable. 	6/30/2017	<p>Underway</p> <p>(CPIO reported as implemented October 2019)</p>
Language Access Audit 2016	<p>Recommendation #2: In order to address components four and five of the language access framework, the City Manager or designee should designate a person or persons with authority to:</p> <ol style="list-style-type: none"> 1. coordinate the timely implementation of the City’s language access program consistent with the designed plan identified by the stakeholder team; 2. monitor the program for compliance with applicable policies and regulations; and 3. periodically update the program based on changing conditions, public input, and performance measurement and analysis. 	6/30/2017	<p>Underway</p> <p>(CPIO reported as implemented March 2018)</p>
Disaster Preparedness Audit 2021	<p>Recommendation #8: The Director of HSEM should work with the Director of CPIO to create and implement a Language Access Plan for emergencies to ensure that affected communities receive adequate information about all stages of emergency management, including planning, response, recovery, and mitigation activities. This plan should prepare the City to provide adequate language access during significant or catastrophic events and should include strategies for ensuring translations are timely communicated, such as pre-translated templates.</p>	9/30/2022	<p>Underway</p>

Scope

The audit scope included actions taken by multiple City departments to respond to the selected recommendations in audits related to Language Access including:

- City Language Access Audit (September 2016)
- Disaster Preparedness Audit (November 2021)

Methodology

To complete this special report, we performed the following steps:

- Communicated with City staff in Communications and Public Information Office and Homeland Security and Emergency Management
- Reviewed City Language Access and Bilingual Pay policies, plans, templates, and outreach materials
- Evaluated the City's actions to respond to relevant recommendations
- Administered a survey to all City departments with language services
- Analyzed tweets sent by the City, HSEM, and Austin Energy during Winter Storm Mara
- Analyzed Bilingual Pay financial and language data for alignment with threshold languages

Audit Standards

This project is considered a non-audit project under Government Auditing Standards and was conducted in accordance with the ethics and general standards (Chapters 1-5).

The Office of the City Auditor was created by the Austin City Charter as an independent office reporting to City Council to help establish accountability and improve City services. We conduct performance audits to review aspects of a City service or program and provide recommendations for improvement.

Audit Team

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