



LOS ANGELES COUNTY
CONSUMER & BUSINESS AFFAIRS

Board of Supervisors

January 24, 2024

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First District

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Second District

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Fifth District

TO: Supervisor Lindsey P. Horvath, Chair
Supervisor Hilda L. Solis
Supervisor Holly J. Mitchell
Supervisor Janice Hahn
Supervisor Kathryn Barger

Director
Rafael Carbajal

FROM: Rafael Carbajal
Director

Chief Deputy
Joel Ayala

REPORT BACK ON IMPROVING LANGUAGE ACCESS IN LOS ANGELES COUNTY (ITEM NO. 3, AGENDA OF MARCH 7, 2023)

Recognizing the vital role of equitable language access in improving life outcomes for all County residents, [your Board's motion of January 25, 2022](#), directed the Department of Consumer Affairs and its Office of Immigrant Affairs (OIA) to formulate and submit a Countywide Language Access and Equity Plan. [OIA's report, submitted on October 17, 2022](#), identified and recommended key strategies to remove language barriers, drawing insights from extensive engagement with County and community partners, as well as a comprehensive analysis of language access programs.

On March 7, 2023, your board adopted a motion, [Improving Language Access in Los Angeles County](#), which directed OIA to implement the recommendations contained in our Strengthening Language Access in County report submitted to your Board on October 17, 2022. Your Board also requested that OIA periodically report back with progress updates.

Attached is the requested status report delineating the progress OIA has made in implementing your directives, in close collaboration with County and community partners, which includes:

- Adding a Language Access MAPP Goal to department heads for Fiscal Year 2023-24.
- Developing and submitting a Countywide Language Access Policy for your Board's adoption consideration.



dcba.lacounty.gov
info@dcba.lacounty.gov

320 W. Temple St., Room G-10, Los Angeles CA, 90012-2706
(213) 974-1452 • (800) 593-8222 • Fax: (213) 687-1137

- Coordinating an interdepartmental Language Access Working Group to assist departments with:
 - Developing their Language Access plans;
 - Implementing their Language Access MAPP goal;
 - Integrating the Countywide Language Access Policy;
 - Developing a Threshold Languages Policy suitable for implementation at the Countywide and individual department levels; and
 - Providing and receiving support on Language Access.

We thank your Board for your leadership and support on strengthening language access in the County of Los Angeles to ensure that all residents have equitable access to the support services available for them. OIA will continue to report back to your Board every 180 days on further progress made.

In the interim, should you have any questions concerning the Language Access Initiative, please contact me or Rigoberto Reyes, Executive Director, Office of Immigrant Affairs, at (213) 247-1365 or rreyes@dcba.lacounty.org.

RC:JA:RR
DS:EV:ph

Attachment

c: Executive Officer, Board of Supervisors
Chief Executive Office
County Counsel



LOS ANGELES COUNTY
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LA County Office of Immigrant Affairs
LAC 4 YOU
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COUNTY OF LOS ANGELES
**LANGUAGE ACCESS
STRATEGY**

SUBMITTED BY:
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PREPARED BY:
MICHAEL NOBLEZA
Executive Advisor &
Equity Strategy Consultant



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Executive Summary

In its October 17, 2022 report¹ back to the County of Los Angeles Board of Supervisors (Board), the Office of Immigrant Affairs (OIA) proposed seven strategic goals to help move the County of Los Angeles (County) towards a vision for **consistent, high-quality language access**. On March 7, 2023, the Board adopted OIA's recommendations and designated OIA as the coordinating agency for a countywide language access initiative, while supporting County departments in developing their own language access plans and strategies.

Per directive 12 of the March 2023, motion, this status report (Report) builds upon the recommendations in OIA's October 2022 report by providing further language access research and recommendations for the following County systems and structures:

A. Defining and Supporting Threshold Languages: To realize the vision for consistent and high-quality language access countywide, OIA recommends that each department develop the resources, systems and processes needed to respond to the language access needs of their primary clients. This would be accomplished through the following recommendations:

- A-1. OIA's October 2022 report recommended that each department develop a Departmental Language Access Plan (DLAP). In developing their DLAPs, departments should conduct a demographic analysis and solicit community input to ascertain the threshold languages that address the linguistic needs of their primary clients. Prior to conducting this analysis and soliciting input, departments should determine who their primary clients are.
- A-2. Departments should prominently publish a list of their identified threshold languages and their DLAPs on their websites, customer reception areas, social media platforms and other locations frequented by their clients.
- A-3. During their language access planning, departments should identify what their vital documents are and should translate them into the identified threshold languages.

¹ <https://file.lacounty.gov/SDSInter/bos/supdocs/178487.pdf>

LOTE Speakers

In the October 2022 report back to the Board, the term "English Language Learner" or "ELL" was used to provide a more assets-based description of the population of individuals who do not speak English. This term is in contrast to the common deficit-based term "Limited English Proficiency," otherwise known as "LEP."

The term "ELL" assumes that all immigrants are on a track to learn English. However, many immigrants, especially those who are older, may not, for a variety of reasons, ever be able to learn English.

Subsequent conversations with community and County stakeholders suggest that the term, "**Speakers of Languages Other Than English**" or "**LOTE Speakers**" more accurately reflects this lived reality and honors the vision for a vibrant multicultural, multilingual County.

This is the preferred term that will be used throughout the report.

- A-4. Departments should conduct outreach focused on speakers of department threshold languages to let them know about the availability of services and assistance in their languages.
- A-5. Departments should include strategies in their staff recruitment that prioritize bilingual staff who speak the department's identified threshold languages.
- A-6. The October 2022 report recommended the establishment of a Language Access Working Group (LAWG), led by OIA, to support departments in meeting their language access goals. Through the LAWG, OIA should work with departments to identify and prioritize the languages most shared across departments. The County should use these findings to adopt its countywide threshold languages for translation of vital documents.
- A-7. OIA should create a Language Access Master Services Agreement (LAMSA) to build a pool of translators to strengthen countywide threshold languages capacity. The LAMSA should prioritize adding languages spoken by traditionally underserved clients (i.e., Indigenous, Asian-Pacific Islander, and Black immigrants). OIA should regularly update the LAMSA and make it available to departments.
- A-8. Departments that use their own staff translators to address urgent, unplanned translation requests from other County departments should have full-time staff translators for each language most requested.

B. Equity in Contracting with Community Language Service Providers: To support County departments in responding to requested languages, new strategic partnerships need to be developed with community language service providers. Per the principles of the Equity in Contracting Initiative, to create access for community language service providers, the County must provide adequate and timely reimbursement, reduce administrative burdens and address contracting inefficiencies (including reporting), and make it easier to apply for County language service contracts. The following recommendations would support equity in contracting:

- B-1. Use the full and fair cost principles to ensure that community language service providers' total costs providing services on behalf of the County are covered. This includes revising reimbursable expenses for vendors providing translation services to the County to include travel, parking, and waiting time.
- B-2. OIA should work with County departments to develop a minimum set of language access reporting metrics appropriate for community language services providers.
- B-3. Develop a dedicated online portal that aggregates and centralizes the County's language access contracting opportunities.
- B-4. Ensure that translation validation contract opportunities are specifically focused on community language services providers.
- B-5. Pilot a co-op model in which a fiscal sponsor provides "back office" administrative support to qualifying community language services providers.

C. Use of Technology and Social Media: When leveraged effectively, technology can be a powerful tool for increasing language accessibility. However, technology should be used as a complement to, rather than a replacement for, human interpretation and translation. The gains in productivity by using technology-enabled translation must be balanced with the time spent correcting a translation on the back end. Accuracy is also critical: Technology must be able to capture the cultural nuances and community-specific expressions that are part of how people actually talk, read, and write in everyday life. Four areas of technology identified for future research are: (1) chatbots, (2) self-service kiosks, (3) artificial intelligence-enabled interpretation, and (4) social media. Recommendations for further exploration of technology in support of language accessibility include:

- C-1. The County should conduct market research to identify and adopt guidelines and systems for the proper and effective application of chatbots and AI to strengthen language access.
- C-2. The County should work with ethnic media to identify the social media apps most used in their communities and develop and implement strategies for effectively engaging Language Other Than English (LOTE) speakers in those apps.
- C-3. The County should be intentional in using AI to complement, not replace, human interpretation and translation.

