Global Interpreting Network Inc.

Response to Alliance for Innovation: AFI-2026-124 AI-Driven Translation & Language Access Services

Global Interpreting Network Inc. meets or exceeds solicitation requirements without exception at the highest levels of federal and industry regulatory compliance.

The following individuals are authorized to negotiate with you on behalf of Global Interpreting Network Inc.:

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COVER LETTER

Proposal for AI-Driven Translation and Language Access Services

Dear AFI Evaluation Committee,

Global Interpreting Network Inc. (GINI) is pleased to submit our proposal for AFI's AI-Driven Translation and Language Access Services. As a seasoned Language Solutions Provider (LSP) with nearly 20 years of experience, we don't just offer tools; we offer a **unified communication ecosystem** across Workstreams 1–4.

Our solution is engineered to bridge the gap between the rapid scalability of AI and the nuanced reliability of human expertise.

Why GINI for AFI?

- **The Hybrid Advantage:** While many providers offer either AI or human services, GINI delivers an integrated model. We leverage browser- and app-based AI for immediate scalability, backed by on-demand human linguists for high-stakes healthcare and municipal contexts where accuracy is non-negotiable.
- **Public Sector Precision:** Our infrastructure is purpose-built for government and healthcare compliance. We understand the sensitivity of public agency communication, ensuring every interaction is reliable, accessible, and audit-ready.
- **Immediate Operational Readiness:** We specialize in the "1DARO" (1 Day After Receipt of Order) onboarding standard. With established nationwide contact centers and a robust linguist network, we eliminate the typical "lag time" associated with new contract activations.
- **Turnkey Procurement:** Our deep experience with cooperative agreements means we aren't just a vendor; we are a strategic partner. We simplify the adoption process for participating agencies, ensuring streamlined procurement and rapid service deployment.

Commitment to Innovation and Trust

GINI provides more than a platform - we provide a bridge to inclusivity. By combining real-time AI capabilities with proven linguistic expertise, we help agencies improve multilingual access while maintaining the public trust essential to government operations.
We are ready to immediately promote the **Edge Public Partner** initiative to expand language access nationwide. We look forward to the possibility of a transformative partnership with AFI.

Respectfully submitted,

Hector Fuentes

President and CEO | Global Interpreting Network Inc.

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INTRODUCTION

Global Interpreting Network Inc. (GINI)) is a U.S.-based MBE/SBE language services provider (LSP) with 19 years of experience delivering nationwide language access solutions to Federal, State, local government, healthcare, education, legal, and community-facing organizations. With active operations and contract support across 40 states, GINI supports statewide cooperative agreements and major procurement vehicles including CMAS, GSA, NASPO, BuyBoard, Vizient, and other regional and national programs, providing scalable, HIPAA compliant, and responsive interpretation, translation, localization, and multilingual communication services.

For this solicitation, Global Interpreting Network Inc. offers a comprehensive solution for Workstreams 1 through 4, combining:

+ **AI-Driven Interpretation, Translation, and Language Access Services**
with the
+ **Opt-Out to On-Demand Human-Based Interpretation and Translation**.

Our offering **meets and exceeds the requirements of four Workstreams** to enable and streamline language access for a broad spectrum of municipal and public agency communication needs.

19+
Years in Business

300+
Languages (Human)

~60
AI Languages

4 of 5
Workstreams Bid

Founded in 2007 | S Corporation

Operated by a team of linguist experts and technology professionals with a passion to transform language from an obstacle into a bridge to understanding and opportunities.

Four Call Centers Nationwide

Distributed infrastructure supporting 24/7/365 operations across all U.S. time zones. Dedicated program management. Large qualified network of approximately 17,000 Certified or Qualified Interpreters and Translators.

ISO 9001:2015 & ISO 17100

Quality management and translation certifications governing all service delivery workflows

MBE-Certified | GSA Schedule |CMAS

Minority Business Enterprise certified; cooperative contract experienced with ability to support all Government and Healthcare clientele

Service Scope & Readiness:

- **Services for 300+ languages**: Telephonic Interpretation (OPI), Video Remote Interpretation (VRI), On-Site Interpretation, Document Translation and Localization, and Audio/Video Transcription.
- **Performance at scale**: Workforce management practices and dedicated contract support team allow scale while keeping performance visible and controlled.
- **Turnkey solution for immediate impact**: Real-Time Interpretation, Document Translation, Platform Deployment, and On-Demand services all available at contract start.

GINI is compliant with all industry and federal regulatory standards listed below:

ISO 9001:2015	Quality management governing all service delivery
ISO 17100	Translation standards across all document workflows
SOC 2 Type II	Security, Availability, Confidentiality for all cloud services
HIPAA / BAA	Health-related translation; BAA available upon request
CJIS	Criminal justice and law enforcement data contexts
FedRAMP	Baseline alignment for federally-influenced environments
FERPA	Student educational records and K-12/university contexts
EO 13166 / Title VI	Language access and non-discrimination compliance
ADA / Section 508	Captioning, accessibility, and interface standards
MBE and CA Small Business Certified	Minority Business Enterprise; GSA cooperative contract experienced

PROPOSAL OVERVIEW

One provider. Four workstreams.

Real-time voice interpretation, document translation, OPI/VRI, and a proprietary platform.
All under one contract, a centralized point of contact, and a unified accountability structure.

AI delivers speed. Humans in the loop (HITL) when the context requires it.

60+ languages supported by AI with escalation option to human linguists.
300+ languages supported by a human network for legal, regulatory, medical, or emergency use cases.

19 years of government delivery.

Public sector clients include counties, cities, school districts, state agencies, and federal programs. GSA cooperative contract experienced. We maintain internal structures for program oversight, account support, reporting, issue resolution, emergency continuity, and service monitoring.

Ready now – GINI Accepts Edge Public Partnership Fee

GINI is operationally ready to support this cooperative contract at scale, immediately promoting the Edge Public partnership to expand language access nationwide. 24/7/365 operations across four call centers. Cooperative contract performance from day one to thousands of state government, SLED and political subdivisions client base. Small account set up in two business days on average; large enterprise and multi-site cloud accounts in less than 30 days to full operational availability.

AFI's research identified the gap. GINI's hybrid model closes it.

What vendors without deep Language Access Service experience lack:

- No human backstop when the context requires it.
- Lacking Federal Regulatory Compliance (HIPAA and others) and Industry Standards compliance.
- AI-only outputs create high-risk in legal, medical, and public safety contexts.
- No deep regulatory compliance with LSP provider Code of Conduct, Quality Assurance, Surveillance, and monitoring experience
- No accountability path when accuracy is questioned.

What GINI delivers:

- AI speed with immediate human escalation on demand.
- Compliance with language access regulations governing public sectors
- Integrations with platforms agencies already use (Granicus, Zoom, 311).
- Integration with all government and commercial on-premise equipment, applications and software.
- Audit-ready records and LEP documentation for every interaction.

The GINI difference: One continuous service environment.

AI does not replace qualified interpreters. It provides a front-line, AI-driven access layer for routine communication, supported by clearly defined escalation boundaries.

When nuance, sensitivity, or regulatory context requires it, a qualified human interpreter enters the interaction with context carried forward with zero workflow restart.

AI-First Access

Immediate multilingual delivery
for routine interactions
~60 AI languages, <2s latency
Browser or app

Quality Gate

Real-time confidence scoring
Terminology alignment check
Risk classification
Human escalation trigger

Human Escalation

Immediate multilingual delivery
for critical interactions
~300+ languages
Browser or app

Global INTERPRETING NETWORK

GINI's solution meets all operational performance requirements for Workstreams 1 through 4.

WORKSTREAM 1

REAL-TIME AI VOICE INTERPRETATION

GINI provides: a high-availability, hybrid service model that combines AI-powered real-time voice interpretation with on-demand human linguist support. This approach is specifically designed for public meetings, council sessions, town halls, hearings, and community engagement events.

WORKSTREAM 2

WRITTEN DOCUMENT & CONTENT TRANSLATION

GINI provides: written translation and localization solution purpose-built for the full range of municipal and public-agency content, with AI-driven speed, adaptive workflows, and accountable human review.

WORKSTREAM 3

ON-DEMAND OPI / VRI

GINI provides: a fast, practical multilingual access for routine interactions while preserving immediate access to qualified human interpreters when the communication becomes more sensitive, complex, or high-risk.

WORKSTREAM 4

AI TRANSLATION PLATFORM / SOFTWARE LICENSE

GINI provides: a cloud-based AI translation platform designed to help Participating Public Agencies manage multilingual communication more efficiently across departments, users, and content types.

AI-Driven Language Access Services

AI-supported solutions across live voice, written translation, on-demand interpretation, and platform workflows, reinforced with human backup, review, and escalation. Available 24/7 from any laptop, tablet, or handheld device via secure browser or GINI app.

Live/Real-Time Multilingual Communication

Real-time multilingual communication for meetings, events, and public interactions through AI-enabled tools with managed service oversight and human support.

Written Document & Content Translation

High-volume document translation, localization, terminology control, and structured review workflows for government content including public-facing and higher-risk materials.

On-Demand OPI/VRI with Human Escalation

24/7/365 OPI and VRI operations with qualified interpreters and redundant infrastructure; AI-assisted access backed by immediate human interpreter escalation.

Platform-Based Delivery & Administrative Control

Configurable language access environment with role-based access, secure workflow tools, and historical activity management.

Compliance & Public-Sector Readiness

Structured to support EO 13166, Title VI, ADA, Section 508, HIPAA, and FERPA, with secure handling and stronger human review for higher-risk content and interactions.

Implementation, Support & Service Continuity

Dedicated project management, onboarding, training, reporting, ongoing support, and emergency continuity planning across the full life of the contract.

AI Cutting Edge Solutions from One LSP Services Provider

From a technical and performance standpoint, GINI delivers AI-enabled capabilities across real-time voice interpretation, document translation, on-demand OPI/VRI services, and platform-based language access workflows.

WORKSTREAM 1

GINI MEETS ALL REQUIREMENTS:

- Real-Time AI Voice Interpretation for Live Meetings, Town Halls & Civic Events

Real-Time AI Voice Interpretation with HITL Architecture

Designed for: Live meetings, town halls, council sessions, and civic events across in-person, hybrid, and virtual formats.

Platform Features:

Real-time AI voice interpretation supporting both simultaneous (30 languages) and consecutive (60 languages) meeting formats; meeting attendees, live captions, and multilingual subtitles; Integrations with Granicus, Zoom, Teams, and Webex; post-meeting multilingual transcripts; ADA-compliant captioning and accessibility support; AI-supported languages with access to 300+ human-supported languages; ≥99.9% platform uptime; and <2.0 second AI interpretation latency.

High-availability hybrid model combining AI real-time voice interpretation with on-demand human linguist

RISK-BASED DELIVERY MODEL

Routine public-facing events use AI-led multilingual delivery for speed, scale, and reach. *Higher-sensitivity events*, such as hearings, policy discussions, and legal/regulatory briefings incorporate human oversight, terminology preparation, and live operational monitoring.

ACCESSIBILITY & COMPLIANCE SUPPORT

Live captions, multilingual subtitles, hearing-access support, secure access controls, and monitored delivery protocols supporting EO 13166, Title VI, ADA, Section 508, HIPAA, Joint Commission, and related language-access requirements.

LOWER OPTIONAL RISK

Aligning support model to event importance and complexity reduces communication delays, improves clarity, and lowers risk associated with unsupported multilingual public engagement.

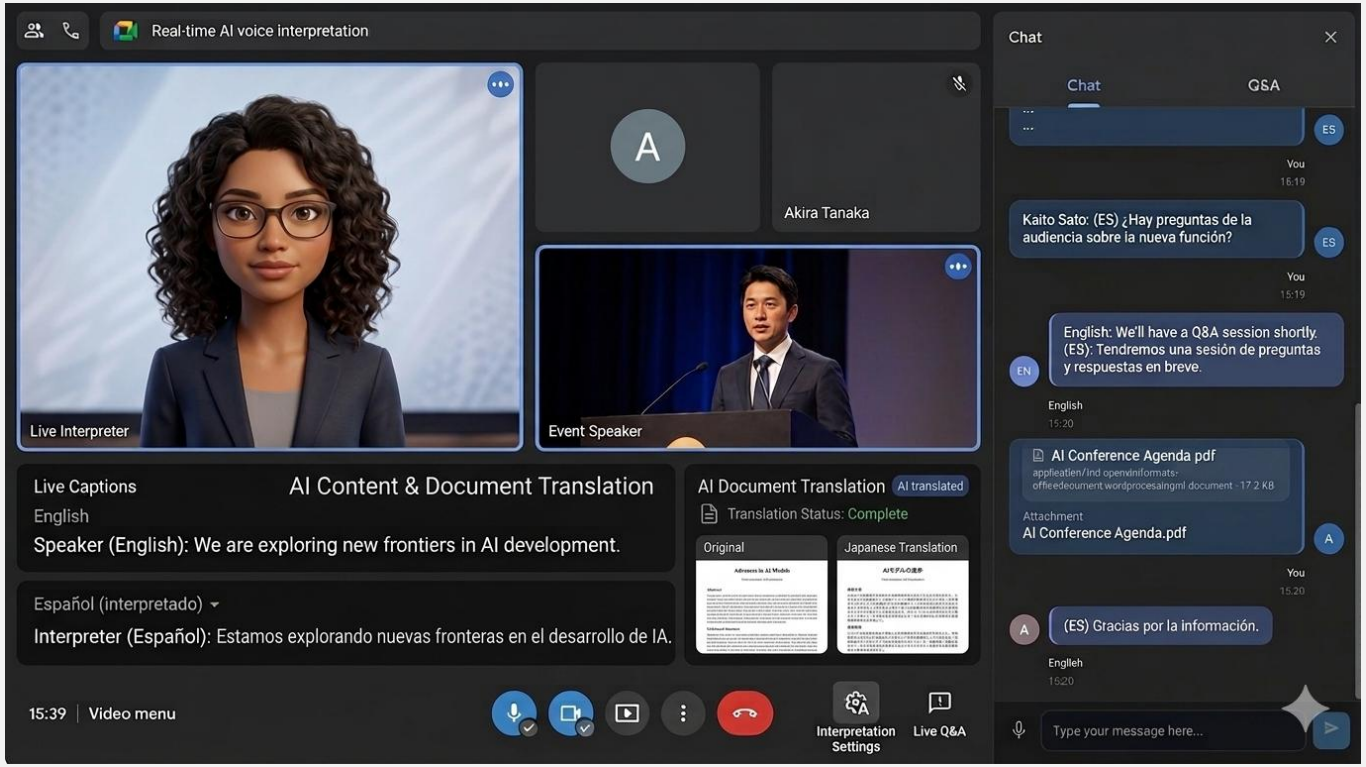
HOW IT WORKS

PARTICIPANT ACCESS:	Browser link, meeting link, QR code, or mobile-enabled entry point. Attendees select preferred language at join; no software installation required.
HOST ACCESS:	Create/schedule conference → Configure dates, participants, and language channels → Invite → Launch and monitor → Reschedule or cancel if desired → Receive auto-generated multilingual transcript on close.
ADMIN PORTAL:	Full visibility into session activity, user management, usage reporting, and analytics through role-based administrative dashboard.

REAL-TIME EVENT LANGUAGE SUPPORT

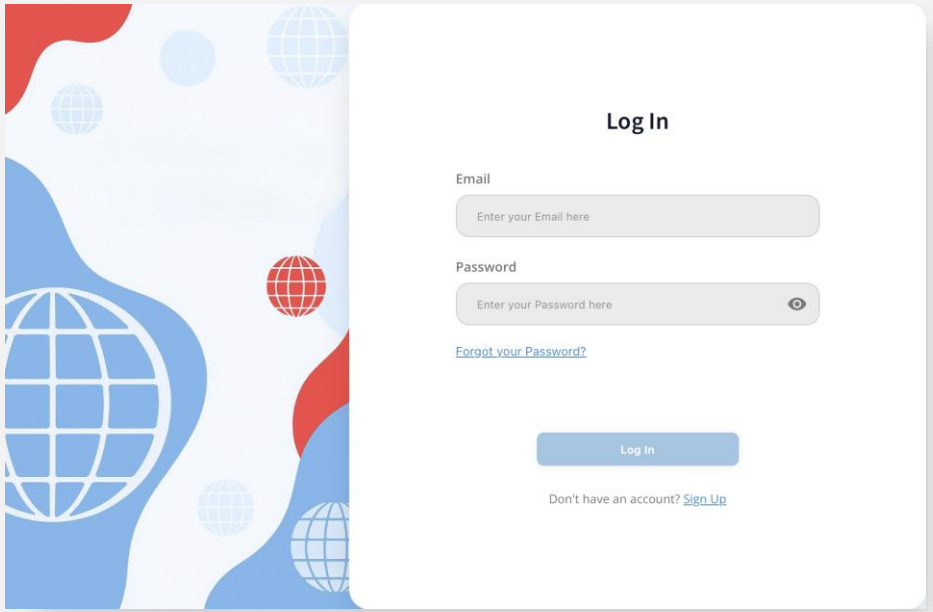
- FEATURING

- AI Interpretation Avatar
- Multiple Language Support
- Up to 30 Languages
- Consecutive or Simultaneous
- Live In-Language Captioning
- Real-Time Chat
- Up to 2000 Participants
- AI Document Translation

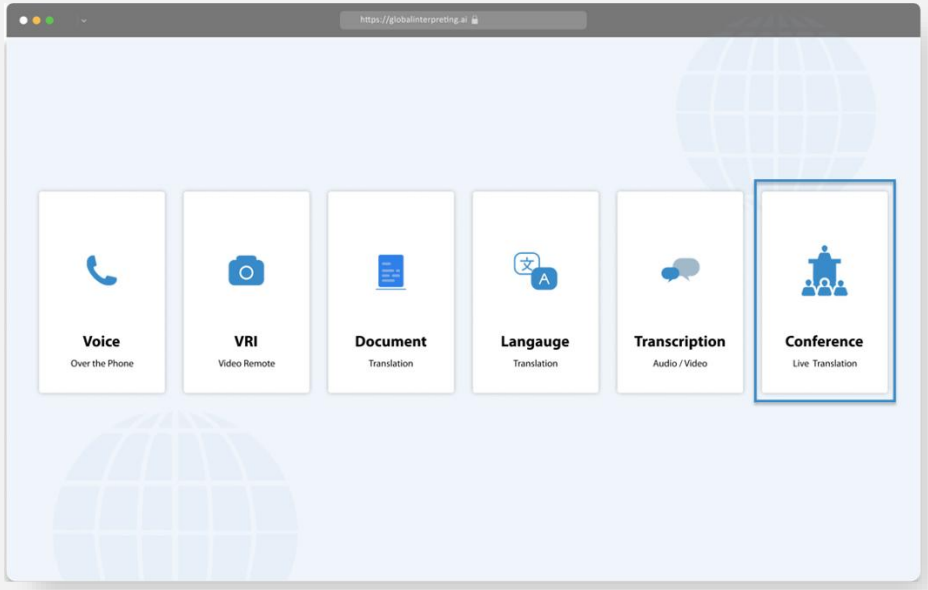


HOW TO ACCESS SERVICES – CONFERENCE SCENARIO

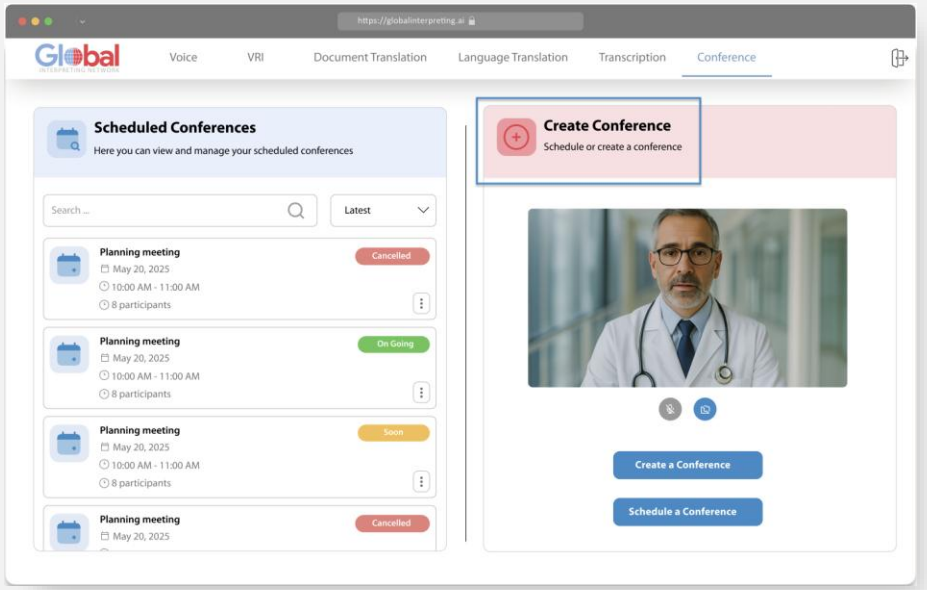
For agency hosts, setting up and launching a multilingual session is straightforward from any browser. To create and manage a conference, hosts follow these steps:



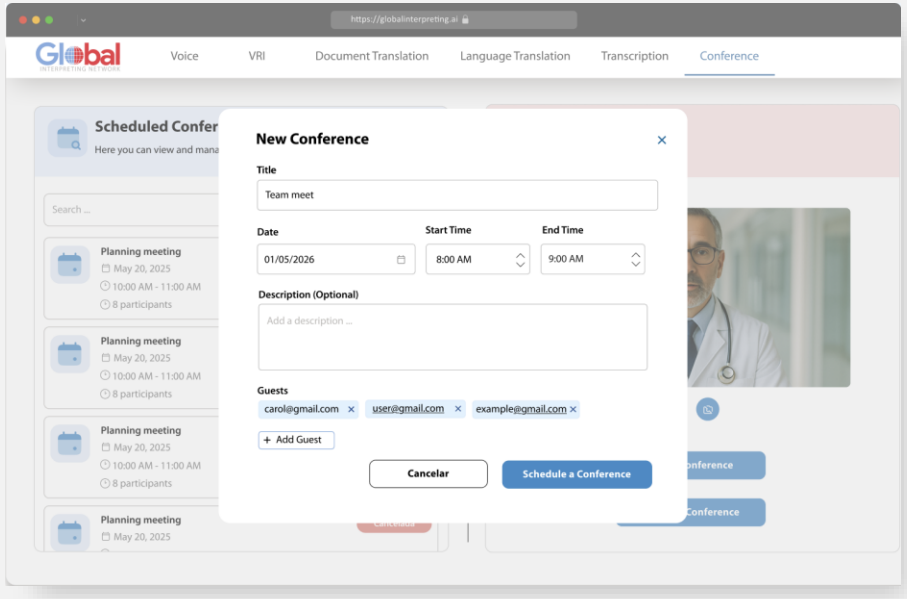
1. Log in to the platform – no software installation required/Same browser access

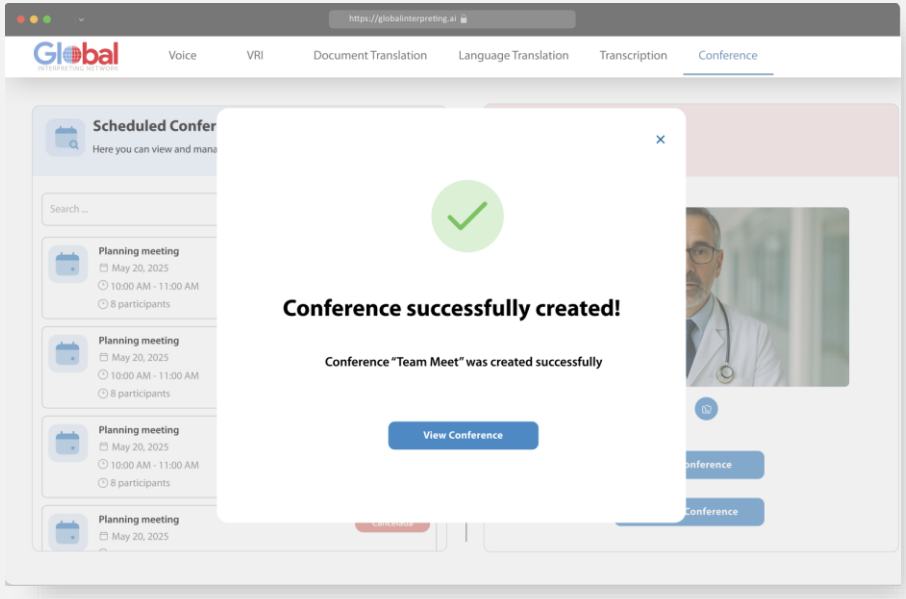


2. Select “Live Conference Interpretation” Service

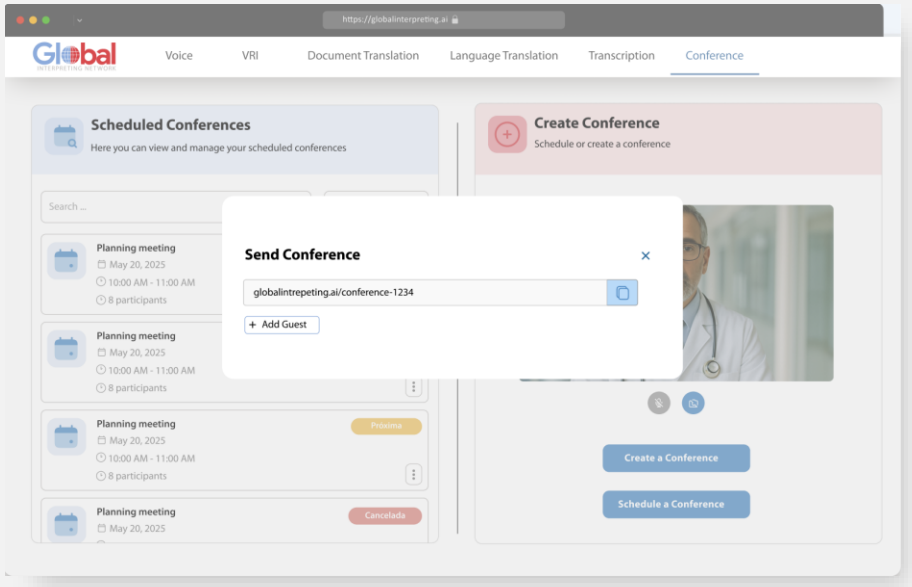


3. Create a new conference – Instant/Scheduled

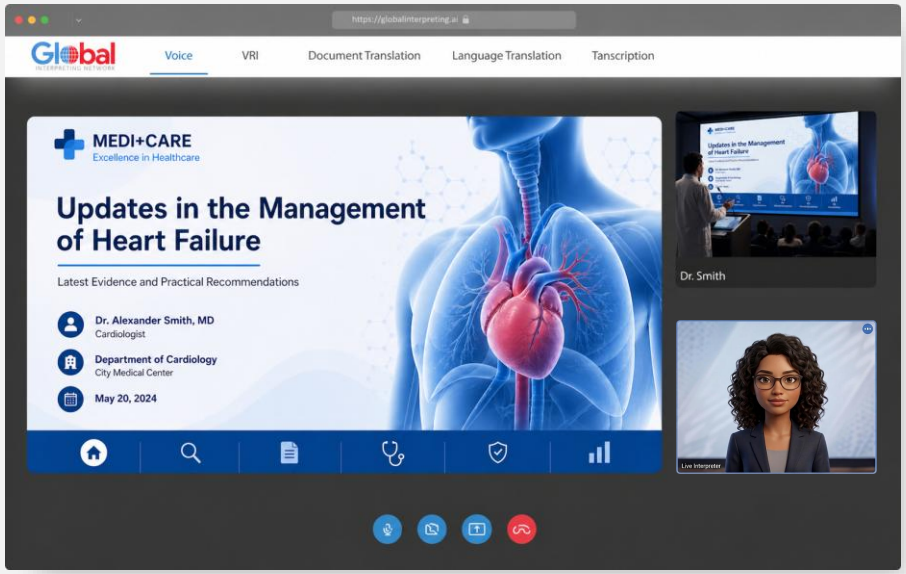




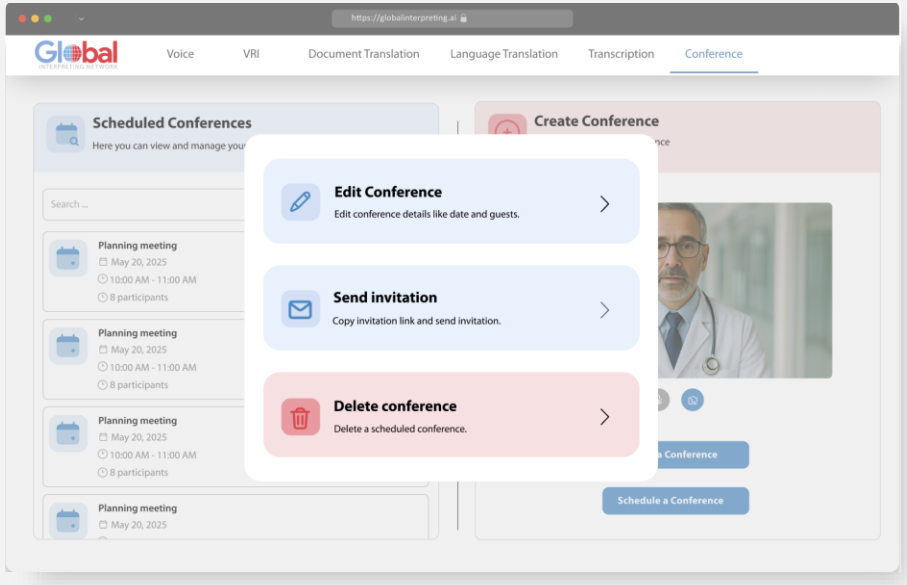
4. Configure conference – Date/Participant number/Conference Name



