



LOS ANGELES COUNTY

# CONSUMER & BUSINESS AFFAIRS

Board of Supervisors

May 12, 2025

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**TO:** Supervisor Kathryn Barger, Chair  
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Director  
Rafael Carbajal

**FROM:** Rafael Carbajal  
Director

Chief of Staff  
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 Los Angeles 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 – Strengthening Language Access in Los Angeles County – 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 its October 17, 2022, report. Your Board also requested that OIA periodically report back with progress updates.

[On January 24, 2024, OIA submitted a report](#) on the progress it had made in implementing the Language Access Initiative in close collaboration with County departments and community partners.

The attached report outlines the additional progress OIA has made since its last report to your Board in implementing the countywide Language Access Initiative. It also contains recommended next steps and resource needs to successfully continue implementing your directives.



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## **I. Progress to Date:**

- **Adoption of a Countywide Language Access Policy (LA Policy):** In April 2024, your Board unanimously adopted a Countywide Language Access policy, setting minimum standards for consistent, high-quality language access across all County departments.
- **Creation of Departmental Language Access Plans (DLAPs):** OIA has provided technical assistance to all 39 County departments in developing their DLAPs. This includes individualized OIA and community reviewers' feedback to ensure that their service delivery aligns with community needs and with the LA Policy.
- **Language Access Working Group (LAWG):** OIA launched an LAWG in February 2024 that meets regularly. Comprised of representatives from each of the 39 County departments, the LAWG serves as a collaborative forum for departments to share best practices, resources, and address common challenges.
- **Language Access Complaint Form (LA Complaint Form):** OIA is supporting County departments in updating their websites to provide clear multilingual service information, including creating and posting a standardized LA Complaint Form for clients to report language access barriers to individual departments and OIA.
- **Training on the Language Access Policy (LA Policy):** OIA has ensured that all Language Access Liaisons completed required training on the LA Policy, the Internal Services Department's On-Demand Interpretation & Translation Services (ODITS), and language access reporting requirements.
- **Language Access Training Plans:** OIA assisted all County departments in completing and submitting to OIA their Departmental Language Access Training Plans, ensuring that their staff will be trained on identifying client language preferences, data tracking, and service procedures by April 30, 2025.

## **II. Next Steps:**

Over the next 18 to 24 months, OIA will focus on the following three strategic priority areas and plans to implement six key strategies to ensure a sustainable, consistent, and high-quality approach to language access across the County (see attached report for more detailed information about each of these items):

### **Priority Areas**

1. Implement Improvements
2. Sustain Improvements
3. Institutionalize Improvements

### **Six Core Strategies for Implementation**

1. Establish Minimum Language Access Standards
2. Partner with Community-Based Organizations for Service Delivery
3. Leverage Technology to Expand Access and Efficiency
4. Language Access in Emergency Preparedness and Response
5. Support and Empower Bilingual Staff
6. Build and Retain a Linguistically and Culturally Diverse Workforce

### **III. Resource Needs:**

*Expanding OIA's Capacity:* OIA needs to grow its existing capacity to deliver on the Board's commitment to provide equitable language access in services across all County departments. Currently, only a portion of one Program Manager's time and limited hours from a consultant are dedicated to this Countywide initiative, an insufficient level of staffing for the scale of support required. OIA recommends:

- Hiring three Administrative Services Managers (ASMs) to provide individualized language access support to County departments. Jurisdictions that have successfully implemented language access initiatives have several dedicated staff at this level, something OIA currently lacks.
- Establishing a dedicated OIA hotline and staff to support speakers of languages other than English navigating County services.
- Investing in language access technology, including translation management tools to streamline document translation across County departments, and creating a centralized multilingual resource hub to store available resources and make them readily available to County departments, partners, and residents.

*Strengthening Los Angeles County Departments' Capacity:* In addition to building OIA's internal capacity, the following recommendations support long-term departmental readiness and sustainability:

- Each County department should have its own dedicated language access manager.
- Provide County departments with resources for document translation.
- Incentivize language access innovations.
- County departments should apply a language access lens in all their initiatives.

We commend the Board's unwavering leadership in strengthening the County's language access to ensure that all our residents have equitable access to the vital services

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available to them. Ensuring that residents who speak languages other than English have equitable access to County services is more crucial now than ever.