D. Language Access in Emergency/Rapid Response Situations: Language accessibility in emergency/rapid response situations is significantly enhanced by focusing on pre-translating the most needed emergency information. This is further improved by ensuring that information about emergency protocols and resources is centralized and readily accessible, and partnering with trusted community messengers who can help disseminate information in an emergency. To support equitable recovery from an emergency/disaster, attention should be paid to in-language outreach and application support. The following recommendations would increase the County's capacity to be linguistically responsive in emergency situations:

- D-1. Whenever possible, use demographic analysis to assign bilingual first responders and emergency personnel to geographic areas where the languages they speak are most needed.
- D-2. Pilot an emergency response network comprised of trusted community messengers and ethnic media partners trained in the County's emergency response protocols.
- D-3. Conduct an audit of 211LA to ensure that it is accessible and responsive to LOTE speakers.
- D-4. Train emergency personnel in how to identify a LOTE speaker's preferred language and how to access the appropriate language services for that preferred language.

- D-5. Develop a glossary of emergency terms, pre-translate them into languages prioritized by the Office of Emergency Management (OEM), and validate these translations with community partners.
- D-6. Ensure that documentation of language assistance requests is included by OEM and other responding agencies in After Action Reviews following an emergency response.
- D-7. Train bilingual staff and volunteers on how to provide language access that is culturally appropriate during public emergencies and individual situations.

E. Strengthening the County's Bilingual Bonus System: In a July 2022 departmental survey County Counsel conducted on behalf of OIA, County departments identified the use of their own bilingual staff as a primary resource for providing language services. Bilingual staff are best prepared to provide effective language services when they receive adequate training and are routinely assessed for their skills proficiency and ability to meet the regulatory requirements of their specific industry. Recommendations that will help set up bilingual staff for success in providing high-quality language services include:

- E-1. Departments should provide regular training to all staff on the department's responsibility to provide language access and how to access the department's language assistance resources.
- E-2. Departments should conduct consistent assessment of bilingual staff through vetted testing providers. The Department of Human Resources (DHR), in partnership with OIA, should provide departments with a list of testing providers.
- E-3. Departments should re-test staff on a regular basis to make sure they still meet the department's criteria for the bilingual bonus. Re-testing should be conducted either every three years or when an employee changes the role for which they were originally certified, whichever comes first.
- E-4. DHR should work with OIA to incorporate training on language access, cultural responsiveness, and applying the immigrant lens into the County's workforce training academy.
- E-5. DHR, in consultation with OIA, should audit the County bilingual bonus system to identify and propose recommendations to make it more responsive to the County's current and future language access needs. Recommendations should include whether (a) there should be more stringent certification standards for employees who provide specialized translation/interpretation services (medical, legal, etc.); (b) the bilingual bonus compensation is competitive with market conditions; (c) there are opportunities to enhance the recognition of bilingual employees (Bilingual Employees Day, Board recognitions, etc.) to promote and value bilingualism in the County's workforce.
- E-6. Departments should work with OIA to help determine what strategies or supports are needed to implement changes intended to strengthen the bilingual bonus system.

F. Funding Language Access: The County needs to continue aligning and investing adequate resources to ensure that it is meeting its legal obligations to provide effective language access per Title VI of the Civil Rights Act of 1964, Executive Order 13116, California Dymally-Alatorre Bilingual Services Act, and California Code 11135. There are two strategies the County can pursue to fund a countywide language access strategy that complements the investments individual departments are making in their language access efforts: The County should ensure that departments are maximizing what they currently invest in language access and work in partnership with departments to secure new resources as needed. These recommendations are starting points to assess the potential need for additional resources to support the countywide language access strategy:

- F-1. Centralize language access resources under an online language access hub with resources for departments, partners and stakeholders.
- F-2. OIA should work with departments to identify a list of priority languages for which OIA should build a Translators and Interpreters Corps that can be deployed to support departments as needed.
- F-3. Seek federal, state, and philanthropic grants to strengthen and sustain language access in the immediate and long-term.
- F-4. Negotiate and implement cross-jurisdictional memoranda of understanding between the County and its cities to enable them to contract with OIA to access OIA interpreters and translators and other language access resources.

Background

Equitable language access means access to improved life outcomes for all Angelenos. Being able to access services in one's preferred language can help lead to:

- Improved health outcomes
- Economic security
- Educational achievement
- Employment opportunities
- Greater civic participation

On January 25, 2022, the Board of Supervisors unanimously passed a motion² directing the Department of Consumer and Business Affairs (DCBA) and its Office of Immigrant Affairs (OIA), in consultation with County Counsel, the Department of Children and Family Services, the Alliance for Health Integration, the Department of Public Social Services, other impacted County departments, as well as strategic external partners and stakeholders, to develop and submit to this Board, within 180 days, a Countywide Language Access and Equity Plan.

On October 17, 2022, OIA submitted a report on Strengthening Language Access in County Services (Report). As part of its research, OIA conducted a landscape analysis of federal, state, and local language access programs, identifying best and promising practices. OIA engaged over 100 County and community stakeholders to get their perspectives and feedback on barriers confronting speakers of languages other than English (LOTE) to accessing County services and programs.

On March 7, 2023, the Board of Supervisors unanimously passed a motion³ to adopt the Strengthening Language Access in County Services report (Report) that OIA developed in partnership with other County departments.

Developments Since the Last Report

Since OIA submitted its prior report to the Board in October 2022, two notable legal developments have occurred that contribute to the context of language accessibility in the County. First, in February 2023, President Biden signed Executive Order 14091, Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. Among the many equity-focused commitments it makes, the executive order lifts up the importance of linguistically appropriate services for federally funded programs.

² <https://file.lacounty.gov/SDSInter/bos/supdocs/165698.pdf>

³ <https://file.lacounty.gov/SDSInter/bos/supdocs/178489.pdf>

Secondly, regulations that have been proposed for California Code 11135 – the state’s equivalent of the Civil Rights Act – might be implemented to include non-discrimination on the basis of national origin. It is important to note that both instances point to the importance of having laws that specifically address the implementation of a broader equity-focused vision for government services.

Coordinating a Countywide Language Access Strategy

At the County level, per Directive #2 of the March 7, 2023, Board motion, OIA will be bringing forward for the Board’s consideration a new policy that supports a countywide language access strategy. This administrative policy will require that all County departments complete Departmental Language Access Plans (DLAPs) that address the seven strategic goals presented in OIA’s October 2022 report to the board:

1. **Collect and Use Language Need Data to Improve County Service Delivery and Inclusion:** Regularly collect data on language needs and preferred language requests and use data to improve customer service and resource allocation for all public-facing County departments.
2. **Increase the Availability and Quality of Spoken and Signed Interpreter Services:** Established protocols for quality spoken and signed language services that are clearly communicated to the public for all public-facing County departments.
3. **Increase the Availability and Quality of Document Translation:** Established protocols for the translation of information and documents identified as vital for the public for all public-facing County departments.
4. **Develop Departmental Language Access Plans:** Review language access strategies on a regular basis for all public-facing County departments.
5. **Conduct Training:** Plan for providing ongoing training for staff on the provision of language accessibility and cultural responsiveness for all public-facing County departments.
6. **Effectively Response to Language Access Complaints:** Established protocols for the collection of and effective response to language access complaints for all public-facing County departments.
7. **Ensure Quality of Outsourced Language Access Services:** Established protocols for the regular assessment of their department’s language services vendors and strategic partnerships for all public-facing County departments.

The policy will also spell out OIA’s role as the County’s coordinating agency for language access countywide, providing technical assistance and organizing training for departments to support them in aligning with the proposed countywide language access policy and strategic goals.