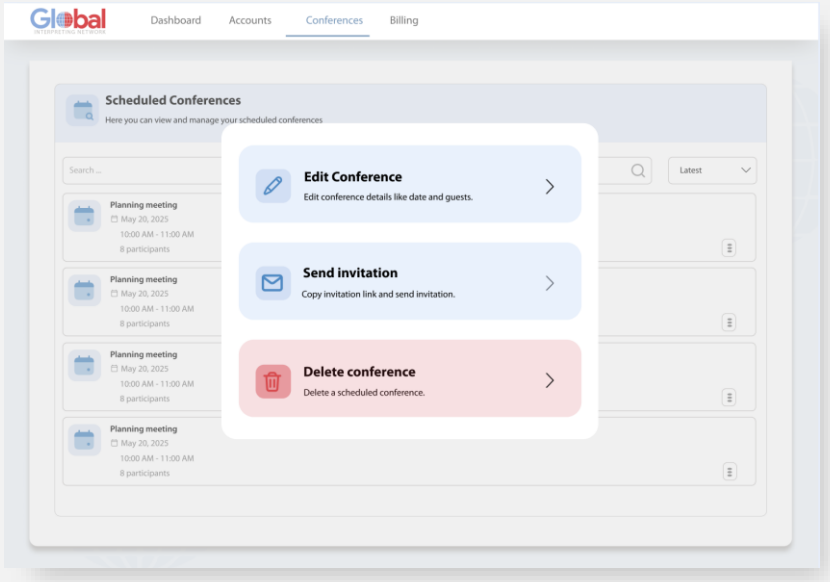
5. Invite participants



6. Launch and monitor the session



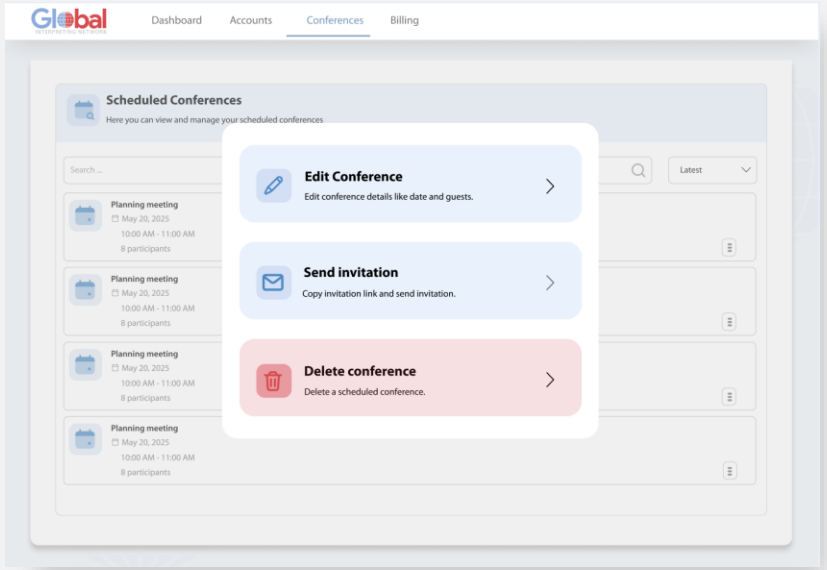
7. Close session - the platform automatically generates a multilingual transcript, available for download upon completion



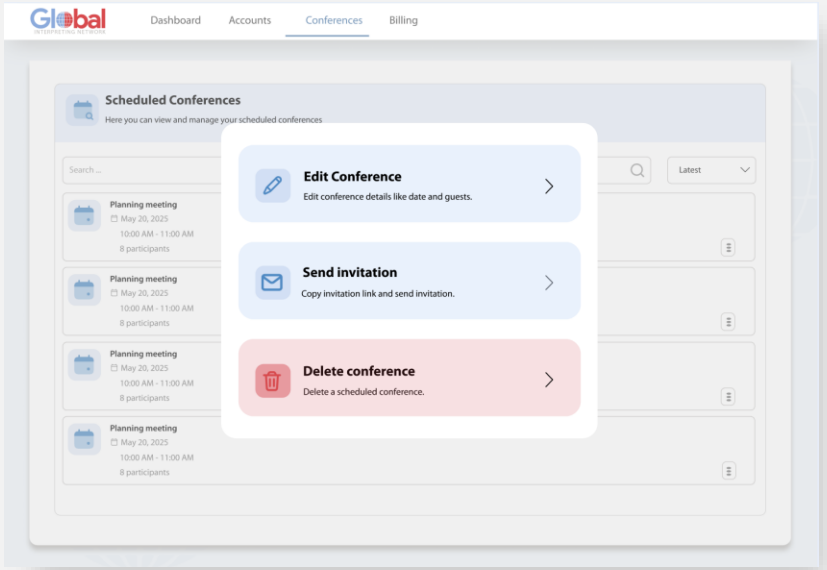
*The host has additional options such as rescheduling or canceling the conference and having an overview of scheduled conferences.

SECURE AGENCY ADMINISTRATOR CAPABILITIES

Agency administrators have full visibility into session activity, user management, and usage reporting through the GINI administrative portal. To manage conferences and access reporting, administrators follow these steps:



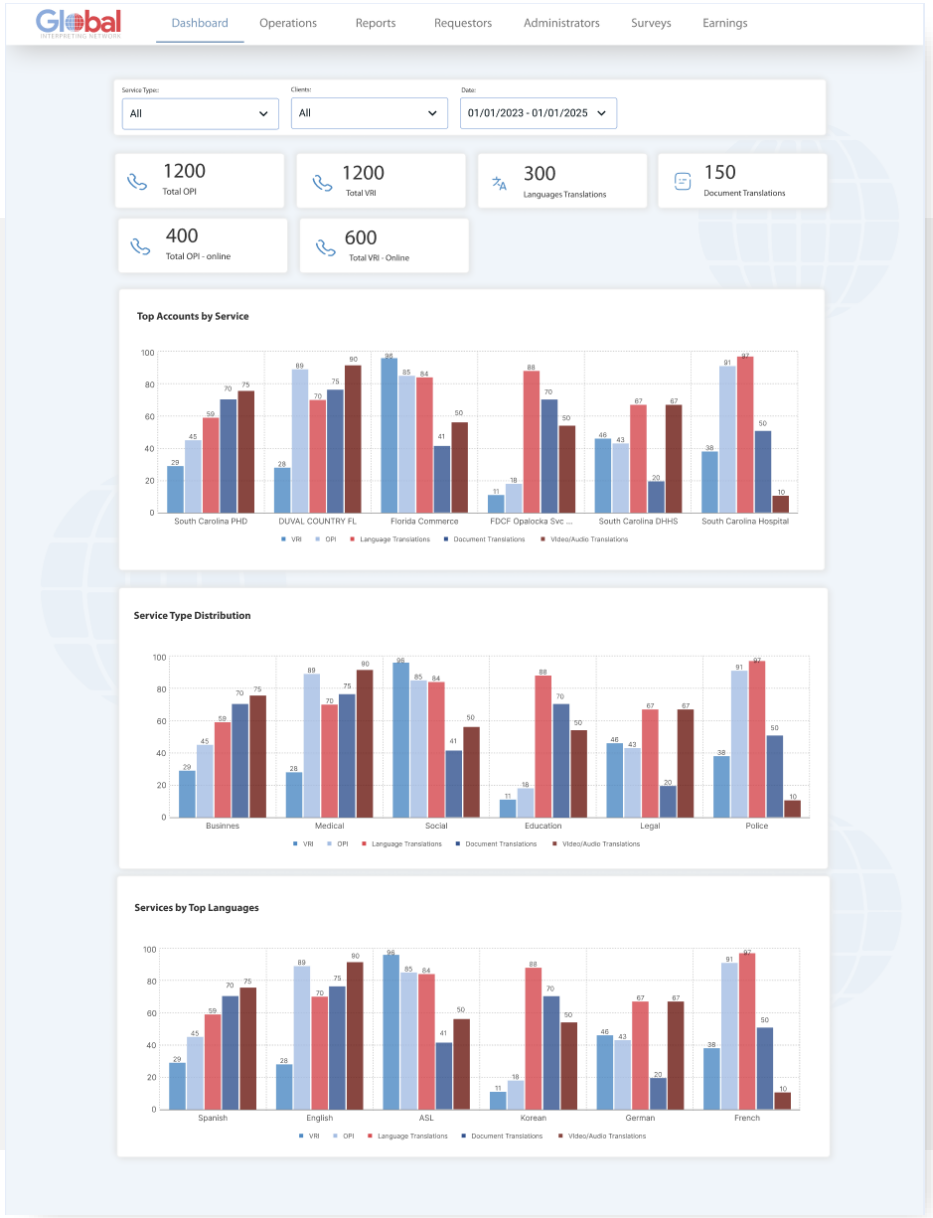
1. Log in to the admin portal - Agency administrators log in through the same web portal and are automatically directed to the administrative dashboard based on their assigned role.



2. Manage conferences – View scheduled/past sessions. Edit date or cancel conferences.

3. View Reports and Analytics

- Over 50 different report format styles are available in real-time.



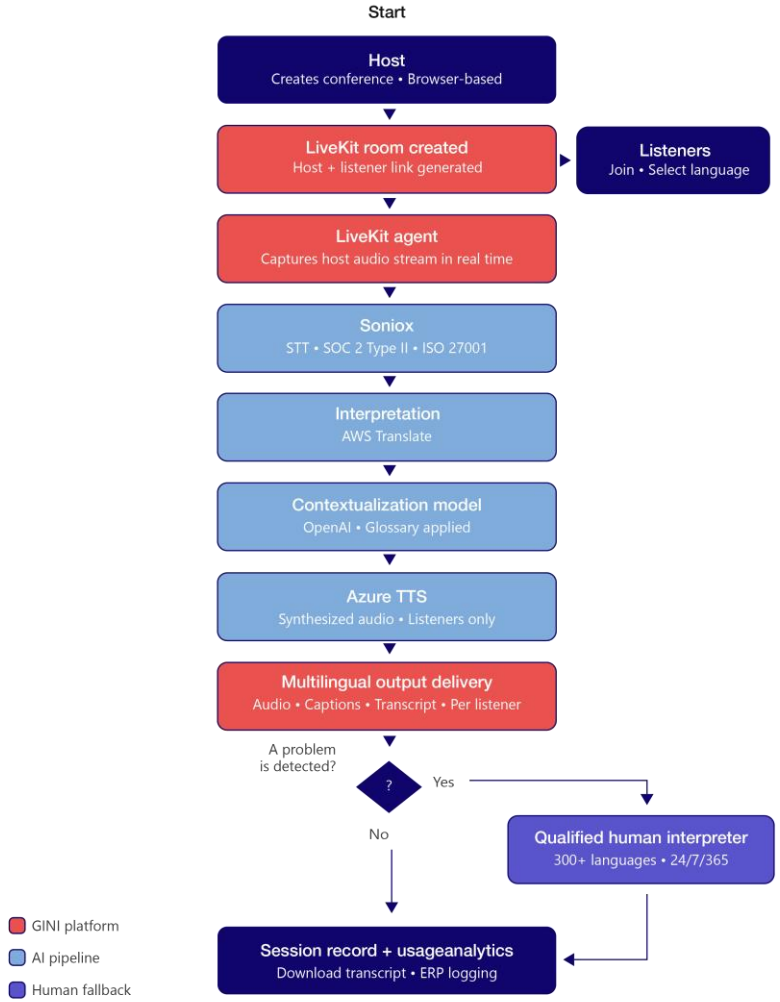
GINI's technical approach is designed around how public agencies actually operate, matching the delivery model to the meeting type, audience, and risk level while supporting secure, accessible, and practical multilingual communication across common government meeting environments.

Risk-based delivery model: Routine public-facing events can use AI-led multilingual delivery for speed, scale, and broad reach, while higher-sensitivity events such as hearings, policy discussions, legal or regulatory briefings, and terminology-heavy sessions can incorporate human oversight, terminology preparation, and live operational monitoring.

Accessibility and compliance support: Workstream 1 helps agencies strengthen compliance with HIPAA, Executive Order 13166, Title VI, ADA, Section 508, Joint Commission, and related language-access requirements through live captions, multilingual subtitles, hearing-access support, secure access controls, and monitored delivery protocols.

Lower operational risk: By aligning the support model to the importance and complexity of each event, GINI helps agencies reduce communication delays, improve clarity, and lower the risk associated with unsupported or ineffective multilingual public engagement.

Service Workflow Process Overview



All key performance factors met at contract start or through no-cost platform updates

Performance Metric	GINI Committed SLA
AI interpretation latency (audio-to-output delay)	**< 2.0 seconds maximum**
Platform uptime guarantee	**≥ 99.9% continuous uptime**
Concurrent language channels per session	**Up to 30 simultaneous; scalable to 200+ overall**
Maximum concurrent meeting participants	**Up to 2,000 per session; higher with advance configuration**
Connectivity recovery time (session drop)	**≤ 50 seconds automatic reconnection; immediate browser relaunch**

RFP Requirement	GINI Compliance
Real-time AI interpretation; simultaneous interpretation for councils/forums	**✓ Met at contract start**
Mobile/web access: no installation required; in-person, hybrid, virtual formats	**✓ Met at contract start**
Live captions and multilingual subtitles; ADA-compliant; hearing-assist compatible	**✓ Met at contract start**
20 language minimum for AI	**✓ 30 Simultaneous / 60 Consecutive AI languages (+300 HITL Languages)**
Zoom, Microsoft Teams, Webex, Google Meet integration	**✓ Met or no-cost update**
Granicus, iLegislate, Legistar, Swagit integration	**✓ Met or no-cost update**
Post-meeting multilingual transcripts; usage analytics and reporting dashboards	**✓ Met or no-cost update**

Global INTERPRETING NETWORK

Eight-stage process from intake to continuous improvement

1

Agency Intake & Session Setup

Agency defines meeting type, audience size, required languages, and accessibility needs; staff create/configure sessions via browser—scheduled or on-demand

2

Platform & Compliance Configuration

Session configured for delivery channel; secure access, attendee permissions, captioning controls, transcript preferences, and admin visibility applied

3

Language, Terminology & Output Setup

Source and target languages selected; municipal terminology, domain vocabulary, and naming conventions applied; participants select preferred language on join

4

Participant Access

Attendees join via browser link, meeting link, QR code, or mobile entry point; select preferred language; receive real-time audio and text output

5

Audio Capture & Pre-processing

Speaker audio from in-room system or host device securely received; processing controls optimize clarity and intelligibility before AI pipeline routing

6

AI Interpretation Pipeline + Quality Gate

Spoken content processed into multilingual output; quality checks verify security, languages, terminology alignment, intelligibility, and delivery stability; human escalation activated if thresholds not met

7

Multichannel Delivery

Translated audio, live captions, and subtitles distributed to personal devices, browser streams, meeting overlays, and venue displays—no disruption to primary session flow

8

Session Closeout, Transcripts & Analytics

Platform auto-generates multilingual transcripts, subtitle files, timestamps, session records; GINI reviews usage trends, language demand, and performance data for continuous improvement

ISO 9001-aligned; SOC 2 Type II, ISO 27001, NIST, HIPAA, CJIS, FERPA, ADA, Title VI

1. PRE-EVENT QUALITY CONTROLS

- Terminology alignment using municipal glossaries and domain-specific language models
- Identification of high-risk content: legal, policy, public safety
- Pre-configuration of 60+ language channels minimum, and growing
- AI tuning informed by human interpreter correction data; structured Q&A feedback loop

2. REAL-TIME PERFORMANCE & MONITORING

- Near real-time latency; ≥99.9% uptime; concurrent multi-language support
- ADA/Section 508-compliant captions; role-based access controls
- AI confidence-based escalation to human interpreters for high-stakes content
- Continuous validation of output quality, intelligibility, and completeness

3. POST-EVENT QA & REPORTING

- Multilingual transcript generation and session records for agency review
- Tracking of latency, error rates, and quality indicators
- Usage analytics dashboard: session-level compliance and language access reporting
- Agency feedback and user experience data collection

4. GOVERNANCE & CONTINUOUS OVERSIGHT

- ISO 9001-certified quality management system
- Documented SLA tracking and performance benchmarking
- Compliance with ADA, Title VI, and all applicable language access requirements
- Continuous improvement through AI model refinement and workflow optimization

Quality indicators: session readiness, language-channel availability, transcript completeness, caption usability, terminology consistency, and appropriate human escalation for sensitive or high-risk events.

WORKSTREAM 2

GINI MEETS ALL REQUIREMENTS:

- Written Document & Content Translation

AI-Powered Document & Content Translation with HITL

Designed for: Ordinances, forms, websites, emergency alerts, newsletters, documents, and other content.

Platform Features:

Government docs and public forms; website/CMS localization; emergency alert translation (Code Red, Nixle, Everbridge); batch processing; human-in-the-loop review for high-stakes content; translation memory; municipal terminology governance; quality assurance scoring.

Cloud-based translation platform: AI speed + adaptive workflows + accountable human review

EFFICIENT

AI-Powered, Context-Aware Translation

Using LLM and machine translation engines for rapid first-pass output across ordinances, resolutions, notices, forms, applications, legal communications, website content, emergency alerts, and newsletters

Integrated Translation Memory & Terminology Management

Preserve consistency across programs, agencies, and recurring content

Automated Content Synchronization

Translations updated when source content changes; reduces rework across departments

Transcreation & Localization Support

Including cultural adaptation and layout adjustments for diverse audiences

Seamless CMS, TMS & Enterprise Integration

Agencies embed translation directly into existing workflows

ACCURATE

Adaptive Translation Workflows

Improve quality over time through human feedback and continuous learning

Multilingual SEO & Digital Consistency

Optimization for multilingual SEO and consistent user experience across translated digital content

Human-in-the-Loop Review Model

AI accelerates initial translation and terminology application; certified linguists provide review, refinement, and final approval for public-facing, legal, regulatory, medical, emergency, and sensitive materials

Built-In Quality Scoring & Analytics

Confidence indicators, reporting, and analytics — full transparency into performance, accuracy, and service utilization

All key performance factors met at contract start or through no-cost platform updates

Standard

3 to 5 business days

Urgent

Less than 24 hours

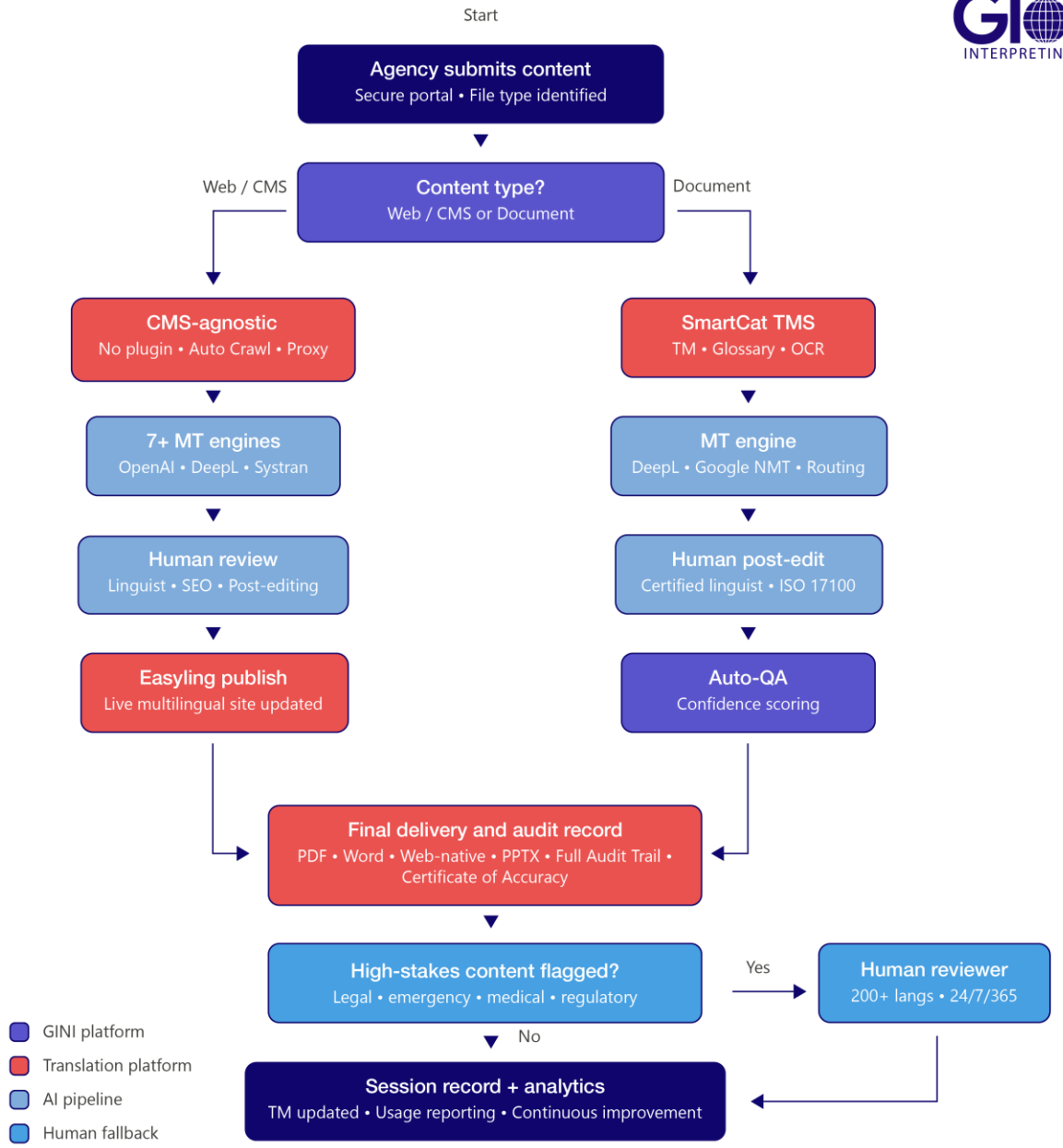
Emergency

<4 hour turnaround

Deliverables: Fully editable source formats + print-ready PDFs. Certificate of Accuracy provided for human-reviewed work. Confidence scores and quality flags available on request. Desktop publishing: layout-faithful editable files, packaged assets, print-ready PDFs mirroring source formatting across all target languages.

RFP REQUIREMENT	GINI COMPLIANCE
Government docs: ordinances, resolutions, notices, permits, legal communication	✓ **Met at contract start**
Public forms: benefits, utilities, applications, voter info, housing assistance	✓ **Met at contract start**
Website/web portal localization with CMS integration	✓ **Met at contract start**
Emergency/public safety notification translation (Code Red, Nixle, Everbridge)	✓ **Met at contract start**
Municipal newsletters, social media posts, press releases, public information	✓ **Met or no-cost update**
Batch document translation for large-volume processing needs	✓ **120,000 words/day capacity, average**
Glossary and municipal terminology management	✓ **Met at contract start**
Human-in-the-loop review for high-stakes legal/regulatory content	✓ **Met at contract start**
Translation memory for consistency across recurring agency content	✓ **Met at contract start**
Output format preservation: PDF, Word, web-native	✓ **Met at contract start**
Quality assurance scoring and confidence indicators per translation	✓ **Met at contract start**

Service Workflow Process Overview



Seven-stage governed workflow from intake to continuous improvement

1

Request Intake & Content Clarification

Secure intake via portal, file transfer, or approved email; GINI evaluates content purpose, language pair, urgency, sensitivity, target audience, required format, accessibility requirements, and existing terminology

2

Platform Preparation & Terminology Setup

Project configured within AI-enabled environment; translation memory, centralized glossaries, and style guidelines applied; agency-specific terminology—department names, program titles, regulatory language—loaded before translation

3

AI-Assisted Translation Generation

Context-aware AI accelerates first-pass production for high-volume, repetitive, and time-sensitive content; all content routed through managed workflow with rules-based decisioning based on sensitivity, intended use, and risk level

4

Human Review, Refinement & Formatting Check

Certified linguists perform HITL review and post-editing; high-stakes content receives bilingual editing, proofreading, and terminology validation; format preservation (Word, PDF, web-native), accessibility compliance, and transcreation for cultural relevance

5

Quality Gate

Formal control point assesses accuracy, completeness, terminology consistency, natural phrasing, formatting integrity, and risk level; built-in QA tools and validation checks confirm outputs meet performance and compliance expectations

6

Second Linguistic Verification

Routine content: standard QA checks. Public-facing, legal, regulatory, medical, or emergency materials: enhanced review path—secondary linguistic validation, proofreading, and verification for highest level of accuracy and accountability

7

Final Delivery, Audit Record & Analytics

Finalized translations delivered in required format; automated CMS/content platform integration where applicable; complete audit record created: translation history, terminology usage, reviewer actions, quality documentation; continuous improvement applied via memory updates, metrics, and feedback

ISO 9001 and ISO 17100 aligned; SOC 2, HIPAA, FERPA, ADA, Title VI compliant

1. Pre-Processing & Content Controls

- No human backstop when the context requires it.
- AI-only outputs create risk in legal, medical, and public safety contexts.
- No deep government compliance experience.
- No accountability path when accuracy is questioned.

