

# Machine Translation Software in Agencies' Websites and Mobile Apps

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Office of Human Rights  
District of Columbia

## Purpose:

The Language Access (LA) Program accepts using Machine Translation (MT) Software with the contingency that the agency has a justified reason for using such technology. Furthermore, the agency must contact the Chief Technology Officer at the Office of the Chief Technology Officer (OCTO), the agency in charge of submitting the waiver request to the Mayor's Office of the General Counsel on behalf of the agency.

The implementation guidelines included in the following sections are approved by the Office of Human Rights Language Access Program.

## Automated MT software background:

It is important to understand the modus operandi of automated translation technology. The machine translation algorithms save words and their relative positions as the probability that they may occur together, creating a statistical estimate of the translations of similar sentences. Therefore, the algorithmic systems do not interpret words' meaning, context, and intention as a human translator does.

Note that Google Translate, WeGlot, ChatGPT, DeepL, and other automated MT software features do not extend to embedded/linked documents, creating a barrier to equitable access to crucial information for the LEP/NEP community. To avoid liability issues, inaccurate/erroneous translations, and the spread of misinformation, it is advised that the documents are professionally translated and include a quality assurance process before embedding the translated documents/links.

Recent evidence from different research reports and studies shows that MT<sup>1</sup>, particularly Google Translate, produces materially less accurate results when translated from English into several other languages, particularly non-European languages.

Also, it has been noted that automated translations fall short in understanding social media posts, and in particular, the machine translation tools raise further concerns when it translates into languages that don't use Roman characters, requiring an extra layer of quality control to ensure that the translations are accurate.

## Basis for position:

Recent data<sup>1</sup> shows that the price of cutting corners in terms of the cost of translation service can carry a long tail impact on the quality of the translations. A critical aspect of machine translation is that it does not work well with idioms, cultural nuance, different dialects, and slang.

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<sup>1</sup> UCLA and Memorial Sloan Kettering Cancer Center Study published in 2021

A PBS news weekend report and interview with the Respond Crisis organization on May 7, 2023, highlights the pitfalls of the risk of using translation technology in languages like Afghan, Pashto, and Dari that struggle to translate idioms or specific dialects.<sup>2</sup> This report also noted that the Respond Crisis has seen several instances of mistranslations in critical asylum documents that can seriously jeopardize the case of completely invalidating them.

### **Recommendation:**

Although the LA program does not recommend or endorse the use of Google Translate or other automated MT software or technology, we understand it is one of the most efficient methods to provide multilingual access with most agencies' limited technical resources.

Based on the global health pandemic, the District of Columbia's Executive Office of the Mayor used Google Translate, as seen on the COVID-19 emergency response page. It has been noted that this type of hybrid website is effective when an agency's website content is constantly changing/updating.

In sampling websites, we have found that for a hybrid website to be effective, it must have the following elements:

- High visibility of Google Translates or other automated Machine Translation software (icon) to ensure accessibility of language services
- Professional translation of embedded/ linked documents (pdf, editable pdf file)
- Title of the linked vital document translations should be translated in the translated language along with the English title. See examples:<sup>3</sup>
  - [Solicitud en Español \(Spanish online application\)](#)
  - [Renovate Right! Tip Sheet for Preventing Lead Exposure ¡Pinte correctamente! Consejos para prevenir la exposición al plomo](#)
- Ensure that the translations by MT software are reviewed by qualified human translators, as per the Department of Justice's December 2021 guidelines<sup>4</sup>.

### **It is strongly advised that an agency also include a disclaimer, such as the examples below:**

- The <agency name> website has been translated for your convenience using translation software powered by Google Translate. Reasonable efforts have been made to provide an accurate translation. However, no automated translation is perfect or intended to replace human translators.
- Translations are provided as a service to <company name> website users and are provided "as is."
- No warranty of any kind, expressed or implied, is made regarding the accuracy, reliability, or correctness of any translations made from <source language> into any other language. Some content (such as images, videos, Flash, etc.) may not be accurately translated due to the limitations of the translation software.

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<sup>2</sup> <https://www.pbs.org/newshour/show/how-language-translation-technology-is-jeopardizing-afghan-asylum-seekers>

<sup>3</sup> "Spanish (Español). Accessed September 19, 2023. <https://doee.dc.gov/node/714902>.

<sup>4</sup> DOJ December 2021 Publication: Improving Access to Public Websites and Digital Services for LEP person

- The official text is the English version of the website. Any discrepancies or differences created in the translation are not binding and have no legal effect for compliance or enforcement purposes. If any questions arise related to the accuracy of the information on the translated website, refer to the official English version of the website.<sup>5</sup>

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<sup>i</sup> <https://slate.com/technology/2022/09/machine-translation-accuracy-government-danger.html>  
<https://www.pbs.org/newshour/show/how-language-translation-technology-is-jeopardizing-afghan-asylum-seekers>  
<https://restofworld.org/2023/ai-translation-errors-afghan-refugees-asylum/>  
<https://digital.gov/2012/10/01/automated-translation-good-solution-or-not/>

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<sup>5</sup> [Attribution Requirements | Cloud Translation | Google Cloud](#)