



The Language of Business

Adopting Private Sector Practices to Increase Limited-English Proficient Individuals' Access to Government Services

CAA | Chinese for Affirmative Action
Center for Asian American Advocacy

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TABLE OF CONTENTS

INTRODUCTION	1
1. PROMISING PRACTICES IN THE PRIVATE SECTOR	3
What Motivates Private Sector Organizations to Provide Multilingual Services?	3
Understanding the Language Needs of the Market.....	3
Hiring Bilingual Staff Can Save Money	5
Evaluating and Training Bilingual Staff	5
Bilingual Support for Field Employees.....	7
Dedicated Bilingual Offices	7
Telephone Call Centers.....	7
Translation is More than Just “Translation”	9
Cost Saving Measures for Translation.....	10
Disseminating Translated Information	10
Emerging Technological Advancements in Translation and Interpretation	11
2. TRANSLATING PROMISING PRIVATE SECTOR PRACTICES INTO MORE ACCESSIBLE GOVERNMENT PROGRAMS.....	13
Checklist: Implementing Language Accessible Services for Public Agencies	13
Assess the Language Needs of the Constituency	13
Implement a Comprehensive Document Translation Plan	14
Hire Qualified and Competent Bilingual Staff	15
Achieve Efficiencies through Pooled Translation and the Use of Call Centers	15
Implement Quality Control	16
Know the Community and Respond to Community Needs	16
Publicize Services in Ethnic Media and at Community Events	16
Create and Oversee a Language Access Plan	16
3. RESOURCES TO HELP MAKE SERVICES MORE ACCESSIBLE	17
NOTES	21
APPENDIX: Participating Institutions.....	22

INTRODUCTION

The Language of Business

In recent years state and local government agencies have begun to respond to California's changing population by adopting policies to provide services in multiple languages. The 2000 Census reports that 40 percent of California residents speak a language other than English at home, and one out of five residents over the age of five – over 6.2 million people – are limited-English proficient (LEP).¹

While LEP individuals may frequently experience communication problems in their daily activities, language barriers can be much more harmful when essential services are involved. Communication barriers at government agencies can deprive people of health care and social services, safety in the workplace, the ability to report crimes, and the resources needed to avoid or leave welfare. The harms affect not only the individuals deprived of services but also the broader community. Unsolved crimes and untreated illnesses can endanger public safety and health. Restricting low-wage immigrant workers' access to agencies responsible for labor law protections or job search services means that this population will face greater challenges in becoming economically self-sufficient and may have a greater need for government-funded social or health services. At the broader level, language barriers can undermine government accountability and threaten our democratic values. When a government is unable to communicate with 20 percent of its residents (the percentage of California residents who are LEP), it simply cannot address the needs of or expect participation from a cross section of the population.

Recognizing the need to improve communications with the growing immigrant population, the State of California has passed a number of bills in recent years aimed at making state agencies more accessible to

new immigrants.² Several local governments – San Francisco, Oakland, and Monterey Park – have also adopted ordinances or resolutions that require public agencies to hire sufficient multilingual staff who can communicate in the languages most commonly spoken in the local area, as well as translate important government documents.³

As government agencies begin to identify more effective methods for communicating with individuals with limited-English skills, they should look to the private sector for promising practices. Shaped by market forces, private companies in California have been providing sophisticated multilingual services to LEP communities for many years. Many large utilities, telephone companies, banks, private hospitals and other retail businesses in California have multilingual staff and telephone systems that communicate with customers in a number of languages.

This report examines the language access practices of five private corporations and one large nonprofit organization that provide telecommunication, utility, financial, and health services, and describes how such promising practices can be adopted by government agencies. These institutions, which are described in greater detail in the Appendix, include: Asian Health Services, Charles Schwab, Kaiser Permanente⁴, Pacific Gas and Electric Company, SBC Communications, and Wells Fargo. While some of these institutions are highly regulated by government agencies, and some are required to make their services available to all members of the public, most described their motivation

The 2000 Census reports that 40 percent of California residents speak a language other than English at home.

for providing multilingual services as driven by the bottom line. Without multilingual services, these companies would be at a significant disadvantage in competing for business among California's growing immigrant communities.

This report will provide an overview of effective private sector language access practices by focusing on the methods used by companies to do the following:

- **Assess the language needs of customers;**
- **Develop effective outreach and marketing strategies targeting LEP populations;**
- **Hire and train bilingual personnel;**
- **Create multilingual telephone or customer service centers to communicate directly with customers who are not fluent in English; and**
- **Develop cost effective procedures for translating and distributing written materials.**

Government agencies, of course, are quite different from private companies and face a number of challenges in adopting private sector practices. The second part of this report takes the lessons learned from the private sector and offers guidelines for public agencies interested in adopting private sector practices to make their services more accessible to LEP individuals.

PROMISING PRACTICES IN THE PRIVATE SECTOR

1

“SBC’s service relies on strong and open communications. With a diverse customer base, we have broken barriers for our customers whose needs cross languages, physical limits and ethnicities. We are proud of our legacy.”

Jody C. Garcia, Vice President
SBC Diverse Markets Group

What Motivates Private Sector Organizations to Provide Multilingual Services?

Spurred by California’s diverse marketplace, private companies have developed sophisticated and cost efficient methods of communicating with their LEP customers. All of the institutions interviewed for this report agree that multilingual communication capacity simply makes good business sense in California. An investment in bilingual staff, translation of materials, and related services gives these companies a competitive advantage in attracting customers among the growing immigrant population as well as an opportunity to promote good community relations.

NOTE: The terms “translation” and “interpretation” are often used interchangeably to describe the general practice of communicating information delivered in one language into another. In the interest of conforming with the understanding of the terms used by professional organizations, we use the term “translation” to refer to written communications and “interpretation” to refer to oral or spoken communications.

Understanding the Language Needs of the Market

Before companies can effectively serve LEP populations, they must first assess a community’s language needs. Private companies use a wide range of methods for evaluating language proficiencies and preferences in the customer market, including demographic analysis using publicly available U.S. Census data, market surveys, and focus groups. Over time, many companies also develop systems for tracking customer language preferences that provide more accurate information about ongoing language needs.

All of the surveyed institutions began their demographic analysis by closely reviewing language and ethnicity data available from the U.S. Census. Only a few years ago, obtaining such language information for specific geographic areas or having the information cross referenced with other demographic characteristics was difficult and often involved using research services or hiring consultants. However, detailed demographic information is now available at the U.S. Census Bureau’s Web site (www.census.gov). With only a basic understanding of Census data, one can use the search tools at this Web site to find language proficiency information for geographic regions ranging from the entire country to as small as a Census block.