2. Translation Quality & Accuracy

- AI translation with confidence, scoring and quality indicators
- Human-in-the-loop-post-editing for high-stakes or low-confidence outputs
- Multi-step QA workflows aligned to ISO 17100 best practices
- Consistency controls using translation memory and terminology management tools

3. Performance & Turnaround Standards

- Scalable processing for high-volume and batch translation needs
- Standard, urgent, and emergency (<24 hour) delivery tiers
- Automated workflows ensure timely delivery without compromising accuracy
- High-stakes content: bilingual editing, proofreading, independent verification prior to release

4. QA Monitoring, Reporting & Improvement

- Tracking error rates, edit distance, and quality scoring metrics
- Audit trails for all translation activities and revisions
- Reporting dashboards aligned to agency compliance and transparency needs
- Continuous improvement through AI model refinement and terminology updates; no unauthorized AI training on agency data

Quality indicators: turnaround performance, content completeness, terminology consistency, formatting integrity, effectiveness of human post-editing, revision counts, and routing of high-stakes content through enhanced review paths.

WORKSTREAM 3

GINI MEETS ALL REQUIREMENTS:

- On-Demand Voice Interpretation
- OPI / VRI / ASL

AI-Powered On-Demand OPI / VRI with HITL Escalation

Designed for: 24/7/365 phone and video interpretation with AI-first triage, immediate live human escalation, and ASL support across 300+ languages.

Platform Features:

OPI 24/7/365 in 300+ languages; 60 languages supported by AI and growing; VRI with visual context support; AI-first triage + human escalation; Five9, Genesys, Avaya, 311, CRM integration; ≤1.0s avg AI connect time; ASL (AI + certified); specialized access for public safety, health, courts.

AI-first access for routine interactions; immediate human continuity for high-stakes communication

AI-FIRST ACCESS

AI-ASSISTED VOICE INTERPRETATION

Common, repeatable exchanges: appointment scheduling, registration, intake questions, directions, billing inquiries, call routing, front-desk support — immediate language access, reduced wait time, no workflow abandonment if escalation needed

AGENCY-SPECIFIC LANGUAGE ALIGNMENT

Recurring terminology, program language, departmental phrasing, and common service expressions reflected in the interpretation workflow — consistent with how the agency actually speaks to the public

BOUNDARY & RISK-GOVERNANCE LAYER

Determines whether interaction remains suitable for AI-assisted handling or must shift to live interpreter. Legal, medical, benefits, rights, consent, eligibility, or high-risk communication triggers escalation — prevents open-ended automation

LIVE INTERPRETER ESCALATION & CONTINUITY

Qualified interpreter enters with context carried forward:

Same continuous service environment — no restart required.

24/7/365 service continuity:

Redundant telecom infrastructure, workforce management practices, and emergency management planning — stable access during peak demand, after-hours, and unexpected surges.

ACCESS PATHS

OPI — Over-the-Phone Interpretation

Browser-based platform, no software install: log in → select voice or VRI → select language and domain category → AI connects immediately → real-time captions or chat transcript → up to 6 participants → escalate to human if needed → end session and feedback survey

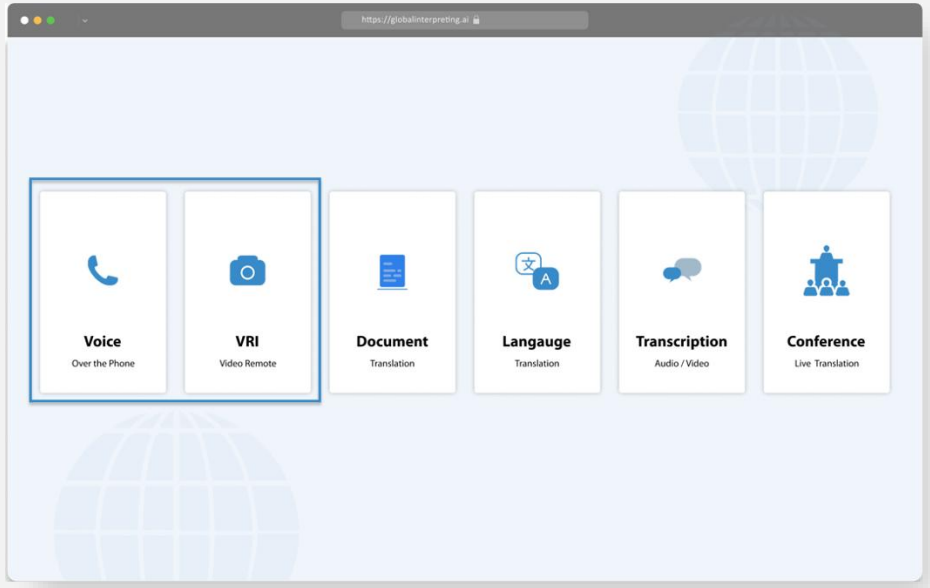
VRI — Video Remote Interpretation

Same platform access path as OPI; camera enabled for interactions requiring visual context — facial expression, gesture, or ASL access.

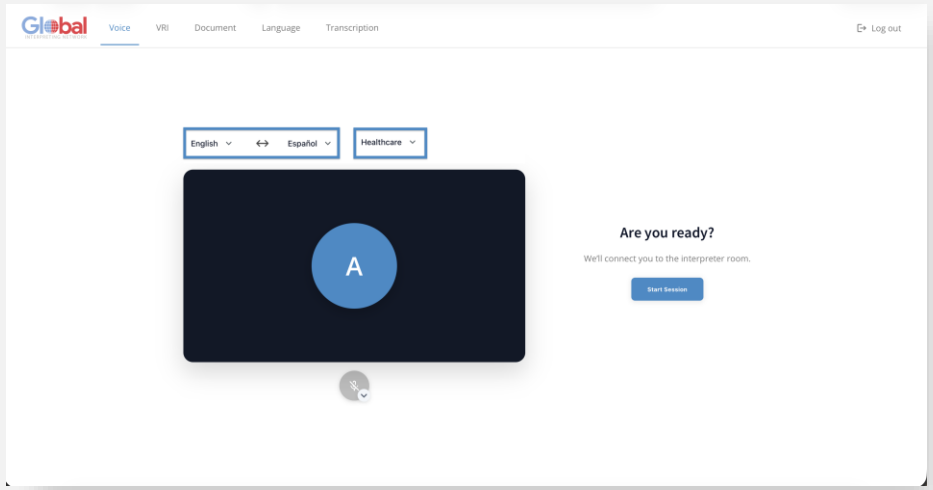
SERVICE ACCESSIBILITY

- Process Overview

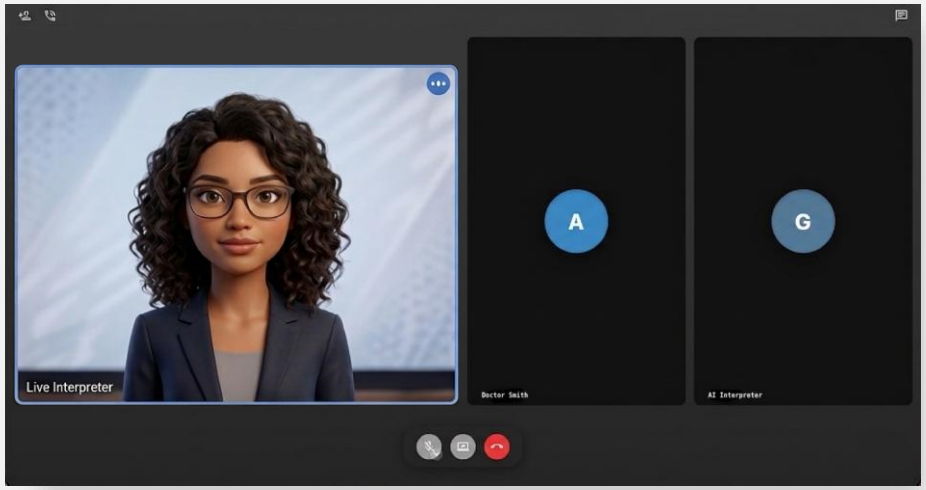
Agency staff access OPI and VRI services through the same browser-based platform, requiring no additional software or installation. Both modalities follow the same simple access path. The only difference is that VRI enables camera support for interactions that benefit from visual context. To connect to an interpretation session, staff follow these steps:



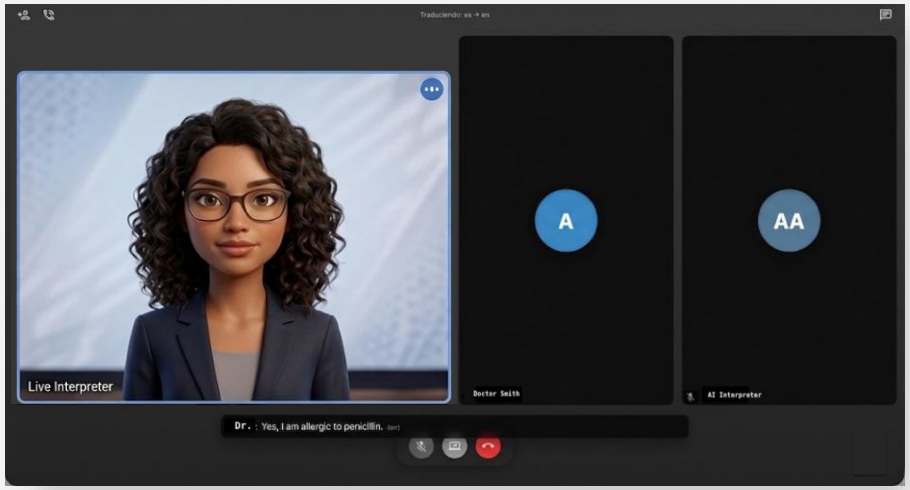
1. Log in and select Voice or VRI Service

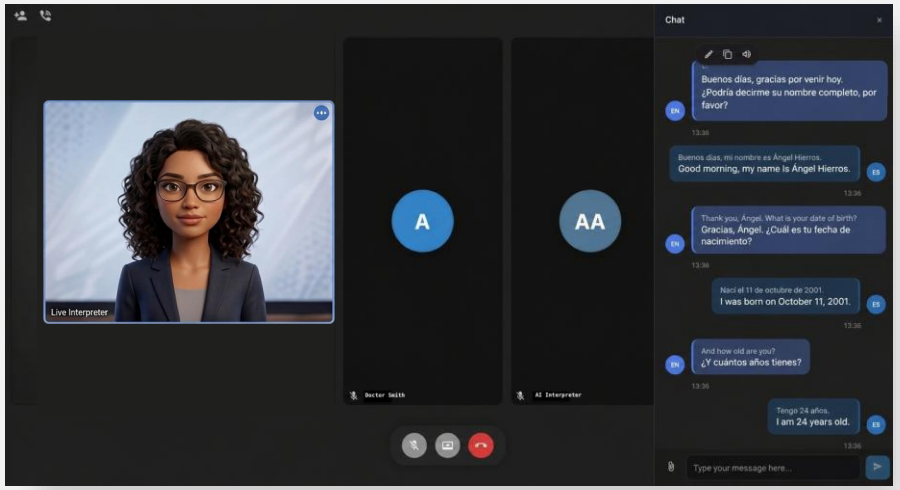


2. Log in and select Voice or Video Service

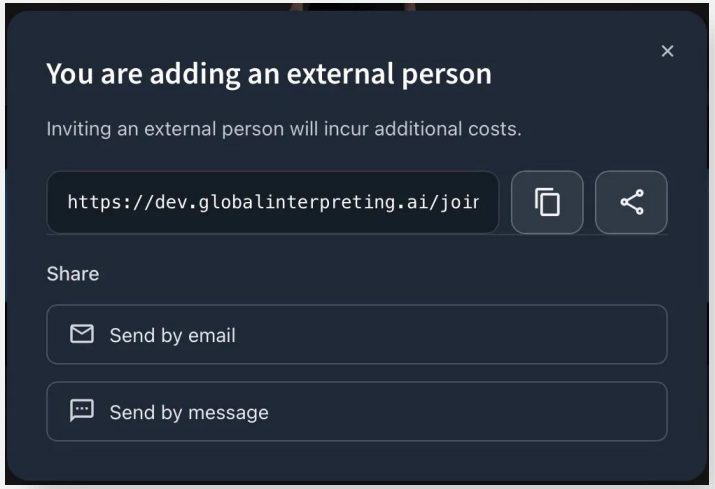


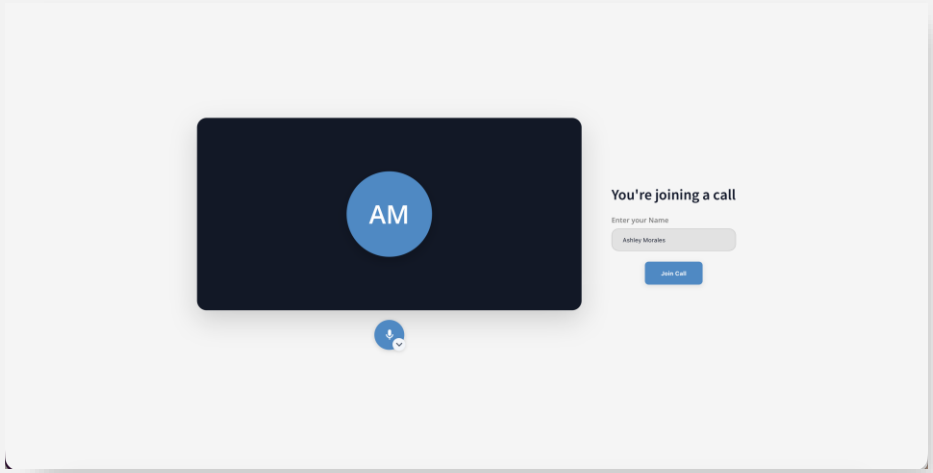
3. Start session – AI Interpreter connects immediately





4. Conduct the interpreted session with real-time captions or chat transcript

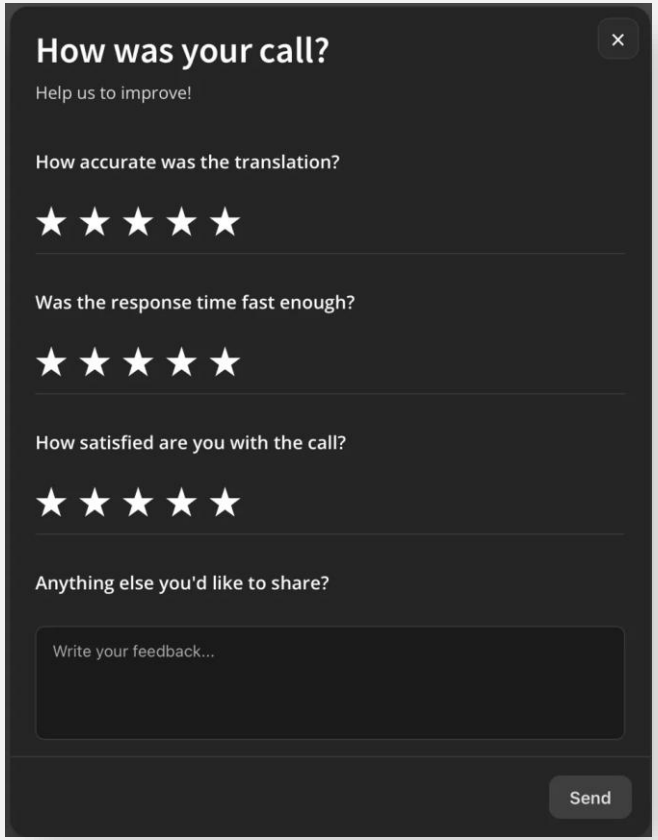




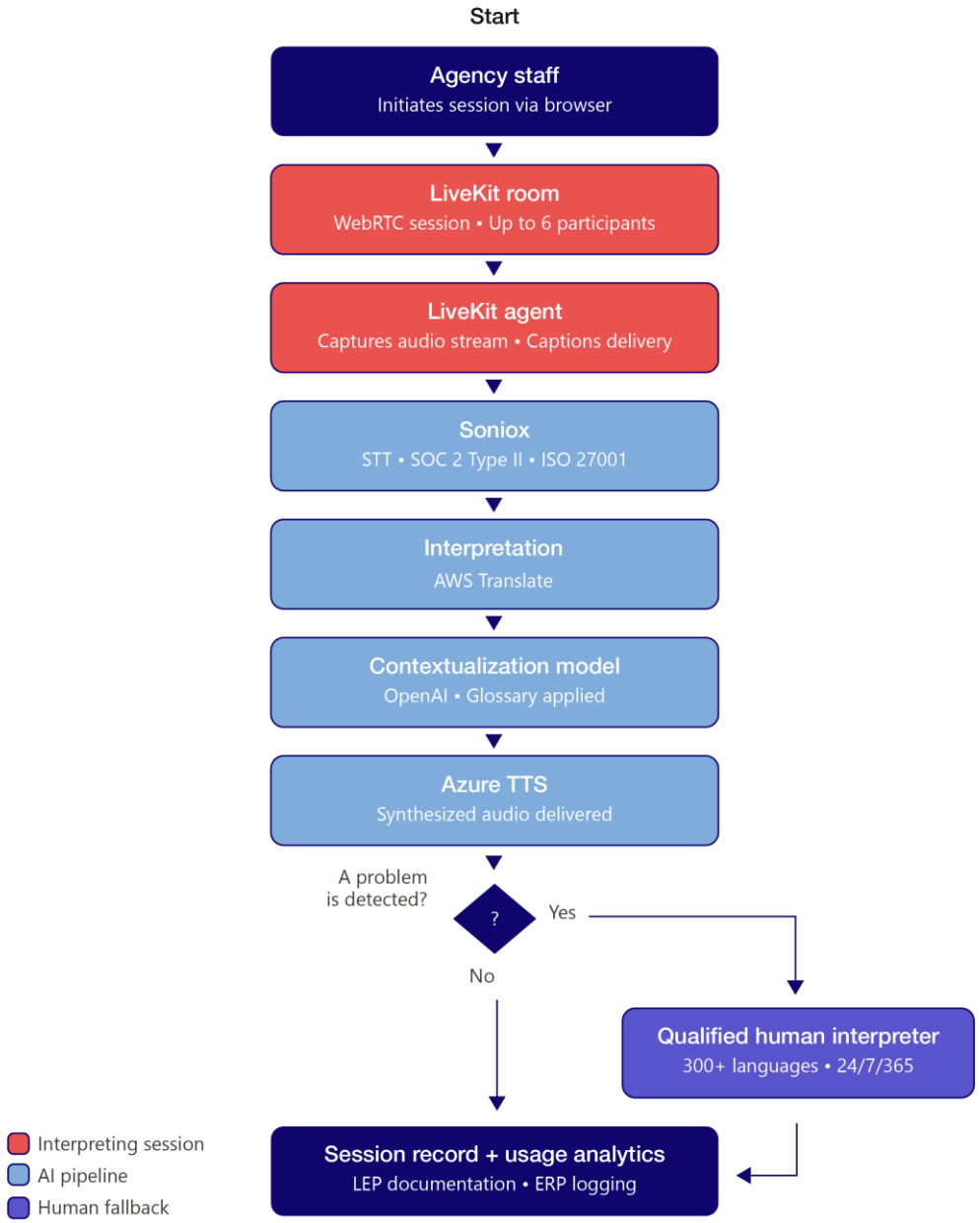
5. Invite up to 6 participants if needed

6. Escalate to a human interpreter if needed

7. End session and complete feedback survey



Service Workflow Process Overview



All key performance requirements met at contract start or through no-cost platform updates

PERFORMANCE METRIC	GINI COMMITTED SLA
Average speed-to-connect (AI)	**≤ 1.0 second average**
AI interpretation latency	**< 2.0 seconds audio-to-output**
Platform uptime	**≥ 99.9%**
Language availability (human network)	**300+ languages, 24/7/365**
Language availability (AI)	**~60 languages, immediate connection**
Connectivity recovery	**≤ 50 seconds; browser relaunch available**
Concurrent session capacity	**Up to 2,000 participants; 60 language channels**
No user wait without system response	**Automated engagement ≤ 3 seconds**

RFP REQUIREMENT	GINI COMPLIANCE
On-demand OPI available 24/7/365 in 200+ languages	**✓ 300+ languages supported**
VRI with visual context support for complex interactions	**✓ Met at contract start**
AI-first triage with human interpreter escalation	**✓ Core HITL architecture**
Integration: Five9, Genesys, Avaya, 311 platforms, CRM systems	**✓ Met or no-cost update**
Average speed-to-connect < 30 seconds (high-demand languages)	**✓ ≤ 1.0 second average (AI)**
ASL interpretation via VRI	**✓ Human ASL Certified**
Specialized access: public safety, health, housing, courts	**✓ Met at contract start**
Per-minute and flat-rate subscription pricing models	**✓ Both models available**
Monthly LEP usage reporting and incident documentation	**✓ Met at contract start**

Seven integrated layers, one continuous governed service environment

1

Secure Access & Routing Layer

Governs how users enter the service; configures departments, roles, and routing; directs requests into OPI, VRI, or ASL service paths, the control structure that makes the service usable, secure, and scalable

2

Core AI Interpretation Layer

Immediate multilingual voice for high-frequency routine encounters: scheduling, registration, directions, billing support, general inquiries; extends service coverage without requiring every interaction to begin with a live interpreter

3

Agency-Specific Language Alignment Layer

Configured around recurring program language, public-facing phrasing, and common service terminology—multilingual communication reflects how the agency actually serves residents and callers

4

Boundary & Risk-Governance Layer

Determines whether interaction remains suitable for AI-assisted handling or must shift to live interpreter; governs which routine conversations stay on AI path; flags legal, medical, consent, eligibility, and high-risk content for escalation

5

Live Interpreter Continuity

Qualified interpreter enters interaction with context carried forward; not a disconnected backup—an integrated human-support layer within the same service model; no restart, no workflow disruption

6

Service Oversight & Quality Management Layer

Governs monitoring, escalation management, issue resolution, and account support across both AI and live-interpreter encounters; one controlled program structure, not a collection of loosely connected tools

7

Analytics, Records & Continuous Improvement Layer

Captures language demand, modality usage, routing activity, escalation patterns, and performance trends; enables GINI to refine terminology, improve routing, strengthen service boundaries, and support ongoing program optimization

Real-time, system-driven quality framework focused on access, continuity, routing accuracy, and effectiveness

Access & Responsiveness

- Average speed-to-connect: ≤1.0 second average (AI)
- 24/7/365 system availability across 300+ languages human; 60+ AI
- Intelligent AI-based intake and routing efficiency

Routing Accuracy & Suitability

- Correct language identification and routing rate
- % of interactions handled within defined AI-use boundaries
- Appropriate modality utilization (OPI vs. VRI vs. ASL)

User Experience & Issue Resolution

- Complaint trends and resolution timelines
- Automated engagement protocols—no user waiting >3 seconds without system response
- Monthly state government usage metrics, tracking, and documentation reporting

Session Performance & Continuity

- Session continuity and call completion rates
- Connectivity stability and automatic recovery (≤50 seconds)
- Overall platform uptime ≥99.9%

Real-Time Quality Monitoring

- AI interpretation latency <2.0 seconds audio-to-output
- Audio clarity and interaction stability monitoring
- System responsiveness during peak and high-volume usage

Continuous Improvement & Analytics

- Trend analysis: connection times, routing accuracy, usage patterns
- Data-driven optimization of language coverage and system performance
- Ongoing refinement of AI routing and response models through escalation monitoring

WORKSTREAM 4

GINI MEETS ALL REQUIREMENTS:

- AI Translation Platform/Software License

AI Translation Platform / SaaS License

Cloud platform with role-based access, SSO, API/SDK integration, audit logging, municipal glossary configuration, and on-premise option.

Platform Features:

Cloud SaaS + on-premise option; REST API/SDK; role-based access + multi-department management; custom glossaries and terminology training; audit logging; SSO (SAML 2.0, Azure AD, Okta); ADA Section 508 compliant; white-label interface; U.S.-based data residency, operations, customer support and all functional departments.

Governed language-access environment

PLATFORM ARCHITECTURE

Cloud-based SaaS with municipal-specific configuration: Agencies gain self-service AI translation while GINI remains available for configuration, terminology control, workflow governance, human review, and escalation.

Role-based access environment: Agencies manage access by function with full visibility into translation activity across users and departments; historical activity retained for consistency.

Configured around agency-specific terminology: Glossaries, approved terminology, and recurring content patterns produce consistent output — not treating every request as a stand-alone event. On-premise or private cloud deployment available for agencies with data sovereignty requirements.

INTEGRATION & SECURITY

REST API and SDK access: Integration with existing municipal software systems; validated integrations with CMS, CRM, 311 systems, and video conferencing platforms.

Single Sign-On (SSO): SAML 2.0, Azure AD, Okta; role-based access controls and multi-department user management.

Audit logging, translation history, and accountability trails: Across all translation activities and user interactions.

ADA Section 508-compliant interface: White-label or agency-branded options; U.S.-based data hosting strongly preferred.

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Platform as Managed Program Resource

Not just software handed off at go-live. GINI supports configuration updates, workflow adjustments, terminology maintenance, and escalation needs across the full contract term, ensuring the platform continues to operate as a governed language-access environment. Agencies may need different levels of configuration, training, and operational support; GINI's approach accommodates all of them under the same cooperative agreement.

