

Racial Equity Analysis: Language Access Policy, May 14, 2024

Step #1: What is your proposal and the desired results and outcomes?

1. Describe the policy, program, practice, or budget decision.

The Board of Supervisors identified the creation of a countywide Language Access Policy as one of the objectives of the Racial Equity and Social Justice pillar of the County's 5-year Strategic Plan <<https://socostrategicplan.org/racial-equity-and-social-justice/>>.

During the American Rescue Plan Act engagement process, disproportionately impacted community members and community-based organizations also identified the need for a Language Access Policy to avoid significant disproportionately negative impacts on essential workers and communities of color during natural disasters and future public health crises.

The development of the Language Access Policy and Implementation Plan achieve Goal 4, Objective 4 of the Racial Equity and Social Justice (RESJ) Pillar of the County's Strategic

Pillar: Racial Equity and Social Justice

Goal 4: Engage community members and stakeholder groups to develop priorities and advance racial equity.

Objective 4: Develop and establish a language access policy for the County of Sonoma by end of 2021.

2. What are the intended results (in the community) and outcomes (within your own organization)?

The intended result in our larger community is to support and develop an awareness and understanding of language access rights and how to exercise those rights to secure language access during service provision and other engagement with County departments and agencies.

The intended result within the County is to ensure equitable service provision and engagement with residents and clients of the County, to address the Board's priorities related to establishment and implementation of a Language Access Policy, to improve the quality of translation and interpretation at the County, to ensure equitable outcomes for bilingual staff, and to improve staff and leaders' culturally responsive public service.

3. What does this proposal have an ability to impact?

This proposal presents an opportunity to ensure consistent and high-quality translation and interpretation services throughout the County for all departments and agencies who

provide services to linguistically diverse community members. It also presents an opportunity for County leaders and staff to develop their skills to provide culturally responsive public service.

This proposal will impact and improve every area of the County’s service provision, including family, youth, and children, economic development, health, housing, human services, parks and recreation, planning and development, transportation, as well as improve the County’s Community Engagement efforts.

Step #2: What’s the data? What does the data tell us?

1. Will the proposal have impacts in specific geographic areas (neighborhoods, areas, or regions)? What are the racial demographics of those living in the area?

The Language Access Policy can impact all non-English speakers or Linguistically Diverse individuals living, working, or visiting the county and accessing County of Sonoma services.

There are specific areas of the County, as documented by the [Portrait of Sonoma](#), that are more likely to be populated by Linguistically Diverse community members. The residents of these areas are more likely to be impacted by this policy and its implementation, including receiving County services and accessing their resulting language rights, and participating in community education efforts related to the policy.

2. What does population level data, including quantitative and qualitative data, tell you about existing racial inequities? What does it tell you about root causes or factors influencing racial inequities?

Demographic	Number of Speakers	Percentage of 2021 County Population	Speak English less than “Very Well”	% who speak English less than “Very Well” in group
Population 5 years and over	463,676	100%	54,847	11.8%
Speak only English at home	341,113	73.6%	N/A	N/A
Speak a language other than English at home	122,563	26.4%	54,847	44.5%
Spanish	89,575	19.3%	42,727	47.7%

Asian and Pacific Island languages	14,812	3.2%	7,297	49.3%
All other languages	18,176	3.9%	4,823	26.5%

The 2020 Census data shows the County population 5 years of age and over at 463,676. There are 122,563 (26.4%) individuals who speak a language other than English at home, and 54,847 (11.8%) who speak English less than “very well.” There are 14,812 (3.2%) speakers of Asian and Pacific Island languages, with 7,297 (1.6%) who do not speak English “very well.” There are 18,176 (3.9%) speakers of all other languages, with 4,823 (1.0%) who do not speak English “very well.”

