

July 29, 2021

D.C. Department of Human Services
Attn: Director Laura Zeilinger
64 New York Ave. NE
6th Floor
Washington, DC 20002

VIA EMAIL

Dear Director Zeilinger,

We hope this message finds you well. This letter is submitted by the Council for Court Excellence (CCE) and is endorsed by the organizations and individuals listed below on page four. Through this letter, CCE would like to bring your attention to three deficiencies with the translation function on the STAY DC website. We hope these issues can be resolved as soon as possible to ensure that Limited-English Proficient (LEP) and Non-English Proficient (NEP) individuals are able to access financial assistance that is vital for survival during these trying times. The issues are listed as follows:

1. The translate function in itself is hard to locate for LEPs/NEPs. Currently, the Google Translate function is identified by a small menu bar in the top left-hand corner that reads “Select Language” in English. This is the first language barrier that LEP/NEP individuals face when accessing the website, as they are unable to locate the very function that is meant to translate the page into their respective language. This issue can easily be resolved by amending the website to showcase the translation function in a clear and accessible manner. For example, the [D.C. Office of Human Rights \(OHR\) website](#) lists all available languages in bold at the bottom of its webpages. Each language is hyperlinked so that a simple click takes you to the translated version of the page. The languages are also written in both English and the respective language. We encourage the Department of Human Services (DHS) to amend the STAY DC website and incorporate changes similar to the OHR website so that LEP/NEP individuals are easily able to identify where to click for a translated webpage. The website already uses a method similar to the OHR website for the eligibility checklist, and we see no reason why it cannot be used for the entire website.
2. With the STAY DC website’s current format, even if a LEP/NEP individual were able to locate the translation function, the languages provided in the dropdown menu are all written in English, providing a further language barrier. Those who are not familiar with the written English translation of their language are effectively prevented from knowing which language option to choose. As indicated in our previous recommendation, we urge DHS to utilize the same format as OHR and list the available languages in English and the respective language so that LEP/NEP visitors to the site can easily identify their language.

3. The STAY DC website utilizes Google Translate to translate the page for LEP/NEP individuals. We are concerned about whether Google Translate is the best product to use, as it does not incorporate context into most of its translations, rendering some of its translations as nonsensical and/or confusing. For example: when translated in Spanish, the main page translates the title of “STAY DC” into a literal command for the viewer to “stay” in D.C. The Chinese translation provides a similar mistranslation and interprets “STAY DC” as “Stay/Stop DC”. There is also the additional concern that none of the pop-up boxes are translated, so when the website asks for a viewer to insert their login information, LEP/NEP viewers are unable to do so because the request is in English.

In order to fully grasp the assistance that STAY DC provides, assess whether they qualify for the assistance and apply for the assistance, LEPs/NEPs need the website to be translated accurately. We ask that DHS and/or the other sponsoring agencies utilize a better, more accurate translation program. In the alternative, if securing a different program is prohibitively costly or unavailable, we ask that a professional proficient in each language review the corresponding page translations and make sure they are appropriate before being posted on the website.

Under the Language Access Act, covered entities are required to provide translations of vital documents.¹ While the current website may provide some form of translation, it can be argued that the counter-intuitive structure of the website constructively prevents LEPs/NEPs from accessing the translation services needed, essentially rendering the website’s translation function useless. We urge DHS to amend the STAY DC website so its translation functions are effective and useful.

A further concern to consider is the potential waste of federal funding should there be an insufficient amount of funds distributed to D.C. residents. Under federal guidelines, the STAY DC program has until September 30, 2021 to distribute at least \$130 million of the federal relief aid, or else the unused funds may be returned to the federal government.² As of June of this year, the STAY DC program has only used a little over 5% of its total funding.³ Naturally, this problem is only exacerbated by the fact that thousands of LEPs/NEPs are unable to access these funds because of the poor translation of the STAY DC website. Encountering poor or limited translation services is likely to either frustrate and/or discourage LEPs/NEPs from completing the application, or result in incorrect application submissions. Amending the website to allow for meaningful access to accurate translations is sure to encourage an increase in LEP/NEP usage of the program, and we urge DHS to promptly resolve the matter.

The COVID-19 pandemic has impacted families around the nation, and we cannot deny that immigrant communities have been disproportionately affected. D.C. has previously heightened the problem by failing to provide adequate interpretation and translation services for vaccination

¹ §D.C. Code 2-1933(a).

² Jarrod Wardwell, [*D.C. Begins to Improve its Central COVID-19 Rent Relief Program, Which Applicants Say is Hard to Reach and Riddled with Delays*](#), Street Sense Media (June 23, 2021).

³ *Id.*

resources and programs.⁴ Repeating these past mistakes has literally become a matter of life or death. Rental and housing assistance for those affected by the COVID-19 pandemic is paramount for housing security, and STAY DC is critical to ensure this housing stability. The website needs to be updated with proper translation and interpretation functions to allow for the LEP/NEP community to access these resources. Otherwise, we risk isolating the community yet again from live-saving programs. We ask that the Department of Human Services (DHS) promptly amend the website to ensure this does not happen.

We appreciate your consideration and hope to hear from you soon.

Sincerely,

/s/ Sosseh Prom

Sosseh Prom | Policy Counsel

Pronouns: she/her/hers

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⁴ Laura Hayes and Amanda Gomez, [Much of D.C.'s Vaccine Information is Only in English. Some Change is Coming](#), Washington CityPaper (Mar. 18, 2021); Julie Zauzmer, [D.C. Says Long-Awaited Translation of Vaccine Website is Coming this Weekend](#), The Washington Post (April 9, 2021).

List of Organization and Individual Endorsements

Organizations

Advocates for Justice and Education, Inc.

Excluded Workers Coalition

Autistic Women & Nonbinary Network

FCB Law

AYUDA

Legal Counsel for the Elderly

Bread for the City

Multicultural Community Service

Children's Law Center

*The Fund for Community Reparations for
Autistic People of Color's Interdependence,
Survival, and Empowerment*

D.C. Affordable Law Firm

The Platform of Hope

*D.C. Chapter of the National Domestic
Workers Alliance*

Tzedek D.C.

D.C. Language Access Coalition

*Washington Lawyers' Committee for Civil
Rights and Urban Affairs*

Empower D.C.

Equal Rights Center

Washington Legal Clinic for the Homeless

Individuals

Alexandra Smith

Judy Estey

Courtney Wilkes

Martin Kleinbard

David Cynamon

Parisa Norouzi

Felicia Battista, Esq.

Victor E. Long, Esq.

Gabrielle Mulnick Majewski

Yoliara Ramos

Jeffrey Gutman