HOW IT WORKS

PARTICIPANT ACCESS:	Log in via SSO → navigate to translation workspace → select department, content type, and language → submit content or connect via API
HOST ACCESS:	AI first-pass translation → terminology and glossary controls applied → confidence scoring → route to human review for high-stakes or below-threshold content

All key performance requirements met at contract start or through no-cost platform updates

RFP REQUIREMENT	GINI COMPLIANCE
Cloud-based SaaS platform with municipal-specific configuration	✓ **Met at contract start**
On-premise / private cloud deployment (data sovereignty)	✓ **Met at contract start**
REST API and SDK access for municipal system integration	✓ **Met at contract start**
Role-based access controls and multi-department user management	✓ **Met at contract start**
Custom domain terminology training and glossary building tools	✓ **Met at contract start**
Audit logging, translation history, and accountability trails	✓ **Met at contract start**
SSO: SAML 2.0, Azure AD, Okta	✓ **Met at contract start**
ADA Section 508-compliant interface design	✓ **Met at contract start**
White-label / agency-branded interface options	✓ **Met at contract start**
U.S.-based data residency controls	✓ **Met at contract start**

Global INTERPRETING NETWORK

Four-quadrant QA framework — reliability, accuracy, security, and continuous improvement

1. Platform Reliability & Performance

- ≥99.9% uptime with monitored system performance
- Scalable architecture supporting enterprise-level usage and API integration
- Continuous system monitoring, alerting, and incident response protocol

2. Accuracy & Model Governance

- Domain-specific training and glossary controls
- Continuous evaluation of translation accuracy and output quality
- Support for human review workflows within the platform
- Transparency through confidence scores and audit logs

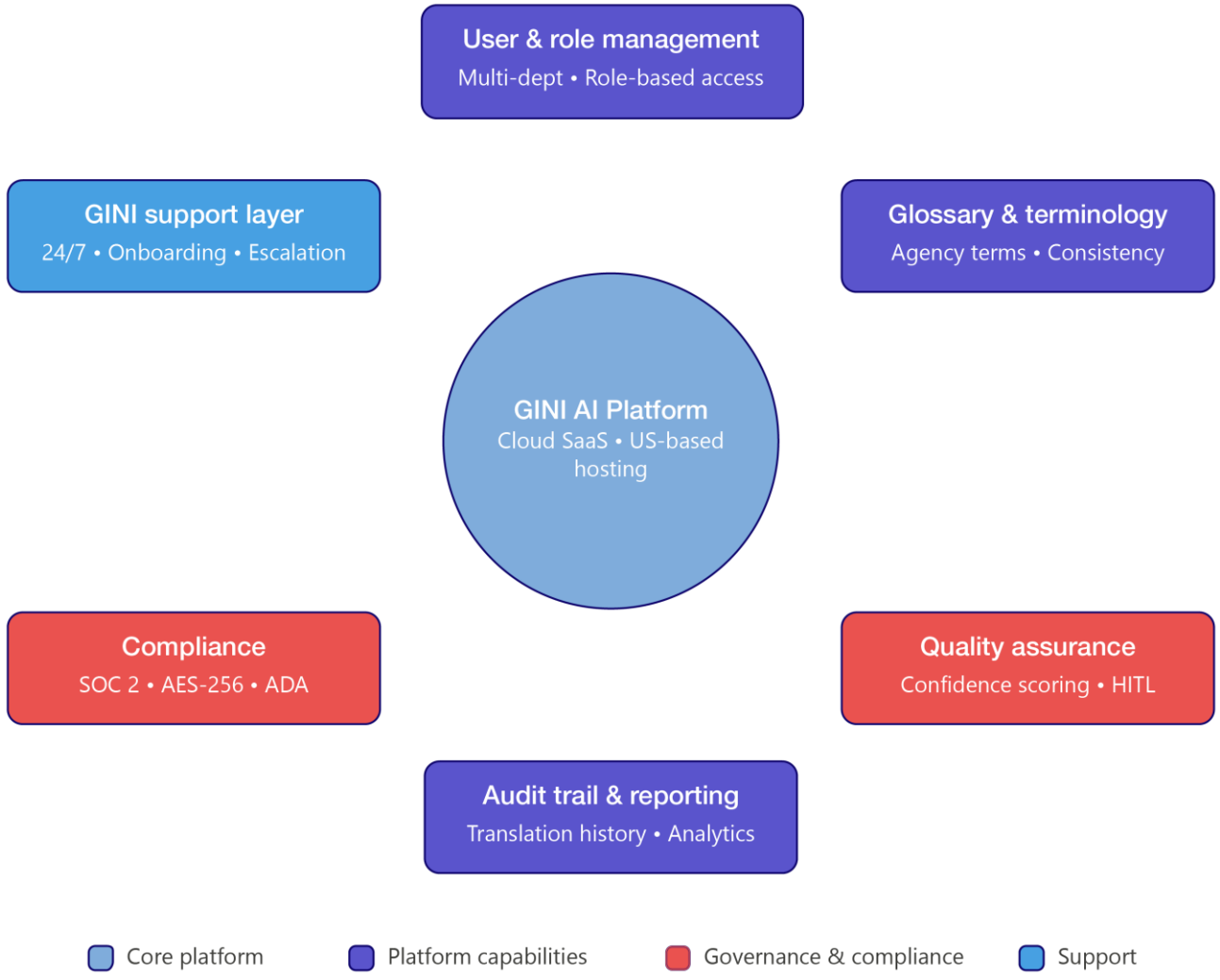
3. Security & Compliance Controls

- SOC 2 Type II, ISO 27001, CJIS, HIPAA, FERPA (as applicable Scalable)
- AES-256 encryption; TLS 1.2+; RBAC; SSO integration
- Strict data residency and zero unauthorized AI training policy

4. Integration, Usability & Continuous Improvement

- REST API/SDK access for integration with municipal software systems
- ADA Section 508-compliant interface; user acceptance testing per agency
- Full audit trails; usage analytics; ongoing AI model and platform update

Service Workflow Process Overview



SECURITY, COMPLIANCE & DATA PRIVACY

ENTERPRISE-GRADE PROTECTION ACROSS ALL WORKSTREAMS

Compliance and multiple certifications for all solicitation requirements - Proven through federal contracts, GSA engagements, major healthcare audits, and ISO 9001 surveillance

SOC 2 Type II

Security, Availability, Confidentiality minimum standard all cloud services

ISO 27001 Aligned

Information security management system practices

NIST CSF + SP 800-53

Cybersecurity Framework and control alignment

FedRAMP Moderate/High Baseline

For federally-influenced environments

CJIS Security Policy Compliant

Criminal justice and law enforcement data contexts

StateRAMP Ready

For participating state agencies

HIPAA + BAA Available

Health-related translations; Business Associate Agreement provided

FERPA Compliant

Student educational records and education-related data

FISMA-Aligned Controls

Where applicable to federally-funded agency programs

Section 508 / ADA Accessible

Interface and communications accessibility standards

EO 13166 / Title VI

Language access and non-discrimination compliance

ISO 9001:2015 QMS

Ongoing audit and improvement cycles; documented SLA tracking

Defense-in-depth safeguards protecting PII, PHI, and law enforcement data across all workstreams

Data Protection & Privacy Controls

- Encryption at rest and in transit: AES-256, TLS 1.2+
- Role-based access control (RBAC) with least-privilege enforcement
- Multi-factor authentication (MFA) and secure identity management
- Strict data retention and deletion policies, including agency-directed purge capabilities
- Zero-use policy: agency data never used to train AI models without explicit written consent
- Full disclosure and governance of sub-processors and third-party data flows

Operational Security & AI Governance

- 24/7 security monitoring, logging, and audit trails across all systems
- Regular penetration testing and vulnerability assessment
- Formal incident response and breach notification ≤72 hours of discovery
- Disaster recovery and business continuity planning with tested failover
- Secure session controls for live and on-demand interpretation services
- AI operates within controlled, auditable environment
- HITL validation and escalation for high-risk or sensitive content
- Confidence scoring, terminology controls, and QA checks on all AI outputs
- Clear separation between customer data and AI model training pipelines
- Aligned with NIST AI Risk Management Framework (AI RMF)

Sub-Processor and Service Identification

Sub Processor	Service	Data Processed	Region	Certifications	Data Handling	Encryption
LiveKit	WebRTC Sessions	Audio, video	US	SOC 2,GDPR, HIPAA, CCPA	• Does not use data or train AI models • Records stream data if recording is enabled; retained up to 30 days	• In-transit: TLS 1.2+,DTLS, SRTP • At rest: AES 256 • Native E2EE
Soniox	Speech-to-text	Audio	US	SOC 2,Type II, ISO 27001, GDPR, HIPAA	• No model training • No data retention unless explicitly requested • Securely isolated storage available • Data deletion options	• In-transit: TLS 1.2+ • Access controls on stored data
AWS Translate	Translation	Text	US East	SOC 2, ISO 27001, HIPAA	• No model training • No data retention unless explicitly requested	• In-transit: TLS 1.2+ • At rest: SSE-S3/SSE-KMS
OpenAI	Contextualization	Text	US	SOC 2,Type II	• No model training • 30-day retention for abuse monitoring, then deleted	• In-transit: TLS 1.2+,DTLS, SRTP • At rest: AES 256
Assure TTS	Text-to-speech	Text	US	SOC 2, ISO 27001	• No model training • No data retention unless explicitly requested	• In-transit: TLS 1.2+,DTLS, SRTP • At rest: AES 256
AWS	Cloud infrastructure	All platform data	US East	SOC 2, ISO 27001	• Data processed as configured by GINI • No secondary use	• In-transit: TLS 1.2+,DTLS, SRTP • At rest: AES 256 (Configurable per service

Training designed for actual users; 24/7/365 support infrastructure; sustained throughout full contract term

Training & User Support

- Initial administrator and end-user training: virtual and on-site options
- Training focused on actual users: how to request services, access
- correct modality, flag sensitive content, and escalate when needed
- Multi-factor authentication (MFA) and secure identity management
- Training materials: documentation, video tutorials, knowledge base
- Ongoing training for new staff and platform updates throughout contract term
- Dedicated account management and customer success support
- Configuration changes, new user onboarding, terminology maintenance, and workflow adjustments supported from kickoff meeting to post go-live

SLAs & Service Continuity

Performance Metric	Performance Metric
Platform uptime (WS1 and WS3 minimum)	**≥ 99.9%**
OPI speed-to-connect (high-demand languages)	**< 15 seconds, average 8 -10 seconds (≤1.0s avg for AI)**
Customer support availability	**24/7/365 — Tier 1/2/3 escalation**
Breach notification	**≤ 48 hours of discovery**
Connectivity recovery	**≤ 50 seconds**
Standard doc translation turnaround	**3 - 5 business days**
Urgent document translation	**≤ 24 hours**
Emergency translation	**< 6 hours**
Planned maintenance notification	**Advance notice provided; maintenance windows defined**

Agencies go live in under 30 days: structured, department-ready, and continuously supported

Please refer to the attached **Implementation, Onboarding, and Support Plan** for a comprehensive overview of our deployment methodology, including implementation procedures, onboarding protocols, tiered customer support, Quality Surveillance, escalation management, dedicated account management services, ongoing training commitments, and performance support framework. The attached plan also outlines our rapid-response activation timelines and scalable deployment capabilities designed to support both single-site facilities and complex enterprise-wide, multi-location implementations with minimal disruption and immediate operational readiness.

Per-Workstream Onboarding Specifics

- WS1: Event access setup, language-channel planning, participant access guidance, support for meeting administrators and facilitators
- WS2: Secure intake setup, approval paths, terminology capture, document-handling procedures
- WS3: Account configuration, routing rules, OPI/VRI access methods, ASL service access, escalation planning
- WS4: Role-based platform configuration, user permissions, workflow setup, reporting alignment, guidance on AI vs. human-review routing

19 years supporting SLED clients: counties, cities, school districts, state agencies, & federal programs

State & County Government

Multi-year OPI/VRI and document translation contracts; compliance-grade delivery for state agencies; EO 13166, Title VI, and HIPAA-aligned programs

Municipal & City Government

Health departments, courts, correctional jails, voters, DMV, and a wide range of other interpretation support language access programs, including public meetings, town halls, and public-facing document translation

K-12 & Higher Education

FERPA-compliant services; student communications, parent outreach, enrollment materials, and administrative translation across school districts and universities

Healthcare & Public Health

HIPAA-compliant OPI/VRI; emergency health communications, patient-facing interpretation, and Joint Commission-aligned service delivery

Federal & GSA Programs

Cooperative contract experience; GSA Schedule and comparable program history; operational readiness for Edge Public cooperative contract at scale

Legal & Community Programs

Court and legal interpretation support; community-facing language access programs; housing, benefits, and social services translation

References & Past Performance: provided as an attachment
Per instructions, provided as separate attachments.

GINI is operationally ready to support this contract at scale & immediately promote Edge Public nationwide

Cooperative Contract Readiness

- GINI maintains established teams, nationwide contact centers, linguist networks, and infrastructure for rapid onboarding (typically 1 Day After Receipt of Order), customer training, and ongoing support under the cooperative model.
- Experience with cooperative agreements enables immediate activation, streamlined procurement adoption, and efficient service delivery for Participating Public Agencies from day one.
- Turnkey solution designed for immediate impact—real-time interpretation, document translation, platform deployment, and on-demand services all available at contract start.
- GINI's integrated AI and human service framework ensures agencies receive both innovation and operational reliability, delivering measurable multilingual access improvements while maintaining public trust.
- Cooperative contract readiness, structured program management, and reporting discipline ensure immediate usability across diverse agencies and departments.

Edge Public Sales & Marketing Support

- GINI brings the operational, sales, and marketing skilled teams required to support Edge Public's cooperative outreach and sales goals nationwide.
- Long-term government relationships and internal structures in place for program oversight, account support, reporting, issue resolution, emergency continuity, and service monitoring.
- Four-call-center model and dedicated contract support team scale across multiple Participating Public Agencies simultaneously under one cooperative agreement.
- GINI welcomes the opportunity to contract with AFI and immediately promote the Edge Public partnership to expand language access nationwide.
- Monthly Contract Sales accounting reports submitted electronically by the 10th of each following month, formatted per Edge Public requirements.

RFP requires disclosure of underlying AI/ML architecture, model sourcing (proprietary vs. open-source vs. third-party), and published accuracy rates. For supplemental AI Accuracy Measurement, Known Limitations, Human Interpreter Escalation Paths, & Evaluation Methodology - see attachments.

- AI platform combines LLM and machine translation engines for context-aware, rapid first-pass output (WS2); real-time AI voice interpretation pipeline for live events (WS1); AI-assisted voice interpretation for OPI/VRI (WS3); cloud-based SaaS AI translation platform for direct agency deployment (WS4).
- AI models governed through domain-specific training and glossary controls; continuous evaluation of translation accuracy and output quality; confidence scoring and audit logging across all outputs.
- AI tuning informed by correction data from human interpretation services, with structured translation Q&A workflow formalizing the feedback loop between human and AI delivery / aligned with domain adaptation, controlled vocabularies, and risk-based QA frameworks.
- Aligned with NIST AI Risk Management Framework (AI RMF); AI operates within a controlled, auditable environment, not as an unmanaged tool; clear separation between customer data and AI model training pipelines.
- Platform improvement: continuous AI model refinement through usage patterns, revision trends, performance data, and human linguist feedback loops; adaptive translation workflows improve quality over time.
- Accuracy measurement methodology: confidence scoring, quality indicators, and error rate tracking per translation; human evaluation and post-editing analysis applied for high-stakes content types.

No geographic limitation on service delivery, to include US territories. Built for national cooperative scale.

Cooperative Contract Readiness

- U.S.-based provider with nationwide coverage: no geographic limitation on service delivery across participating states, counties, municipalities, and educational institutions.
- Four call centers nationwide provide distributed redundancy and time-zone coverage for 24/7/365 OPI and VRI availability across all U.S. regions.
- Cloud-based AI platform and browser-based access eliminate hardware or geography constraints for Workstreams 1, 2, 3, and 4, any agency, any location, any device.
- Large qualified linguist network distributed nationally; workforce management supports coverage across all time zones, including Alaska, Hawaii, and U.S. territories.
- Language availability: where AI coverage (60 languages) does not include the requested language, the 300+ language human linguist network provides immediate backup—no gap in service.

High-Demand Period Scalability

- Election cycles: platform supports simultaneous multilingual delivery for large-scale civic engagement; scalable to 2,000+ concurrent participants per session with higher capacity via advance configuration rollout.
- Emergency events: redundant telecom infrastructure and emergency management planning in place for surge scenarios; 24/7/365 emergency support and sub-5-minute turnaround for critical alert translation.
- Major municipal initiatives: batch document translation capacity of 120,000+ words per day; parallelized AI processing with human QA scales for high-volume simultaneous projects across departments.
- Workforce management practices and emergency continuity planning enable GINI to maintain stable service during peak demand, unexpected surges, and after-hours periods without performance degradation.
- Cooperative scale: four-call-center model and dedicated contract support team built specifically to scale across multiple Participating Public Agencies simultaneously under one cooperative agreement.

No geographic limitation on service delivery. Built for national cooperative scale.

WS3: Language Identification Assistance

- If the language of a caller or participant is unknown at the point of contact, GINI's live support structure can assist with language identification so the interaction is routed correctly, eliminating delays caused by unknown language requests in 311, front-desk, or call center environments.
- Language identification support is available 24/7/365 and is built into the service access model; not a separate process requiring agency staff to resolve independently.
- Once identified, the interaction routes immediately into the appropriate OPI, VRI, or ASL service path without requiring the caller to restart or re-explain their need.

WS4: Platform as Managed Program Resource

- GINI's platform is fully supported, handed off to agencies after go-live, it is operated as both a software environment and a managed program
- Because GINI already supports government accounts requiring structured onboarding, role clarity, reporting, issue resolution, and service continuity, the platform is introduced as part of a larger managed solution rather than a standalone tool.
- Participating Public Agencies may need different levels of configuration, training, and operational support. GINI's approach accommodates all agency sizes and technical capacities under the same cooperative agreement.
- GINI remains available throughout the full contract term to support configuration updates, workflow adjustments, terminology maintenance, user questions, and escalation needs, ensuring the platform continues to operate as a governed language-access environment, not a disconnected utility.
- This managed program resource model is especially important in a cooperative contract environment, where usage expands over time across different departments, programs, and participating entities that may not have dedicated technical staff.

What GINI delivers across all four workstreams under AFI-2026-124: at a glance

WS1: Real-Time Multilingual Communication with Live Captions, Transcripts & Human Escalation

- Real-time AI voice interpretation; live captions; multilingual subtitles distributed to personal devices, browser streams, meeting overlays, and venue displays
- Post-meeting multilingual transcripts, subtitle files, timestamps, and session records for agency transparency and compliance
- Human interpreter escalation available throughout; qualified interpreters monitor and enter sensitive or high-stakes event
- Usage analytics, participation reporting dashboards, and session-level LEP compliance documentation

WS2: High-Volume, Accurate Document Translation with Terminology Control & QA

- AI-driven translation with terminology control, translation memory, and quality assurance across all municipal content types
- Human post-editing, bilingual review, proofreading, and Certificate of Accuracy for high-stakes materials
- Format-preserved output in PDF, Word, and web-native formats; desktop publishing and localization; agile sprint support
- Complete audit trail per project: translation history, terminology usage, reviewer actions, and quality documentation

WS3: On-Demand Interpretation with Rapid Connection Times & Qualified Interpreter Access

- AI-first OPI and VRI with ≤1.0 second average connection time; 300+ languages 24/7/365 including ASL
- ASL support via VRI: Human certified ASL interpreters on demand
- Qualified human interpreter escalation for legal, medical, public safety, housing, and rights-related content; context carried forward, no restart
- Monthly LEP incident documentation and usage reporting for agency compliance purposes

WS4: Secure, Role-Based AI Translation Platform with Auditability, Integration & Administrative Control

- Cloud SaaS with on-premise option; U.S.-based data residency; REST API/SDK for municipal system integration; RBAC, SSO
- Audit logging, translation history, and full accountability trails; municipal glossary configuration and adaptive output improvement over time
- ADA Section 508-compliant interface; white-label options; managed program resource throughout full contract term
- API access (per 1M characters); user acceptance testing per agency; continuous AI model updates and platform enhancement.

ATTACHMENTS

Edge Public
By Buyers Edge Platform

Global
INTERPRETING NETWORK

AI-Driven Language Services Implementation Plan, Onboarding and Support
For
AFI Edge Public Cooperative Agreement Customer Support

Project Overview and Scope

Global Interpreting Network Inc. (GINI) will implement a scalable AI-driven translation and language access solution for AFI, Edge Public, and Participating Public Agencies (PPAs) nationwide. The purpose of the solution is to help municipalities and public agencies provide faster, more consistent, and more accessible multilingual communication across public meetings, written content, websites, digital services, call centers, and on-demand resident interactions.

GINI's implementation approach is built for the public-sector use cases identified in the AFI solicitation, including real-time AI voice interpretation, written document and content translation, on-demand OPI/VRI, and AI translation platform deployment. The solution is designed to support the legal and operational language access obligations of municipalities, including Executive Order 13166, Title VI, ADA, Section 508, HIPAA, where applicable, FERPA, where applicable, and related state language access requirements.

GINI's delivery model is intentionally hybrid. AI is used to improve speed, scale, availability, and operational efficiency; qualified human linguists remain available as an opt-in or escalation path when accuracy, context, sensitivity, or public accountability requires human support. **GINI's current platform supports 300+ languages. Our AI offering supports a minimum of 60 languages and is incrementally increasing.** This structure allows agencies to use AI confidently for routine or high-volume needs while preserving human review and live interpreter continuity for legal, medical, public safety, emergency, regulatory, benefits-related, public-facing, or otherwise high-stakes communications.

Implementation Objective
Deploy a secure, configurable, cloud-based AI language access environment in one business day for small Government clientele, and under 30 days for large enterprise cloud implementations, while ensuring each participating agency receives appropriate configuration, terminology controls, user access, training, support, reporting, and human escalation pathways.

Standard Implementation Process for a New Municipal Client

GINI's standard implementation process is designed around municipal operating realities: multiple departments, varied user sophistication, various government on-premise applications and software usage, accessibility obligations, recurring language demand, and the need for transparent reporting. Each implementation begins with a structured discovery process and ends with a governed, trained, and measurable language access program.
The process includes:

Edge Public
By Buyers Edge Platform

Global
INTERPRETING NETWORK

1. **Program Discovery and Scope Confirmation**
   GINI confirms the agency's selected workstreams, priority departments, public meeting needs, document translation requirements, website or digital content needs, OPI/VRI use cases, ASL needs, and expected user groups.
2. **Technical and Security Review**
   GINI validates agency-side technical requirements, network access, browser/app compatibility, conferencing tools, call center systems, CMS platforms, data retention expectations, and security requirements.
3. **Service Design and Configuration**
   GINI configures service channels, access permissions, language lists, reporting fields, terminology controls, escalation pathways, user roles, and agency-specific workflows.
4. **Integration and Data Setup**
   GINI supports integrations with common government platforms, imports historical translation assets where available, and creates reusable glossaries and translation memory to improve consistency over time.
5. **Testing and User Acceptance**
   GINI validates workflows before launch, including real-time meeting access, AI interpretation output, document submission, human review routing, OPI/VRI access, escalation rules, reporting, and support ticket pathways.
6. **Training and Go-Live**
   GINI trains agency administrators and end users, provides written and digital Quick Reference Guides and training materials, and monitors customer performance activity.
7. **Post-Go-Live Optimization**
   GINI reviews usage, performance, support activity, language demand, terminology updates, and adoption opportunities through monthly and quarterly review cycles.
8. **Use with Existing On-Premise Platforms**
   Such as Granicus, Civic Plus, Tyler Technologies, Accela, NeoGov, etc.

Implementation Timeline
GINI confirms that enterprise, multi-facility, cloud deployments are targeted for full deployment in under 30 calendar days from contract execution, assuming timely agency participation in requirements validation, access decisions, and testing.
Small customer deployments can occur in typically two days or less with full training and operational availability.

Standard Cloud Deployment Timeline

Timeline	Milestone	Key Activities
Days 1–3	Contract Execution & Kickoff	Confirm scope, participating departments, workstreams, contacts, governance cadence, and deployment priorities.
Days 4–7	Requirements Validation	Review use cases, languages, platforms, security requirements, reporting fields, user groups, translation needs, and escalation rules.
Days 8–12	Technical Setup	Configure agency account, role-based access, admin controls, secure intake channels, browser/app access, and reporting framework.

Days 13–18	Integration & Configuration	Configure conferencing tools, website/CMS workflows, call center routing, terminology glossaries, branding, translation memory, and user permissions.
Days 19–23	Testing & Quality Validation	Conduct UAT for meeting access, document workflow, OPI/VRI access, escalation to human support, reporting, and support ticket routing.
Days 24–27	Training	Deliver administrator and end-user training, quick-start guides, support procedures, and department-specific usage instructions.
Days <28–30	Go-Live & Stabilization	Activate production service, monitor early usage, resolve launch issues, confirm SLA tracking, and begin adoption support.

Deployment may occur faster for specific services:

Service Component	Typical Activation Timeline
OPI/VRI access	Immediate to two business days, depending on configuration
Document translation workflow	Immediate to two business days
Cloud AI translation platform	Immediate / Under 30 calendar days
Real-time AI meeting interpretation	Immediate / 15–30 calendar days

Implementation Assumptions and Dependencies

GINI's under-30-day deployment target for standard cloud implementations assumes timely coordination between GINI and the Participating Public Agency during the onboarding period. GINI will manage the implementation schedule, configuration activities, training preparation, and go-live coordination; however, successful deployment also depends on the agency's timely completion of required implementation inputs and approvals.
The under-30-day target assumes the agency will:

- Designate an agency project sponsor, implementation contact, technical contact, and administrative users within the agreed-upon onboarding timeframe.
- Provide access to required systems, platforms, files, meeting environments, CMS workflows, call center contacts, or other agency-side resources needed for configuration.
- Confirm user roles, department structures, administrative permissions, reporting fields, and service access requirements.
- Provide available glossaries, prior approved translations, style guides, terminology lists, branding preferences, public-facing language, or other reusable language assets needed for configuration.
- Complete security, privacy, SSO, whitelisting, or technical review steps within agreed project timeframes.
- Participate in requirements validation, testing, training, and go-live readiness activities as scheduled.

If agency approvals, technical access, security review, data delivery, or user-role decisions require additional time, GINI will coordinate with the agency to adjust the implementation

schedule while preserving service continuity and prioritizing any services that can be activated earlier, such as OPI/VRI access or standard document translation workflows.

Governance and Communication Cadence

GINI uses a structured governance and communication cadence to keep implementation visible, accountable, and aligned with agency priorities. The cadence is scaled to the size and complexity of the deployment, but each implementation includes defined project contacts, regular status communication, and a formal go-live readiness review.

Meeting / Touchpoint	Timing	Purpose
Kickoff Meeting	Days 1–3 after contract execution	Confirm scope, participating departments, workstreams, agency contacts, implementation priorities, timeline, and immediate action items.
Weekly Implementation Check-Ins	Weekly during implementation	Review progress, open items, configuration decisions, agency dependencies, testing status, training schedule, and risks to the timeline.
Technical Coordination Meetings	As needed during setup and integration	Coordinate SSO, API, CMS, conferencing tools, call center workflows, whitelisting, security review, and platform access requirements.
Go-Live Readiness Review	Before production launch	Confirm configuration, users, access pathways, training completion, support contacts, SLA tracking, reporting setup, and launch approval.
<30-Day Post-Launch Review	Approximately 30 days after go-live	Review early usage, support tickets, training questions, SLA performance, glossary updates, adoption issues, and recommended adjustments.
Quarterly Business Reviews	Quarterly, or as agreed with the agency	Review usage trends, SLA performance, support activity, language demand, workflow improvements, training needs, and future expansion opportunities.

Technical Requirements on the Agency Side

GINI's cloud deployment model is designed to minimize agency-side infrastructure requirements. All users can access services through standard web, mobile, telephone, or conferencing environments.

Area	Agency-Side Requirement
Hardware	Laptops, tablets, smartphones, or meeting room audio equipment. No specialized hardware required for standard cloud use.
Software	Modern web browser; access to approved conferencing tools such as Zoom, Microsoft Teams, Webex, or Google Meet, where applicable.
Network	Stable internet access for browser/app, VRI, live meeting, and platform use.

Audio/Video	Microphone and speakers for meeting interpretation; camera access for VRI and ASL, where applicable.
Security Access	Agency IT may whitelist domains, approve secure file transfer, configure SSO, or review data handling settings if required.
Administrative Setup	Identification of agency administrators, departments, user roles, language needs, and reporting requirements.

Integration Support for Common Government Platforms

GINI supports practical integration planning for common municipal platforms and workflows. Integration maturity varies by platform and agency environment and may include native platform capability, API/SDK-supported workflows, structured file exchange, secure export/import processes, embedded links, browser-based access, SSO coordination, or workflow alignment. During implementation, GINI will confirm the specific integration method for each agency system and document whether the integration is available as a standard configuration, requires technical coordination, or requires custom scoping.

GINI's integration approach is designed to reduce agency burden while supporting the systems commonly used by municipalities for public meetings, websites, permitting, HR, call centers, emergency notifications, and resident communications.

- **Public meeting and agenda platforms**, including Granicus, Legistar, Swagit, and iLegislate. GINI supports meeting workflow mapping, public access links, multilingual captions/subtitles, transcript workflows, and real-time language access for public meetings, council sessions, hearings, and community events.
- **Website and CMS platforms**, including CivicPlus, Drupal, WordPress, and other municipal CMS environments. GINI supports website localization workflows, content export/import coordination, glossary alignment, translation memory, and web-native file support.
- **ERP, case management, and permitting platforms**, including Tyler Technologies and Accela. GINI supports translation workflows for public-facing forms, notices, applications, permits, templates, and recurring correspondence.
- **HR and applicant tracking platforms**, including NeoGov. GINI supports translation of applicant communications, policy content, staff-facing materials, notices, instructions, and onboarding-related documents.
- **311, CRM, and call center platforms**, including Five9, Genesys, Avaya, Salesforce, and 311 systems. GINI supports OPI/VRI routing, access codes, call center workflows, reporting fields, escalation paths, and integration planning for multilingual resident support.
- **Video conferencing platforms**, including Zoom, Microsoft Teams, Webex, and Google Meet. GINI supports real-time language access, meeting links, browser/mobile access, multilingual captions/subtitles, live event support, and session closeout records.