Aligning Systems and Structures

This report focuses specifically on the systems and structures that will need to be aligned in order for a countywide language access strategy to be sustainable:

- A. Defining and supporting threshold languages
- B. Equity in contracting with community language services providers
- C. Use of technology and social media
- D. Language access in emergency / rapid response situations
- E. Strengthening the County's bilingual bonus system
- F. Funding language access

A. Defining and Supporting Threshold Languages

OIA's October 2022 report to the Board detailed the practice of using threshold languages: If the number of speakers of a language in a jurisdiction or service planning area exceeds an established level, then that language is deemed a "threshold language." The threshold language triggers a predetermined level of language assistance that corresponds to that threshold, typically translation of written information. Thresholds can be established based on:

- A minimum number of speakers of a language in a jurisdiction or beneficiaries of a service
 - An example of this type of threshold is the L.A. County Development Authority (LACDA)'s "determination as to whether five percent or 1,000 participants from the Housing Authority's-administered programs or persons from the waiting list speak a specific language, which triggers consideration of document translation needs."⁴
- Percentage of a population in a jurisdiction;
 - An example of a percentage-based threshold is the Department of Public Social Services (DPSS). "DPSS follows CDSS Division 21 standards to determine the departmental threshold languages. Specifically, the departmental threshold languages include those languages that make up 5% or more of the caseload for any program or office location."⁵
- A law or regulation, which can often be based on a numerical or percentage-based threshold, but also may include languages designated as being priority regardless of whether they meet a threshold.
 - One example of mandated threshold languages applies to the County's health departments. There are federal and California state mandates

⁴ The Los Angeles County Development Authority (LACDA) "Improving Access for Persons with Limited English Proficiency, Revised January 1, 2023."

⁵ DPSS Language Access Plan 2023

regarding the provision of public health information to the largest LOTE speaking populations. There are also industry mandates, such as HIPAA compliance, which affect the provision of language access specifically in the public health sector.

- Another example is the Registrar-Recorder/County Clerk. California Election Code Sec. 14201 mandates that ballot information be printed in languages that meet the threshold of three percent of voting-age residents in any given precinct.⁶

Currently, there is no countywide list of threshold languages that applies to every department. Each department may have different regulatory requirements that apply specifically to them. Even though all departments are supposed to serve the entire County, their main programs may serve specific populations or geographic areas that are not served by other departments.

To further underscore the complexity of threshold languages, the City of Los Angeles identified 14 threshold languages, which trigger various language access requirement depending on the language. The City of Long Beach has determined that all city departments should provide translation and interpretation services in at least Spanish, Khmer and Tagalog.⁷ The Superior Court of California in the County has the majority of requests for court interpreters in Spanish, Korean, Mandarin, Armenian and Vietnamese.⁸ L.A. Regional Planning has identified Spanish and Mandarin as threshold languages in the County's unincorporated areas. The California Department of Social Services provides translated materials into 16 different languages⁹, while the California Department of Health Care Services has determined that 11 languages within the County meet its threshold and concentration language requirements.¹⁰ Simply put, even within the same jurisdiction, the determination of threshold languages can differ based on client population or which part of the County LOTE speaking communities might be.

The Value of Threshold Languages

The greatest value that threshold languages offer is clarity: Knowing which languages trigger a translation or interpretation requirement helps the public better understand what resources are available to address their language access needs. An established list also helps departments to focus and maximize their finite resources.

⁶ Registrar-Recorder, "2017 Multilingual Election Services"

⁷ <https://www.longbeach.gov/ti/modernization/language-access/>

⁸ Superior Court of California – County of Los Angeles, "2023 LEP Plan":

<https://ascpubstorage.blob.core.windows.net/cts-webgrouppublic/LIBSVCCourtroomSupport/Language%20Access%20Services/Court%20Interpreters/LEP%20Plan/LEPPlan.pdf>

⁹ <https://www.cdss.ca.gov/inforesources/translated-forms-and-publications>

¹⁰ <https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2021/Threshold-Concentration-Languages.pdf>

However, threshold languages fail to be an effective practice when used incorrectly. One way in which this might happen is when threshold languages are used as a determinant of whether or not someone is provided with language assistance: A LOTE speaker might request assistance in a language that is not a threshold language, and the department might say that they cannot provide assistance in that language because it's not on the threshold language list. Any County client should be able to make a request for language assistance and expect to have that request fulfilled, regardless of which languages are deemed threshold languages by a department. In other words, **threshold languages should be a floor standard, not a ceiling.**

Similar to this scenario is when threshold languages become a shortcut. Staff may feel that once they've identified a list of threshold languages, they no longer have to conduct demographic analysis. The pandemic and recent migrant arrivals have underscored how dramatically demographics can shift in a jurisdiction. Thus, regular demographic analysis needs to be the foundation for an effective language access strategy.

Another way in which threshold languages can be less effective is if the level of assistance triggered by a threshold is not clear to staff. 67 percent of the County departments responding to the July 2022 survey conducted by County Counsel on OIA's behalf stated that they have threshold languages, and yet only five percent have protocols that define how threshold languages should be used. County staff should be trained to know which languages are threshold languages and the type of language assistance they are expected to provide based on that threshold.

Threshold languages need to be seen within the broader context of a LOTE speaker's journey navigating the County system. Having linguistically accessible information is an important entry point. A LOTE speaker will likely have a reasonable expectation that, if they receive written information in their preferred language, then they should also expect to receive assistance in that preferred language when they interact with a County worker. However, sometimes this is not the case: County departments may translate written information into a language but not have the bilingual staff or a language service provider that can readily provide in-language technical assistance and support to a LOTE speaker.

The Cost of Threshold Languages

Threshold languages can not only be ineffective but also costly: The overall expense associated with language assistance multiplies with each threshold language established. Smaller departments may bear a disproportionate impact in that regard because the threshold language list might require translating written information into languages that a department's main programs may not really serve.

Further, translation is not a one-time occurrence. Translated documents need to be updated whenever there are changes to a program or to the laws governing a program. For every threshold language added, the costs of updating translations also multiplies.

The biggest cost-efficiency that a coordinated countywide strategy offers is the opportunity for shared costs among departments. If a number of County departments have a need for the same threshold language, then they might find a way to pool their resources so that they can share the burden of working with service providers of that language. This may be especially beneficial for smaller departments that are unlikely to have bilingual staff who can help in that threshold language.

Applying the Equity Lens to Threshold Languages

In a region as diverse as the County, with upwards of 200 languages, most language groups do not have enough speakers to meet the numeric or percentage-based thresholds used by departments. It is important that the process by which threshold languages are identified be made available to the public: The public should have a sense of the extent to which the community was involved in the demographic analysis informing the determination of threshold languages.

The public should also understand the sources of data used to conduct demographic analysis. Common sources of data include:

- The US Census
- Public schools
- WIC enrollment
- Court records
- Public health records

In addition to looking at requests for language assistance, departments should consider language access complaints filed while assessing their language access needs. Furthermore, departments should also look at the populations their main programs intend to serve to determine if there are linguistic communities that should be requesting language access for which there is no data.

Finally, threshold languages are most effective when there is a sizable population that exceeds thresholds or when a linguistic community is geographically concentrated in a specific part of the County. However, speakers of different linguistic communities tend to be dispersed throughout the County, and there is no clear map of where these speakers might be located. Equitable language access efforts in the County should intentionally include making more visible those linguistic communities that might be missed because they are less concentrated in specific geographical areas.

Exploring Countywide Threshold Languages

Given the preceding considerations regarding the value and cost of threshold languages, it is understandable that there be a desire for a countywide list of threshold languages. This would mean that all County departments would be responsible for ensuring they have the capacity to provide adequate language assistance in select languages.

Much research still needs to be done to bridge the gap between the reality of different County departments with different threshold language mandates and the ideal of

countywide threshold languages that would support consistent language access across departments. However, efforts are underway and/or planned to help close this gap:

The Chief Executive Office is conducting a landscape analysis of whether or not each County department has established threshold languages, and if so, which languages those are. This analysis will be included as part of their report back to the Board.