Detailed demographic information is now available at the U.S. Census Bureau’s Web site www.census.gov.

Initial demographic analyses led the institutions in this report to develop new marketing

strategies to serve the needs of growing immigrant communities. Several created new divisions within their companies dedicated to research and marketing for these growing populations. For example, in the 1980s, Wells Fargo created an “Ethnic Division” after its demographic research revealed that its service market was becoming increasingly diverse. This new division used market analysis and statistical extrapolation⁵ to determine the languages in which services should be provided. With the recent release of the 2000 Census data, Wells Fargo re-examined its marketing practices and re-named its Ethnic Division the “Emerging Markets Department.” The Emerging Markets Department at Wells Fargo oversees the translation of both informational materials (including brochures and posters) and collateral documents (including loan documents, legal notices, contracts, and home mortgage papers) into Spanish. Increasing numbers of documents are also translated into Asian languages.

Tracking Customer Language Preferences

Kaiser Permanente asks all its plan members about a preferred language of communication. Kaiser collects information about patient or plan member language preferences during initial enrollment and at various subsequent points of contact, including appointment scheduling, advice line services, and member surveys. Kaiser tracks this information within its computerized database of members. Language preference data is used to coordinate interpretation when a health care provider cannot speak the patient’s preferred language. This system is internally managed and appears seamless to plan members. Professional interpreters are scheduled to attend all pre-arranged appointments, or dispatched to meet any unanticipated demands. Similarly, Kaiser can target multilingual written communications to those members in the appropriate languages.

Similarly, in 1994, Pacific Gas and Electric Company (PG&E) conducted a demographic analysis of the population it serves, primarily through use of publicly available Census data. This led the company to make a concerted effort to improve the scope of linguistically accessible services for customers whose primary language is Spanish, Chinese, or Vietnamese.

Other entities have expanded their market analysis to rely not only on demographic information but also on community-based feedback. For example, SBC’s multilingual and ethnic market services have been informed by input from focus groups. Focus groups drawn from the general public are called to test marketing strategies and evaluate new services and materials. SBC can then make appropriate changes in its services to reflect the demands and needs of specific populations. SBC also convenes community advisory groups that can help inform how it can improve communications with emerging populations. SBC holds an annual “Asian Pacific Community Forum,” where Asian and Pacific American community leaders make recommendations concerning community needs. Similarly, SBC has a long-standing relationship with the Hispanic Association on Corporate Responsibility (HACR) that also addresses community access issues.

Kaiser Permanente also relies on focus groups and regular surveys to better understand community needs and evaluate member satisfaction with their services. In addition, Kaiser has implemented a sophisticated system to track the language preferences of patients by collecting this information from the outset of a member’s relationship with the organization. This allows Kaiser to continually respond and communicate with individuals in the language of their choice. It also provides Kaiser with an accurate language assessment of its service population, which, in turn, informs the scope

of multilingual services it needs to provide to communicate effectively with its patients.

In addition to Kaiser, SBC also tracks the language preferences of its customers by asking about their preferred language of communication at the time a new account is opened. SBC communicates with customers, including contacts for service and the distribution of materials, in their preferred language. As of 2002, 1.5 million out of SBC's total of 16 million accounts in California were "tagged" for communications in languages other than English.

Hiring Bilingual Staff Can Save Money

Contracted interpreter services can be very expensive, particularly if used on a regular basis for routine communications. Private-sector institutions prioritize the hiring of bilingual staff in languages that are commonly spoken in their market areas. All of the surveyed institutions indicated that efficiencies can be achieved by hiring bilingual staff to serve in public contact positions at offices, as call center operators, and as in-house document translators. Since bilingual staff members are capable of performing job responsibilities in at least one non-English language and English, employers benefit from their services even when not engaged in language translation or interpretation.

Evaluating and Training Bilingual Staff

The need to hire qualified interpreters cannot be overstated. Using casual interpreters and translators, or worse children and other family members or friends, who lack professional-level language skills can result in the inaccurate delivery of information, or even serious injuries or death in health care settings. Certain specialized services, including health care and legal, have developed their own

standards for translation and interpretation.⁶ However, in all situations, bilingual staff must be sufficiently conversational in both English and the other language, and adhere to ethical principles that preserve the ability of a LEP client to communicate with a service provider without undue interference or omission in the interpretation process.

The Benefits of Bilingual Staffing in Health Care

The two health service entities included in this report, Asian Health Services and Kaiser, particularly underscore the cost savings achieved in having bilingual staff. At Asian Health Services (AHS), 97 percent of its staff can speak at least two languages. Many staff can speak three or more languages. AHS tries to save money by avoiding costly interpretation and relying instead on bilingual health care providers who can understand and communicate directly with LEP patients.

For Kaiser Permanente, the potential cost savings with on-site dedicated led to the establishment of the San Francisco based "Multicultural Services Center." Effective communication with patients promotes the delivery of quality health care, which is good for business. It simply costs less when patients can accurately comprehend information provided on each visit in the language that they understand. The lack of qualified and trained medical interpreters can result in misdiagnoses or life-threatening consequences, all of which result in multiple patient visits. All bilingual staff must have conversational proficiency in both English and the non-English language, including knowledge of idiomatic expressions. Health care interpreters require a set of core competencies, including understanding of basic medical situations, medical terminology, cultural competency, and professional standards and ethical codes. Kaiser makes optimal use of their interpreter's language skills. When interpreters are not scheduled to provide in-person interpretation, they staff Kaiser's multilingual call center, described in detail later in this report.

The essential elements of a good system for bilingual employee evaluation include:

- Initial qualification testing at appropriate language proficiency level;
- Regular monitoring of staff;
- Follow-up coaching by qualified supervisors;
- Development of a consistent use of terminology to avoid customer/client confusion;
- Survey of customers/clients to evaluate satisfaction with bilingual services; and
- Adherence to any professional interpreter standards, particularly in health care and legal settings.

The institutions surveyed all employ rigorous qualification testing and regular monitoring of

bilingual staff to ensure that they are competent to provide interpretation. Kaiser employs a “continuous quality improvement” process, using a combination of random silent telephone monitoring of bilingual telephone-based service representatives, peer monitoring of on-site interpreters, and patient and provider feedback through surveys following appointments with health care providers to evaluate levels of comfort and confidence in the delivery of multilingual services. SBC’s system for bilingual staff evaluation is described in detail in our discussion of telephone call centers below.

All of the institutions recognize that good business depends on effective consumer communication and satisfaction. Developing a staff of qualified interpreters and translators requires good training and ongoing monitoring.