Data Migration and Historical Translation Import Capabilities

GINI supports the migration and structured use of existing agency language assets to improve consistency, reduce duplication, and accelerate future translation workflows. During implementation, GINI works with the Participating Public Agency to identify any

prior translated materials, approved terminology, multilingual templates, website content, or translation memory resources that should be incorporated into the agency's language access environment.

This process allows the agency to preserve its previously approved public-facing language and apply it consistently across future projects. Where available, GINI can review and organize historical translations, recurring notices, forms, program descriptions, department names, public safety language, benefit terminology, legal phrases, and other frequently used content so they can inform future translation and localization work.

GINI can also import or build agency-specific glossaries and translation memory resources. These tools help ensure that repeated phrases, service names, policy terms, and resident-facing instructions are translated consistently across departments, document cycles, websites, and public communications. This is especially valuable for municipalities that issue recurring notices, maintain multilingual web content, or use standardized forms across multiple programs.

Historical translation import may include prior approved translations, bilingual templates, glossary files, website strings, public notices, emergency messages, forms, letters, and other reusable multilingual content. GINI reviews these materials for format, usability, language pair, sensitivity, and approval status before incorporating them into the active workflow. Content that is outdated, inconsistent, or not formally approved can be flagged for agency review before reuse.

All data migration activities are handled through secure, agency-approved channels. GINI coordinates with the agency to confirm file ownership, confidentiality requirements, retention preferences, access permissions, and any restrictions on reuse. Agency materials are used only to support the agency's own translation consistency, workflow efficiency, and language access program. Agency data is not used to train or fine-tune AI models without explicit written authorization.

Customization and Configuration Process

GINI's configuration process is designed to make the solution usable across departments while preserving agency-level control.

Configuration Element	Description
Terminology Glossaries	Agency-approved terms, department names, program names, benefit terms, legal phrases, public safety terms, and recurring instructions.
Translation Memory	Historical and newly approved translations were reused to improve consistency and efficiency.
Branding	Agency-branded interface options, public-facing language access instructions, meeting access labels, and user-facing guidance where applicable.
User Roles	Administrator, department manager, requester, reviewer, translator/reviewer workflow, reporting-only access, and technical support contacts.
Workflow Rules	Approval paths, human review triggers, emergency priority routing, department-level permissions, and escalation rules.

Risk Controls	AI-only, AI-assisted with human post-editing, human review required, or live human interpreter escalation, depending on use case.
Reporting Fields	Department, language, modality, user, service type, project status, turnaround, priority, cost center, and compliance notes.

Training and Support

GINI provides structured training and ongoing support at no additional cost to help agency staff adopt the AI-driven language access solution with confidence and consistency. Training is designed for practical municipal use, with separate guidance for administrators, department leads, end users, IT contacts, public meeting staff, and call center or front-desk personnel. The goal is to ensure that agency users know how to access services, select the appropriate workflow, understand when human support should be used, and obtain help quickly when needed.

Initial Administrator and End-User Training

During implementation, GINI provides initial training for both administrators and end users. Training may be delivered virtually or on-site, depending on the agency's preference, deployment size, and operational needs.

Administrator training focuses on the functions needed to manage the agency's language access environment, including user roles, department access, reporting tools, terminology resources, support procedures, escalation paths, and configuration controls. This training prepares agency administrators to monitor activity, assist internal users, request changes, and coordinate with GINI's account team.

End-user training is designed for staff who will request translations, access OPI/VRI services, support public meetings, use the AI translation platform, or route language access requests from residents. Training covers how to submit a request, select the appropriate service type, access interpretation through approved channels, use meeting interpretation links or QR codes, identify when human review or live interpreter support is required, and contact support.

GINI may also provide role-specific training for agency teams with specialized use cases, including:

- Public meeting staff using real-time AI voice interpretation, live captions, multilingual subtitles, and post-meeting transcript workflows.
- Call center, 311, and front-desk staff using OPI/VRI, ASL via VRI, language identification, and live interpreter escalation.
- Communications or public information teams requesting translation of notices, alerts, newsletters, social media, and web content.
- IT or security staff supporting access, integrations, SSO/API coordination, data handling, and technical review.

Training Materials and Knowledge Resources

GINI will provide a highly tailored & optimized training package that supports both launch readiness and long-term adoption to meet the best needs of government end-users. These materials are written for agency staff and designed to be easy to reference after training sessions are complete.

Training resources will include, at a minimum:

- Administrator guides covering user roles, reporting, support procedures, glossary resources, and configuration controls.
- End-user quick-start guides for translation requests, OPI/VRI access, public meeting language access, and platform navigation.
- Workflow checklists for common agency tasks, including document submission, meeting setup, language access requests, and human escalation.
- Service request instructions for translation, interpretation, AI-assisted workflows, and human review.
- Public meeting access instructions, including participant-facing guidance for links, QR codes, captions, subtitles, and multilingual audio where configured.
- Interpretation access procedures for OPI, VRI, ASL via VRI, and escalation to qualified human interpreters.
- Best-practice guidance for using AI-assisted and human-supported language services appropriately in municipal settings.
- Video tutorials for common workflows, such as submitting a translation request, accessing OPI/VRI, launching multilingual meeting support, reviewing translated files, and contacting support.
- Knowledge base content with FAQs, troubleshooting steps, workflow guidance, platform update information, and user support resources.

Ongoing Training for New Staff and Platform Updates

Training does not end at go-live. GINI provides ongoing training support at no additional cost throughout the contract term to help agencies maintain consistent use as staff, departments, and platform features change.

Ongoing training may include refresher sessions, new-user onboarding, department-specific training, and short update sessions when new features, workflow changes, terminology processes, or reporting tools are introduced. GINI may also recommend targeted retraining when usage reports, support tickets, or account reviews show that staff would benefit from additional guidance.

For agencies expanding adoption across departments, GINI can support phased training so each group receives instruction aligned to its actual use case. For example, a public information office may need deeper guidance on document translation and public-facing terminology, while a call center may need more focused training on OPI/VRI access, escalation, and service documentation.

Technical Support Tiers and Escalation Procedures

GINI provides a tiered technical support structure designed to resolve routine user issues quickly, escalate service-impacting matters appropriately, and maintain clear accountability between GINI and the agency.

Tier 1 support serves as the first point of contact for routine user assistance. This includes login or access questions, password support, basic workflow guidance, service request instructions, general troubleshooting, and "how-to" questions related to translation requests, OPI/VRI access, public meeting language access, and platform navigation. Tier 1 support resolves common issues directly or routes the matter to Tier 2 when configuration or deeper application support is required.

Tier 2 support addresses application, workflow, and configuration issues. This may include user role changes, department setup, reporting questions, terminology or glossary updates, translation workflow concerns, meeting setup support, OPI/VRI access configuration, routing rules, and recurring operational issues. Tier 2 support works directly with the agency's designated administrator or department lead when an issue requires confirmation of permissions, workflow rules, reporting fields, or agency-specific preferences.

Tier 3 support addresses advanced technical matters that require specialized platform, integration, security, or engineering review. This may include API or SSO issues, integration support, platform defects, data handling concerns, security review items, system performance issues, and complex troubleshooting involving agency IT systems or third-party platforms. Tier 3 support may involve GINI technical specialists, platform resources, engineering support, and the agency's IT or security team.

Escalation is managed through defined Quality Assurance customer support processes. GINI is responsible for triage, ticket management, internal escalation, technical troubleshooting, service restoration, and communication of status updates. The agency is responsible for identifying authorized contacts, confirming agency-side access requirements, providing timely approvals or technical information, and coordinating any internal IT, security, department, or executive decisions required to resolve the issue.

Escalation Structure

Step 1: User or Department-Level Request
Agency staff submits the issue through the approved support channel. Routine questions are handled by GINI Tier 1 support. The agency user provides relevant details such as service type, department, affected users, urgency, screenshots where applicable, meeting or document reference, and business impact.

Step 2: Agency Administrator Coordination
If the issue involves permissions, user roles, department configuration, reporting, workflow rules, glossary preferences, or internal approval, GINI coordinates with the agency's designated administrator or program lead. This prevents unauthorized changes and ensures configuration decisions remain aligned with agency governance.

Step 3: GINI Tier 2 Escalation
If the matter cannot be resolved through Tier 1, GINI escalates to Tier 2 for application, workflow, and configuration support. Tier 2 reviews service settings, workflow rules, reporting setup, meeting configuration, document routing, or interpretation access settings, and implements corrective action where appropriate.

Step 4: Joint Technical Escalation
If the matter involves integration, SSO, API connectivity, network access, security controls, CMS/call center platforms, or third-party systems, GINI escalates to Tier 3 and coordinates

directly with the agency's IT or security contact. Both parties work from a shared issue record, with GINI addressing platform-side causes and the agency addressing agency-side network, access, firewall, identity management, or third-party system requirements.

Step 5: Critical Incident Escalation
For Priority 1 issues, such as a production outage, live public meeting failure, emergency communication blockage, or inability to access a core service, GINI immediately escalates internally to senior technical and operational leadership. The agency's designated emergency or executive contact is notified, and both parties coordinate on service restoration, workaround options, public-facing impacts, and post-incident review.

Step 6: Account Management and Corrective Action Review
After resolution, recurring or significant issues are reviewed by GINI's account management/customer success team and the agency's program lead. The review may result in updated training, revised workflows, configuration changes, glossary updates, user guidance, or a corrective action plan.

This escalation model gives agencies a clear path for routine support, operational support, technical troubleshooting, and critical incident management. It also ensures that GINI retains responsibility for vendor-side performance while the agency maintains control over internal approvals, access decisions, IT dependencies, and business-priority determinations.

Dedicated Account Management and Customer Success Support

Each agency receives account management and customer success support to promote adoption, training, monitor performance, and resolve operational needs over time as customer requirements change over time. GINI's account support is intended to give agencies a consistent point of contact beyond the help desk, especially for service planning, usage review, training needs, glossary updates, reporting, and program improvement.
The account management function includes regular check-ins, SLA and usage review, coordination of monthly and quarterly business reviews where appropriate, review of support trends, and recommendations for workflow improvements. For larger or multi-department deployments, GINI may assign a dedicated account manager to coordinate implementation, training, reporting, issue resolution, and expansion planning across agency departments.

This structure helps ensure that the language access program remains active, measurable, and aligned with agency needs after launch rather than functioning as a one-time technology deployment.

Support Hours and Response Time SLAs by Ticket Priority

GINI provides support coverage aligned to the operational needs of municipal clients, including urgent escalation for live-service issues. Standard platform and account support is available Monday through Friday, 6:00 a.m. to 8:00 p.m. across all time zones, including federal holidays, with 24/7/365 escalation for Priority 1 production-impacting incidents and continuous 24/7/365 access for all services.

The platform supports 300+ languages. Our AI offerings shall support a minimum of 60 languages and increasing, 24/7/365. Platform and account support are available during extended business hours, with an available dedicated account manager. Escalation

procedures for critical service-impacting events, including system outages, live meeting failures, emergency communication blockage, or inability to access a core production service.

Ticket Priority	Definition	Initial Response Target
Priority 1 — Critical	System outage, live meeting failure, emergency communication blockage, or inability to access a core production service.	25 minutes
Priority 2 — High	Major feature unavailable, significant workflow disruption, urgent production issue, or multiple users affected.	1 business hour
Priority 3 — Standard	Routine user issue, configuration request, reporting issue, non-critical workflow question, or single-user access issue.	1 business day
Priority 4 — Low / Enhancement	General question, training request, enhancement request, documentation request, or non-urgent configuration update.	1 business day

For Priority 1 issues, GINI provides continuous updates until service is restored or an acceptable workaround is in place. For Priority 2 issues, GINI provides same-business-day updates and works toward resolution or workaround as quickly as practicable. Priority 3 and Priority 4 items are tracked through normal support channels and reviewed as part of ongoing account management when they indicate broader training, configuration, or adoption needs.

Service Level Agreements (SLAs)

GINI's SLA framework is designed to provide clear, measurable service expectations across all proposed service categories. The following summary highlights the core SLA commitments for system availability, interpretation access, document translation, support response, and maintenance notification.

SLA Category	Proposed Commitment
Workstream 1 Uptime — Real-Time AI Voice Interpretation	99.9% monthly uptime
Workstream 3 Uptime — On-Demand OPI/VRI	99.9% monthly uptime
Workstream 4 Uptime — AI Translation Platform / Software License	99.9% monthly uptime
Spanish OPI Average Speed-to-Connect (certified/human)	Approximately 5 seconds after language identification
High-Demand Spoken Languages Speed-to-Connect	Under 30 seconds
Standard Document Translation (certified/human)	6 business hours to 3 business days for up to 10,000 words, depending on language pair, complexity, formatting, and review requirements

Urgent Document Translation	24 hours where feasible based on language pair, file condition, formatting, and review requirements
Emergency Translation	2–4 hours for short-form emergency content, depending on length, language pair, complexity, and required human review
Priority 1 Support Response	30 minutes
Planned Maintenance Notice	5 business days for standard maintenance; 10 business days for high-impact maintenance where feasible

These commitments will be monitored through service records, support tickets, usage reporting, account reviews, and corrective action tracking. GINI will review SLA performance with the agency through regular account management meetings, monthly operational reviews, or quarterly business reviews, depending on the scope and complexity of the deployment.

System Availability and Uptime

GINI commits to a **minimum 99.9% monthly uptime guarantee** for Workstream 1 and Workstream 3, consistent with AFI's stated minimum requirement. GINI also applies the same 99.9% monthly uptime target to its standard cloud-based AI translation platform deployment under Workstream 4.

This uptime commitment applies to production availability of the core hosted service environment, excluding scheduled maintenance, emergency maintenance, agency-side connectivity issues, third-party outages outside GINI's control, or force majeure events. GINI's service continuity model includes redundant operational processes, monitored service access, escalation procedures, and technical support workflows to reduce disruption and restore service quickly if an issue occurs.

For live public meetings, urgent resident-facing services, OPI/VRI access, and high-demand translation workflows, GINI treats service interruption as a priority operational matter and escalates service-impacting incidents through its support and account management structure.

Document Translation Turnaround SLAs

GINI provides document translation turnaround commitments based on priority level, language pair, volume, file complexity, formatting requirements, and whether human review is required. Translation work may include public notices, municipal forms, legal communications, permits, applications, websites, digital content, newsletters, emergency messages, and other public-facing materials.

Standard translation requests, Certified/human	GINI targets delivery of up to 20,000 words within 2 to 4 business days, depending on the language pair, file format, and review requirements.
Urgent translation requests	GINI targets delivery of up to 20,000 words within 24 hours, where the language pair, file condition, formatting needs, and review requirements allow.

Emergency translation requests	Short-form emergency content may be delivered in as little as 2 to 4 hours, depending on length, language pair, complexity, and required human review.
High-volume or batch translation	GINI can support 40,000+ words per day for high-frequency languages through coordinated workflow management, parallelized production, translation memory, terminology controls, and human QA oversight.

Where documents are legal, regulatory, medical, public safety-related, benefits-related, or otherwise high-stakes, GINI may route the content through enhanced human review even if the request is urgent. In those cases, GINI will confirm an achievable turnaround at intake so the agency receives a realistic delivery commitment without compromising quality or public-sector risk controls.

OPI/VRI Speed-to-Connect SLAs

GINI's current platforms support 300+ languages. Our AI offerings shall support a minimum of 60 languages and increasing. GINI's on-demand interpretation model is designed to provide rapid access to interpreters across OPI, VRI, and ASL-supported services. Speed-to-connect is monitored by language, modality, demand level, and routing pathway.

For SLA tracking purposes, high-demand spoken languages include Spanish and other languages commonly requested in municipal and public agency environments, such as Mandarin, Cantonese, Vietnamese, Portuguese, Arabic, Russian, Haitian Creole, Somali, Korean, Tagalog, Polish, French, Amharic, Hindi, Khmer, Hmong, Japanese, Gujarati, and Tigrinya, as well as other frequently requested languages identified during agency onboarding. GINI will confirm each agency's high-demand language profile during implementation and will monitor speed-to-connect performance by language category, modality, and usage pattern.

GINI's current human-based platform proposes OPI/VRI speed-to-connect commitments are:

- Spanish: approximately 5 seconds after language identification.
- High-demand spoken languages: under 30 seconds.
- Other spoken languages: target under 30 seconds where interpreter availability allows; rare languages or specialized credential requirements may vary.
- ASL via VRI: available through VRI, with connection expectations based on interpreter availability, scheduling conditions, and request type.
- Scheduled ASL or specialized interpretation: coordinated in advance to support reliable coverage.
- AI-assisted interpretation with human escalation: escalation path available when the interaction becomes complex, sensitive, or high-risk.

Real-Time AI Voice Interpretation Performance

For Workstream 1, GINI's SLA framework also addresses the reliability, usability, and measurable performance of live multilingual meeting support. GINI will configure each

session based on meeting type, required languages, audience access method, caption/subtitle needs, transcript requirements, and risk level.

GINI's proposed Workstream 1 performance targets include:

- **Platform uptime:** 99.9% monthly uptime for the production environment.
- **Pre-event readiness check:** Completed for scheduled public meetings and major civic events where GINI is notified in advance and agency meeting details are provided.
- **AI interpretation latency:** Target near real-time delivery, with latency dependent on audio quality, meeting platform, language pair, caption/subtitle configuration, and network conditions.
- **Language channel support:** Support for multiple simultaneous language channels per session, configured based on agency need, meeting format, and platform capacity.
- **Participant access:** Browser-based or mobile-enabled access for attendees where configured, with support for meeting links, QR codes, or other approved access methods.
- **Session recovery:** If a configured session connection drops due to a platform-side issue, GINI will prioritize restoration or workaround support as a live-service incident.
- **Caption/subtitle availability:** Support for live captions, multilingual subtitles, and translated audio where configured for the event.
- **Post-session records:** Post-meeting transcripts, subtitle files, usage data, participation reporting, and session closeout records were configured.
- **Human monitoring or escalation:** Available for high-risk, high-visibility, sensitive, legal, regulatory, public safety, or public-facing meetings where the agency requests additional oversight.
- **Support response for live meeting disruptions:** Live meeting failures or production-impacting session issues are treated as Priority 1 incidents with a 30-minute initial response target.

For scheduled public meetings or major civic events, GINI recommends advance coordination to confirm audio source, meeting platform, language channels, participant access instructions, backup contacts, caption/subtitle preferences, transcript needs, and support procedures before the session begins. This readiness process helps reduce avoidable technical issues and improves the reliability of multilingual access during public meetings.

AI Translation Platform and Software License SLAs

For Workstream 4, GINI provides a 99.9% monthly uptime target for the cloud-based AI translation platform. The platform SLA applies to standard production access, user login, translation workflow access, administrative functions, and reporting tools within GINI's hosted service environment.

GINI also supports role-based access controls, administrative configuration, translation history, audit records, glossary management, translation memory, and agency-specific workflow rules, where configured. Platform issues are triaged through the same ticket severity model used for technical support, with critical access issues escalated immediately. For agencies using SSO, API, CMS workflows, call center integration, or other third-party systems, GINI will coordinate troubleshooting with the agency's IT team to determine

whether the issue is platform-side, agency-side, or related to a third-party service dependency.

Customer Support Response Time Commitments

GINI assigns support response commitments based on ticket severity and operational impact.

Severity	Description	Initial Response Target
Severity 1 — Critical	Production outage, live meeting failure, emergency communication blockage, inability to access core OPI/VRI or platform services, or issue affecting multiple users in a mission-critical workflow.	30 minutes
Severity 2 — High	Major feature unavailable, significant service degradation, urgent production issue, integration failure, or issue affecting multiple users or departments.	1 business hour
Severity 3 — Standard	Routine support request, single-user issue, reporting question, configuration request, non-critical workflow issue, or document/project support question.	1 business day
Severity 4 — Low / Enhancement	General question, training request, enhancement request, documentation update, minor configuration change, or future workflow improvement.	1 business day

For Severity 1 incidents, GINI provides active updates until the service is restored or a reasonable workaround is in place. For Severity 2 incidents, GINI provides same-business-day updates and works toward resolution or workaround as quickly as practicable. Severity 3 and Severity 4 tickets are tracked through standard support channels and may also be reviewed during account management meetings if they indicate a recurring issue, training need, or configuration improvement.

Planned Maintenance and Advance Notice

GINI schedules planned maintenance during low-usage windows whenever practicable to reduce disruption to agency operations. Standard planned maintenance will be communicated at least **five business days in advance**. High-impact maintenance that may affect production access, integrations, meeting support, or administrative workflows will be communicated at least **ten business days in advance,** where feasible.
Maintenance notices will identify the expected date, time, affected services, anticipated duration, user impact, and any recommended agency actions. Emergency maintenance may be performed with shorter notice when required to protect security, service stability, data integrity, or continuity of operations. In those cases, GINI will notify designated agency contacts as soon as practicable and provide follow-up communication after the maintenance activity is complete.

Incident Management and Service Restoration

GINI maintains an incident management process for service-impacting events. When an incident occurs, GINI triages the issue, assigns severity, identifies affected services, initiates

vendor-side escalation, and coordinates with the agency's designated contacts when agency side action may be required.

For critical incidents, GINI's process includes:

- Immediate escalation to technical and operational leadership.
- Identification of affected users, services, workstreams, or integrations.
- Workaround development where available.
- Communication to designated agency contacts.
- Status updates until service is restored or stabilized.
- Post-incident review for significant or recurring issues.
- Corrective action tracking where needed.

Quality and Accuracy Commitments

GINI's SLA framework includes quality controls in addition to speed and uptime. For document translation, quality commitments include completeness checks, terminology consistency, formatting review, human post-editing where required, and enhanced review for high-stakes content. For OPI/VRI, quality indicators include correct language routing, connection speed, session continuity, interpreter qualification alignment, and escalation effectiveness. For real-time AI voice interpretation, quality indicators include session readiness, channel availability, caption/subtitle usability, transcript completeness, and appropriate human oversight for sensitive meetings.

GINI may track quality through a combination of internal QA review, customer feedback, support tickets, revision trends, interpreter performance monitoring, translation memory updates, glossary updates, and account review findings.

Reporting and SLA Review

GINI provides reporting to support agency oversight, compliance documentation, and continuous improvement. SLA and usage reporting may include:

- Uptime and service availability.
- Support ticket volume, severity, and response times.
- OPI/VRI usage by language, department, and modality.
- Average speed-to-connect by language category.
- Translation volume by language, department, priority, and turnaround.
- Real-time meeting support, activity, and session records.
- Human escalation activity from AI-assisted workflows.
- Glossary and terminology updates.
- Usage trends and adoption patterns.
- Corrective actions and service improvement recommendations.

For larger deployments, GINI recommends monthly operational reviews and quarterly business reviews. These reviews give the agency a structured forum to assess performance, identify training needs, update workflows, refine terminology, and plan expansion across departments.

Service Credits and Corrective Action

If service performance falls below agreed SLA targets, GINI will work with the agency to identify the cause, implement corrective action, and monitor improvement. Corrective actions may include additional training, configuration changes, escalation process adjustments, workflow updates, technical remediation, staffing review, glossary refinement, or service monitoring enhancements.

Please note references are extremely busy, and may be on business travel or other leave with delayed responses.

References

Florida State Commerce Department
Danielle McNeil, Contract Manager
850-599-0329
Danielle.McNeil@commerce.fl.gov
Length of Service: 2019–Present
Services Provided: OPI for hotlines; VRI for webinars/trainings; translation of public-facing materials
Volume: 250,000+ minutes annually
Languages Supported: 300+

Unity Physicians Hospital
Tami Johnson, Chief Nursing Compliance Officer
574-231-6877; 610-462-9494
tami.johnson@umsh.net
Length of Service: 2019–Present
Services Provided: Interpretation and Translation services supporting patient communications and compliance needs (on-site and/or remote per solicitude).
Volume: 470,000+ minutes annually
Languages Supported: 300+

Florida Department of Economic Opportunity
Leah Langston, Policy Coordinator
850-717-8411
Leah.Langston@deo.myflorida.com
Length of Service: 2020–Present
Services Provided: OPI for claimant hotlines; VRI for interviews; translation of forms and determinations
Volume: 300,000+ minutes annually
Languages Supported: 300+

Nebraska Department of Health and Human Services
Joyful Stoves, Program Specialist
531-289-8214
Joyful.Stoves@nebraska.gov
Length of Service: 2019–Present
Services Provided: OPI, VRI, OSI, and document translation for patient and public-facing materials
Volume: 300,000+ minutes annually
Languages Supported: 300+

Sarasota County Schools
Jasmine Simmons, Records Technician II
941-486-2166 ext. 68417
Jasmine.Simmons@sarasotacountyschools.net
Length of Service: 2020–Present
Services Provided: OPI, VRI, and document translation for K–12 parent communication, records, and compliance
Volume: 150,000+ minutes annually

Please note references are extremely busy, and may be on business travel or other leave with delayed responses.