Analysis from the 2021 update of the Portrait of Sonoma reveals that the County’s overall Human Development Index (HDI) score, comprised of health, education and earnings measures, is 6.19 out of a maximum total score of 10.00. The HDI score for the four largest racial/ethnic groups are as follows: White 6.74, Latino 4.93, Asian 6.86, and Black 3.99. Multiple factors, including access/affordability of housing, immigration status, racial discrimination, employment stability and wages, language barriers, access to health care, and access to education, can be attributed to the differences in these scores.

While there are non-English speaking White residents, demographic data for the county show that the majority of residents who do not speak English are Spanish speaking or speak Asian or Pacific Islander languages. Those residents tend to identify racially as communities of color being Latinx/Hispanic, Asian and Pacific Islanders and experience disproportional marginalization. Improving language access to county services for the 11.8% of residents who are linguistically diverse and do not speak English well can improve the outcomes of residents who are largely immigrants and from communities of color.

3. What performance level data do you have available for your proposal? This should include data associated with existing programs or policies.

The inability to read, write or understand English can impact an individual’s ability to access meaningful services. Without the ability to read or understand “vital documents” non-English speaking community members are at a disadvantage to complete forms, applications, questionnaires; access material that provides information about services programs or benefits; or access material that may affect their rights, duties or privileges

regarding services or benefits provided by an agency. Furthermore, there are health and life impacts on residents who cannot receive health and emergency notices in their preferred languages.

The County currently employs over 700 staff who are bilingual. Additionally, the County has contracts with professional Language Service Companies. Existing investment by the county is spent on bilingual staff premiums, department contracts with interpretations/translation companies, and county blanket purchase orders for interpretations/translation services. These investments are over \$1 million per year to provide language access services to County clients.

The Office of Equity and its consultants engaged with Hispanic/Latine, Asian and Pacific Islander residents who speak languages other than English, as well as immigrants from Mexico and Central America who speak indigenous languages. The OOE and its consultants also held focus groups to learn about their lived experiences with County services, and to understand what the County does well, and where service delivery and access to information falls short. From that work, rich qualitative data showed many service and administrative gaps. Closing those gaps to meet the needs of communities of color, immigrant and non-English speaking recommendations was a key focus of this Language Access Policy.

From community engagement, the following service gaps were identified:

- Many linguistically diverse community residents are unaware of their language rights.
- There is a community perception that many county agencies/departments cannot offer services in languages besides English/Spanish.
- County telephone menus have no options for phone-based assistance in non-English/Spanish languages.
- Hispanic/Latinx, Asian, and Pacific Islander residents noted a complete absence of professional interpretation services in languages like Mixteco, Triqui, Chatino, Tagalog, Fijian and other languages.
- Hispanic/Latinx, Indigenous, Asian, and Pacific Islander residents need assistance understanding and completing English forms.
- Immigrant communities noted that translation of County documents are often confusing in terminology.
- Hispanic/Latinx, Indigenous and Asian residents need language support regarding COVID-19 testing and vaccine information.
- Hispanic/Latinx, Indigenous, Asian, and Pacific Islander community members noted there is no existing infrastructure to consistently engage liaisons from marginalized linguistic groups.

- Community members note that some residents have literacy limitations for documents in written form and need access in oral/video formats.

4. Are there data gaps? What additional data would be helpful in analyzing the proposal? If so, how can you obtain better data?

We currently have qualitative data from community engagement efforts related to this policy making effort, about residents not being able to access an interpreter/translator in their desired language or residents not receiving information in their preferred language.

We do not have quantitative data on the number of staff encounters with Linguistically Diverse clients, which languages clients speak, or if staff have been unsuccessful accessing a language appropriate translator/interpreter. During the implementation phase of this policy, this level of data will be collected.

The policy proposal here addresses both the qualitative data we have collected and attempts to reflect it and includes strategies for collecting quantitative data during initial implementation of the Language Access Policy.

Ongoing tracking of language access assistance throughout county departments and agencies will be needed and is proposed in the Implementation Plan. Staff will document encounters with linguistically diverse clients, noting their service requests, languages needed, modes of contact (in-person or over the phone) and other relevant information (see details in Step #5 below).