If you have any questions concerning the attached report, please contact me or Rigoberto Reyes, OIA's Executive Director, at (213) 247-1365 or [rreyes@dcba.lacounty.org](mailto:rreyes@dcba.lacounty.org).

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DS:EV:ph

Attachment

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**A Roadmap for  
Sustaining Consistent,  
High-Quality Language  
Access Countywide**

Prepared by Michael Nobleza  
Equity & Belonging Strategy Consultant



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# Executive Summary

Language access is not just a matter of equity, it is essential for public safety, economic resilience, and effective delivery of government services. Los Angeles County (“County”) is home to one of the most linguistically diverse populations in the nation. Ensuring that all residents can access County services is critical to maintaining public trust, protecting lives in emergencies, and preventing inefficiencies that increase costs to taxpayers. Language access is foundational to the County’s vision of providing effective, compassionate, and fair service to all communities.

## Linguistically Marginalized

When speakers of Languages Other Than English (LOTE speakers) are intentionally or unintentionally unable to access resources and power and portrayed as less valuable, powerful or privileged than English speakers

Recent events, including ongoing wildfires, shifting federal policies, and economic disruptions, have underscored the urgency of a comprehensive and proactive language access strategy. Emergencies have shown that language barriers can delay response efforts, putting lives at risk. At the same time, businesses increasingly rely on a multilingual workforce; access to County resources in multiple languages supports economic stability, job access, and community resilience.

Meeting the needs of speakers of Languages Other Than English (LOTE speakers) not only advances equity for linguistically marginalized residents but also strengthens the County’s ability to deliver inclusive, high-quality service. This renewed focus on language access affirms the County’s commitment to fairness, opportunity, and resilience, and to building a healthier, safer, and more prosperous County for all.

Over the past two years, under the leadership of the Office of Immigrant Affairs (OIA), the County has laid the foundation for a new vision for consistent, high-quality language access. Key accomplishments include:

- OIA proposed a Countywide Language Access Policy that establishes a baseline or floor for language access standards across all County departments. The Policy was unanimously adopted by the Board in April 2024.
- OIA convened a Countywide **Language Access Working Group (LAWG)** bringing together all 39 County departments to share best practices, address common language access barriers, and explore opportunities for cross-departmental collaboration and resource-sharing.

- OIA implemented the first-ever Management Appraisal and Performance Program (MAPP) goals for language access. These goals were designed to support departments in focusing on key departmental systems and processes that will need to be addressed to improve language accessibility across the County.
- OIA provided tailored feedback to all 39 County departments on their **Departmental Language Access Plans (DLAPs), incorporating both internal review and community input. This approach ensured that DLAPs informed by community voice and addressed** the key language access barriers lifted by community stakeholders through listening sessions. These efforts aim to help departments streamline services, reduce inefficiencies, and expand equitable access.

As the County looks to full implementation of the countywide language access initiative, it will focus on the **six key strategies** listed below that will align key County systems and structures with its strategic vision for equitable and effective language access:

- A. Establish minimum standards for language access**
- B. Equity in contracting with community-based language service providers**
- C. Leverage technology to provide language assistance**
- D. Language access in emergency / rapid response situations**
- E. Empower bilingual County staff**
- F. Build a linguistically-diverse and representative County workforce**

A summary of these six key strategies and associated recommendations follows:

**A. Establish Minimum Standards for Language Access (Including Determining Countywide Threshold Languages)**

OIA should work with County departments to define what minimum standards look like for providing language access. This includes exploring the development of an implementable and enforceable policy that would address the most immediate and significant language access gap – figuring out and documenting the preferred written and spoken languages of every individual seeking access to County programs, services, and benefits.

**B. Equity in Contracting with Community-Based Language Service Providers**

County departments should have the flexibility to procure language assistance resources that best meet their functional needs, given their staffing and budget constraints. However, the County would do well to figure out how to support strategic partnerships



and ensure equitable contracting with community-based language service-providers, especially for languages that are less widely spoken. Equitable contracting should consider: (1) vendor recruitment and selection; (2) vendor utilization; and (3) contract administration.