Languages Supported: 300+

Alabama Dept. of Health & Human Services
Kerita N. W. Howard, ACES Subject Matter Expert
Kerita.Howard@dhr.alabama.gov
Length of Service: 2019–Present
Services Provided: OPI and translation services for statewide public assistance programs
Volume: 200,000+ minutes annually
Languages Supported: 300+

Global INTERPRETING NETWORK

Language List

Over-the-Phone Interpretation (OPI)

Acehnese
Achi (Rabinal, Calbulco) Acoli
Aderi
Afrikaans
Aguateco
Ajo
Akan
Akateko
Albanian
Algerian
Amharic
Anuak
Arabic
Arakanese
Aramaic
Armenian
Asante
Ashanti
Assamese
Assyrian
Awateko
Azerbaijani
Azeri (Cyrillic)
Azeri (Latin)
Azeri (Turkish)
Badini
Bahasa (Malaysian)
Bajo
Bajuni
Balochi
Bamanankan
Bambara
Basa Sunda
Bashkir
Basque (Euskera)
Bassa
Belarusian
Bengali
Berber
Bosnian
Breton
Bulgarian
Burmese
Buryat
Cambodian
Cantonese (Chinese)
Cape Verde Creole Carolinean
Catalan
Cebuano
Chadian (Arabic)
Chaldean
Chamorro
Chin (Lai)
Chinese (Hokkien)
Chinese Shanghainese
Chinese Xiang
Chinn
Chiu-Chow
Chuj
Chuukese
Corsican
Cotocoli (Tem)
Croatian
Czech
Danish
Dari (Afghan Persian, Afghan Farsi)
Dinka
Diola
Divehi
Dutch
Dyula
Edo
Estonian
Ewe
Falam Chin
Fante
Farsi, Iranian
Filipino (Tagalog)
Finnish
Flemish
French
French Canadian
French Creole
French-Albanian
French-Arabic
French-Italian
French-Spanish
Frisian
Fukienese Chinese
Fulani
Fuqing
Fuzhou
Ga
Galician
Garre
Georgian
German
Ghulfan (Arabic)
Greek
Greenlandic
Guarani
Guere
Guinea-Bissau Creole
Gujarati
Hainanese
Haitian Creole
Hakha Chin
Hakka Chinese
Hassaniya Arabic
Hausa
Hebrew
Hindi
Hmong
Hunan
Hungarian
Igbo
Ilocano
Ilonggo
Indonesian
Inuktitut
Iranian Farsi
Irish
Isixhosa
Isizulu
Italian
Italian-Romanian
Ixil
Jakaltek / Jakalteko
Japanese
Jawanese
Jiangsu
Jola-Fonyi
Jordanian
K'iche
Kabiye
Kachin
Kannada
Kaqchikel
Karen
Karen Pow
Karenni (Kayah)
Kazakh
Khmer (Cambodian)
Kibajuni
Kikongo
Kikuyu
Kinkani
Kinyamulenge
Kinyarwanda
Kirundi
Kiswahili
Kituba
Korean
Kosraean
Kotokoli
Kpelle
Kunama
Kurdish
Kurdish (Bahdini)
Kurdish (Kurman)
Kurdish (Sorani)
Kurmanji
Laotian
Latvian
Lebanese (Arabic)
Leta
Lingala
Lithuanian
Loma (Liberian)
Lower Sorbian
Luganda
Luo
Luxembourgish
Maay Maay
Macedonian
Madi
Malay
Malayalam
Malaysian
Maldivian
Malinke
Maltese
Mam
Mandarin
Mandingo
Mandinka
Maori
Mapudungun
Mara Chinn
Marathi (Indian)
Marshallese
Masalit
Matu Chin
Mbay
Mende
Mien
Mina (Togolese)
Mirpuri

Global INTERPRETING NETWORK

Language List

Over-the-Phone Interpretation (OPI)

Mixteco
Mixteco Alto
Mizo (Chinn)
Mohawk
Moldovian
Mongolian
Montenegrin
Mushunguli
Navajo
Neapolitan
Nepali
Nigerian
Ningbo
Norwegian
Occitan
Oriya
Oromifa
Oromo
Pahari
Pampango
Pangasinan
Papamiento
Pashto
Patois (Jamaican)
Persian, Iranian
Pidgin
Polish
Popti
Poqomchi
Portuguese (Brazilian)
Portuguese Creole
Pulaar
Punjabi
Q'anjob'al
Q'eqchi
Quechua
Quiche
Rahkine
Rohingya
Romanian
Russian
Sami (Inari)
Sami (Lule)
Sami (Northern)
Samoan
Sango
Sanskrit
Saraiki
Scottish Gaelic
Serbian
Sethang
Setswana
Shona
Sichuan
Sicilian
Sinhalese
Slovak
Slovenian
Smi (Skolt)
Smi (Southern)
Somali
Soninke
Sorani
Sotho
Spanish
Spanish-Italian
Spanish-Portuguese
Spanish-Romanian
Sri Lankan (Tamil)
Sudanese Arabic Creole
Swahili
Swedish
Sylheti
Syriac
Tachew
Tahitian
Taiwanese
Tajik
Tamazight
Tamil
Tatar
Tedim Chin
Telugu
Teochew
Thai
Tibetan
Tigre
Tigrinya
Toisanese
Tongan
Tosk
Trukese
Tshiluba
Turkish
Turkman
Twi
Ugyhur
Ukrainian
Upper Sorbian
Urdu
Uzbek
Vietnamese
Visayan
Walloon
Welsh
Wolof
Yakut
Yapese
Yi
Yiddish
Yoruba
Yucatec
Yupik
Zomi
Zulu
Zyphe Chinn (Zophei Chinn)

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Global INTERPRETING NETWORK

Global INTERPRETING NETWORK **Language List**

Video Remote Interpretation (VRI)

American Sign Language (ASL)
Arabic
Bosnian
Bulgarian
Burmese
Cantonese (Chinese)
Croatian
Farsi, Iranian
French
French Canadian
French-Albanian
French-Arabic
French-Italian
French-Spanish
Greek
Gujarati
Haitian Creole
Hindi
Hmong
Italian
Italian-Romanian
Japanese
Karen
Khmer (Cambodian)
Kinyarwanda
Kirundi
Korean
Macedonian
Mandarin
Nepali
Pashto
Polish
Portuguese (Brazilian)
Portuguese (Continental)
Punjabi
Rohingya
Russian
Serbian
Somali
Spanish
Spanish-Italian
Spanish-Portuguese
Spanish-Romanian
Swahili
Tigrinya
Turkish
Vietnamese

California Small Business Certification Number

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To verify most current certification status go to: https://www.caleprocure.ca.gov

DGS
GENERAL SERVICES

Office of Small Business & DVBE Services

Certification ID: 56707

Legal Business Name:
Global Interpreting Network Inc

Doing Business As (DBA) Name 1:
Global Interpreting Network Inc

Doing Business As (DBA) Name 2:
Global Interpreting Network Inc

Address:
25060 Avenue Stanford
Suite 155
CA
VALENCIA
CA 91355

Email Address:
jwhittington@globalinterpreting.com

Business Web Page:
www.globalinterpreting.com

Business Phone Number:
866)397-9288

Business Fax Number:

Business Types:
Service

Certification Type	Status	From	To
SB(Micro)	Approved	19/12/2025	31/12/2027

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Email: Certification@dgs.ca.gov
Call OSDS Main Number: 916-375-4940
707 3rd Street, 1-400, West Sacramento, CA 95605

Minority Business Entity Certificate Number

THIS CERTIFIES THAT

Global Interpreting Network Inc
dba Global Interpreting Network Inc

NMSDC
National Minority Supplier Development Council

* Nationally certified by the: SOUTHERN CALIFORNIA MINORITY SUPPLIER DEVELOPMENT COUNCIL AS MINORITY BUSINESS ENTITY (MBE) MEETING ALL FEDERAL AND STATE THEMES, GOALS, AND OBJECTIVES

*NAICS Code(s): 541930

* Description of their product/services as defined by the North American Industry Classification System (NAICS)

02/22/2024		SC58438
Issued Date		**Certificate Number**
03/01/2029	**Ying McGuire** **NMSDC CEO and President**	**Virginia Gomez, President**
Expiration Date		

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* MBEs certified by an Affiliate of the National Minority Supplier Development Council, Inc.®

Business Associate Agreement

This Business Associate Agreement (Agreement) is entered into by the Covered Entity (Agency name) and Business Associate (Global Interpreting Network Inc.) for interpretation, translation, localization, document formatting, scheduling, reporting, and related language access services that may involve the creation, receipt, maintenance, transmission, use, disclosure, or access to Protected Health Information (PHI), Personally Identifiable Information (PII), or other confidential information. Business Associate agrees to protect such information in accordance with HIPAA, the HIPAA Privacy, Security, and Breach Notification Rules, applicable state privacy and security requirements, and the underlying contract, purchase order, or statement of work.

1. Permitted Uses and Disclosures

Business Associate shall use or disclose PHI and PII only as necessary to perform contracted interpretation and translation services, including interpreter coordination, linguistic review, quality assurance, secure document handling, invoicing, and service reporting; as required by law; or as authorized in writing by Covered Entity. Business Associate shall not sell, reuse, mine, train systems on, or further disclose PHI or PII for any unrelated purpose.

2. Safeguards and Confidentiality

Business Associate shall maintain reasonable administrative, technical, and physical safeguards to protect the confidentiality, integrity, and availability of PHI and PII. Safeguards may include workforce confidentiality obligations, role-based access, minimum necessary practices, secure transmission, secure storage, controlled file access, incident response procedures, and secure return, deletion, or disposal controls.

3. Language Services Personnel and Minimum Necessary Standard

Business Associate shall limit access to PHI and PII to the minimum necessary to complete the requested service. Interpreters, translators, editors, project managers, quality reviewers, subcontractors, and agents with access to PHI or PII shall be required to maintain confidentiality and comply with applicable privacy and security obligations. Linguists shall not retain, copy, disclose, or use Covered Entity information except as needed to perform the assigned service.

4. Subcontractors and Agents

Business Associate shall ensure that any subcontractor, linguist, or agent that creates, receives, maintains, transmits, or accesses PHI or PII on its behalf agrees to substantially similar privacy, security, breach notification, and confidentiality requirements.

5. Security Incidents and Breach Reporting

Business Associate shall report any known unauthorized access, use, disclosure, loss, or suspected breach of PHI or PII without unreasonable delay and consistent with applicable law and contract requirements. Notice shall include, to the extent known, the nature of the incident, information involved, affected individuals, mitigation steps, and corrective actions.

6. Individual Rights Support

To the extent Business Associate maintains PHI in a designated record set, Business Associate shall reasonably assist Covered Entity with access, amendment, restriction, confidential communication, and accounting of disclosure requests required by HIPAA or applicable law.

7. Return, Destruction, and Survival

Upon completion or termination, Business Associate shall return or securely destroy PHI and PII unless retention is required by law, contract, audit obligations, or written direction from Covered Entity. Any retained information shall remain protected, and confidentiality obligations shall survive termination.

8. Order of Precedence

If this Agreement conflicts with the underlying contract, the stricter privacy, security, confidentiality, or breach notification requirement shall apply unless prohibited by law.

Acknowledgment and Sign-Off

☐ Covered Entity acknowledges that this Agreement applies to interpretation, translation, and related language access services involving PHI, PII, or confidential information. ☐ Business Associate acknowledges its responsibility to safeguard PHI, PII, and confidential information.

Covered Entity Sign-Off	Business Associate Sign-Off
Authorized Representative:	**Authorized Representative:**
Title:	**Title:**
Signature:	**Signature:**
Date:	**Date:**

SCB
SYSTEMS CERTIFICATION BODY
AN IAPMO COMPANY

QUALITY MANAGEMENT SYSTEM CERTIFICATE

This certifies that the quality system of

Global Interpreting Network, Inc.

25060 Avenue Stanford, Suite 155, Valencia, CA 91355, USA

is registered by IAPMO SCB in recognition of a
Quality Management System, which fulfills the requirements of

ISO 9001:2015

Scope of Registration

Provision of Interpretation and Translation Services.

Certificate No: 1119201

Certificate Decision/Re-Issue Date:	01/ 17/202 4
Certificate Issue Date:	01/17/202 4
Certificate Expiry:	01/16/202 9
Site Structure:	All Facilities

SHIRLEY DEWI, SR. VICE PRESIDENT OF
MANAGEMENT SYSTEM REGISTRATION SERVICES

909.230.5526 | WWW.IAPMOSCB.ORG
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SCB
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Page 1 of 1

Accuracy Measurement Methodology and Known Limitations

Global Interpreting Network Inc. (GINI) | Response to AFI-2026-124 | AI-Driven Translation & Language Access Services

Prepared: May 2026 | Version 1.0 | CONFIDENTIAL — FOR PROCUREMENT USE ONLY

This section describes how GINI measures quality across its three-stage AI pipeline: speech recognition (STT), machine translation with LLM-based contextualization, and text-to-speech synthesis (TTS); presents empirical results by language pair and content type for real-time interpretation (Workstreams 1 and 3), and explains the mitigations controls in place for identified limitations

1. Evaluation Methodology

GINI's quality measurement framework spans the three stages of its AI pipeline: speech recognition (STT), machine translation with LLM-based contextualization, and text-to-speech synthesis (TTS). Each stage is evaluated using industry-standard metrics appropriate to its output type.

Stage	Component	Primary metric	Evaluation basis	Coverage
Stage 1 — STT	Speech recognition: real-time transcription for live interpretation and OPI/VRI	WER / CER (%)	Real-world audio across diverse acoustic conditions, accents, and speaker types; human-verified ground truth transcriptions	31 languages
Stage 2 — Translation	AWS Translate + GPT-4o mini contextualization: applies to both the live interpretation pipeline and written document translation	COMET, BERTScore, BLEU, chrF, TER	30 language pairs × 3 content domains (Civil, Education K-12, Healthcare), two translation directions	30 language pairs
Stage 3 — TTS	Azure Neural TTS: synthesized audio delivered to interpretation listeners in real time	Predicted MOS (WVMOS, scale 1–5)	940 audio samples; WVMOS model correlates strongly with human perceptual ratings	31 languages

1.1 Stage 1 — Speech Recognition (STT)

GINI uses Soniox for real-time speech-to-text. Accuracy is measured using **Word Error Rate (WER)** for most languages and **Character Error Rate (CER)** for logographic languages (Korean, Madarin, Japanese). Lower values indicate higher accuracy. In addition to aggregate WER, Soniox returns a **word-level confidence score** for each recognized word in real time. This score signals whether the ASR model was uncertain about a given word due to background noise, heavy accent, cross-talk, or poor audio quality, making word-level confidence an important mitigation step towards know limitations in language pairs.

1.2 Stage 2 — Translation Quality

Translation quality is measured using five complementary metrics across 30 language pairs and three government-relevant content domains. The pipeline applies AWS Translate as the base engine, followed by GPT-4o mini contextualization, a conservative post-editing step that corrects only hard errors (mistranslations, missing content, dropped negations) without paraphrasing correct output. For the live interpretation pipeline, translation operates in near-real time between Soniox STT output and Azure TTS synthesis.

Metric	Weight	What it measures	Good threshold	Acceptable threshold
COMET	Primary	Semantic quality trained on human translation judgments; captures meaning and context via multilingual embeddings	≥ 0.93	0.85 – 0.93
BERTScore	High	Contextual semantic similarity beyond exact word matches	≥ 0.96	0.92 – 0.96
BLEU	Moderate	N-gram precision overlap; reliable as baseline but penalizes valid paraphrases. Note: near-zero BLEU scores for Japanese and Mandarin are a metric artifact of tokenization differences, not a translation failure. COMET is the primary indicator for these languages.	≥ 0.50	0.35 – 0.50
chrF	Moderate	Character-level F-score; more robust than BLEU for morphologically rich languages such as Finnish, Turkish, and Indic scripts	≥ 0.75	0.60 – 0.75
TER	Supporting	Translation Edit Rate inverted: minimum edits to match reference	≥ 0.70	0.55 – 0.70

1.3 Stage 3 — Text-to-Speech (TTS)

TTS naturalness is assessed using predicted **Mean Opinion Score (MOS)** via WVMOS, a wav2vec2-based model that correlates strongly with human perceptual ratings. Audio is synthesized by Azure Neural TTS at 16kHz. Scores are averaged across 940 samples spanning all three content domains. MOS ranges from 1 (bad) to 5 ((indistinguishable from natural human speech); in practice, Azure Neural TTS typically targets the 4.0–4.9 range.

2. Language Tier Classification

GINI uses a combined tier classification that reflects both **industry-standard linguistic resource availability** (the amount of training data available for a given language across general AI models) and **observed pipeline performance** across all three evaluation stages. This combined approach allows

GINI to identify languages where strong pipeline engineering compensates for lower resource availability (a key differentiator for LEP-serving municipalities).

Note: All 31 languages in GINI's catalog deliver functional, usable output. Tiers define the **level of confidence monitoring and human escalation readiness** applied to each language, not a ceiling on quality.

Tier	Definition	STT WER	COMET (translation)	TTS MOS	Confidence behavior
T1	High-resource language or strong pipeline performance across all three stages. AI output delivered with high confidence. No additional supervision required for standard content.	< 8%	≥ 0.91	≥ 4.0	High confidence
T2	Medium-resource or mixed pipeline performance. Output is accurate and usable. Human escalation is available and recommended for high-stakes interactions.	8% – 15%	0.87 – 0.91	3.0 – 3.9	Confidence indicator shown
T3	Lower-resource language or one pipeline stage operating below the acceptable threshold. Output remains functional (a COMET of 0.87 or a MOS of 3.0 represents intelligible, usable content) but confidence scores are more variable. The system actively monitors confidence and surfaces escalation prompts to the user when thresholds are not met.	> 15%	< 0.87	< 3.0	Escalation suggested

Note: Languages classified as T3 by industry-standard resource availability (e.g., Bengali, Afrikaans, Albanian, Bosnian, Persian, Telugu, Azerbaijani) may achieve T2 combined performance under GINI's pipeline due to targeted model selection and service mixing. These are identified explicitly in the language table below.

3. Pipeline Performance Results by Language and Content Type

3.1 Full Language Performance Table

All 31 languages are shown below with per-stage metrics. Color coding indicates performance level and confidence behavior: green = high confidence, yellow = confidence indicator shown to user, red = confidence monitoring active, escalation suggested if thresholds not met.

Language	Industry	GINI tier	STT WER	COMET (contextualized avg)	TTS MOS	Confidence	HITL required?
T1 —Full pipeline performance							
English	T1	T1	6.5%	source (EN)	4.45	High confidence	No
Spanish	T1	T1	5.3%	0.9037	4.13	High confidence	No
French	T1	T1	5.7%	0.9099	4.06	High confidence	No
German	T1	T1	7%	0.9066	3.96	High confidence	No
Italian	T1	T1	4.5%	0.9125	3.88	High confidence	No
Portuguese	T1	T1	4.8%	0.9059	3.66	High confidence	No
Russian	T1	T1	6.2%	0.8926	3.82	High confidence	No
Mandarin	T1	T1	6.6%	0.8998	3.68	High confidence	No
Japanese	T1	T1	8.7%	0.8957	3.68	High confidence	No
Korean	T1	T1	4.3%	0.9024	3.70	High confidence	No
Polish	T1	T1	6%	0.8914	3.90	High confidence	No
Danish ▲	T2	T1	7.7%	0.9218	3.65	High confidence	No
Norwegian ▲	T2	T1	8.4%	0.9263	4.09	High confidence	No
T2 — Acceptable pipeline performance							
Turkish	T2	T2	8.9%	0.9222	3.95	Confidence indicator shown	Recommended — legal, emergency, medical
Romanian	T2	T2	4.4%	0.9090	3.98	Confidence indicator shown	Recommended — legal, emergency, medical
Czech	T2	T2	9.7%	0.9165	3.97	Confidence indicator shown	Recommended — legal, emergency, medical
Finnish	T2	T2	10.6%	0.9289	3.80	Confidence indicator shown	Recommended — legal, emergency, medical

Bulgarian	T2	T2	5.6%	0.9039	3.89	Confidence indicator shown	Recommended — legal, emergency, medical
Croatian	T2	T2	9.5%	0.9155	3.92	Confidence indicator shown	Recommended — legal, emergency, medical
Catalan	T2	T2	10.7%	0.8931	3.86	Confidence indicator shown	Recommended — legal, emergency, medical
Bengali ★	T3	T2	6.3%	0.9082	4.08	Confidence indicator shown	Recommended — legal, emergency, medical
Afrikaans ★	T3	T2	7.4%	0.9056	4.15	Confidence indicator shown	Recommended — legal, emergency, medical
Albanian ★	T3	T2	7.7%	0.9106	3.89	Confidence indicator shown	Recommended — legal, emergency, medical
Bosnian ★	T3	T2	6.6%	0.9173	3.84	Confidence indicator shown	Recommended — legal, emergency, medical
Vietnamese	T2	T2	5.4%	0.9031	3.05	Confidence indicator shown	Recommended — legal, emergency, medical
Persian ★	T3	T2	10.9%	0.8922	4.08	Confidence indicator shown	Recommended — legal, emergency, medical
Punjabi ★	T3	T2	10%	0.8837	3.62	Confidence indicator shown	Recommended — legal, emergency, medical
Telugu ★	T3	T2	8.2%	0.8714	3.50	Confidence indicator shown	Recommended — legal, emergency, medical
Azerbaijani ★	T3	T2	7.9%	0.9077	3.79	Confidence indicator shown	Recommended — legal, emergency, medical
T3 — Confidence monitoring active							
Hindi	T2	T3	7.4%	0.8670	3.41	Escalation suggested	Yes — all government content
Arabic	T1	T3	16.2%	0.9005	3.94	Escalation suggested	Yes — all government content

★ *Language classified as T3 by industry resource availability but elevated to T2 by GINI pipeline performance.*

▲ *Language classified as T2 by industry resource availability, elevated to T1 by GINI pipeline performance.*

3.2 Translation Quality by Content Type

Translation accuracy varies by content domain due to differences in vocabulary complexity, register formality, and tolerance for paraphrase. The table below presents COMET scores for key language pairs broken down by the three evaluated critical content domains: Civil/Legal, Education K-12, and Healthcare.

Language	Tier	Civil / legal	Education K-12	Healthcare	Domain variance Δ
Spanish	T1	0.8923	0.9057	0.8947	Δ 0.0134
French	T1	0.8981	0.9154	0.9074	Δ 0.0173
German	T1	0.9134	0.8950	0.9104	Δ 0.0184
Arabic	T3	0.9044	0.9171	0.8848	Δ 0.0323
Mandarin	T1	0.9266	0.8550	0.9164	Δ 0.0716
Japanese	T1	0.9114	0.8786	0.9288	Δ 0.0502
Hindi	T3	N/A	0.8384	0.7752	Δ 0.0632
Turkish	T2	0.9088	0.9519	0.9099	Δ 0.0431
Bengali	T2	0.8765	0.9194	0.8848	Δ 0.0429
Vietnamese	T2	0.8849	0.9175	0.9202	Δ 0.0353
Telugu	T2	0.8631	0.8960	0.7902	Δ 0.1058
Punjabi	T2	0.8501	0.8886	0.7927	Δ 0.0959
Persian	T2	0.8773	0.9245	0.8688	Δ 0.0557

Key finding: Domain variance (Δ) is lowest for T1 languages (< 0.01 across domains) and highest for T3 languages where Indic script complexity interacts differently with formal vs. instructional content. Healthcare shows the highest sensitivity for Hindi, Telugu, and Punjabi, where medical terminology is underrepresented in the base AWS Translate training corpus. For these specific language-domain combinations, GINI's confidence scoring system applies tighter thresholds and is more likely to surface an escalation prompt.

3.3 Translation Direction Analysis (EN→X vs. X→EN)

Across all 30 language pairs, translation into English (X→EN, avg COMET 0.9028) and from English (EN→X, avg COMET 0.8995) perform comparably overall. Direction effects are most pronounced for:

- **Indic languages:** Hindi shows a +0.107 COMET advantage for X→EN over EN→X; Punjabi +0.077; Telugu +0.059. GINI's confidence scoring system applies direction-aware thresholds for these languages, and the confidence indicator is always surfaced for EN→Hindi, EN→Telugu, and EN→Punjabi output.
- **European T1/T2 languages:** EN→X matches or outperforms X→EN for Norwegian, Finnish, Czech, Croatian, and Bosnian, reflecting strong bidirectional coverage.
- **Balanced pairs:** German, Arabic (T3), and Korean show < 0.005 COMET differential between directions, indicating symmetric quality despite Arabic's elevated WER.

3.4 GPT-4o mini Contextualization Impact

GPT-4o mini post-editing improves COMET in 64.6% of evaluated cases, with an average delta of +0.0035. The post-editor is deliberately conservative: it corrects only hard errors and returns the original translation unchanged when no error is detected. This avoids introducing stylistic divergence that would penalize n-gram metrics without improving meaning.

Domain	Δ COMET	Δ BERTScore	% pairs improved	Languages benefiting most
Civil / legal	+0.0062	+0.0010	69.0%	Persian +0.014, Finnish +0.012
Education K-12	+0.0005	+0.0001	60.0%	Bengali +0.009, Albanian +0.008
Healthcare	+0.0038	+0.0012	65.0%	Afrikaans +0.008, Bengali +0.009

4. Known Limitations and How They Are Addressed

GINI discloses all known limitations transparently. For each, the primary mitigation is GINI's three-layer confidence and escalation system, described below, followed by language- and stage-specific notes.

4.1 GINI's Three-Layer Confidence and Escalation System

Rather than treating human escalation as a fixed requirement tied to a language tier, GINI applies a real-time confidence monitoring system that evaluates output quality at each stage of the pipeline and surfaces actionable information to the user. Escalation is always available: but it is triggered by evidence, not assumption.

Layer	Signal source	What is monitored	What happens
1	**Soniox word-level confidence (STT)**	Soniox returns a confidence score for every recognized word in real time. Low scores indicate uncertainty due to background noise, heavy accent, cross-talk, or poor audio quality. Because the entire downstream pipeline depends on transcription accuracy, this layer catches problems at the source (before translation) and accumulates signals immediately.	When word-level confidence falls below the defined threshold, the system flags the affected segment, surfaces a confidence indicator to the agency administrator and session participants, and prompts the option to escalate to a human interpreter. For live interpretation sessions (WS1, WS3), this prompt appears in the participant interface in real time.
2	**Translation / contextualization confidence (Stage 2)**	GPT-4o mini contextualization produces a confidence assessment for each post-edited segment. Low confidence at this layer indicates that the translation engine encountered ambiguous source content, domain-specific terminology not covered by the active glossary, or structural complexity that reduces output reliability.	Low-confidence translation output is flagged before delivery. For live interpretation, the system surfaces the confidence indicator and escalation prompt.
3	**Manual escalation**	Any session participant, agency administrator, or agency staff member may request human escalation at any time, regardless of confidence scores. This layer is always available and requires no threshold to trigger.	For Workstream 1 (live meetings), the escalation button is accessible to the session host throughout the event. For Workstream 3 (OPI/VRI), any participant can request a human interpreter mid-session.

4.2 Stage 1 — Speech Recognition Limitations

Language / scenario	Limitation	How GINI addresses it
Arabic (T3) — WER 16.2%	Highest WER in the evaluated set, driven by dialectal variation between Modern Standard Arabic and regional spoken varieties, and right-to-left script complexity. Even at 16.2%, Soniox outperforms all evaluated alternatives for Arabic. The limitation is not that Arabic is unsupported, it is that live dialectal speech introduces variability that no current ASR system fully eliminates.	Layer 1 confidence monitoring is active for Arabic live interpretation sessions. When word-level confidence drops below threshold (as is more likely in dialectal speech) the confidence indicator is immediately surfaced and human escalation is prompted.
Persian, Punjabi, Catalan, Finnish — WER 10–11%	WER above the 8% good threshold but within the acceptable range. Interpretation quality is functional and usable. The elevated WER reflects limited availability of diverse real-world audio training data for these languages.	Layer 1 confidence monitoring applies. For these languages, GINI recommends using human interpreter escalation for sessions with high-stakes agenda items.
Acoustic challenges (all languages)	Background noise, overlapping speakers, heavy accents, and poor microphone quality can reduce STT accuracy for any language, including T1 languages.	Layer 1 word-level confidence scoring catches acoustic degradation in real time regardless of language tier. GINI provides pre-session audio setup guidance to agency administrators and supports room acoustic testing for high-visibility meetings.

4.3 Stage 2 — Translation Quality

Language / content type	Limitation	How GINI addresses it

Hindi (T3), Telugu & Punjabi (T2) — healthcare content	COMET scores for EN→Indic in healthcare context fall below 0.87 (Hindi: 0.7752, Telugu: 0.7902, Punjabi: 0.7927). These languages use morphologically rich Indic scripts with complex verb agreement, and medical terminology is underrepresented in the base translation models. This is the most significant translation limitation in the catalog. Note that X→EN direction performs well for all three (avg COMET > 0.91).	Layer 2 confidence monitoring applies tighter thresholds for these language-domain combinations. Low-confidence segments are flagged before delivery and the escalation prompt is surfaced. GINI's glossary system and HITL corrections captures approved medical terminology to improve consistency over time.
EN→Hindi — all content types	EN→Hindi consistently scores below 0.87 COMET across all evaluated domains, reflecting the asymmetric training data gap described in Section 3.3.	Layer 2 confidence indicators are surfaced for EN→Hindi output. X→EN Hindi performs well (COMET 0.9273) and may be delivered with standard confidence behavior for informational content.
Civil / legal content — all T2/T3 languages	Civil/legal achieves the lowest avg COMET (0.9008) across domains. Formal legal register and jurisdiction-specific terminology are underrepresented. A synonym for a legal term can change legal meaning entirely.	GINI maintains municipal terminology glossaries that are applied before translation for recurring legal language. Layer 2 confidence monitoring is active.
Japanese, Mandarin — BLEU scores	BLEU scores near zero for EN→Japanese and EN→Mandarin in some evaluations. This is a metric artifact of tokenization differences between these languages and Latin-script references, not a translation failure. COMET scores are in the acceptable range (Japanese 0.8957, Mandarin 0.8998).	COMET and BERTScore are used as the primary quality indicators for East Asian languages. BLEU is not used for threshold-based confidence decisions for Japanese or Mandarin.