Additionally, frequent engagement with community members and trusted Community-Based Organizations (CBOs) will be done to assess how well the County is meeting language needs.

Step #3: How have communities been engaged? Are there opportunities to expand engagement?

1. Who are the most affected community members who are concerned with or have experience related to this proposal? How have you involved these community members in the development of this proposal?

The Language Access Policy reinforces the value of anti-racism by enhancing county-wide efforts to more meaningfully and effectively communicate and engage with residents of the County, in particular those whose identity includes speaking a language other than English as their language of communication and who have experienced marginalization and exclusion from communication and services at the County. Non-

English-speaking or Linguistically Diverse residents are the most affected community members.

Previous disasters experienced in the County (recent fires, floods and the COVID-19 pandemic) impacted BIPOC residents differently than White communities. The COVID-19 pandemic disproportionately harmed BIPOC residents at a higher rate compared to White residents. Without information in multiple languages, residents had unequal access to vaccine information as well as the vaccines themselves.

During recent fires and floods, emergency evacuation shelters and Recovery Support Centers saw a large demand for Spanish language assistance. The Hispanic/Latinx residents experienced long wait times for services without adequate staffing of bilingual staff and interpreters. The County has seen a long history of Spanish and indigenous language speaking advocates from communities following each fire, flood, and certainly during the pandemic.

Ten focus groups were held with community members and leaders in eight (8) different languages: two focus groups in Spanish, and one each in Mixteco, Triqui, Tagalog, Fijian, Chatino, Mandarin, Khmer, and Vietnamese.

Focus groups were also held with County staff, bilingual employees and County leadership to inform the policy development process.

2. What has your engagement process told you about the burdens or benefits for different groups?

Community and internal focus groups provided the Office of Equity direct insight into the priorities, barriers, and lived experiences of those too often left out of policy decisions. Centering community voices paves the way for more informed, equitable systems. Several consistent themes emerged around language access, emergency communications, confusing processes and more. After analyzing the feedback provided from all focus groups, some broad trends have become apparent in the feedback received from the community.

Language Access Barriers

- Lack of language services, information, staff
- Reliance on informal interpretation
- Comprehension struggles with English and Spanish for indigenous language speakers, and other non-Spanish speaking community members

Cultural Barriers

- Power dynamics, stigma, shame prevent speaking up

- Lack of cultural awareness/sensitivity
- Burden falls on community groups

Emergency/Disaster Communication Gaps

- No language disaster alerts or response in languages other than English and Spanish

- Dangerous info gaps during fires, storms, COVID-19

Interest in Enhanced Staffing and Resources

- Hiring more bilingual staff
- Phone interpretation services
- Document translation
- More printed materials

Desire for Cultural Empowerment

- Validate diverse languages in services
- Build language/cultural pride
- Address stigma accessing services

Awareness Building

- Groups unaware of rights
- Interest in community language trainings

Community engagement suggested that non-English, non-Spanish speaking households are most impacted in accessing County services. Some residents are unaware of their language access rights or how to advocate on behalf of themselves to get interpreters/translators in their desired languages.

Residents highlighted gaps in access and respect, need for system-level bilingual resources/staffing, emergency communication limitations, and interest in collective education/empowerment across languages. Vulnerable community reliance on children and informal networks place risks on shelter, economic aid, COVID-19 testing and vaccination access. Core desires center on language inclusive staffing, translations, interpretation services, printed materials, outreach channels, support in forms/documents, language trainings, and general respect for native communication.

Additionally, bilingual staff conveyed the additional work burden they feel to provide language access to clients. Many bilingual staff identify as Latinx or non-White. Increasing the quality of their work life and valuing their bilingual skillset may create pathways towards promotion and retention, rather than towards burnout and frustration.

3. What has your engagement process told you about the factors that produce or perpetuate racial inequity related to this proposal?