Developing a Pool of Professional Interpreters

Noting the considerable dearth of formally trained health care interpreters, related training programs, and community standards, in the mid-1990s, Kaiser Permanente established a model health care interpreter-training program. In collaboration with City College of San Francisco (CCSF), the Kaiser curriculum was successfully expanded into a formal health care interpreter-training program in an academic setting. The curriculum is based on elements that Kaiser considers crucial to meeting its standard of care, and that CCSF regards as essential academic standards. The collaborative has evolved into a formal 15-unit (378 hours) “Health Care Interpreter Certificate Program,” making CCSF the first educational institution in the western United States to offer health care interpreter training at the college level. The program, aimed at enhancing students’ marketability and preparation for successful employment in the health care industry, is currently in its seventh year. The program has been successfully replicated at other community colleges in California, including Mt. San Antonio College and Reedley College and is being disseminated in 14 states.

Asian Health Services developed their pool of interpreters with a “Language Cooperative” project. The project provides interpretation services to local hospitals, clinics, and various state and county service providers. Currently, the Language Cooperative provides on-site and telephone-based health care interpretation in Cantonese, Korean, Mandarin, Vietnamese, and Spanish. Telephone-only interpretation is also available in Cambodian (Khmer) and Farsi. Similar to Kaiser, the Language Cooperative has developed a 50-hour, six-week training on interpretation in a health care setting. Training curriculum reflects professional health care interpreter standards. Topics include the role and responsibility of the health care interpreter, legal and ethical issues, interpretation skills, culture and health, culturally competent communication, anatomy and physiology, and medical terminology. The training is open to anyone, but priority is reserved for staff of health care facilities, and those interested in becoming an interpreter for the Language Cooperative.

Bilingual Support for Field Employees

Several of the institutions surveyed employ field employees who communicate with customers outside of a well-regulated office environment. Ensuring consistency in the delivery of multilingual services in the field poses unique challenges, as bilingual staff may not be as readily available. While hiring bilingual field staff to meet the needs of substantial LEP populations is preferable, organizations also need to have a back-up system to communicate with their customers when field employees cannot speak the customer's language.

PG&E field employees carry lexicons for phrases in other languages as they meet in person with customers. The lexicons offer basic communication opportunities for field operators who interact with LEP customers at their homes. If more in-depth language assistance is required, field employees can contact PG&E's call center by telephone for interpretation. PG&E's call center, described in more detail below, offers dedicated telephone lines in Spanish, Chinese, and Vietnamese, with access to other languages through a contract with Language Line Services, the largest provider of language interpretation and translation services to both the private and public sectors nationwide.

Dedicated Bilingual Offices

Banks and financial institutions have pioneered the concept of bilingual branch offices located in communities with substantial LEP populations. The designation of bilingual local offices enables businesses to tailor their services to the language needs and cultural characteristics of a particular neighborhood population. LEP customers who visit these branches can be assured that they will be able to speak to a customer service representative who can communicate important information to them in their native language. Customers know that they do not have to bring their own interpreter along with them and can expect to receive professional-level services. In

most bilingual offices, every teller and customer service representative is at least bilingual.

Wells Fargo maintains Spanish language branches in areas with substantial Spanish speakers. Charles Schwab operates bilingual branches for Chinese and Korean speakers in locations throughout the United States. Both corporations spent considerable resources publicizing the locations of bilingual offices through the ethnic media.

Targeted Bilingual Branch Offices

Nationally, Charles Schwab's Asia Pacific Services operates 16 "fully bilingual" branches for two Asian language populations. Each employee at these branches can conduct business in English and the primary language preferred by its main client base. Fourteen of these branches, located in New York, Texas, Washington, and California, serve Chinese language customers, and two branches, in Los Angeles and New York, are dedicated to serving local Korean-speaking communities.

Kaiser Permanente also operates specific health care "modules," or offices targeting specific populations. In San Francisco, Kaiser has a Chinese Bilingual Module, fully staffed with bilingual and bicultural Chinese speaking staff. Physicians, nurse practitioners, health educators, behavioral medicine specialists, medical assistants, registered nurses, and receptionists are all equipped with multilingual skills to serve patients. In this setting, monolingual Chinese language speakers can communicate entirely in their native language and receive a full array of health care services.

Telephone Call Centers

Recognizing that many customer services can be handled over the telephone, several of the surveyed corporations have established multilingual call centers, comprised of telephone service representatives staffing banks

of telephones in a central location. For many of these institutions, multilingual call centers are one of the primary ways in which they interact with LEP customers who have routine questions, complaints, or request guidance on how to effectively use company services. By housing bilingual staff in one central location, companies save on costs associated with establishing multiple locations in different population centers throughout the service area. When done properly, the use of telephone communications saves both the company and its customers time in answering questions or resolving complaints.

Companies that use multilingual call centers usually set up a separate telephone number for each non-English language. Calls to the non-English lines are automatically routed to customer representatives who can communicate in the caller's native language. However, to be efficient, bilingual customer service representatives do not simply answer non-English calls. Instead, most spend a substantial amount of work time answering calls in English until there is a need to speak with a non-English speaking customer.

The institutions surveyed use these call centers:

SBC provides dedicated call center customer service in Cantonese, Japanese, Korean, Mandarin, Spanish, Tagalog, and Vietnamese, across multiple call centers located throughout California. Almost all of SBC's 260 Asian market call center Service Representatives are native speakers of the dedicated languages. Each Service Representative must undergo testing in English, math, language assessment and reasoning/logic and then complete 12 weeks of training before assuming his or her full responsibilities. All Service Representatives are periodically monitored for quality control purposes. Utilizing monitors to assess performance based on adherence to model

language used for explanation of services, call center managers provide feedback and coaching to Service Representatives as needed. In addition, SBC conducts periodic follow-up calls to assess customer satisfaction with services. For other languages, SBC contracts with Language Line Services to handle calls from LEP customers who speak a broad range of languages. Since September 2003, Language Line Services has assisted SBC in handling over 45,000 calls in 90 different languages.

PG&E operates three non-English customer telephone numbers dedicated to Spanish, Chinese, and Vietnamese callers. The company employs approximately 25 Spanish call center operators. While Chinese and Vietnamese dedicated operators were also employed originally, the company has now replaced these operators with an automatic connection to Language Line Services telephone interpreters, who can interpret between the Chinese or Vietnamese-speaking caller and an English-speaking operator. Calls in other languages are received by the main English-speaking telephone number, and can be connected with a Language Line Services interpreter as appropriate. With this system, most callers wait no more than 20 seconds for an operator, regardless of language. The specific language customer care numbers are publicized at community information fairs, and through weatherization programs, written brochures, and telephone books. Account billing inserts may also contain information about how to communicate with PG&E by telephone in Spanish, Chinese, and Vietnamese.