Additionally, a subset of OIA's LAWG will be invited to participate in a roundtable to make recommendations on a countywide strategy for threshold languages that will meet departments where they are at.

Recommendations for Threshold Languages

- A-1. In developing their DLAPs, departments should conduct a demographic analysis and collect community input to determine threshold languages that address the linguistic needs of their primary clients.
- A-2. Departments should publish those threshold languages prominently when they publish their DLAPs on their websites.
- A-3. During their language access planning, departments should identify what their vital documents are and should translate them into the identified threshold languages.
- A-4. Departments should conduct outreach to people who speak department threshold languages to let them know about the availability of assistance in their languages.
- A-5. Departments should include in their hiring strategies prioritizing the recruitment of bilingual staff who speak the department's identified threshold languages.
- A-6. As part of its LAWG, OIA should work with departments to prioritize the languages most shared across departments and make recommendations for countywide threshold languages for the translation of departments' vital documents.
- A-7. OIA should create a language access master services agreement to build its own pool of staff translators that would be available to other departments.
- A-8. Departments that use their staff translators to address urgent, unplanned translation requests from other County departments should have full-time staff translators for each language that is most requested.

B. Equity in Contracting with Community Language Service Providers

The primary mechanism for County departments to partner with community language service providers is through master services agreements (MSAs). Research conducted in preparing this report uncovered these language access master services agreements:

- The Internal Services Department (ISD) Board-approved Language Interpretation Services Master Agreement (LISMA), which is being replaced by the On-Demand Interpretation and Translation Services (ODITS) master agreement.

- The Health departments' public health-specific contracts, administered by the Department of Public Health (DPH), for language services and community engagement.

MSAs help to streamline the County's contracting process by pre-qualifying vendors who identify their services and rates ahead of time. Many MSAs are structured to capitalize on economies of scale, effectively prioritizing large, for-profit language service providers who can provide interpretation and/or translation in several different languages. This makes it easy for a department to choose just one or two vendors, rather than 8-12 different community-based language service providers, to provide general interpretation and translation services.

Feedback from both community and County stakeholders points to the need to also develop a pool of community language service providers that can complement the larger, generalist vendors. Community-based interpreters and translators are familiar with how their language is colloquially spoken in the County. To contrast, many of the large, generalist vendors provide services in Spanish as it is spoken in Spain, not in various Latin American countries where most Spanish speaking immigrants come from.

Community interpreters and translators also tend to have the trust of their communities. They not only bring technical expertise as language experts but also are able to help communicate the nuances of meaning and intent. This is especially important when interpretation and translation moves from general information to the specifics of enrollment and participation in a County service, program or benefit. This is also why it is important to, whenever possible, have community experts review information translated for the public to ensure that the intended meaning is being conveyed, rather than a literal translation, which tends to happen with machine translations.

Many community language service providers are part of small, often volunteer-run, community-based organizations, or they may be individual leaders who are trusted in their communities as effective cultural brokers. For some of the County's smallest linguistic communities, these community interpreters and translators are the only CBOs of their kind, helping to create access to County services in language.

The County's Equity in Contracting initiative was launched out of the County's recognition that effective and strategic partnerships with community-based organizations was the best way to address the challenges posed by the COVID-19 pandemic. Based on feedback from hundreds of CBOs and in partnership with over 40 County leaders, these three strategic priorities were identified to ensure equitable contracting:

1. Provide adequate and timely reimbursement.
2. Build ongoing partnerships between County and nonprofit organizations.
3. Reduce administrative burden, address contracting inefficiencies, expand access.

These priorities are especially appropriate for community language service providers.

Adequate and Timely Reimbursement

Translation projects tend to be defined projects. Fees for not only translation but also design and formatting for language scripts that read right to left need to be defined for a community translator to be adequately compensated for their work. A fee-for-service approach seems to work for this type of work.

Interpreter jobs tend to be on an hourly and as-needed basis. Interpreters often have to travel to a physical location, e.g., a courthouse or hospital, to provide language services. As a result, they incur costs for travel, waiting time spent in between jobs, and parking. A fee-for-service approach may not work for this type of scenario, if the full costs borne by a community interpreter to provide language services are not reimbursable.

There is also the challenge of how long it takes to receive payment from the County. Many of the community language service providers are volunteer-run and fund their operations through community-centered fundraising. As such, they do not have significant savings that can sustain them beyond a month. This puts providers in a very difficult financial position if they are having to figure out alternative revenue sources to carry them until they receive their County payment. One community partner interviewed for this report conveyed the experience of having to take out a loan to make payroll while they awaited payment from the County, but that that payment did not cover the interest on the loan.

One of the recommendations made by the L.A. County Economic Resilience Workgroup on Foundations and Nonprofits in its April 2022 update letter to the Board¹¹ was to create a zero-interest, revolving loan fund for CBOs delivering contracted services and experiencing payment delays. Such a loan would be helpful for community language service providers.

Partnerships Between County and Community Language Service Providers

Because each department has its own language access strategy and resource base, a community language service provider contracted to provide support to the County will likely have different experiences, depending on the department.

A few community language service providers shared in the research for this report that they have to provide reporting to different County departments with which they contract. However, as a result of the differences in regulations governing each department, reporting requirements are different enough that the reporting burden is multiplied, even though the core measures for language accessibility are the same across departments.

With this specific challenge, a centralized reporting mechanism would help in capturing the most commonly sought metrics for language service provision.

¹¹ https://drive.google.com/file/d/1AWJgKgQsXGfV_nxCE9GLJkiZEHJ3qJFI/view

Reduce Administrative Burden, Address Contracting Inefficiencies, and Expand Access

Even if the contracting process is strengthened, community language service providers would still have to first find out about and apply for a contracting opportunity and then have the organizational infrastructure to qualify for that opportunity.

As departments elevate their language access strategies to align with the new countywide strategy, they will likely need translation and interpretation services in many different languages. Many of these projects may likely be appropriate more for community language service providers. To make these contracting opportunities easier for providers to access, they should be centralized in an easy-to-find online portal dedicated to County language service opportunities. (An example of such an approach is CEO's portal for American Rescue Plan Act-funded grant opportunities.)

Outreach can then be directed to an established list of community language service providers and directed toward this online contract opportunity portal.

Per a recommendation of the Equity in Contracting Initiative, applications should be simplified to make it easier for community language service providers to submit their qualifications for a contract.

Even with improvements to raising awareness about contract opportunities, many community language service providers may still not have the organizational infrastructure to deal with the administrative and reporting burdens that come with contracting with the County. In this regard, a co-op model, where a fiscal sponsor provides many of the "back office" functions that would be developed for a nonprofit. For example, human resources and contract management, would be very helpful.

Recommendations for Equitable Contracting

- B-1. Use the full and fair cost principles to ensure that community language service providers' total cost of providing services on behalf of the County are covered. This includes revising reimbursable expenses for vendors providing translation services to the County to include travel, parking and waiting time.
- B-2. OIA should work with County departments to develop a minimum set of language access reporting metrics appropriate for community language services providers.
- B-3. Develop a dedicated online portal that aggregates and centralizes the County's language access contracting opportunities.
- B-4. Ensure that translation validation contract opportunities are specifically focused on community language services providers.
- B-5. Pilot a co-op model in which a fiscal sponsor provides "back office" administrative support to qualifying community language services providers.

C. Use of Technology and Social Media

This report does not purport to offer any regulatory policies for the use of technology in providing language access. Rather, it seeks to provide some considerations for the appropriate use of technology to increase language accessibility and identifies promising areas in technological development that the County might consider further exploring.¹²

One of the primary considerations when using technology is to use it as a complement to, rather than a replacement for, human translation and interpretation work. It is vitally important for accurate, appropriate, and validated translations when communicating information related to life, livelihood or legal issues.

Related to this is what the American Translators Association describes as balancing the gains in productivity by using technology-enabled translation with the time spent correcting a translation on the back end.