With the intersectionality of race/language/immigrant status, the lack of language access to community residents who do not read, write, or speak English very well impacts immigrant populations with large impacts on Spanish language, indigenous language, and Asian/Pacific Islander language speaking residents. The lack of equal access to materials and services in the non-English languages spoken by residents, contributes to inequities felt by the BIPOC community.

Language access and cultural barriers emerge as prevalent equity issues. Whether Mixteco, Triqui, Tagalog, Khmer or other languages, reliance on English/Spanish excludes many residents from basic health and emergency information, economic support programs, document comprehension, phone services, in-person appointments and more.

For indigenous populations who speak one of 83 Mixteco variants, they are offered language access in Spanish which they struggle to understand. Given the lack of Mixteco interpreters and translators, they rely on their children, family and friends when accessing county services and completing forms. Linguistic diversity poses challenges, the lack of systematic Mixteco interpretation and Spanish reliance leaves the community voiceless across county service systems. Culturally competent Mixteco language inclusion emerges as an urgent equity issue.

For indigenous populations who speak Chatino, many of the same issues facing Mixteco-speaking residents were echoed. The lack of systematic Chatino interpretation across institutions and services emerges as an urgent issue to address. The community advocates for standard options to retain their culture, comprehend services, and participate equitably.

Indigenous community members who speak Triqui also struggle to understand Spanish and feel resigned to inadequate options. Phone menus, interpretation and emergency communications are not provided in Triqui. English forms require children to assist their parents to complete and Spanish forms and documents are difficult to comprehend. Professional Triqui interpreters and translators are needed. Providing Triqui access encourages cultural retention and pride.

Fijian residents highlighted cultural and language gaps which reinforce voicelessness and barriers to services. Improving Fijian language access and cultural competence while leveraging community trust and locales emerges as a critical need.

Cambodian/Khmer community engagement reported largely positive county interactions and language access. Areas for improvement centered on continuing to provide relevant information in native language, as well as job and workforce support.

The Filipino community is a small population in the county and feels unseen. A lack of Tagalog interpreters burdens this community with feeling shame in requesting interpreters, reliance on family for language assistance, and unawareness of language rights.

Mandarin-speaking residents spoke of more interpretation support. Some residents pay for their own interpreters due to lack of county support and lack of knowledge of language access rights. They place a heavy reliance on their informal networks to help with document translation. There is a cultural reluctance to demand language rights which compounds these barriers residents experience.

Spanish-speaking residents highlighted difficulty with quality translations that they could understand in plain language, and long wait times for Spanish assistance. Often, residents had to cancel health and social service appointments due to lack of interpreters. During disasters, Spanish-speaking residents felt bias and racism emerging when information and aid only flows in English. Clients also feel unwelcome due to longer wait times when accessing services via phone. The community wants system-level Spanish inclusion and equity.

Self-advocacy and speaking up also prove challenging for cultural reasons like power dynamics and stigma. Community members often feel that services get offloaded onto overburdened community groups already working to fill immense needs. Opportunity for cultural education and sensitivity training exists.

Being an immigrant or person of color, and not speaking English impacts a person's sense of belonging to the community. Our community engagement work in developing this Policy shows that providing language access improves residents' sense of belonging, while also working to facilitate pride in one's cultural heritage.

Step #4: What are your strategies for advancing racial equity?

- 1. Given what you have learned from research and stakeholder involvement, how will the proposal increase or decrease racial equity? Who would benefit from or be burdened by your proposal?**

Both County leadership and community members identified the opportunity to establish a consistent, county-wide approach to language access provision during the engagement and prioritization process leading to American Rescue Plan Act investments in December 2021. As a result, the Board approved the distribution of \$1.16 million American Rescue

Plan Act (ARPA) funds for the development of a Language Access Policy and Plan, as part of a larger effort to invest in building and strengthening the County's cultural responsiveness. The intended product was the creation of a Language Access Plan and Policy to achieve equitable participation and access to County government services supporting underserved communities of color and other communities who have traditionally experienced marginalization from government processes and services.