Kaiser Permanente has specific language lines for Chinese and Spanish. The San Francisco medical center operates a dedicated Chinese language interpreter call center for Northern California Regional Call Centers. Ten percent of all San Francisco Kaiser members have indicated a Chinese-language preference. The call center is staffed by qualified health care interpreters,

many of whom were trained in the Health Care Certificate Program, a partnership of Kaiser and City College of San Francisco. Telephone service representatives are capable of handling calls in Cantonese, Mandarin, and other Chinese dialects. Other Kaiser regional offices operate similar call centers for Spanish-speakers.

Charles Schwab’s Asia Pacific Services office staffs a live 24 hour, 7 days a week call center dedicated to servicing Mandarin, Cantonese, Vietnamese, and Korean language client calls. In addition, Schwab offers automated “telebroker” service in Cantonese and Mandarin.

Wells Fargo operates a call center for Spanish-speaking customers, employing approximately 90 agents who take calls from Spanish-speaking customers.

The surveyed institutions recognize that telephone communications can present their own challenges. Many recent immigrants may not be comfortable discussing a problem over the phone, and the challenge of communicating with LEP individuals can be magnified when individuals cannot see each other’s body language or gestures. Institutions that use multilingual telephone centers recognize that the staff must be culturally competent and understand the context of their customers’ lives in order to communicate effectively over the phone. At the time our research was conducted, all of the telephone call centers were actually located in California, and therefore bilingual staff are familiar with the communities in which their customers resided.

Translation is More than Just “Translation”

A translated document is often the first entry point for LEP individuals to access services. Therefore, it is critical that translated documents are both linguistically accurate and culturally

competent. Inexperienced organizations often do not understand that quality translation involves more than the simple act of a single translator converting English language text into a non-English or bilingual document.

The Benefits of Bilingual Materials

Recognizing that individuals may have varying levels of English and non-English language comprehension, Charles Schwab translates its applications and forms into non-English languages while still including English text. In this manner, customers with varying levels of English proficiency are better able to comprehend information requested of them, and Charles Schwab employees who may not be fluent in the non-English language are better able to identify the information collected.

All of the surveyed institutions have developed procedures for ensuring high quality translations, in which documents are reviewed at a minimum by at least two translators for both accuracy and cultural appropriateness. For instance, as described in the accompanying box, Asian Health Services has implemented a comprehensive translation practice that includes not only linguistic translation, but also an assessment for cultural competence and comprehension to ensure that the targeted audience will understand translated materials. Other institutions, including Charles Schwab, add a review for compliance with legal and corporate standards. In order to ensure that all materials comply with federal laws, rules, and regulations, these documents must undergo a compliance review by both bilingual licensed investment staff and senior officers before the information is disseminated to the general public.

A second review of translated materials for accuracy, cultural competence, and comprehension is especially important when a corporation contracts out for translation.

Outside translators may not be as aware or familiar with company services or the client population as company employees.

Comprehensive Translation Review

Asian Health Services (AHS) provides numerous health education materials on specific topics to its own patient population, and many of its materials are translated into Chinese, Korean, or Vietnamese. Upon completion of the initial translation, all the materials are reviewed for accuracy and cultural competence by AHS staff. AHS has established a committee that decides which materials should be prioritized for translation. By translating critical materials first, AHS can ensure that it provides consistent information to all patients, and it can streamline the need for detailed oral explanation when complicated matters can be communicated in written form. The Language Cooperative at AHS provides translation, cultural review and adaptation, and focus-group and field testing of written materials into Cambodian (Khmer), Chinese (Cantonese or Mandarin-specific), Korean, Laotian, Vietnamese, Spanish, and Farsi/Dari. All translations are reviewed for accuracy and quality as well as for cultural appropriateness and accessibility.

In recent years, computerized translation services have become widely available on the Internet, offering a cheap but very ineffective approach to communicating with LEP populations. None of the surveyed agencies use these services because they lack human review. Often, the literal translation offered by these free instant translation services is incomplete and inaccurate, and there is a complete lack of cultural considerations important to conveying accurate meanings of the original text. Moreover, correcting an inaccurate computerized translation is generally more time intensive than simply translating the document accurately with a qualified human translator the first time.

Cost Saving Measures for Translation

The surveyed institutions all recognize that the translation of written materials can be a particularly efficient way to communicate with the customer base on topics that would otherwise require repeatedly communicating the same information orally on a case-by-case basis. The institutions we surveyed have adopted a number of cost-effective measures for translating written materials, including:

- Developing lexicons of commonly used terminology to enhance translation memory and prevent “reinventing the wheel” for each new document;
- Centralizing translation resources across regions rather than relying on individual offices to generate often duplicative translations of the same or similar information;
- Recycling commonly translated passages related to general services and practices and avoiding duplicative translation; and
- Requesting outside translation vendors to provide materials in electronic form to ensure that future amendments or revisions to documents will not require re-translation or re-entry of the entire original document.

Disseminating Translated Information

Translation of materials without a strategic plan for distributing the documents does little to promote meaningful access to services. The most common and traditional distribution method is to make translated brochures and other materials available at an organization’s offices. However, private sector entities have come up with other strategies to disseminate translated materials. For example, upon identifying a client

with a non-English language preference, Charles Schwab mails these clients a “welcome package” with bilingual forms, a bilingual CD-ROM, and a host of information about services, programs, and various investment topics. Other institutions buy advertising in ethnic newspapers to deliver information about programs and services to a wider prospective customer base. Some, such as PG&E, distribute information on programs for low-income families and weatherization through community organizations.

These institutions also use the Internet to distribute information and promote interactive access to services electronically. Charles Schwab has online banking services in Chinese and Korean. PG&E’s Web site provides links to brochures and forms in Spanish, Chinese, and Vietnamese, and advertises customer service telephone numbers in those languages. SBC similarly maintains Web sites in both Spanish and English.

Emerging Technological Advancements in Translation and Interpretation

Private sector institutions have also been at the forefront in using new technology to deliver multilingual services. Following are several examples of technologies that private institutions are exploring or utilizing to improve communications with LEP consumers.

Videoconferencing is an emerging tool for interpretation, particularly in the health care setting. While not as ideal as live in-person interpretation, patients prefer videoconferencing to telephone-based interpretation because of the ability to visually interact with the interpreter. The interpreter is also better able to interpret between provider and patient when he or she can actually see the interaction.

