

Letter to California Citizens Redistricting Commission
RE: Meeting Interpretation Recommendations

March 25, 2021
California Citizens Redistricting Commission
901 P Street, Suite 154-A
Sacramento, CA 95814
Sent via electronic transmission

Dear Commissioners,

We applaud your continued effort to incorporate meaningful interpretation and translation into the Commission's planned outreach and public meetings. As organizations that work with or advocate for limited English proficient ("LEP") communities in California, we respect the complexity of the task in front of you and also urge you to provide crucial interpretation support for our community members. Language inaccessibility is just one of many historic barriers to civic participation for our communities, but it is one that the Commission has a real opportunity to break down in pursuit of equitable treatment of all Californians.

We appreciate the framework and commitments set out in the language access plan you discussed and adopted on January 28th. To further strengthen these, we respectfully request that you include interpretation of the Commission's discussion in addition to incoming public comment. Meaningful engagement with the public requires a two-way flow of information. Community members who take the time to participate in this process must be able to understand the information being discussed at the meeting. We identified the following approaches for meeting interpretation that balance the needs of the community with the logistical and budgetary constraints that the Commission is working within.

- **Outreach and Educational Sessions** - We suggest the Commission provide interpretation services for their educational presentations in the top-12 languages upon request, while also making a best effort to provide on-request interpretation in additional languages. Presentations with requests for interpretation are likely to be just a small portion of the overall outreach efforts, but represent a crucial opportunity to engage some hard-to-reach communities early in the redistricting process. Conducting these sessions in-language makes it clear their input is welcome and desired.
- **Communities of Interest (COI) Workshops** - We suggest the Commission adopt one of the two approaches outlined below.
 - Provide full Spanish interpretation for all COI workshops. Maintain the policy of providing interpretation upon request for top-12 languages (with best effort made to provide on-request interpretation for additional languages), but extend the interpretation coverage to the full workshop period.
 - Provide full Spanish interpretation for all COI workshops and establish a set number of workshops for which full interpretation will be provided in the other top-12 languages, taking into account the respective populations and geographies of the relevant communities. Ensure that these workshops are identified well in advance so that community-based organizations can focus their efforts appropriately. If other language groups request a translated COI workshop, make best efforts to provide interpretation for the full workshop. Maintain the policy of providing interpretation in the top-12 languages for the public comment period upon request, with a best effort to provide it for additional languages.

- **Line-Drawing Sessions** - We suggest the Commission maintain the policy of providing interpretation upon request for top-12 languages (with best effort made to provide on-request interpretation for additional languages), but extend the interpretation coverage to the full workshop period.

We also hope that the Commission will take into consideration the likely moderate to low uptake of the on-request services when examining cost estimates. Providing the option of full coverage at every meeting does not mean budgeting for interpretation at every meeting. Additionally, we have some operational recommendations for interpretation services that we think may be useful.

- **Phone-Based Language Channels** - While using the Zoom interpretation feature is a good option, Commission staff also raised the possibility of providing a phone-based option to provide non-English audio. Given the logistical challenges of getting community members logged directly into the Zoom meeting, we support exploring the use of language-specific phone lines to provide access to interpretation.
- **Grouping Comments by Language** - When multiple languages will be used, grouping commenters by language will allow for a smoother experience for commenters, interpreters, staff, and Commissioners.
- **Translated Call-in Instructions** - Both written and verbal instructions for calling in to provide public comment should be translated.
- **Interpreter Support** - In light of the complexity of the redistricting process, we recommend that the Language Access Coordinator provide potential interpreters with basic training to understand redistricting and the public input process, including providing a glossary of key terms and translated written materials. This will help interpreters better meet community members' needs.

We hope these recommendations help with your ongoing efforts to address language needs of LEP Californians who want to participate in the redistricting process. We are always happy to answer any questions or provide additional comments related to these issues as you decide how to proceed. Please feel free to reach out to Adria Orr (adriao@advancingjustice-alc.org) and Julia Marks (juliam@advancingjustice-alc.org) at Asian Americans Advancing Justice - Asian Law Caucus or Jacqueline Coto (jcoto@naleo.org) at NALEO Educational Fund to follow up.

Sincerely,
 Advancement Project California
 Asian Americans Advancing Justice - Asian Law Caucus
 Asian Americans Advancing Justice - Los Angeles
 CAIR San Francisco Bay Area
 California Black Census and Redistricting Hub
 California Common Cause
 Coalition for Humane Immigrant Rights (CHIRLA)
 Disability Rights California
 League of Women Voters of California
 Mi Familia Vota
 NALEO Educational Fund
 Partnership for the Advancement of New Americans