The County has a long history of hearing from Spanish and indigenous language speaking community members and advocates following each fire, flood, and certainly during the pandemic. Work done with community around SB 160 recommendations highlighted the differential impacts of disasters on Spanish-speaking and/or immigrants, many of whom also identify as BIPOC. The Language Access Policy will address some of those SB 160 requests by providing services, materials and information in additional languages besides English.

The intent of the Policy is to ensure language access to all non-English-speaking residents accessing County services, with the goal of improving equity to linguistically diverse community members and thus decreasing racial inequities.

Departments or county agencies and their bilingual staff serving large numbers of linguistically diverse clients would be most burdened with additional work to provide language access interpretation and translation services to clients. Additionally, reliance on children, family members and friends to provide language access should be eliminated with increased access to professional language access services. Language Access comes from the right to not be discriminated against due to the inability to speak or understand English.

2. What are potential unintended consequences? What are the ways in which your proposal could be modified to enhance positive impacts or reduce negative impacts?

Language Access is required by both Federal and State Legislation. Language access rights increase with the significance of the life event, and with the frequency of contacts with linguistically diverse populations.

Potential unintended consequences: Certain linguistically diverse communities feel more visible because forms are available in their languages, while others feel invisible because materials are not offered in their languages. Providing language access information on phone menus, through signs in county departments, and links on county webpages, linguistically diverse residents can realize increased access and to enhance non-English speaking community member belonging in the County and to county programs, services and information.

- 3. Are there complementary strategies that you can implement? What are ways in which existing partnerships could be strengthened to maximize impact in the community? How will you partner with stakeholders for long-term positive change?**

The Office of Equity developed new partnerships with community in designing the Language Access Policy and strengthened existing relationships during community engagement.

Working alongside trusted Community-Based Organizations (CBOs) is paramount to the success of the Language Access Policy. Outreach to CBOs will be done to inform them on the Language Access Policy and Implementation Plan. Periodic outreach should be done with community members and CBOs to see how effective implementation of language access is going. The Language Access Policy is meant to serve the needs of the community. Therefore, it is imperative to engage with community in a bi-directional conversation and engagement to ensure the Policy is working as intended, and to address any pitfalls with implementation.

The Implementation Plan details the ways in which Community-Based Organizations can serve as partners in this effort to increase quality of language access services, to improve community members' sense of belonging, and to ensure bilingual staff are valued and resourced. In this way, staff and leaders are better connected to community partners.

- 4. Are the impacts aligned with your community outcomes defined in Step #1?**

Yes

Step # 5: What is your plan for implementation?

- 1. Describe your plan for implementation.**

The Office of Equity (OOE) has developed an Implementation Plan and has recommended that the Board of Supervisors name the OOE as responsible for implementation responsibility, and to dedicate a Language Access Coordinator to ensure effective implementation of this Policy and Plan. The Language Access Coordinator will train staff on the legal requirements for language access; how to provide language access services either using bilingual staff or professional language access companies/contracts/BPOs; work with department personnel to determine which documents are considered "vital" and require translation; ensure creation of phone menus in other language options; train staff on how to provide assistance completing/understanding English forms; training staff to avoid use of

minor children, friends or family members as interpreters/translators; community education of language access rights and how to access services in relevant languages.

2. Is your plan: Realistic? Adequately funded? Adequately resourced with personnel? Adequately resourced with mechanisms to ensure successful implementation and enforcement? Adequately resourced to ensure on-going data collection, public reporting, and community engagement? If the answer to any of these questions is no, what resources or actions are needed?

The successful implementation of the Language Access Policy and Plan requires adequate resources. A Language Access Authority (LAA) needs to be responsible to oversee this work, and the recommendation from staff and community is to have the Office of Equity be the LAA.

Second, to ensure the consistent and thorough implementation of the Policy, a Language Access Coordinator is recommended. Having a dedicated Coordinator is a best practice used in other jurisdictions that have Language Access Plans. The Office of Equity has submitted a Program Change Request during the 2024 Budget workshops to hire a Language Access Coordinator beginning in Fiscal Year 2024-2025. This position is crucial for success of the Policy and Implementation Plan.