Another consideration is the accuracy of translation. It is not enough to capture an academic translation of terms. The focus should be on meaning, capturing the cultural nuances and community-specific expressions that are part of how people actually talk and write in everyday life. One County stakeholder interviewed for this research offered the example of how information about a state benefit program was translated into Tagalog/Pilipino using academically correct terminology. However, community feedback was that translations should use a colloquial combination of Tagalog and English since that is how it is spoken in the community.

The OIA October 2022 report to the Board addressed the issue of machine translation without qualified human review, and different County departments are examining where machine translation is helpful in strengthening their work. However, there are four additional areas in which technology might be leveraged to increase language accessibility:

1. Chatbots
2. Self-service kiosks
3. Artificial Intelligence enabled interpretation
4. Social media

Chatbots

Businesses and social service organizations have increasingly adopted message-based services, popularly known as chatbots, to improve the user experience for visitors to their websites. Basic chatbots pop up in a window to ask questions like, “How can I help you?” Based on the user’s response, links to webpages and content related to that response

¹² See Appendix A for the overall body of research on the use of technology for language access from which this report draws.

are presented to the user. This type of feature is especially helpful when a LOTE speaker is trying to get information when County offices are closed.

One main barrier for LOTE speakers to find the information they need on a County website is not knowing where to look. Chatbots can be helpful in supporting them navigate information-packed websites. It is particularly important for County departments to consider using chatbots for urgency situations. In dire circumstances, like domestic violence or imminent evictions, it would be very helpful for a chatbot to take user inputs and determine if that user needs to be connected with emergency resources.

Self-Service Kiosks

With the pandemic past its crisis phase, in-person visits to County offices and service counters are increasing. LOTE speakers may walk into a County space and may or may not encounter a staff greeter who can help them connect with the appropriate County staff and resources. Self-service kiosks can help increase access for LOTE speakers in these situations by triaging their issues and pointing them to where they need to go when a greeter is not present. This would also reduce wait time by helping County visitors learn about the County service they need and informing them about they need to do get them.

Artificial Intelligence-Enabled Interpretation

The increased usage of artificial intelligence (AI) may soon lead to interpretation that matches the accuracy of a certified human interpreter. Here the challenge is to provide AI with machine learning models that draw from a broad enough data set. Plenty of data exist for translation between English and some languages spoken widely in the world. However, for AI to provide usable interpretation for a less widely spoken language, data would need to be generated between English and that language.

Related to this issue is the importance of glossaries of terms to help AI to learn. More accurate interpretations and translations can be made if there are specific technical terms and phrases that a department has already translated in a specific way. This is especially important when a phrase may have multiple translations depending on the context.

Social Media

Social media has upended the public communications model: No longer do most people receive news and information from traditional broadcast news outlets, but rather from social media channels. Social media apps, like WhatsApp, WeChat and Line, meet people where they are. Additionally, some linguistic communities gravitate towards specific apps. For example, Mandarin speakers tend to use WeChat.

Many immigrants access the internet through their mobile phones rather than desktop or laptop computers. Thus, social media apps allow users to quickly share information with each. The downside, of course, is that misinformation can be spread just as fast.

A linguistically inclusive and accessible strategy would be incomplete without consideration of the social media apps LOTE speakers use.

Recommendations for Appropriate Use of Technology

- C-1. The County should conduct market research and develop and implement guidelines for the effective use of chatbots.
- C-2. The County should work with ethnic media to identify the social media apps commonly used in their communities, and develop and implement strategies for how to effectively engage LOTE speakers in those apps.

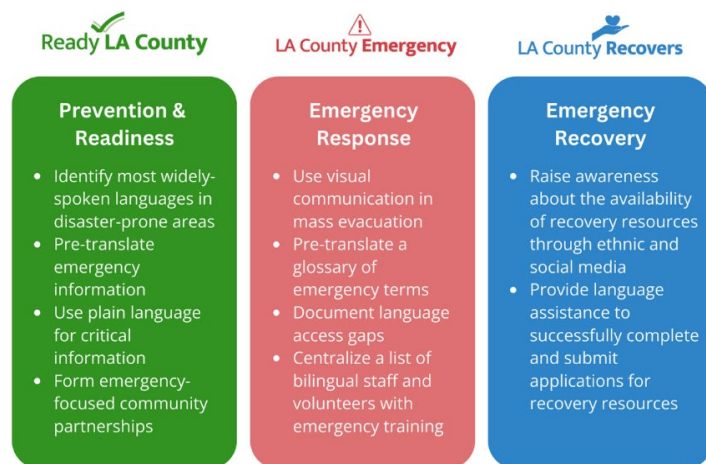
D. Language Access in Emergency and Rapid Response Situations

Public health emergencies like the COVID-19 and monkeypox pandemics, natural disasters like Hurricane Hillary, wildfires and the Montebello tornado, and public safety emergencies like the Monterey Park mass shooting underscore the importance of having in place protocols for the provision of language access in emergency settings.

Although not every possible scenario can be anticipated, in general, there are three stages of emergency preparedness and management in which the County must be prepared to provide language assistance:

1. Prevention & Readiness
2. Response
3. Recovery

Considerations for Language Access in Emergency Situations



Language Access in Prevention and Readiness

A tenet of emergency and disaster planning and response is to develop responses to the most likely scenarios and move resources into place in advance.

The first step in developing such proactive responses is conducting focused demographic analysis specifically of disaster-prone geographies to determine languages that should be prioritized for information translation. Many jurisdictions can identify areas that are

prone to wildfires, flooding or other natural disasters, and examine which languages are spoken in those areas. Once these languages are identified, a jurisdiction's emergency management office can then develop an emergency communications plan that addresses the language need in the most disaster-prone communities.

Critical information and alert texts can and should be pre-translated into at least Spanish in the County. Translations should be pre-vetted by community members to determine if they make sense to the communities receiving them. OEM has translated its Emergency Survival Guide¹³ into 14 different written languages. To make them more accessible, the titles of each of the guides should be written in the written script for each language, rather than in English as they currently are.

To ensure that messaging is consistent, a glossary of emergency terms would be helpful, which should also be translated into the priority languages determined by an OEM's demographic analysis and validated by community experts.

As is best practice in general for translated written materials, but especially for emergency information, critical information should be in plain language. For example, in the New York City Emergency Implementation Plan, outreach materials are encouraged to use the following plain language principles:

- Content is written in short sentences.
- Content is broken down with lists and headers.
- Content is written in the active voice.
- Content does not contain jargons.

In addition to pre-translating emergency communications content and using plain language principles, emergency communications should be organized in a manner that is intuitive for LOTE speakers. Many jurisdictions organize emergency communications by and across departments rather than centrally and according to topics, which may not be as intuitive for LOTE speakers unfamiliar with a jurisdiction's organization.

OEM organizes information related to emergency readiness, response, and recovery according to those three phases. Like many jurisdictions, OEM directs website visitors to a contracted service — in this case, 211LA — to connect visitors with other County and community-based services. As such, it would be important to make sure that 211LA meets the same quality standards that apply to OEM.

Forming community partnerships specifically for the dissemination of emergency information by trusted community messengers is a best practice employed by other jurisdictions. Many use ethnic and social media to communicate information and counter disinformation, which is crucially important. Some jurisdictions have also created partnerships with consulates.

¹³ <https://ready.lacounty.gov/emergency-survival-guide/>

One powerful example of an emergency-focused community partnership is [King County's Trusted Partners Network](#) in the Seattle-Tacoma area. In Washington State, RCW 38.52.070 directs local jurisdictions to make sure that emergency information be inclusive of the major linguistic communities within their jurisdiction. King County's Inclusive Emergency Communications Plan recognizes the role that community partners play as trusted sources of information. King County's Trusted Partner Network recruits volunteers from various linguistic communities who agree to sign up for emergency alerts, to be trained by the County's Office of Emergency Management to disseminate emergency information through their networks, and to participate in ongoing scenario trainings. This kind of partnership model is especially helpful in bridging gaps between a local jurisdiction and its diverse linguistic communities.

Language Access in Emergency Response

Even with advanced planning, language access can be challenging in emergency situations. As the [County's Operational Area Emergency Response Plan - Emergency Public Information Annex¹⁴](#) points out, two key assumptions made about the operational environment in which first responders and emergency personnel are operating in an emergency are that 1) communications infrastructure is compromised, and 2) misinformation and rumors spread quickly.