While the initial investment in videoconferencing equipment is significant, video-based interpretation can save costs by limiting the time in which the interpreter’s services are utilized to the actual act of interpreting. Traditional on-site interpretation requires health care providers to reserve an interpreter for a minimum amount of time. If a patient fails to show up or an appointment is delayed, the interpreter’s “meter” is still running, potentially costing the provider significantly more than required for the actual interpretation. Video-based interpreters are also able to service more interpretations because they can remain in one location without losing the time necessary to travel from one location to another.

Going Online

Schwab’s Asia Pacific Services division promotes online trading for its Chinese language customers by publishing a translated guide to computer-based trading with accompanying CD-Rom, and by maintaining a Chinese language Web site. Schwab regularly distributes Chinese language informational fact sheets and tax law updates to these customers via electronic communications. Schwab also operates a Korean language Web site for online trading.

Translation memory software promotes consistency in an organization’s multilingual communication. Translation is not an exact science, and there are often different ways to translate the same English term or phrase. For institutions that translate a large number of documents, translation software can review materials to ensure that they are translated consistently and stores commonly used terms and passages for future documents. In this manner, different documents that use the same terms or passages can be standardized to minimize any consumer confusion.

Simultaneous interpretation equipment provides organizations with a time efficient, quality method for communicating information to large groups of LEP persons at meetings where the primary information is delivered in English. The person needing interpretation wears a headset on which the interpretation is broadcast the same time that the English speaker is communicating the information. Long associated with the United Nations and other high-level diplomatic settings, such equipment is becoming more widely used. Use of this equipment helps LEP individuals to follow the English speaker's communication as he or she is delivering it. Gestures accompanying the communication are understood as the presentation is delivered.

Even though simultaneous interpretation requires the use of highly-skilled interpreters, such equipment can result in significant cost savings because it cuts down on the time needed to interpret an English communication. Without such equipment, live interpretation can often double the time needed for a presentation as the English communication is translated. This equipment also enables a presentation to be easily communicated in several languages at the same time (headsets can be distributed according to language), potentially reducing the number of meetings required to communicate the same information.

TRANSLATING PROMISING PRIVATE SECTOR PRACTICES INTO MORE ACCESSIBLE GOVERNMENT PROGRAMS

2

While private businesses appear to be well ahead of most government agencies in providing effective multilingual services, it is important to recognize that public agencies often face greater challenges in serving limited-English proficient (LEP) communities. First, unlike private businesses, government agencies must serve everyone and cannot target their services to specific populations. In California, more than 100 languages are spoken, and in many metropolitan areas, public agencies often provide services in non-English languages. Second, there are a number of federal, state and local laws that require government agencies to provide a relatively high level of access to LEP individuals.⁷ This includes the translation of applications, eligibility requirements, notices, letters, and many more documents than what most private businesses would translate. Third, translation and interpretation in the public context can be more technical and requires a high level of fluency in both English and other relevant languages. For instance, courts and administrative hearings require interpreters to provide verbatim interpretation and a higher level of technical skills than that required in most business settings.

However, even with these differences, the public sector still has much to learn from private sector practices. While government is not motivated by market share or profits, its ability to respond to community needs and carry out basic responsibilities such as protecting public safety or health depends on its capacity to communicate effectively with constituents. Spurred by cost efficiencies and customer satisfaction, private companies have developed innovative and sophisticated practices to delivering multilingual services, and

many of these practices can be incorporated by government agencies into existing programs to better serve LEP individuals. The practices that have been developed by the two health care organizations in this report are particularly relevant to government agencies that provide similar services to LEP individuals.

Checklist: Implementing Language Accessible Services for Public Agencies

The following are eight ways in which public agencies can implement some of the most effective private sector practices described in this report.

✓ Assess the Language Needs of the Constituency

Before an agency can develop a plan to make its services accessible in languages other than English, it must understand the needs of both the current and potential client population in its geographical service area. At a minimum, this involves a demographic analysis using readily available Census data. Census information provides a good starting point for analyzing language needs, but it has limitations. It is generally collected once every ten years and may not offer some of the detailed information about language preferences necessary to make informed decisions.⁸ Census data is also useful only for planning on an aggregate basis, and does not provide the agency with individual-based information.

Taking a cue from the private sector, agencies should consider surveying the population they serve to assess client language preferences and satisfaction with the scope of multilingual services currently provided. Like private

entities, agencies can also convene focus groups drawn from local LEP populations to better understand the needs of potential clients who are not being served.

Many public agencies already maintain computerized databases with information about each client they serve. Agencies should use these databases to track language preferences. Tracking client language preferences enables the agency to adjust and respond to emerging language needs of its service population as a whole. For example, agencies can use such a database to conduct an internal review of which programs and offices serve the highest numbers of LEP clients and prioritize multilingual services at these locations. It also permits an agency to communicate appropriately with individual clients and anticipate the need to match that client with appropriate bilingual assistance for pre-arranged appointments or mailing important notices or informational materials. Agencies should be mindful, however, that existing client databases will not necessarily reflect the language needs of emerging populations who face substantial language barriers and therefore do not use services.

Finally, agencies should assess existing language resources, developing a roster of multilingual employees and comprehensive list of already translated documents, in order to evaluate additional resources necessary to meet the needs of LEP constituencies.

✓ **Implement a Comprehensive Document Translation Plan**

Public agencies serving LEP populations should develop a comprehensive document translation plan. This involves more than having a bilingual employee translate a document and then releasing it to the public.

The best practices among private institutions have the following elements:

- *Identifying and prioritizing documents for translation.* At a minimum, this should involve creating a full list of documents available in English and establishing a planning group comprised of representatives from various public-contact departments within an agency to establish translation priorities. An agency should also consider seeking community-based input since community advocates are often in the best position to identify the most critical documents.
- *Competent initial translation.* If an agency uses its own employee to translate a document, it should ensure that the individual's language proficiencies have been tested. A fluency in the written form of both the target language and English is essential. The ability to translate written documents requires a higher level of fluency than one's ability to speak a language. The translator should also have an appropriate familiarity with the technical subject matter and terminology addressed by the document. Finally, the translator should have a sufficient cultural understanding of the target language population.
- *Second review of translation by another competent translator.* A second pair of eyes should review any translated document. A qualified bilingual employee should review translations made by outside vendors.
- *Review for cultural competence and comprehension.* Because a literal translation of English text usually does not convey an accurate meaning, documents must be reviewed for cultural competence, literacy level, and understanding.