The implementation plan calls for a phased effort with an initial assessment of department contracts, blanket purchase orders (BPOs), analysis of vital document translation demands, and current level of bilingual staff capacity. Afterwards, implementation of the Policy would begin, followed by training of staff and community members on appropriate language access assistance. For successful implementation, a Language Access Coordinator needs to be hired to manage department trainings, devise a tracking and on-going data collection system, design community language access trainings, and overall manage the implementation of the Policy.

This Policy was designed by collaborating with internal staff, community members and CBOs in a thoughtful and intentional way to create a Countywide Policy and Plan for implementation. If adequately resourced, this will be successful in achieving racial equity in service provision and in valuing and ensuring bilingual staff are also resourced and skilled to conduct their work.

Step #6: How will you ensure accountability, communicate, and evaluate results?

- 1. How will impacts be documented and evaluated? Are you achieving the anticipated outcomes? Are you having impact in the community?**

The Language Access Coordinator will provide training and technical support across the County. They will work with departments/agencies to identify “vital documents” in need of translation; train personnel on identifying languages spoken by clients and work with staff to determine when and how to access professional translators and interpreters. The Coordinator will also work with departments to devise a tracking system to assess language access needs and encounters, and ensure Language Service Companies meet the needs of departments and clients.

Ongoing tracking of language access assistance throughout county departments and agencies will be needed and an annual report highlighting that data will be generated by the Coordinator.

The Coordinator will report to the Board of Supervisors on an annual basis regarding the implementation of this policy and plan, and the provision of language access in the County. This report shall be made publicly available and translated into Spanish. It may be translated or summarized in other languages upon community request. This report shall include, at a minimum:

- The total number of language access encounters in the preceding year, broken down by:
 - Language
 - Modality (interpreting, translation)
 - Location
 - County agency

- The total number of residents to whom language access was provided, broken down by:
 - Language
 - Modality
 - Location
 - Agency

- The resources required to provide language access in the previous year, broken down by:
 - Language
 - Modality
 - Provider type
 - County bilingual employees
 - Language Services Companies, Community Based Organizations, and other entities located within the County

- Language Services Companies, Community Based Organizations, and other entities located outside of the County
 - Location
 - Agency
- Level and nature of community engagement regarding the language access plan.
- Any trends or recommendations to the County government regarding improvement of the provision of language access.
- An analysis of how the LAPP meets the values of the County.

- 2. What are your messages and communication strategies that will help advance racial equity?** More education and communication with the community about language access laws and rights, and how to access County program and services in desired languages. Communication strategies include training with Community Based Organizations (CBOs), social media, County webpages, and signages in front-facing departments.

OOE is partnering with the County ISD web team, which will increase the quality of online services and ensure the efficient use of technological resources, while also ensuring that a human is available to review the accuracy of machine translations.

- 3. How will you continue to partner and deepen relationships with communities to make sure your work to advance racial equity is working and sustainable for the long haul?**

The Language Access Coordinator (LAC) position will be critical to ensuring that racial equity is advanced. The LAC will be able to ensure that all departments are trained consistently, and that clients and residents will have the same level of language access throughout County services and programs. This will improve service access by BIPOC community members who are non-English speaking.

The implementation Plan recommends that the LAC will conduct a countywide language access needs assessment every two years by interviewing and/or surveying county employees who interact with non-English-speaking individuals, as well as interviewing and/or surveying linguistically diverse community members.

The LAC will conduct community engagement work with local CBOs who serve linguistically diverse individuals to provide information about the County's policy and procedures, and to seek feedback on the way in which the program is working. It is in this collaborative approach to co-design with CBOs that the county can work to advance racial equity with the BIPOC community in a long-term, sustainable manner. This community outreach work will include periodic engagement with community members and CBO's to determine if language access needs are being met; internal staff

engagement to determine barriers being faced by community and modifying implementation plans to resolve those issues.