Therefore, there are three key pressure points in which language access is especially critical in emergency response situations:

- One-on-one communication between emergency personnel and community members
- The dissemination of emergency information
- Interagency coordination

One-on-one communication between emergency personnel and community members: Language access can mean the difference between life and death in a crisis. A LOTE speaker may not be able to communicate information about their physical well-being or an ongoing threat to public safety. They may not understand instructions communicated by law enforcement, leading to potential escalation of a situation. In the event of a fast-moving fire, mass shooting, or a tsunami, emergency personnel are trying to urgently communicate evacuation orders and may not stop to ask every individual if they require language assistance.

In mass evacuation situations, where the priority is to get as many people as possible to safety, using visual communication based on commonly-understood iconography can facilitate communicating emergency orders across languages. For example, the figure of a person running away from the symbol of a flame can be used to tell people that a wildfire evacuation is underway. Ideally, public education should be undertaken during non-crisis

¹⁴ L.A. County Office of Emergency Management, "Los Angeles County Operational Area Emergency Response Plan – Emergency Public Information Annex (Approved 12/8/2016)"

times to explain these icons so that people are not having to make sense of them in the middle of a crisis.

In non-evacuation scenarios, it is ideal to first identify a speaker's preferred language, which can be challenging when time is of the essence. "I Speak..." cards can be helpful: Emergency personnel can pull out a card with a list of languages in their native script, and the LOTE speaker would be encouraged to point to their preferred language.

Even if a speaker's preferred language is identified, the challenge then becomes connecting that speaker with an appropriate interpreter. Ideally, there would be trained bilingual emergency personnel who would be able to provide interpretation. Having emergency personnel who are both bilingual in a speaker's preferred language and are also formally trained to provide interpretation is not likely in most cases.

An alternative is to conduct interpretation remotely, either using video-based or telephonic interpretation. Though video-based interpretation is better for capturing non-verbal communication, in an emergency where communication infrastructure is likely non-functional, telephonic interpretation becomes an acceptable alternative.

In addition to the challenge of identifying preferred language and connecting a speaker with language services in that preferred language, it is important to consider cultural assumptions that might impact a LOTE speaker's understanding of an emergency. As Miguel Lugo, Latino Community Liaison for the City of Atlanta Police Department points out, many immigrants come from countries where the police force is federalized; as a result, LOTE speakers may not understand the concept of different jurisdictions when seeking assistance in an emergency.

Dissemination of emergency information: Widely disseminating accurate and up-to-date information during an emergency is critical for saving lives. Residents need to know where to go for emergency information, and emergency information needs to be pushed out across as many social networks as possible. Further, California State Assembly Bill 1638, authored by Mike Fong and signed into law by Governor Newsom on October 8, 2023, updates existing law on emergency response services:

"...[C]ommencing January 1, 2025, in the event of an emergency within the jurisdiction of a local agency, as defined, that provides emergency response services and that serves a population within which 5% or more of the people speak English less than "very well" according to American Community Survey data and jointly speak a language other than English, that the local agency provide information related to the emergency in English and in all languages spoken jointly by the 5% or more of the population that speaks English less than "very well." The bill would require local agencies to use data by January 1, 2025, as specified, to determine which languages are spoken jointly by 5% or more of the population in its jurisdiction and to reassess that data every 5 years."

The [LACounty.gov/emergency](https://www.lacounty.gov/emergency) website is translated into 13 of the most widely spoken languages in the County.

Residents can also sign up for the County’s emergency alert system, which is a free mass notification system for County residents and business owners.

Some of the most commonly used phrases used during an emergency can be pre-translated using a glossary of emergency terms.

However, it is better to send alerts in English, rather than using auto-translated messages, when messages translated by a certified human translator are unavailable. In a presentation to the Municipal Language Access Network, Kate Hutton (Communications Coordinator for the City of Seattle and formerly the Communications Coordinator for the City of Los Angeles’ Office of Emergency Management) gave the example of a Southern California county using machine translation to relay information about the 2017 Thomas Fire; “brush fire” was mistranslated with “brush” as “hairbrush.”

Regardless of whether pull methods (i.e., LOTE speakers are being drawn to a specific website or media channel for information), or push methods (i.e., broadcast communications to the broader public), are being considered, it is incumbent upon emergency public information planners to incorporate the language access lens into their checklists of tasks.

Interagency coordination: A key protocol during emergency response is interagency coordination: A designated agency takes responsibility for coordinating other agencies involved in emergency response to ensure clarity of roles, to facilitate a smooth information flow and to direct resources to where they are most needed.

In the County, OEM plays the role of coordinating agency in an emergency/disaster response. For example, during the beginning of the COVID-19 pandemic, OEM activated the Joint Information Center (JIC) per its emergency response protocols. The JIC coordinated across County departments and across jurisdictions to make sense of the unfolding public health crisis and to communicate information to the public.

FEMA has as a protocol in its federal disaster response documenting gaps in language access through *After Action Reviews*. Debriefing about a specific response is a regular practice in emergency management, and it makes sense that instances of failures to provide effective language access be recorded. This data can then be used to develop proactive responses for similar disaster responses in the future.

In its coordinating capacity, the JIC can also centralize and distribute needed resources. This might include centralizing a list of bilingual staff and volunteers who can be called upon to provide language services as needed. Ideally, such staff should be trained in the County’s emergency response protocols in order to be effective as on-call interpreters and translators.

Language Access in Emergency Recovery

The final phase of an emergency is recovery as residents and business owners need help connecting with loved ones, applying for financial assistance, and filing insurance claims.

The American Rescue Plan Act has a built-in equity lens that focuses on helping communities to build back better from the COVID-19 pandemic. The County has reinforced the importance of language accessibility to critical pandemic recovery resources, such as business recovery options and mortgage relief.

To ensure equitable access to recovery resources, two engagement points must be addressed for language access:

1. **Availability:** First, efforts must be made to raise awareness about disaster recovery resources. In the case of LOTE speakers, this means reaching out through ethnic and social media channels where specific linguistic communities are likely to receive their information. It also means using trusted community messengers to disseminate information about these opportunities.
2. **Application:** Even though a LOTE speaker might be eligible for recovery resources, it is likely the case that information and forms for applying for that resource as in English. Considerations that must be made to ensure that the application process is language accessible include:
 - a. Providing the application form and instructions in a LOTE speaker's language, whenever possible;
 - b. Connecting a LOTE speaker with bilingual staff or a community partner to help the speaker fill out the application; and
 - c. Considering the impact of cultural beliefs that may impact a LOTE speaker's application, e.g., mistrust for governmental institutions, fear that personal information might be used against a speaker in an immigration case, and discomfort in seeking any kind of aid.

Clearly, effective emergency recovery must include language accessibility as a factor for recovery efforts to not widen existing service gaps confronting LOTE speakers.

Recommendations for Language Access in Emergency Situations

- D-1. Whenever possible, use demographic analysis to assign bilingual first responders and emergency personnel to geographic areas where the language(s) they speak will be most likely needed.
- D-2. OEM should work with OIA to ensure that the language access lens has been applied to its emergency plans and protocols.
- D-3. Pilot an emergency response network comprised of trusted community messengers and ethnic media partners trained in the County's emergency response protocols.

- D-4. Conduct an audit of 211LA to ensure that it is accessible to LOTE speakers.
- D-5. Train emergency personnel in how to identify a LOTE speaker's preferred language and how to access the language services for that preferred language.
- D-6. Develop a glossary of emergency terms, pre-translate them into the languages prioritized by OEM, and validate these translations with community partners.
- D-7. Make sure OEM and other responding agencies include documentation of language assistance requests in their After Action Reviews following an emergency response.
- D-8. Train bilingual staff and volunteers in providing emergency language services.