- *Focus group and field testing of documents prior to final release.* Obtaining community or client feedback on the clarity and accuracy of a translated document ensures that the document will be comprehensible to the general public before it is released widely. An agency should consider convening a community-based focus group of LEP individuals for this purpose for any important documents.

✓ **Hire Qualified and Competent Bilingual Staff**

Public agencies that rely on staff for their bilingual capacities should ensure that these individuals are qualified and competent in both the target language and English. Only then can they accurately convey information to a LEP client and report the client's information in English to the agency. Self-identification of employee language proficiency is generally inappropriate.

Agencies should ensure that all employees who utilize their language skills on the job have been tested at an appropriate level for their task. Written translation requires specialized skills and employees who have only been tested for their oral fluency cannot be presumed to be qualified to perform written translation. Some fields, particularly health and legal services, require a sophisticated understanding of the technical terminology and knowledge of the field. Specialized testing has been developed by the private sector in these areas. Health care and other interpreter training programs are becoming increasingly available, and agencies should consider recruiting bilingual candidates through these programs. Agencies may also want to consider how to develop incentives for bilingual employees to complete training programs or better utilize their language skills through appropriate pay premiums.

✓ **Achieve Efficiencies through Pooled Translation and the Use of Call Centers**

Public agencies can achieve cost efficiencies in translation and interpretation by increasing their economies of scale. Like private sector entities, public agencies should consider centralizing translation across local offices or even across agencies, reducing the costs associated with hiring a translator for each office. Pooling translation can also promote consistency in the translation of terms. Standardizing translations, in turn, can minimize confusion.

Where appropriate, agencies should establish telephone-based systems for communicating with LEP individuals, in addition to staff that can serve individuals in person. For larger agencies, or agencies that are able to share resources, a call center staffed by live bilingual employees is a desirable system for addressing needs and questions of the LEP population. A less ideal alternative is connecting LEP individuals who call a general telephone number to an outside telephone-based service that can interpret between the LEP client and the English-speaking employee. The problem with this method is that LEP individuals may not feel comfortable calling a line in which they are greeted in English and cannot respond. Also, in the time required to get an appropriate interpreter or staff person on the line, the LEP individual may become confused and hang up. Another alternative is a dedicated bilingual telephone line on which individuals hear a greeting in their language and can leave messages that are regularly checked and promptly returned by bilingual staff. Of course, this method does not work for urgent situations.

Finally, while telephones can be used to answer simple questions, they are also less effective in addressing complex issues or reviewing written documents where an interpreter or bilingual staff does not have the document available

for review. In these situations, telephone communication may actually confuse or frustrate LEP individuals, and it may be more appropriate to refer these individuals to an office that can provide in-person communication.

✓ **Implement Quality Control**

Agencies must have in place procedures for evaluating the quality of both their written materials and spoken language services. Poor quality multilingual communications can be just as inaccessible to LEP individuals as English-only services. Private sector institutions have established quality control procedures for reviewing translated materials before they are disseminated to the public. The basic elements of this procedure have already been described above. With regard to the in-person or telephone based services provided by bilingual employees to LEP clients, agencies should implement systems for training, monitoring, evaluating, and coaching employees who deliver information in other languages to ensure that information is delivered with appropriate accuracy and cultural sensitivity. Agencies should employ comprehensive and regular trainings for staff on language access resources and policies. Monitoring of multilingual services can be performed by qualified supervisors, peers, or outside contractors. Finally, quality control should include a client-based assessment. Private sector entities employ satisfaction surveys following a customer interaction. Agencies can similarly seek feedback from clients about their ability to communicate with and understand bilingual employees.

✓ **Know the Community and Respond to Community Needs**

Agencies should not develop multilingual services in isolation, but should ensure that services are responsive to the actual needs of the community served. Private sector institutions regularly use market surveys and analyses to develop new products and services

desired by their customer base. Public agencies can similarly employ a community-based review process to understand how to make their services more accessible to LEP populations through targeted multilingual focus groups and surveys. Agencies should also track immigration and local population trends to identify growing or new language groups and proactively address any new language needs.

✓ **Publicize Services in Ethnic Media and at Community Events**

Even if an agency hires bilingual staff and translates important documents into languages other than English, its efforts are of little value if LEP populations are not aware of them. Private sector institutions often launch major advertising campaigns in the ethnic media. Agencies can use cost-effective ways to publicize the availability of multilingual services. Many ethnic newspapers will consider publishing information about government services for free or at reduced rates as a public service. Bilingual employees can go on ethnic radio and television programs to discuss the scope of multilingual services available at their agency. Agencies should also send bilingual representatives to community fairs and festivals where they can distribute translated literature and talk to LEP individuals about their agency's services.

✓ **Create and Oversee a Language Access Plan**

To facilitate the community-based input that private sector entities rely upon, government agencies should create a language access plan that sets forth their internal policies and procedures for providing language accessible services. The plan should assign implementation and monitoring responsibilities to specific employees and provide staff training to all employees who interact with the public. It should also describe how written translations will be developed, distributed, and used. The language access plan should also indicate when and how the plan will be updated.

RESOURCES TO HELP MAKE SERVICES MORE ACCESSIBLE

3

Many of the institutions described in this report were pioneers and were among the first to develop effective multilingual services in their industries. These institutions often had to develop their programs with little or no guidance from other sources. However, in recent years, more resources have become available to help institutions, particularly government agencies and those providing health care, to make services more accessible. These include Web sites and publications describing language access laws that apply to public agencies and promising language access practices. Below is a summary of Web sites and other resources that can help agencies improve their capacity to serve LEP individuals.

Demographic Information

U.S. Census Bureau

www.census.gov

This Web site contains extensive demographic information. Information is available in summary form at the national, state, and municipal levels. However, for detailed information about language characteristics, use the “American Fact Finder” tool and examine data from either Census 2000 Summary Data File #3 or Data File #4. File #3 has language data for the following racial categories:

- White alone (*alone*: only one race was identified by the individual)
- Black or African-American alone
- American Indian or Alaska Native alone
- Asian alone
- Native Hawaiian or Pacific Islander alone
- Some other Race alone
- Two or more Races
- Hispanic or Latino origin
- White alone, not Hispanic or Latino

(Note that the Federal Government considers Hispanic or Latino origin different from race.)

File #4 provides the same information but allows one to search and filter the data by specific ethnic or racial groups. For instance, File #4 allows one to search for the language characteristics of a specific Asian American ethnic community (e.g., Korean, Vietnamese, Chinese, etc.). According to the Census Bureau, information is available by 86 “ancestry” groups.