4.4 Stage 3 — TTS Limitations

Language	Limitation	How GINI addresses it
Vietnamese — MOS 3.05	Lowest TTS MOS in the evaluated set. Vietnamese is a tonal language with 6 lexically distinct tones where pitch contour carries meaning. MOS 3.05 is above the 3.0 functional threshold and represents the one case where TTS output may affect comprehension for extended listening. Note: Vietnamese translation quality (COMET 0.9031) and STT (WER 5.4%) are both strong.	For Vietnamese live interpretation sessions, GINI surfaces a TTS quality notice to participants and recommends enabling text captions as the primary output. Layer 3 manual escalation to a human interpreter is recommended for high-stakes or extended Vietnamese sessions.
Hindi — MOS 3.41, Telugu — MOS 3.50	MOS scores in the lower functional range, reflecting limited Azure Neural TTS training data for Indic scripts relative to Latin-script languages. Output is intelligible and usable for interpretation purposes, but intonation patterns are less natural than T1 languages.	Combined with translation quality limitations for these languages, GINI treats Hindi (T3) and Telugu (T2) as requiring active Layer 2 confidence monitoring and surfaces the confidence indicator for all TTS output, given their low MOS scores. Layer 3 manual escalation is always available.
Danish, Portuguese, Korean, Japanese, Mandarin Simplified — MOS 3.65–3.68	MOS in the lower functional range: intelligible and suitable for interpretation delivery, with slight synthetic quality characteristics. All are above 3.0 and do not impede comprehension.	Standard confidence behavior applies. GINI monitors TTS quality feedback and applies upgraded Azure Neural voice models as they become available. Layer 3 manual escalation is always accessible.

5. Key Performance Metrics Summary

Metric	T1 languages	T2 languages	T3 languages	Overall avg	Benchmark
Languages in tier	13	16	2	31 total	—
Avg STT WER	5.9%	7.9%	11.8%	7.2%	< 15% acceptable
Avg COMET — translation (contextualized)	0.9097	0.9036	0.8838	0.9012	≥ 0.87 acceptable
Avg TTS MOS	3.99	3.79	3.68	3.85	≥ 3.0 functional
% languages meeting acceptable threshold (all 3 stages)	100%	100%	0%	94%	—
Confidence monitoring layer	Layer 1 (STT) active	Layers 1–2 active; indicator shown	Layers 1–3 active; escalation prompted	—	—

6. Continuous Improvement

GINI's quality measurement program governs ongoing accuracy monitoring:

- **Correction logging:** all escalation interventions are captured with original output, correction, error type, language pair, and content domain. This data feeds a continuous learning loop for model refinement and glossary improvement.
- **Glossary governance:** agency-specific terminology is captured during onboarding and updated throughout the contract term. Approved terms are enforced at the translation stage before output reaches the interpretation or document delivery layer.
- **Benchmarking cadence:** GINI reruns formal quality evaluations when any underlying model (AWS Translate, GPT-4o mini, Soniox, Azure TTS) is updated and publishes updated benchmarks to participating agencies within 30 days of a material model change.
- **Language expansion:** GINI is actively expanding interpretation coverage from 31 to 60+ languages. All newly added language pairs undergo the same three-stage evaluation before being made available to agencies, and are assigned a confidence tier at launch.

Appendix — Complete Evaluation Data

This appendix contains the complete per-language, per-domain, and per-direction evaluation data underlying the summary results presented in Sections 1–5. All scores are reported for both the baseline

(AWS Translate only) and contextualized (AWS Translate + GPT-4o mini) pipeline configurations. Color coding follows the same convention as the main section: green = good, yellow = acceptable, red = below threshold / confidence monitoring active.

Appendix A — STT Word Error Rate by Language

The table below presents Word Error Rate (WER) and Character Error Rate (CER) for all 31 supported languages. CER is used for Korean, Mandarin, and Japanese, where character-level evaluation is more appropriate than word-level. The **Advantage** column shows the WER/CER reduction GINI achieves over the best available alternative for that language, reflecting the quality uplift from using Soniox as the STT engine.

Language	Tier	Metric	GINI (Soniox)	Best alternative	GINI advantage	Note
English	T1	WER	6.5%	9.3%	-2.8pp	Source language for all interpretation sessions.
Spanish	T1	WER	5.3%	7.1%	-1.8pp	
Mandarin	T1	CER	6.6%	10.1%	-3.5pp	CER used — character-level metric appropriate for logographic scripts.
Arabic	T3	WER	16.2%	22.9%	-6.7pp	High WER driven by dialectal variation (MSA vs. regional spoken varieties). Layer 1 confidence monitoring active.
Korean	T1	CER	4.3%	8.1%	-3.8pp	CER used — character-level metric appropriate for logographic scripts.
Russian	T1	WER	6.2%	8.0%	-1.8pp	
French	T1	WER	5.7%	8.3%	-2.6pp	
Japanese	T1	CER	8.7%	10.3%	-1.6pp	CER used — character-level metric appropriate for logographic scripts.
German	T1	WER	7.0%	9.0%	-2.0pp	
Italian	T1	WER	4.5%	6.9%	-2.4pp	
Polish	T1	WER	6.0%	7.7%	-1.7pp	
Hindi	T3	WER	7.4%	13.0%	-5.6pp	
Turkish	T2	WER	8.9%	13.3%	-4.4pp	
Catalan	T2	WER	10.7%	13.9%	-3.2pp	WER above 8% good threshold; Layer 1 confidence monitoring applies.
Czech	T2	WER	9.7%	12.3%	-2.6pp	
Danish	T1	WER	7.7%	10.7%	-3.0pp	
Finnish	T2	WER	10.6%	15.2%	-4.6pp	WER above 8% good threshold; Layer 1 confidence monitoring applies.
Norwegian	T1	WER	8.4%	11.8%	-3.4pp	
Romanian	T2	WER	4.4%	6.8%	-2.4pp	
Vietnamese	T2	WER	5.4%	8.9%	-3.5pp	Strong WER; TTS is the primary limitation for this language.
Bengali	T2	WER	6.3%	23.8%	-17.5pp	
Persian	T2	WER	10.9%	22.3%	-11.4pp	WER above 8% good threshold; Layer 1 confidence monitoring applies.
Punjabi	T2	WER	10.0%	27.5%	-17.5pp	WER above 8% good threshold; Layer 1 confidence monitoring applies.
Telugu	T2	WER	8.2%	26.9%	-18.7pp	
Afrikaans	T2	WER	7.4%	6.5%	--0.9pp	
Albanian	T2	WER	7.7%	7.9%	-0.2pp	
Azerbaijani Latin	T2	WER	7.9%	12.8%	-4.9pp	
Bosnian	T2	WER	6.6%	13.2%	-6.6pp	
Bulgarian	T2	WER	5.6%	9.2%	-3.6pp	
Croatian	T2	WER	9.5%	13.4%	-3.9pp	
Portuguese	T1	WER	4.8%	8.1%	-3.3pp	

Appendix B — Full Translation Quality Scores

Results are organized by content domain. For each language pair, both translation directions (EN→Language and Language→EN) are shown. **COMET** is the primary quality indicator. **Δ COMET** shows the improvement from GPT-4o mini contextualization (positive = improvement). For Japanese and Mandarin, near-zero BLEU scores are a tokenization artifact, COMET is the authoritative metric for these languages.

Civil / Legal

Language pair		Baseline — AWS Translate					Contextualized — AWS + GPT-4o mini					Δ COMET
Pair	Tier	COMET	BERTScore	BLEU	chrF	TER	COMET	BERTScore	BLEU	chrF	TER	
English → Afrikaans	T2	0.8863	0.9290	0.5857	0.8111	0.7374	0.8830	0.9204	0.5536	0.8078	0.7327	-0.0033
Afrikaans → English	T2	0.9211	0.9786	0.6342	0.8408	0.7342	0.9192	0.9801	0.6283	0.8363	0.7106	-0.0019
English → Albanian	T2	0.8704	0.8968	0.3818	0.6820	0.5473	0.8945	0.9025	0.4046	0.6959	0.5887	+0.0241
Albanian → English	T2	0.8793	0.9486	0.4818	0.7314	0.5916	0.9013	0.9610	0.4871	0.7262	0.5897	+0.0220
English → Arabic	T3	0.9091	0.9301	0.5730	0.7821	0.7281	0.9044	0.9213	0.4930	0.7629	0.6718	-0.0047
Arabic → English	T3	0.8944	0.9625	0.4436	0.7072	0.6424	0.9090	0.9666	0.4576	0.7234	0.6685	+0.0146
English → Azerbaijani Latin	T2	0.8840	0.8766	0.2945	0.6372	0.4618	0.8800	0.8902	0.3406	0.6543	0.5206	-0.0040

Azerbaijani Latin → English	T2	0.9019	0.9544	0.3889	0.6741	0.5013	0.9134	0.9614	0.4490	0.6599	0.4981	+0.0115
English → Bengali	T2	0.8731	0.8844	0.3365	0.6377	0.4840	0.8765	0.8778	0.2755	0.6018	0.4415	+0.0034
Bengali → English	T2	0.9194	0.9614	0.4214	0.7382	0.5344	0.9145	0.9603	0.3909	0.6881	0.5291	-0.0049
English → Bosnian	T2	0.9130	0.8944	0.4267	0.6690	0.5594	0.9145	0.8977	0.4424	0.6783	0.5564	+0.0015
Bosnian → English	T2	0.8913	0.9573	0.4710	0.7173	0.6550	0.8892	0.9581	0.4410	0.6663	0.5747	-0.0021
English → Bulgarian	T2	0.8861	0.8969	0.4239	0.6424	0.6145	0.8969	0.8899	0.3931	0.6233	0.5591	+0.0108
Bulgarian → English	T2	0.8735	0.9509	0.3529	0.6194	0.4308	0.8986	0.9552	0.4047	0.6965	0.5297	+0.0251
English → Catalan	T2	0.8550	0.8991	0.4214	0.6751	0.5869	0.8658	0.9027	0.4225	0.6835	0.6152	+0.0108
Catalan → English	T2	0.8550	0.9460	0.4104	0.6597	0.4210	0.8792	0.9584	0.4665	0.7033	0.4732	+0.0242
English → Chinese Simplified	T1	0.9237	0.9414	0.0034	0.6403	-0.1176	0.9266	0.9382	0.0275	0.6426	-0.0588	+0.0029
Chinese Simplified → English	T1	0.9005	0.9595	0.3757	0.6225	0.5528	0.8980	0.9576	0.4043	0.6446	0.5491	-0.0025
English → Croatian	T2	0.9213	0.9146	0.4087	0.7035	0.6336	0.9186	0.9108	0.4052	0.6895	0.6239	-0.0027
Croatian → English	T2	0.8959	0.9620	0.4236	0.7122	0.5684	0.8974	0.9632	0.4437	0.7090	0.5716	+0.0015
English → Czech	T2	0.9010	0.8717	0.3178	0.5979	0.4853	0.9146	0.8808	0.3516	0.6287	0.4997	+0.0136
Czech → English	T2	0.8933	0.9562	0.3851	0.6452	0.4632	0.8929	0.9582	0.4109	0.6675	0.4966	-0.0004
English → Danish	T1	0.9205	0.9059	0.4408	0.7178	0.6383	0.9220	0.9103	0.4431	0.7446	0.6147	+0.0015
Danish → English	T1	0.8945	0.9607	0.3974	0.6581	0.5932	0.9010	0.9613	0.4162	0.6805	0.5983	+0.0065
English → Finnish	T2	0.9225	0.8976	0.3818	0.7349	0.5046	0.9334	0.9055	0.3960	0.7426	0.5364	+0.0109
Finnish → English	T2	0.8932	0.9587	0.4355	0.6656	0.6043	0.9255	0.9676	0.4700	0.7110	0.6508	+0.0323
English → French	T1	0.9059	0.9374	0.6771	0.8211	0.7568	0.8981	0.9274	0.6439	0.7809	0.7254	-0.0078
French → English	T1	0.9103	0.9692	0.5578	0.7812	0.6874	0.9085	0.9685	0.4957	0.7464	0.6612	-0.0018
English → German	T1	0.9097	0.9333	0.4843	0.7567	0.6499	0.9134	0.9230	0.4918	0.7473	0.6490	+0.0037
German → English	T1	0.9004	0.9656	0.4625	0.6692	0.6193	0.9116	0.9662	0.4537	0.6886	0.6380	+0.0112
English → Italian	T1	0.9116	0.9151	0.4883	0.7426	0.6669	0.9144	0.9049	0.4392	0.7187	0.6498	+0.0028
Italian → English	T1	0.9015	0.9635	0.4480	0.7351	0.5710	0.9020	0.9630	0.4632	0.7286	0.5641	+0.0005
English → Japanese	T1	0.9138	0.8559	0.0000	0.4366	0.0000	0.9114	0.8529	0.0000	0.4158	0.0000	-0.0024
Japanese → English	T1	0.8718	0.9421	0.2585	0.5507	0.3778	0.8878	0.9459	0.2551	0.5896	0.4086	+0.0160
English → Korean	T1	0.9128	0.8755	0.1978	0.3997	0.2955	0.9181	0.8841	0.2239	0.4358	0.3203	+0.0053
Korean → English	T1	0.9008	0.9511	0.2789	0.5751	0.5008	0.9107	0.9546	0.3291	0.6137	0.5411	+0.0099
English → Norwegian	T1	0.9322	0.9345	0.5464	0.7843	0.7191	0.9351	0.9210	0.5219	0.7274	0.6583	+0.0029
Norwegian → English	T1	0.9041	0.9639	0.4271	0.6815	0.6114	0.9038	0.9650	0.4647	0.7032	0.5940	-0.0003
English → Persian	T2	0.8453	0.8808	0.3568	0.5823	0.5200	0.8773	0.8832	0.3123	0.5873	0.5005	+0.0320
Persian → English	T2	0.8905	0.9500	0.3525	0.6161	0.4232	0.8905	0.9509	0.3567	0.6030	0.4178	+0.0000
English → Polish	T1	0.8760	0.8449	0.2609	0.5395	0.4004	0.8850	0.8486	0.2598	0.5473	0.4028	+0.0090
Polish → English	T1	0.8665	0.9450	0.2936	0.6175	0.2778	0.8652	0.9460	0.3126	0.6185	0.2867	-0.0013
English → Portuguese	T1	0.8952	0.9252	0.5207	0.7592	0.7410	0.9044	0.9290	0.5401	0.7685	0.7614	+0.0092
Portuguese → English	T1	0.9044	0.9683	0.5809	0.7711	0.6512	0.9178	0.9718	0.6011	0.7877	0.6433	+0.0134
English → Punjabi	T2	0.8477	0.8979	0.3836	0.6363	0.5884	0.8501	0.8959	0.3706	0.6309	0.5731	+0.0024
Punjabi → English	T2	0.9209	0.9652	0.4582	0.7383	0.6014	0.9219	0.9671	0.4827	0.7380	0.6068	+0.0010
English → Romanian	T2	0.9149	0.9006	0.4101	0.7089	0.6132	0.9210	0.9043	0.4383	0.7234	0.6252	+0.0061
Romanian → English	T2	0.8927	0.9579	0.4341	0.7128	0.5672	0.9007	0.9589	0.4323	0.7167	0.5071	+0.0080
English → Russian	T1	0.8917	0.8892	0.4107	0.6684	0.5429	0.8942	0.8895	0.3902	0.6648	0.5243	+0.0025
Russian → English	T1	0.8636	0.9481	0.3306	0.6037	0.3905	0.8754	0.9536	0.3631	0.6080	0.4530	+0.0118
English → Spanish	T1	0.9059	0.9282	0.5886	0.7689	0.7694	0.8923	0.9180	0.5327	0.7412	0.7300	-0.0136
Spanish → English	T1	0.9170	0.9645	0.5640	0.7777	0.6448	0.9003	0.9608	0.5304	0.7503	0.6016	-0.0167
English → Telugu	T2	0.8490	0.8780	0.2736	0.6133	0.4315	0.8631	0.8830	0.2764	0.6201	0.4143	+0.0141
Telugu → English	T2	0.9087	0.9565	0.3900	0.6933	0.4844	0.9133	0.9584	0.4142	0.7214	0.5174	+0.0046
English → Turkish	T2	0.9106	0.8963	0.5548	0.7802	0.7009	0.9088	0.8908	0.5508	0.7643	0.6895	-0.0018
Turkish → English	T2	0.8919	0.9526	0.3985	0.6338	0.5168	0.9166	0.9605	0.5172	0.7086	0.5926	+0.0247
English → Vietnamese	T2	0.8774	0.9000	0.4110	0.6198	0.5399	0.8849	0.9010	0.4226	0.6326	0.5387	+0.0075
Vietnamese → English	T2	0.8663	0.9392	0.2763	0.5434	0.3087	0.8800	0.9445	0.2805	0.5689	0.3286	+0.0137

Education K-12

Language pair		Baseline — AWS Translate					Contextualized — AWS + GPT-4o mini					Δ COMET
Pair	Tier	COMET	BERTScore	BLEU	chrF	TER	COMET	BERTScore	BLEU	chrF	TER	
English → Afrikaans	T2	0.9009	0.9253	0.5066	0.7712	0.6792	0.8997	0.9283	0.5434	0.8025	0.6940	-0.0012
Afrikaans → English	T2	0.9214	0.9839	0.4828	0.8158	0.8121	0.9228	0.9847	0.5025	0.8233	0.8182	+0.0014
English → Albanian	T2	0.9145	0.9309	0.4535	0.7997	0.7569	0.9165	0.9311	0.4724	0.8064	0.7452	+0.0020
Albanian → English	T2	0.9337	0.9806	0.4378	0.7833	0.8093	0.9317	0.9820	0.4136	0.7926	0.8255	-0.0020
English → Arabic	T3	0.9059	0.9161	0.4898	0.7140	0.6756	0.9171	0.9277	0.5447	0.7435	0.6920	+0.0112
Arabic → English	T3	0.8826	0.9619	0.4291	0.6721	0.0945	0.8841	0.9631	0.4268	0.6701	0.0989	+0.0015
English → Azerbaijani Latin	T2	0.9335	0.9263	0.3610	0.7469	0.6691	0.9397	0.9254	0.3593	0.7564	0.6726	+0.0062
Azerbaijani Latin → English	T2	0.9327	0.9812	0.3419	0.7742	0.8152	0.9334	0.9826	0.3647	0.7803	0.8259	+0.0007
English → Bengali	T2	0.9056	0.9034	0.3100	0.6976	0.6039	0.9194	0.9161	0.3040	0.7263	0.6297	+0.0138
Bengali → English	T2	0.9297	0.9772	0.4498	0.7392	0.8604	0.9386	0.9820	0.4436	0.8030	0.8528	+0.0089
English → Bosnian	T2	0.9573	0.9502	0.4088	0.8388	0.7555	0.9483	0.9416	0.4390	0.8229	0.7373	-0.0090
Bosnian → English	T2	0.9161	0.9718	0.4096	0.7466	0.6185	0.9174	0.9727	0.4178	0.7579	0.6168	+0.0013
English → Bulgarian	T2	0.9247	0.9414	0.5073	0.8313	0.7944	0.9252	0.9422	0.5210	0.8280	0.7988	+0.0005
Bulgarian → English	T2	0.9021	0.9670	0.4321	0.7435	0.6416	0.9010	0.9686	0.4411	0.7453	0.6628	-0.0011
English → Catalan	T2	0.9056	0.9262	0.4889	0.7892	0.6826	0.8981	0.9190	0.4542	0.7777	0.6489	-0.0075
Catalan → English	T2	0.9202	0.9751	0.4999	0.8381	0.7946	0.9255	0.9787	0.5382	0.8623	0.8169	+0.0053
English → Chinese Simplified	T1	0.8503	0.8771	0.0714	0.4369	-0.3571	0.8550	0.8772	0.0998	0.4505	-0.3571	+0.0047
Chinese Simplified → English	T1	0.8865	0.9532	0.3286	0.6317	0.4570	0.9015	0.9631	0.3432	0.7042	0.5713	+0.0150
English → Croatian	T2	0.9447	0.9243	0.3755	0.7861	0.7082	0.9350	0.9141	0.4116	0.7755	0.6647	-0.0097
Croatian → English	T2	0.9143	0.9676	0.4104	0.7437	0.5914	0.9142	0.9684	0.4205	0.7530	0.5892	-0.0001
English → Czech	T2	0.9410	0.9133	0.3007	0.7060	0.5744	0.9260	0.9008	0.3493	0.6448	0.5263	-0.0150
Czech → English	T2	0.9088	0.9764	0.4365	0.8027	0.6164	0.9154	0.9771	0.4328	0.8110	0.6325	+0.0066

English → Danish	T1	0.9472	0.9543	0.5593	0.8648	0.8273	0.9491	0.9616	0.5688	0.8683	0.8237	+0.0019
Danish → English	T1	0.9258	0.9823	0.4881	0.8304	0.7774	0.9366	0.9879	0.5003	0.8576	0.8235	+0.0108
English → Finnish	T2	0.9473	0.9205	0.2819	0.7846	0.5643	0.9465	0.9194	0.3004	0.7917	0.5901	-0.0008
Finnish → English	T2	0.9251	0.9755	0.4224	0.7844	0.6949	0.9243	0.9761	0.4007	0.7750	0.6905	-0.0008
English → French	T1	0.9142	0.9468	0.4936	0.8291	0.7393	0.9154	0.9518	0.4902	0.8308	0.7925	+0.0012
French → English	T1	0.9182	0.9734	0.4033	0.7367	0.7455	0.9184	0.9748	0.4152	0.7471	0.7457	+0.0002
English → German	T1	0.8948	0.8953	0.3131	0.7274	0.5779	0.8950	0.9008	0.3265	0.7520	0.5776	+0.0002
German → English	T1	0.9003	0.9654	0.2912	0.6561	0.4697	0.8987	0.9640	0.2813	0.6496	0.4597	-0.0016
English → Hindi	T3	0.8620	0.9156	0.3475	0.6800	0.5738	0.8384	0.9003	0.3673	0.6348	0.5340	-0.0236
Hindi → English	T3	0.9408	0.9853	0.4254	0.8099	0.8515	0.9427	0.9865	0.4384	0.8170	0.8632	+0.0019
English → Italian	T1	0.9230	0.9213	0.4495	0.8054	0.7587	0.9226	0.9251	0.4559	0.8209	0.7695	-0.0004
Italian → English	T1	0.9145	0.9727	0.3510	0.6969	0.6230	0.9142	0.9730	0.3516	0.7038	0.6287	-0.0003
English → Japanese	T1	0.8670	0.8657	0.0714	0.4288	-0.7857	0.8786	0.8677	0.0714	0.4383	-0.2143	+0.0116
Japanese → English	T1	0.8681	0.9415	0.2273	0.5708	0.2085	0.8709	0.9436	0.2289	0.5680	0.1583	+0.0028
English → Korean	T1	0.8988	0.8866	0.2726	0.4736	0.3129	0.8867	0.8789	0.2754	0.4356	0.3108	-0.0121
Korean → English	T1	0.8965	0.9600	0.3278	0.6588	0.5251	0.8907	0.9648	0.3184	0.6376	0.5287	-0.0058
English → Norwegian	T1	0.9379	0.9492	0.5137	0.8371	0.6514	0.9456	0.9493	0.5187	0.8430	0.6653	+0.0077
Norwegian → English	T1	0.9239	0.9806	0.4544	0.8139	0.7536	0.9252	0.9812	0.4849	0.8240	0.7673	+0.0013
English → Persian	T2	0.9246	0.9212	0.2968	0.7348	0.5311	0.9245	0.9185	0.3219	0.7262	0.5713	-0.0001
Persian → English	T2	0.9280	0.9828	0.3775	0.7740	0.8209	0.9350	0.9864	0.4067	0.8032	0.8109	+0.0070
English → Polish	T1	0.9186	0.8919	0.3021	0.6848	0.5697	0.9106	0.8853	0.3245	0.6785	0.5616	-0.0080
Polish → English	T1	0.9015	0.9660	0.3180	0.7063	0.6039	0.9034	0.9668	0.3266	0.7215	0.6135	+0.0019
English → Portuguese	T1	0.9028	0.9256	0.3957	0.7443	0.7060	0.8849	0.9201	0.3989	0.7452	0.6594	-0.0179
Portuguese → English	T1	0.9218	0.9733	0.4376	0.7781	0.6248	0.9220	0.9733	0.4391	0.7799	0.6259	+0.0002
English → Punjabi	T2	0.8924	0.9236	0.3459	0.6971	0.6665	0.8886	0.9171	0.3482	0.6862	0.6373	-0.0038
Punjabi → English	T2	0.9413	0.9855	0.4803	0.8391	0.8962	0.9496	0.9902	0.5350	0.8748	0.9057	+0.0083
English → Romanian	T2	0.9175	0.8990	0.4135	0.6768	0.6620	0.9045	0.8859	0.3833	0.6500	0.5909	-0.0130
Romanian → English	T2	0.9069	0.9650	0.3998	0.7099	0.6021	0.9084	0.9661	0.4227	0.7169	0.6128	+0.0015
English → Russian	T1	0.8858	0.8900	0.3546	0.6161	0.5205	0.8894	0.8881	0.3656	0.6218	0.5216	+0.0036
Russian → English	T1	0.8786	0.9521	0.3203	0.5662	0.4827	0.8810	0.9529	0.3250	0.5791	0.4785	+0.0024
English → Spanish	T1	0.9118	0.9545	0.5228	0.8441	0.7758	0.9057	0.9490	0.4789	0.8232	0.7330	-0.0061
Spanish → English	T1	0.9269	0.9723	0.4563	0.8347	0.7923	0.9284	0.9739	0.4807	0.8482	0.8062	+0.0015
English → Telugu	T2	0.8858	0.9081	0.3537	0.7155	0.6257	0.8960	0.9005	0.3593	0.6841	0.6017	+0.0102
Telugu → English	T2	0.9014	0.9653	0.4353	0.7160	0.6286	0.8996	0.9646	0.3981	0.6788	0.6207	-0.0018
English → Turkish	T2	0.9490	0.9420	0.4581	0.8159	0.6960	0.9519	0.9464	0.4447	0.8408	0.7658	+0.0029
Turkish → English	T2	0.9288	0.9748	0.3905	0.7423	0.7022	0.9283	0.9760	0.4144	0.7475	0.7225	-0.0005
English → Vietnamese	T2	0.9161	0.9110	0.4174	0.7004	0.6660	0.9175	0.9093	0.4253	0.6996	0.6445	+0.0014
Vietnamese → English	T2	0.9057	0.9644	0.3365	0.7243	0.6226	0.9177	0.9707	0.3357	0.7527	0.6709	+0.0120