E. Strengthening the County's Bilingual Bonus System

In a July 2022 survey of County departments that County Counsel conducted on behalf of OIA, one of the primary resources departments identified for providing language services is to utilize bilingual staff. Bilingual staff who complete an initial assessment qualify to receive a monthly pay bonus.

OIA's October 2022 report identified two barriers to the effective leveraging of County staff receiving a bilingual bonus: (1) training and certification, and (2) scope of work.

A successful countywide language access strategy depends on a County workforce that understands the fundamentals of language access. Raising the workforce's overall knowledge begins with providing training to all County staff on what language resources are available to their department and when and how to tap into them.

For bilingual staff to be considered trained and skilled in interpretation and/or translation, they must have at least completed formal training that covers the basics of language service provision and the ethics of providing language assistance. Additionally, some sectors may have more rigorous training requirements, e.g., HIPAA compliance training for bilingual healthcare workers.

Bilingual staff should also complete a standardized assessment of their skill level to ensure they meet the criteria laid out by their department to qualify for a bilingual bonus.

Regarding the scope of work, it is important to distinguish between two types of bilingual staff. First, there are County service providers who speak, read, or write in a language. Then, there are dual-role staff who have within their scope of work benefits/service provision and language services provision.

Like many jurisdictions that have bilingual bonuses, unions have negotiated this additional compensation with an eye on protecting the staff they represent: Unions want staff to be fully compensated for work they are doing, and they want staff to not do work outside of their job description and for which they are not being compensated. As a result, bilingual bonuses are negotiated in such a way that changes should not be made without coming

back to the negotiating table. Challenges come when staff are not regularly assessed or when they shift into a new role that has different language access requirements than the one in which they were originally assessed for a bilingual bonus.

Further, it is often difficult for an employee that has less positional power in the workplace to say no to a language service request from a superior, even if that employee is not formally trained. For example, a healthcare employee might be asked by a doctor to provide interpretation for a medical patient even though they have not had HIPAA compliance training. Or an untrained administrative employee who spends most of their time in the back office might be pulled to a public-facing service counter simply because they grew up speaking a language.

These challenges can be addressed by increasing the number of bilingual staff who are formally trained and certified to provide interpretation or translation services. But certifying bilingual staff who already receive bilingual bonuses can be tricky. In many jurisdictions, unions have pushed back because they perceive it as an effort to take away a negotiated employee benefit.

One way in which some jurisdictions have resolved this issue is to create tiered bonus categories that incentivize staff to pursue formal training.

Another solution is to clarify the grounds for recertifying an employee for the bilingual bonus. If an employee moves into a new role, then they should receive testing specific to their new role to ensure that they meet any regulatory requirements for language access. They should also be tested to make sure they still meet the department's criteria for receiving a bilingual bonus.

Also, policies and regulations are constantly changing so it is important to establish a regular recertification cadence that ensures that staff are still meeting the requirements for bilingual bonuses for their roles.

To this end, a best practice for recertifications for bilingual bonuses involves human resources departments that manage employee bonuses to regularly (i.e., annually) review the following:

- Is the department meeting the needs of the populations/communities it serves?
- Is language service provision within the scope of work for a particular job?
- Is the provision of language services in compliance with the regulations/policies that govern the specific sector?
- What licensing, training and certification requirements would ensure that a bilingual staff are qualified to provide language services within the department and their specific role?
- What are the qualifications for a bilingual employee who has demonstrated needed proficiency and training to receive a bilingual bonus in his or her specific role?

Ultimately, increasing the County's internal capacity to deliver consistent and effective language services rests on supporting bilingual staff to receive the formal training and certification they need to take on an interpreter or translator role.

Recommendations for Strengthening the Bilingual Bonus System

- E-1. Departments should provide regular training on the department's responsibility to provide language access, the departments available language access resources, and how to access such resources.
- E-2. Empower departments to provide consistent assessment of bilingual staff by requiring that they use vetted testing providers. Ideally, DHR, in partnership with OIA, should provide this list to every department.
- E-3. Departments should re-test staff on a regular basis to make sure they still meet the department's criteria for the bilingual bonus. Testing should be done either every three years or when an employee changes the role for which they were originally certified, whichever comes first.
- E-4. DHR should work with OIA to incorporate trainings on language access, cultural responsiveness, and applying the immigrant lens into the County workforce training academy.
- E-7. DHR, in consultation with OIA, should audit the County bilingual bonus system to identify recommendations to make it more responsive to the County's current and future language access needs. Recommendations should include whether:
 - There should be more stringent certification standards for employees who provide specialized translation/interpretation services (medical, legal, etc.);
 - The bilingual bonus compensation is competitive with market conditions;
 - There are opportunities to enhance the recognition of bilingual employees (Bilingual Employees Day, Board recognitions, etc.) to promote and value bilingualism in the County's workforce.
- E-5. Departments should work with OIA to help determine what strategies or supports are needed to implement changes intended to strengthen the bilingual bonus system.

F. Funding Language Access

To meet its legal obligations under the American Disabilities Act, a countywide language access strategy must include adequate funding and resources to ensure that accessibility requirements and aspirations are consistently fulfilled.

The County can enhance these efforts by focusing on these two strategies that advance a countywide language access strategy that supports departments in their language access efforts:

- Ensure departments maximize their current investments in language access; and
- Work with departments to secure additional resources to further strengthen their current capacity and performance as needed.

As part of the OIA-led interdepartmental language access planning process, departments should be guided through a process of applying the language access lens to current program design to ensure that investments in areas like community outreach and engagement and public communications consistently consider language access needs.

Cross-departmental collaboration will also enable the County to identify opportunities to secure new resources for the countywide language access strategy. Some of the opportunities identified by stakeholders include the following:

Centralizing Resources Under OIA

There are very few departments who have full-time staff whose sole responsibility is to serve as professional interpreters and translators.

Therefore, the County would benefit from recruiting and retaining professional interpreters and translators who could be a shared resource to County departments. After departments develop their respective lists of prioritized languages, a subset of languages would be selected for which OIA would secure trained interpreters and translators. The funds that departments might spend on outsourcing to a contractor could instead be invested in a shared pool of OIA interpreters and translators and language access resources.

Cross-Jurisdictional MOUs for Shared Language Resources

Just like how language access resources might be shared across departments, there is also the opportunity to pool resources across countywide jurisdictions. OIA is working closely with its counterparts in the City of Los Angeles and the City of Long Beach to advance language access. One opportunity for collaboration identified with these partners is for city language access programs to share the costs with the County of contracting with community language service providers. This makes a lot of sense when one considers that the County and city governments are tapping into the same pool of community partners for language services to often serve the same clients.

Federal, State, and Philanthropic Grant Opportunities

Grants for language accessibility are available at federal and state government levels, as well as with private foundations. In the last three years, especially in response to the pandemic, language access and community engagement grant opportunities were made available by federal agencies like the Centers for Disease Control and Prevention, U.S. Department of Health & Human Services, U.S. Department of Homeland Security, and U.S. Department of Justice. The California Department of Social Services and California

Governor’s Office of Business and Economic Development also provide opportunities to support local jurisdictions in areas like language accessibility. Philanthropic foundations also invest large amounts of money every year to advance equity in social justice. Strengthening language access is vital for them to realize their goals.

Recommendations for Funding Language Access

- F-1. Centralize language access resources under an online language access hub with resources for departments, partners, and stakeholders.
- F-2. OIA should work with departments to identify a list of priority languages for which OIA should build a Translators and Interpreters Corps that can be deployed to support departments as needed.
- F-3. Seek federal, state, and philanthropic grants to strengthen and sustain language access in the immediate and long-term.
- F-4. Negotiate and implement cross-jurisdictional memoranda of understanding between the County and its cities to enable them to contract with OIA to access OIA interpreters and translators and other language access resources.