Counting California

<http://countingcalifornia.cdlib.org>

A project of the California State Library and California Digital Library, this Web site presents summarized demographic information on the California population, including Census 2000 data. This Web site is considerably easier to use than the Census Bureau’s Web site but the options for conducting detailed searches are limited. The information is also limited to California.

Modern Language Association

www.mla.org/census_main

This private association provides a Web site that summarizes Census information, data and maps on the various languages that are spoken in the United States.

Government Agencies

Federal Agency Enforcement of Title VI

www.lep.gov

This interagency Web site contains extensive information about the requirements and enforcement of Title VI of the 1964 Civil Rights Act by federal agencies. Title VI generally requires any recipient of federal funding to make their services or programs accessible to LEP

individuals. This Web site contains:

- Background information about Title VI;
- Executive Order 13166 (requesting federal agencies to develop detailed guidances on enforcing Title VI);
- Guidances for implementing Title VI for over 30 federal agencies;
- Federal implementation and enforcement policies;
- “Know Your Rights” materials;
- “I Speak” Flashcards (flashcard written in 38 languages that can be used to identify the language spoken by individuals who attempt to access services); and
- General resources for providing multilingual services.

U.S. Department of Health and Human Services – Office of Civil Rights

www.hhs.gov/ocr/lep

This Web site provides information about the agency’s language access requirements for health and social service agencies that receive federal funding. It also provides a list of resources for state and local governments, including examples of promising practices.

California State Personnel Board

www.spb.ca.gov/bilingual

The California State Personnel Board is responsible for the enforcement of the Dymally-Alatorre Bilingual Services Act, a state law that requires state and local agencies to provide multilingual services when they serve a substantial number of LEP individuals. This Web site contains information about the

responsibilities of state agencies and resources and guidance for complying with the Act. Information available at the Web site include:

- State agencies’ language surveys (identifying the languages most commonly spoken by constituents) and their implementation plan to comply with the Act;
- State agencies’ multilingual forms and Web sites;
- Bilingual certification or testing standards and resources; and
- Information on how to contract for interpreter and translator services.

City of Oakland – Equal Access to Services Ordinance

www.oaklandnet.com/government/equalaccess/english/homepage.html

In June 2001, Oakland became the first city in the United States to adopt a language access ordinance aimed at removing language barriers for LEP residents who seek city services. Title 2, Ch.2.30.01 et seq. of the Oakland Municipal Code. The City Manager’s office is responsible for helping city agencies comply with the ordinance and for investigating complaints.

City and County of San Francisco – Immigrant Rights Commission

www.sfgov.org/immigrant

This agency is responsible for enforcing the city’s language access ordinance (Chapter 91 of the San Francisco Municipal Code) and for providing technical assistance to city agencies to develop implementation plans for providing accessible services.

Best Practices Publications and Resources

Association of Asian Pacific Community Health Organizations, *A Functional Manual for Providing Linguistically Competent Health Care Services as Developed by a Community Health Center* (2002) (available at www.aapcho.org).

The California Endowment, *How to Choose and Use a Language Agency: A Guide for Health and Social Service Providers Who Wish to Contract with Language Agencies* (March 2003) (available at www.calendow.org).

The California Endowment, *A Manager's Guide to Cultural Competence Education for Health Care Professionals* (2003) (available at www.calendow.org).

California Food Policy Advocates, *Best Practices to Improve Food Stamp Program in California* (available at www.cfpa.net).

California Primary Care Association, *Providing Health Care to Limited-English Proficient Patients: A Manual of Promising Practices* (available at www.cPCA.org).

National Employment Law Center, *Low Pay, High Risk, Chapter 1: Focus on Civil Rights of Limited-English Speakers: Language Access to Government Benefits and Services* (November 2003) (available at www.nelp.org).

National Health Law Project, *Providing Language Interpretation Services in Health Care Settings: Examples from the Field* (2002) (available at www.cmwf.org).

The National LEP Task Force is a network of advocates, service providers, and other organizations that support the laws, regulations, and policies prohibiting discrimination on the basis of national origin because of language and cultural differences. Its Web site provides general information about language access issues, media coverage of such issues, and promising practices among government agencies (www.leptaskforce.org).

Legal Resources

National Association of State Workforce Agencies, *Checklist for Developing a Limited-English Proficiency Plan* (2003) (available at www.healthlaw.org).

National Employment Law Center, *Immigrant Workers Project - Access to Benefits*, this Web site includes a summary of language access requirements for labor agencies and describes promising practices (www.nelp.org/iwp/benefits).

National Health Law Program, *Ensuring Linguistic Access in Health Care Settings: Legal Rights and Responsibilities* (August 2003) (available at www.healthlaw.org).

National Immigration Law Center, *Immigrants and Public Benefits*, this Web site includes general information about language access requirements in government, social service, and health (www.nilc.org/immspbs).



Research

The Access Project, *What a Difference an Interpreter Can Make: Health Experiences of Uninsured with Limited-English Proficiency* (2002) (available at www.accessproject.org).

The California Endowment, *Language Barriers in Health Settings: An Annotated Bibliography of the Research Literature* (August 2003) (available at www.calendow.org).

Grantmakers in Health, *In the Right Words: Addressing Language and Culture in Providing Health Care* (August 2003) (available at www.calendow.org).

National Conference of State Legislators, *Language Access: Helping Non-English Speakers Navigate Health and Human Services* (January 2003) (available at www.nga.org/center).

Interpreter/Translator and Related Resources

- American Translators Association (www.atanet.org)
- The Translators and Interpreters Guild (www.ttig.org)
- National Center for Interpretation (<http://nci.arizona.edu>)
- Center for Applied Linguistics (www.cal.org)
- Diversity RX (www.diversityrx.org)
- National Counsel on Interpreting in Health Care (www.ncihc.org)
- California Health Care Interpreters Association (www.chia.ws)

NOTES

¹ Definitions of limited-English proficiency (LEP) vary depending on circumstances or situations in which English is required. Some situations, such as voting, require a high level of English proficiency, whereas other situations in which individuals interact with government agencies require less English skills. For the purpose of this report, we define the term broadly to include individuals who indicated on the decennial Census that they speak English “less than very well.”

² See, e.g., SB 863 (requires health care services plans to provide appropriate language assistance to enrollees by complying with standards and regulations to be issued by the California Department of Managed Health Care); amendments strengthening the Dymally-Alatorre Bilingual Services Act (passed as part of the state’s budget trailer bills in 2002); and AB3037 (amends Government Code Section 11135 to prohibit national origin discrimination by state agencies and any programs receiving state funding).