Healthcare

Language pair		Baseline — AWS Translate					Contextualized — AWS + GPT-4o mini					Δ COMET
Pair	Tier	COMET	BERTScore	BLEU	chrF	TER	COMET	BERTScore	BLEU	chrF	TER	
English → Afrikaans	T2	0.8797	0.9278	0.6703	0.8301	0.7934	0.8960	0.9430	0.6728	0.8572	0.8094	+0.0163
Afrikaans → English	T2	0.8733	0.9783	0.6405	0.8384	0.8020	0.9125	0.9879	0.7011	0.8760	0.8352	+0.0392
English → Albanian	T2	0.9081	0.9393	0.6050	0.8027	0.7588	0.9136	0.9501	0.6428	0.8260	0.7735	+0.0055
Albanian → English	T2	0.9101	0.9788	0.6256	0.8010	0.7671	0.9061	0.9762	0.6023	0.7865	0.7387	-0.0040
English → Arabic	T3	0.8834	0.9134	0.4287	0.7111	0.6431	0.8848	0.9132	0.4150	0.7296	0.6147	+0.0014
Arabic → English	T3	0.9094	0.9818	0.6507	0.8320	0.7892	0.9037	0.9783	0.6157	0.8125	0.7655	-0.0057
English → Azerbaijani Latin	T2	0.8609	0.8853	0.3569	0.6557	0.5377	0.8685	0.8886	0.3735	0.6628	0.5581	+0.0076
Azerbaijani Latin → English	T2	0.9111	0.9724	0.5176	0.7592	0.7093	0.9109	0.9711	0.5099	0.7591	0.6982	-0.0002
English → Bengali	T2	0.8575	0.8937	0.4434	0.7141	0.6460	0.8848	0.9174	0.4369	0.7477	0.6697	+0.0273
Bengali → English	T2	0.9117	0.9720	0.5080	0.7657	0.7076	0.9154	0.9712	0.5174	0.7580	0.7122	+0.0037
English → Bosnian	T2	0.9235	0.9294	0.4724	0.7472	0.6719	0.9303	0.9377	0.5766	0.7927	0.7215	+0.0068
Bosnian → English	T2	0.9055	0.9752	0.5773	0.8150	0.7043	0.9046	0.9750	0.5560	0.7898	0.7374	-0.0009
English → Bulgarian	T2	0.9058	0.9106	0.5056	0.7010	0.6257	0.9096	0.9182	0.5215	0.7182	0.6359	+0.0038
Bulgarian → English	T2	0.8985	0.9752	0.5564	0.8048	0.6896	0.8921	0.9718	0.5052	0.7819	0.6655	-0.0064
English → Catalan	T2	0.8800	0.9435	0.5838	0.7720	0.7277	0.8935	0.9531	0.6638	0.8082	0.7836	+0.0135
Catalan → English	T2	0.9025	0.9744	0.5702	0.7836	0.7608	0.8969	0.9715	0.5456	0.7650	0.7398	-0.0056
English → Chinese Simplified	T1	0.9153	0.9413	0.0000	0.6172	0.0000	0.9164	0.9368	0.0000	0.5989	0.0000	+0.0011
Chinese Simplified → English	T1	0.9033	0.9652	0.4086	0.7064	0.6284	0.9011	0.9632	0.3882	0.6956	0.6151	-0.0022
English → Croatian	T2	0.9264	0.9275	0.4615	0.7301	0.6442	0.9259	0.9167	0.4323	0.7107	0.5831	-0.0005
Croatian → English	T2	0.9060	0.9757	0.5642	0.7915	0.7629	0.9018	0.9741	0.5820	0.7916	0.7560	-0.0042
English → Czech	T2	0.9353	0.9266	0.4948	0.7356	0.6408	0.9416	0.9308	0.5206	0.7508	0.6615	+0.0063
Czech → English	T2	0.9040	0.9704	0.5334	0.7605	0.7457	0.9085	0.9770	0.5958	0.8029	0.7491	+0.0045
English → Danish	T1	0.9157	0.9457	0.6515	0.8342	0.7674	0.9120	0.9394	0.6354	0.8279	0.7769	-0.0037
Danish → English	T1	0.9149	0.9844	0.6716	0.8539	0.8090	0.9102	0.9810	0.6561	0.8273	0.8017	-0.0047
English → Finnish	T2	0.9155	0.8855	0.3445	0.6843	0.4697	0.9287	0.8902	0.3645	0.7064	0.4894	+0.0132
Finnish → English	T2	0.8971	0.9699	0.5357	0.7634	0.7005	0.9151	0.9745	0.5667	0.7963	0.7539	+0.0180
English → French	T1	0.9021	0.9567	0.6540	0.8525	0.7482	0.9074	0.9619	0.6829	0.8596	0.8032	+0.0053
French → English	T1	0.8992	0.9779	0.6338	0.8221	0.7774	0.9113	0.9783	0.6158	0.8138	0.7725	+0.0121
English → German	T1	0.9065	0.9399	0.6351	0.8174	0.7458	0.9104	0.9442	0.6718	0.8321	0.7667	+0.0039
German → English	T1	0.9080	0.9807	0.6052	0.8076	0.7755	0.9108	0.9813	0.6100	0.8075	0.7767	+0.0028
English → Hindi	T3	0.7691	0.8977	0.5419	0.6990	0.6988	0.7752	0.9050	0.5538	0.7268	0.7235	+0.0061
Hindi → English	T3	0.9041	0.9637	0.4833	0.7063	0.7164	0.9118	0.9684	0.5066	0.7316	0.6923	+0.0077
English → Italian	T1	0.9134	0.9614	0.6820	0.8556	0.8045	0.9119	0.9559	0.6714	0.8390	0.7984	-0.0015
Italian → English	T1	0.9069	0.9790	0.5959	0.8072	0.7926	0.9103	0.9802	0.6382	0.8347	0.8050	+0.0034
English → Japanese	T1	0.9254	0.9081	0.0000	0.5967	0.0000	0.9288	0.9205	0.0000	0.6268	0.0000	+0.0034
Japanese → English	T1	0.8938	0.9575	0.3743	0.6880	0.5383	0.8963	0.9559	0.3529	0.6685	0.5307	+0.0025

English → Korean	T1	0.8995	0.9297	0.4747	0.6710	0.5629	0.9103	0.9227	0.4316	0.6378	0.5512	+0.0108
Korean → English	T1	0.8965	0.9526	0.3504	0.6372	0.5451	0.8981	0.9532	0.3483	0.6407	0.5456	+0.0016
English → Norwegian	T1	0.9299	0.9298	0.5130	0.7562	0.7000	0.9319	0.9312	0.5220	0.7594	0.7101	+0.0020
Norwegian → English	T1	0.9196	0.9831	0.6779	0.8619	0.8095	0.9162	0.9806	0.6353	0.8390	0.7869	-0.0034
English → Persian	T2	0.8257	0.8649	0.2763	0.5960	0.4165	0.8688	0.8839	0.3280	0.6252	0.4050	+0.0431
Persian → English	T2	0.8548	0.9553	0.3934	0.6248	0.6701	0.8573	0.9585	0.3815	0.6454	0.6937	+0.0025
English → Polish	T1	0.8986	0.9027	0.4611	0.6899	0.5729	0.9010	0.8936	0.4056	0.6554	0.5185	+0.0024
Polish → English	T1	0.8759	0.9632	0.4532	0.7044	0.6607	0.8828	0.9645	0.4767	0.7181	0.6776	+0.0069
English → Portuguese	T1	0.9088	0.9747	0.8041	0.8953	0.8962	0.8985	0.9558	0.7395	0.8426	0.8488	-0.0103
Portuguese → English	T1	0.9175	0.9861	0.6934	0.8576	0.8326	0.9076	0.9820	0.6161	0.8134	0.8019	-0.0099
English → Punjabi	T2	0.7843	0.8688	0.3496	0.5731	0.5348	0.7927	0.8752	0.3493	0.5756	0.5438	+0.0084
Punjabi → English	T2	0.8919	0.9583	0.4298	0.7215	0.5907	0.8994	0.9627	0.4434	0.7211	0.6031	+0.0075
English → Romanian	T2	0.9084	0.9317	0.5262	0.7412	0.6845	0.9102	0.9314	0.5542	0.7480	0.6833	+0.0018
Romanian → English	T2	0.9113	0.9800	0.5748	0.8173	0.7738	0.9089	0.9786	0.5778	0.8036	0.7715	-0.0024
English → Russian	T1	0.9290	0.9252	0.5716	0.7619	0.6921	0.9250	0.9121	0.4475	0.6832	0.5732	-0.0040
Russian → English	T1	0.8934	0.9742	0.5364	0.7777	0.6862	0.8907	0.9731	0.5436	0.7742	0.6959	-0.0027
English → Spanish	T1	0.8916	0.9458	0.5591	0.8103	0.7363	0.8947	0.9523	0.5857	0.8217	0.7460	+0.0031
Spanish → English	T1	0.9129	0.9823	0.6515	0.8399	0.7787	0.9006	0.9766	0.5450	0.7833	0.7318	-0.0123
English → Telugu	T2	0.7744	0.8374	0.2639	0.5553	0.4000	0.7902	0.8516	0.2848	0.5738	0.4261	+0.0158
Telugu → English	T2	0.8770	0.9536	0.3595	0.6335	0.5168	0.8662	0.9520	0.3462	0.6118	0.5535	-0.0108
English → Turkish	T2	0.9124	0.9053	0.5637	0.8208	0.7167	0.9099	0.8936	0.5436	0.7914	0.6788	-0.0025
Turkish → English	T2	0.9149	0.9724	0.5431	0.7672	0.7400	0.9177	0.9734	0.5946	0.7891	0.7568	+0.0028
English → Vietnamese	T2	0.9188	0.9550	0.7330	0.8289	0.8316	0.9202	0.9504	0.7035	0.8049	0.8215	+0.0014
Vietnamese → English	T2	0.8960	0.9726	0.5409	0.7551	0.7184	0.8983	0.9725	0.5338	0.7513	0.7183	+0.0023

Appendix C — Full TTS MOS Scores by Language and Domain

Mean Opinion Score (MOS) is predicted using WVMOS, a wav2vec2-based model that correlates strongly with human perceptual ratings (Pearson r > 0.90). Scores range from 1 to 5. Values above 3.3 represent functional, intelligible speech suitable for interpretation delivery. Values above 4.0 approach natural human speech quality. Standard deviation (Std) indicates consistency across samples within each language-domain combination.

Language	Tier	Overall		Civil / legal		Education K-12		Healthcare	
		MOS	Std	MOS	Std	MOS	Std	MOS	Std
English	T1	4.45	0.233	Source	—	Source	—	Source	—
Spanish	T1	4.13	0.356	4.34	0.371	4.31	0.316	4.23	0.360
Chinese Simplified	T1	3.68	0.385	4.09	0.557	3.98	0.520	4.12	0.479
Arabic	T3	3.94	0.391	4.23	0.462	4.20	0.376	4.15	0.435
Korean	T1	3.70	0.401	4.06	0.565	4.09	0.455	4.07	0.536
Russian	T1	3.82	0.511	4.14	0.644	4.20	0.377	4.06	0.513

French	T1	4.06	0.295	4.25	0.399	4.27	0.256	4.26	0.354
Japanese	T1	3.68	0.360	4.09	0.565	4.06	0.454	4.05	0.506
German	T1	3.96	0.270	4.25	0.387	4.17	0.344	4.20	0.362
Italian	T1	3.88	0.571	4.19	0.546	4.20	0.461	4.10	0.596
Polish	T1	3.90	0.252	4.17	0.440	4.20	0.309	4.16	0.387
Hindi	T3	3.41	0.351	/	—	3.91	0.619	3.94	0.623
Turkish	T2	3.95	0.311	4.20	0.436	4.22	0.305	4.18	0.413
Catalan	T2	3.86	0.455	4.18	0.518	4.17	0.469	4.12	0.459
Czech	T2	3.97	0.304	4.21	0.453	4.26	0.241	4.17	0.394
Danish	T1	3.65	0.332	4.02	0.570	4.04	0.477	4.10	0.483
Finnish	T2	3.80	0.298	4.11	0.489	4.15	0.368	4.11	0.460
Norwegian	T1	4.09	0.345	4.28	0.375	4.26	0.284	4.27	0.404
Romanian	T2	3.98	0.256	4.24	0.381	4.17	0.326	4.24	0.350
Vietnamese	T2	3.05	0.399	3.83	0.783	3.69	0.792	3.73	0.848
Bengali	T2	4.08	0.280	4.23	0.380	4.29	0.286	4.28	0.313
Persian	T2	4.08	0.386	4.28	0.447	4.25	0.354	4.26	0.336
Punjabi	T2	3.62	0.459	4.04	0.584	4.07	0.548	4.00	0.595
Telugu	T2	3.50	0.413	4.07	0.556	3.93	0.638	3.94	0.611
Afrikaans	T2	4.15	0.292	4.29	0.336	4.30	0.274	4.32	0.333
Albanian	T2	3.89	0.325	4.19	0.458	4.16	0.362	4.17	0.418
Azerbaijani Latin	T2	3.79	0.501	4.15	0.611	4.13	0.400	4.08	0.558
Bosnian	T2	3.84	0.355	4.17	0.487	4.17	0.376	4.10	0.463
Bulgarian	T2	3.88	0.257	4.20	0.388	4.17	0.346	4.13	0.431
Croatian	T2	3.92	0.297	4.19	0.453	4.16	0.354	4.20	0.368
Portuguese	T1	3.66	0.397	4.04	0.616	4.08	0.411	4.05	0.559

Human Interpreter Escalation Paths

Global Interpreting Network Inc. (GINI) | Response to AFI-2026-124 | AI-Driven Translation & Language Access Services

Prepared: May 2026 | Version 1.0 | CONFIDENTIAL — FOR PROCUREMENT USE ONLY

1. System Overview

GINI's real-time interpretation pipeline processes spoken language through four sequential AI services. At each stage, the system monitors signal quality, content risk, and translation confidence. When any threshold is breached (or when a human requests it) the system escalates to a human interpreter who takes full control of the session. Escalation can be triggered at three distinct points in the pipeline, corresponding to three paths:

Path	Trigger Point	Detection Method
Path 1 — Manual Override	Any point in the pipeline	Human presses escalation button
Path 2 — High-Stakes Content	Step 4 — GPT-4o mini Post-Edit	GPT-4o mini flags segment as high-stakes
Path 3 — Low ASR Confidence	Step 2 — Soniox ASR	Soniox word confidence below threshold

2. Signal Accumulation Logic (Paths 2 & 3)

A single escalation signal (one high-stakes segment or one low-confidence ASR window) does not immediately prompt the user. Isolated signals are common in natural conversation: a single complex medical term, a moment of background noise, or a brief crosstalk event should not interrupt the call. Instead, the system accumulates signals silently and only prompts the user once a meaningful pattern has been established.Signals from both Path 2 and Path 3 contribute to the same counter. The thresholds are progressive and reset on user refusal:

Trigger #	Signal Count	Action	If User Says No
1st prompt	3 accumulated signals	Ask user if they want a human interpreter	Reset to 0. New threshold: 10
2nd prompt	10 accumulated signals	Ask user again	Reset to 0. New threshold: 25
3rd prompt	25 accumulated signals	Ask user one final time	Auto-detection disabled for remainder of session

3. Path 1 — Manual Override (Escalation Button)

The manual override path gives any participant in the call (the user, the service provider, or a supervising agent) the ability to request immediate human interpreter takeover at any point, regardless of whether any automated threshold has been triggered.

3.1 Trigger Conditions

- The user feels the AI interpretation is incorrect or unclear and presses the escalation button.
- The service provider agent decides the conversation requires a human interpreter.
- Any participant requests human assistance at any time, regardless of AI performance.

3.2 Implementation Notes

Component	Specification
Escalation button	Persistent UI element, always visible during active call. Single press, no confirmation dialog.
Response time SLA	Human interpreter must join within 60 seconds of escalation trigger.
Context handoff	Full transcript up to point of escalation is shared with human interpreter automatically.
AI resume	AI pipeline can be re-enabled by the human interpreter if they determine escalation was unnecessary.
Logging	All manual escalations are logged with timestamp, session ID, and segment at time of trigger.

4. Path 2 — High-Stakes Content Detection (GPT-4o mini)

GPT-4o mini already processes every translated segment for post-editing. In this path, the model's response is extended to include a structured high-stakes classification alongside the corrected translation. This adds zero additional API latency: the classification is part of the same completion that produces the post-edited translation.

4.1 What GPT-4o mini Flags as High-Stakes

GPT-4o mini is instructed to flag a segment as high-stakes when the content requires domain expertise, clinical judgment, or legal precision that goes beyond reliable machine translation. The flag is reserved for situations where an error could have meaningful real-world consequences. Routine medical information, scheduling, or standard administrative content is not flagged.

Would NOT flag (AI handles confidently)	Would flag as high-stakes
"Take 2 tablets with water once a day."	Complex drug interaction warnings or multi-drug regimens
"Your appointment is on Tuesday at 10am."	Informed consent for a medical procedure or surgery
"Please bring your insurance card."	Legal rights advisories or immigration status determinations
"You have a fever of 38 degrees."	Interpretation of diagnostic test results requiring clinical judgment
"The office is on the third floor."	Financial commitments, contract terms, or benefit eligibility decisions

4.3 Implementation Notes

Component	Specification
Latency impact	Zero additional API calls. Classification returned in the same GPT-4o mini completion as the translation.
Accumulation	Signals accumulate silently. User is prompted at 3, 10, and 25 signals. Auto-detection disabled after 3rd refusal.
User prompt window	User has 30 seconds to respond to the escalation prompt. If no response, AI continues and signal is logged.
Logging	All high-stakes flags logged with segment text, stakes_reason, timestamp, and user response.

5. Path 3 — Low ASR Confidence (Soniox)

Soniox returns a confidence score for each recognized word in the transcription. A low confidence score indicates that the ASR model was uncertain about what was said due to background noise, heavy accent, cross-talk, or poor audio quality. Because the pipeline is strictly sequential, a mistranscribed word propagates through every downstream step uncorrected: AWS Translate faithfully translates the wrong text, and GPT-4o mini post-editing cannot detect a transcription error because it has no access to the original audio.

This is particularly critical in healthcare and legal contexts where a single word error (a wrong dosage, a missed negation, an incorrect term) can have serious consequences. This path detects the problem at the source, before translation begins.

5.1 Confidence Thresholds

Segment-level confidence is the average word confidence across all tokens in a rolling 3-second window:

Confidence Range	Status	Action
0.90 – 1.00	High confidence	Proceed normally through pipeline
0.75 – 0.89	Acceptable	Proceed; flag segment, increment counter
< 0.75	Low confidence	Increment counter; accumulate toward user prompt

5.2 Implementation Notes

Component	Specification
Confidence source	Soniox per-word confidence scores, available in the standard transcription response object.
Segment window	Confidence computed over a rolling 3-second window matching the translation batch size.
Accumulation	Signals accumulate silently. User is prompted at 3, 10, and 25 signals. Auto-detection disabled after 3rd refusal.
Audio quality causes	Background noise, overlapping speech, heavy accent, low microphone quality, technical jargon.
Recovery	System continues monitoring confidence after escalation prompt. Counter resets if user declines.
Logging	All low-confidence segments logged with confidence score, raw transcript, and user response.

6. Summary: Escalation Decision Matrix

The three paths are independent and can trigger simultaneously. Signals from Paths 2 and 3 contribute to the same accumulation counter. In all cases, once the user confirms escalation, a qualified human interpreter joins with full transcript context and the AI

pipeline is paused. All escalation events (including user refusals) are logged for quality review, interpreter training, and ongoing threshold calibration.

Path	Trigger	Detection	Accumulation	Human Action
Path 1 — Manual Override	User/agent presses button	UI event — no AI required	Immediate — no accumulation	Takes full control of call
Path 2 — High-Stakes	GPT-4o min flags high stakes	LLM classification in same completion as translation	Prompts at 3, 10, 25 signals. Disabled after 3rd refusal.	Reviews context, confirms or takes over
Path 3 — Low ASR Confidence	Soniox confidence < 0.75	Average word confidence per 3-second window	Prompts at 3, 10, 25 signals. Disabled after 3rd refusal.	Listens to audio, provides correct interpretation

Section 3: Security, Compliance & Data Privacy

Global Interpreting Network Inc. | Response to AFI-2026-124

3.2 Data Handling Practices

Data Collected, Stored, and Processed During Sessions

During translation and interpretation sessions, GINI collects and processes only the data necessary to deliver the requested service. This may include:

- Audio and video streams for the duration of the session
- Session metadata: language pair, duration, participant count, and modality
- Generated transcripts and captions where enabled by the agency
- Uploaded source files, translated output files, and associated project metadata
- User activity logs, glossary entries, workflow configuration data, and usage analytics

GINI does not collect biometric data, payment information, or personally identifiable information beyond what is incidentally present in agency-submitted content.

Data Retention Schedule and Deletion Processes

GINI applies a minimal retention policy across all service modalities:

- Session audio and video streams, generated transcripts, session records, and compliance documentation are retained for a period consistent with each agency's jurisdictional records retention requirements.
- Where no specific retention period is defined by the agency, GINI applies a default retention period of 6 months.
- Upon contract termination or written deletion request from the agency, GINI will delete all agency data within 30 days and provide written confirmation of deletion upon completion.
- Sub-processor retention practices are governed by individual sub-processor agreements and are summarized in the Sub-Processor Disclosure table in Section 3.3 below.

Use of Agency Data for AI Model Training

GINI does not use agency or PPA data to autonomously train or fine-tune AI models without explicit written consent. The following policy governs data use across all workstreams:

- All agencies are enrolled by default in a no-training policy. Agency data is used solely for the purpose of service delivery and program administration.
- Where agencies participate in human-in-the-loop correction workflows — submitting editorial feedback to improve interpretation or translation quality — such corrections are captured and stored per client account. These corrections may inform model improvement processes only with the agency's prior written authorization.
- Participation in any model improvement program requires explicit consent. Agencies may withdraw consent at any time without impact to service delivery.
- All sub-processors engaged by GINI are contractually prohibited from using agency data for model training purposes. Sub-processor data handling commitments are detailed in the disclosure table below.

Geographic Location of Data Processing and Storage

All GINI platform data is stored and processed on US-based infrastructure. Core platform hosting is provided through Amazon Web Services (AWS) in the US East region. GINI confirms that no agency or PPA data is stored or processed outside the United States without explicit prior written authorization from the relevant agency.

Breach Notification Process and Timeline

In the event of a confirmed or suspected data breach, GINI will notify the affected Participating Public Agency in writing within 72 hours of discovery. The notification will include:

- The nature of the incident and data categories potentially affected
- Containment actions taken at the time of notification
- Ongoing remediation steps and estimated resolution timeline
- Contact information for GINI's incident response lead

GINI maintains an internal incident response framework with defined severity classifications and escalation paths. Following resolution of any critical incident, a post-incident review is conducted within 5 business days and a written summary is made available to affected PPAs upon request.

3.3 Sub-Processor Disclosure

GINI engages the following third-party sub-processors in the delivery of services under this contract.

Sub-processor	Service	Data Processed	Region	Certifications	Data Handling	Encryption
LiveKit	WebRTC sessions	Audio, video	US	SOC 2, GDPR, HIPAA, CCPA	• No data retention unless explicitly requested; retained up to 30 days	• In transit: TLS 1.2+, DTLS, SRTP • At rest: AES-256 • Native E2EE
Soniox	Speech-to-text	Audio	US	SOC 2 Type II, ISO 27001, GDPR, HIPAA	• No model training • No data retention unless explicitly requested • Securely isolated storage available • Data deletion options	• In transit: TLS 1.2+ • Access controls on stored data
AWS Translate	Translation	Text	US East	SOC 2, ISO 27001, HIPAA	• No model training • No data retention unless explicitly requested	• In transit: TLS 1.2 • At rest: SSE-S3/SSE-KMS
OpenAI	Contextualization	Text	US	SOC 2 Type II	• No model training • 30-day retention for abuse monitoring, then deleted	• In transit: TLS 1.2+ • At rest: AES-256
Azure TTS	Text-to-speech	Text	US	SOC 2, ISO 27001	• No model training • No data retention unless explicitly requested	• In transit: TLS 1.2+ • At rest: AES-256
AWS	Cloud infrastructure	All platform data	US East	SOC 2, ISO 27001, FedRAMP	• Data processed as requested (configurable by GINI) • No secondary use	• In transit: TLS 1.2+ • At rest: AES-256 (configurable per service)
DeepL	Translation	Text	US/EU	SOC 2 Type II, ISO 27001	• No model training • Text deleted after translation	• In transit: TLS 1.2+ • At rest: AES-256
Google NMT	Translation	Text	US	ISO 27001, SOC 2/SOC 3, HIPAA	• No model training • Text held briefly in-memory for translation, then deleted	• In transit: TLS/SSL • At rest: AES-256

Sub-processor	Service	Data Processed	Region	Certifications	Data Handling	Encryption
					• Securely isolated data storage when requested	
Azure Translator	Translation	Text	US	ISO 27001, SOC 2	• No model training • Text deleted after translation	• In transit: TLS/SSL • At rest: AES-256

GINI will notify AFI and affected PPAs of any material changes to its sub-processor list no less than 30 days in advance of the change taking effect.

3.4 Incident Response Plan & Breach Notification Procedures

Incident Classification

GINI classifies security incidents across three severity levels:

- **Severity 1 — Critical:** Confirmed unauthorized access to agency or PII/PHI data, ransomware, or system-wide service disruption. Requires immediate response.
- Severity 2 — High: Suspected breach under investigation, significant service degradation, or failed access attempts at elevated frequency.
- Severity 3 — Low/Medium: Isolated anomalies, policy violations, or non-data-impacting events requiring monitoring and documentation.

Escalation Path

Role	Responsibility
Tech Lead and Software Team	First point of contact. Detects, assesses, and initiates containment.
CEO	Notified immediately for Severity 1 and 2. Authorizes external notification.
Legal Counsel	Engaged for regulatory notification and client communication drafting.

Response Timeline

- **0–1 hour:** Detection and initial assessment by Tech Lead.
- **1–4 hours:** Containment actions initiated; CEO notified.
- **4–24 hours:** Root cause investigation underway; scope of impact assessed.
- **Within 72 hours:** Formal written notification issued to the affected Participating Public Agency (PPA) and, where required, to applicable regulatory bodies. Notification will include the nature of the incident, data categories potentially affected, containment actions taken, and remediation steps.

Infrastructure Monitoring

GINI's infrastructure is hosted on Amazon Web Services (AWS) and leverages native security tools including AWS CloudTrail for full audit logging of API activity, AWS CloudWatch for real-time performance and anomaly alerting, AWS Security Groups for network-level access control, and AWS KMS for encryption of audit log data. These tools provide continuous visibility into infrastructure events and support rapid detection of unauthorized activity.

Remediation & Post-Incident Review

Following resolution of any Severity 1 or 2 incident, GINI conducts a post-incident review within 5 business days to document lessons learned, identify root cause, and implement corrective controls. A written summary is made available to affected PPAs upon request.

3.5 Penetration Testing & Vulnerability Management Program

Vulnerability Scanning

GINI conducts regular automated vulnerability scanning of its AWS-hosted infrastructure and application layer. Findings are classified by severity and assigned remediation timelines as follows:

Severity	Remediation Target
Critical	48 hours
High	7 days
Medium	30 days
Low	90 days

Penetration Testing

GINI commits to conducting third-party penetration testing on an annual basis, performed by a qualified independent security firm. Testing scope includes the application layer, API endpoints, authentication and access controls, and data handling workflows. Remediation of Critical and High findings is completed prior to any new government contract activation. Summary reports are available to PPAs upon request under NDA.

Patch Management

GINI maintains a patch management process for all platform dependencies, third-party libraries, and AWS infrastructure components. Critical security patches are applied within 48 hours of release. Non-critical patches follow a scheduled review and deployment cycle aligned to the monthly release cadence.

Continuous Monitoring

AWS CloudTrail and CloudWatch are configured to generate alerts on anomalous API calls, unauthorized access attempts, and infrastructure configuration changes. AWS Security Groups enforce network-level access restrictions across all platform components.

Program Maturity & Roadmap

GINI is actively investing in the maturation of its security program, including the initiation of a SOC 2 Type II audit process and ISO 27001 gap assessment in 2026 (Initiative I11 of GINI's internal product roadmap). These certifications represent GINI's commitment to operating at enterprise-grade security standards over the contract term.

THANK YOU