Report Back on Directives from the March 7, 2023 Board Motion

OIA has made notable progress to lay the foundation for a sustainable countywide language access strategy. The table below provides a summary of activities OIA, in partnership with County and external partners, undertook between March 8, 2023, and December 31, 2023, to support the directives from the March 7, 2023, Board motion:

DIRECTIVE:	ACTIONS:
<p>1. <i>Adopt the recommendations in the Strengthening Language Access in County Services Report (Report) that OIA submitted to the Board of Supervisors on October 17, 2022.</i></p>	<p>Adopted by Board motion on March 7, 2023.</p>
<p>2. <i>Direct DCBA, in consultation with County Counsel, to prepare a Countywide Language Access Policy (Policy) that will demonstrate the County’s commitment to equitable access to language services for the Board’s consideration and adoption.</i></p>	<p>OIA worked with County Counsel to draft a countywide language access policy that focuses on every department completing their Departmental Language Access Plan (DLAP) by June 30, 2024.</p> <p>OIA is submitting the policy to the Board for approval in February 2024.</p>

<p>3. <i>Direct OIA to work with the departments of Public Social Services, Health Services, Children and Family Services, and other public-facing departments and offices to implement the Report's recommendations for which there is existing resources and funding.</i></p>	<p>OIA has provided feedback and support to impacted departments about their language access strategies. OIA has helped connect them with potential vendors that might meet their specific needs.</p> <p>OIA has also met with impacted departments in an informal working group that is focused on developing recommendations for quality standards for contracted language services. These standards will support all departments in vetting language service providers that will contribute to the broader vision of consistent, high-quality language access countywide.</p>
<p>4. <i>Direct the Chief Executive Officer (CEO) to work with OIA to identify and secure adequate bridge and sustainable funding and resources to implement the Report recommendations for which there are no current resources or funding, and report back to this Board on the status of this directive within 180 days.</i></p>	<p>Through its collaboration with ARDI, OIA is currently working on two pilot projects focused on creating more equitable access to American Rescue Plan (ARP) Act funded grant opportunities:</p> <ul style="list-style-type: none"> ■ Launching an online <i>language.lacounty.gov</i> hub that will centralize language access resources. ■ Coordinating language access office hours to provide in-language support and technical assistance in applying for ARP grant opportunities. <p>OIA will work with CEO to provide recommendations in the next report back to the board on what additional funding OIA will need to implement and sustain a countywide language access strategy.</p> <p>OIA will also work with individual departments to identify what resources they might need to implement their DLAPs.</p>
<p>5. <i>Designate OIA as the coordinating agency for a countywide language access system, focusing on these three priorities:</i></p> <ul style="list-style-type: none"> ■ <i>Providing technical assistance to County departments on their departmental language access plans, as recommended in the Report;</i> ■ <i>Coordinating language access training to complement training already conducted by County departments; and</i> ■ <i>Aligning relevant County systems and structures with County language access standards and requirements.</i> 	<p>The countywide language access policy that will be brought to the board confirms the role OIA plays in support of County departments in developing their language access plans.</p> <p>As mentioned in the update for directive #3, OIA continues to provide technical assistance to departments in the development of their language access strategies.</p>
<p>6. <i>Direct OIA to work with the CEO's Anti-Racism, Diversity & Inclusion (ARDI) Initiative to align language access strategic recommendations with ARDI efforts related to data collection and County workforce training in linguistically and culturally responsive service.</i></p>	<p>In addition to OIA's collaborations with ARDI to increase access to ARP-funded opportunities, OIA has finalized new collaboration with ARDI to pursue training and data collection opportunities that will focus on indigenous language speakers. This will enable OIA to extrapolate important lessons about how to serve the diversity of linguistic communities throughout the County.</p>

<p>7. <i>Direct OIA to establish an interdepartmental working group, composed of each public-facing department’s designated language access liaison, which will support sharing of resources and facilitate collaboration among departments.</i></p>	<p>OIA has developed a workplan for the interdepartmental working group that focuses on monthly meetings in which departments will be able to workshop a section of the DLAP template. The goal is for all departments to complete their DLAP by the end of the fiscal year 2023-24 through their participation in this working group.</p>
<p>8. <i>Direct OIA to build strategic partnerships with community-based organizations to expand the translation and interpretation services capacity available to the County.</i></p>	<p>OIA is working with impacted departments to compile a list of community language service providers. This directory will serve as a key resource for County departments looking for CBOs serving particular linguistic communities.</p> <p>OIA has also engaged grantees in the ARP-funded “Capacity-Building for Immigrant-Focused CBOs” grant program. They have provided valuable insight as part of the user research for the ARDI-funded online language access hub project.</p>
<p>9. <i>Delegate authority to the Director of DCBA to develop a bank of interpreter services and enter into master services agreements with organizations that provide translation and interpretation services, and make these master service agreements accessible to all County departments.</i></p>	<p>OIA is reviewing the Department of Public Health’s master services agreements to determine if it makes sense to partner on their master services agreements or to develop one specifically for DCBA. OIA will use data departments provide as part of the interdepartmental language access working group to determine if there are priority languages for which it makes more sense for DCBA to contract through its own master services agreement.</p>
<p>10. <i>Direct the CEO, in consultation with OIA and the Department of Human Resources, to create and establish language access for residents as a MAPP goal for public-facing County departments. OIA and DHR should develop key strategies, timelines, and appropriate measurements to for this MAPP goal, which should include recommendations for training, certification, and professional development for the County workforce to strengthen language access countywide.</i></p>	<p>CEO has included an FY 2023-24 MAPP goal for department heads that focuses on transforming some key departmental practices to support the countywide language access strategy.</p>
<p>11. <i>Direct the Internal Services Department (ISD) to work with OIA and impacted County departments to apply the immigrant lens and language access standards to County language services contracts, building on the work done through the Equity in Contracting initiative.</i></p>	<p>OIA provided feedback on and helped promote the new On-Demand Interpretation and Translation Services (ODITS), which will replace the current Language Interpretation Services Master Agreement (LISMA) in the fall of 2023. OIA promoted the opportunity to a list of over 200 community partners.</p> <p>If DCBA undertakes the creation of its own master services agreement per directive #9, it will structure the agreement to focus on the smallest community language services providers. This approach will create a bench of providers that complements the large, for-profit vendors selected as part of ISD’s master services agreement.</p>

Recommended Next Steps

This report aims to capture the progress made in the last 180 days towards implementing a countywide language access strategy. It also strives to examine the major County systems and structures that need to be addressed in the long term for a countywide language access strategy to be sustainable.

OIA will produce a follow-up report within 180 days of submitting this report that will build upon the recommendations outlined in this report and that will focus specifically on what OIA will need to sustain the countywide language access strategy. Specifically, the next OIA report will contain the following:

1. Status on departments' adoption of their individual Language Access Plans;
2. Recommendations on Countywide and departmental level threshold languages;
3. Staffing and budget recommendations for OIA to coordinate language access;
4. Resource and budget recommendations to support individual departments in adopting new processes and practices to align with the new countywide language access strategy; and
5. Policy recommendations to ensure the success and effectiveness of the countywide language access policy.

Appendix A: References & Resources

Equity in Contracting

- [Center for Nonprofit Management – Equity in Contracting Initiative](#)

Technology

- [American Translators Association, “ATA Position Paper on Machine Translation: A Clear Approach to a Complex Topic” \(August 14, 2018\)](#)
- [Digital.gov, “Introduction to translation technology”](#)
- [Judicial Council of California – Language Access Plan Implementation Task Force, “Technological Options for Providing and Sharing Court Language Access Services Outside the Courtroom \(January 2018\)](#)
- [Migration Policy Institute, “Communicating More for Less: Using Translation and Interpretation Technology to Serve Limited English Proficiency Individuals” \(2011\)](#)
- [National Center for State Courts, “The Future of Language Access in the State Courts”](#)

Emergency & Rapid Response

- [California Governor’s Office of Emergency Services, Communication](#)
- [DHHS, “Ensuring Language Access and Effective Communication During Response and Recovery: A Checklist for Emergency Responders.”](#)
- [FEMA Language Access Plan \(Updated 2020\)](#)
- [DOJ - Community Oriented Policing Services and Vera Institute of Justice, “Overcoming Language Barriers: Solutions for Law Enforcement”](#)
- [NYC Emergency Management Language Access Implementation Plan \(June 2021\)](#)