³ See Chapter 91 of the San Francisco Municipal Code (available at www.sfgov.org/site/government_index.asp#code); Title 2, Ch.2.30.01 et seq. of the Oakland Municipal Code (available at www.oaklandnet.com/government/Equalaccess/English/EAOrd.pdf); and City of Monterey Park Administrative Policy, Policy No. 10-35 (December 18, 2003) (available at www.healthlaw.org/langaccess).

⁴ Kaiser Permanente is a large institution that provides health care services in seven regions across the country, and its practices and policies vary somewhat by region. The language access practices described in this report are those that Kaiser has implemented in the San Francisco Bay Area.

⁵ Wells Fargo’s analysis included statistical and demographic techniques that project population growth rates to anticipate the level of future demand for multilingual services.

⁶ The California Healthcare Interpreters Association created a set of standards for interpreting in the health care field. The stated goal of the document is “to standardize health care interpreting practices by providing a set of ethical principles, interpreter protocols, and guidance on roles particular to the specialty of health care interpreting.” California Standards for Healthcare Interpreters, California

Healthcare Interpreters Association, www.chia.ws/standards.

⁷ A good summary of the various language access laws that apply to California government agencies is provided in National Health Law Program, Ensuring Linguistic Access in Health Care Settings: Legal Rights and Responsibilities (2nd Ed. Aug. 2003). While this manual focuses on health care, it provides a good overview language access laws that apply generally to government agencies in California. These laws include:

- Title VI of the 1964 Civil Rights Act (prohibits recipients of federal funding from discriminating on the basis of national origin, including practices that restrict services for limited-English proficient individuals).
- California Government Code Section 11135 (California state law equivalent to Title VI, which prohibits state agencies and recipients of state funding from discriminating based on national origin).
- Dymally-Alatorre Bilingual Services Act California Government Code Section 7290 (requires state and local government agencies to translate written materials and provide sufficient bilingual staff to serve limited-English individuals when agencies serve a “substantial” number of non-English speaking persons).
- Language access ordinances and policies adopted by various local governments (see also footnote 3, above, and accompanying text).

The manual also describes other language access laws and policies that apply specifically to the health care context.

⁸ The U.S. Bureau of Census has recently received funding to fully implement its American Community Survey project. The goal of this survey is to continuously collect data that in the past had been gathered through the long form of decennial Census questionnaire. The new survey will soon allow public access to more recent information about language proficiency and other social and economic characteristics of the U.S. population. In addition, the Census Bureau is likely to continue to update its Web site, allowing more detailed analysis of Census information by the public. For more information about the American Community Survey, go to the Bureau’s Web site at www.census.gov.

APPENDIX

This report would not have been possible without the participation of the following institutions.

Asian Health Services

Based in Oakland and founded in 1974, Asian Health Services (AHS) is a comprehensive non-profit community health center providing medical care, health education, insurance counseling, and client advocacy to lower income Asian Americans in Alameda County. AHS services about 57,000 medical visits for about 13,500 registered patients annually. With capacity to provide health care services in nine languages, AHS's staff of over 150 includes 18 primary care providers and seven nurses.

AHS also houses the Language Cooperative/ Language and Cultural Access Program, a medical interpretation and translation service. Since 1994, the Language Cooperative has provided phone and on-site interpretation, multilingual focus group facilitation, written translation of health-related documents, and training of providers and interpreters, not only to AHS, but also to a number of private and public-sector health services organizations, including Kaiser Permanente Medical Center – Oakland, Children's Hospital Oakland, Highland Hospital, Alameda County Public Health Nursing, and Alameda Alliance for Health, among many others.

Charles Schwab

With over 19,000 employees serving some 8 million client accounts worldwide, Charles Schwab, headquartered in San Francisco, is one of the largest financial services companies in the world. Long ago recognizing a relatively untapped market of individual investors who preferred communicating in languages other than English, Schwab has offered non-English language services to its American clients for years. Today, Schwab offers extensive services in Spanish, Chinese, and other Asian languages. Charles Schwab's "Asia Pacific Services," for clients who are more comfortable communicating in Asian languages than in English, was formed in the late 1980s. From its humble beginnings of one phone line, four desks, and an annual budget of \$5000, Asia Pacific Services has grown to a staff of some 250 employees, 90 percent of whom are bilingual or multilingual in English as well as at least one other Asian language.

Kaiser Permanente

Kaiser Permanente is one of the largest health care organizations in the country. Divided into seven regions nationwide, Kaiser offers extensive services in languages other than English, in part dependent on the needs of the membership served in each individual region. The Northern California region has long been the model by which other Kaiser regions are measured in their abilities to service LEP members. In San Francisco alone, Kaiser services about 167,000 members, just under 20 percent of whom are limited-English speakers.

Pacific Gas & Electric Company

Pacific Gas & Electric Company (PG&E) is one of the largest utilities in the United States, delivering natural gas and electricity service to 5 percent of all Americans. Headquartered in San Francisco, PG&E has 63 local offices throughout northern and central California. While PG&E has been translating written materials into languages other than English for decades, in 1994, the company conducted a critical demographic analysis of the population it serves. At that time, PG&E launched a concerted effort to improve the scope of linguistically accessible services for customers proficient in Spanish, Chinese, and Vietnamese languages.

SBC Communications

SBC Communications (SBC) is one of the world's leading data, voice and Internet service providers. Together, SBC companies currently serve nearly 60 million access lines nationwide. Serving both residential and business customers, SBC is also, among other things, the largest provider of local telephone services in California, servicing about 16 million accounts.

SBC believes that the diversity of California requires multilingual services. SBC recognized early on that multilingual services make good business sense and instituted formal ethnic market development plans in the 1980s. In 1986, the company launched the development of its Hispanic market plan and opened Hispanic residential and business call centers with Spanish language capability in 1987. In 1987, it also began development of an Asian market plan, and opened Asian residential call centers with language proficiencies in Chinese (Mandarin and Cantonese), Korean, and Vietnamese. Throughout the 1990s, SBC opened additional business and residential call centers dedicated to Filipino and Japanese speaking customers.

Wells Fargo

Wells Fargo Bank offers banking services throughout the western United States. Wells Fargo employs a corporate strategy aimed at evaluating the "mass market" with a special aim at targeting services to the "average customer." Wells Fargo first began recognizing a need to perform some outreach to certain LEP communities in the 1970s, with the issuance of selected marketing brochures in languages other than English. In the 1980s, the company instituted an "Ethnic Division." With the recent release of Census data demonstrating that communities of color together make up the majority of the California population, Wells Fargo re-examined its marketing and services to non-English speaking communities, and re-named its Ethnic Division, the "Emerging Markets Department."

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