### **C. Leverage Technology to Provide Language Assistance**

Technology can be a powerful tool that can enable effective language assistance when used in conjunction with human translators and interpreters. Three areas on which the County might focus to leverage technology to increase language access effectively are:

1. Website accessibility
2. Artificial Intelligence (AI)-Driven Document Translation
3. Translation Management

In the long term, the County should consider launching a Digital Services Initiative that would integrate conversations regarding language accessibility, disability accessibility, and generative AI under one directive to ensure that the County's digital engagement with the public is accessible and equitable.

In the near term, the County should build on its investment in launching the online language access hub developed by OIA, informed by insights from bilingual users in the community and funded by ARDI. This hub is designed as an entry point to the County programs, services, and benefits that would be of most interest to and for which LOTE speakers qualify. Dedicated staffing (at least a content manager) should be allocated to ensure that OIA can work with other departments to keep information on the hub up to date.

### **D. Language Access in Emergency / Rapid Response Situations**

Nowhere is language access more important than in emergency or disaster situations. Focusing on prevention is the most effective and inexpensive way to provide language assistance in rapid response situations. This includes translating the most common standard emergency messages ahead of time. It also includes training community navigators who can help disseminate critical information.

The one area on which the County might focus that would improve service for all County residents, not just LOTE speakers, is trauma-informed care. Training all County workers in the basics of trauma-informed language assistance will help them to be more linguistically and culturally responsive.

## **E. Empowering Bilingual County Staff**

The County's bilingual staff are the first resource departments can tap into to provide language assistance. To enable the County's 14,000+ bilingual staff to be effective language service providers on behalf of the County, there are two areas on which the County should focus:

1. Raising the standards for bilingual bonus certification
  2. Raising the proficiency of bilingual staff through training
- These two focus areas rely on the County developing a more consistent approach to assessing the language proficiency of County employees seeking a bilingual bonus. Ideally, County departments would utilize the Internal Services Department's (ISD) third-party vendors through their newly created On-Demand Interpretation & Translation Services (ODITS), specifically within the ODITS master services agreement category, for language proficiency assessments.

## **F. Build a Linguistically-Diverse and Representative County Workforce**

One of the strategic objectives articulated in the Countywide Language Access Policy is to build a County workforce that reflects the linguistic and cultural diversity of the County. Two ways that it might accomplish this objective are:

1. Raising awareness among bilingual staff about the role they play in realizing the County's commitment to effective linguistic and culturally-responsive service
2. Intentional recruitment from linguistically-marginalized communities

Designating a Bilingual Staff Day would help the OIA raise awareness within the County workforce about the important role that bilingual staff play in providing language access.

These six strategies provide a roadmap for how the County might build a sustainable countywide language access system.

There will be no shortage of new ideas and initiatives to address these six strategies. However, to effectively implement them, attention should be paid to how the countywide language access initiative is resourced, paying attention specifically to the following:

1. Building up the OIA's capacity to support departments in their language access efforts
2. Strengthening the capacity of County departments to deliver linguistically and culturally-responsive service

To build up the OIA's capacity as the coordinating agency for language access countywide, the following should be allocated to the OIA:

- Three positions in the Administrative Services Manager (ASM) Series to provide one-on-one technical assistance to the County's 39 departments, offices and commissions.
- A dedicated OIA phone line and staff to provide in-language support to navigate the County system.

County departments might be able to reduce the cost of providing language services by sharing costs in two specific areas: (1) the online language access hub, and (2) language access technology that all departments can use.

To strengthen the capacity of County departments to deliver linguistically and culturally-responsive service, the following should be considered:

- Each department should have its own dedicated language access manager
- Provide departments with funding for document translation
- Incentivize language access innovations
- Include language access in all report-backs
- Make sure federally-supported programs have their own designated language access coordinator

In the next 18 to 24 months, OIA will work with County departments on three specific phases of work:

1. **Implement improvements** to how language assistance is provided
2. **Sustain improvements** to how language assistance is provided
3. **Institutionalize improvements** to language access

# The Strategic Importance of Language Access in the County

The COVID-19 pandemic exposed the life-and-death consequences of failing to provide adequate and equitable language access. Yet, language barriers have historically hindered the County's ability to provide effective and caring service to an increasingly diverse population.

Language access cuts across all of the County's work and aligns with many of its strategic goals.

Increasing access for all County residents, especially for those from linguistically marginalized communities, has many touchpoints in the County's 2024-2030 Strategic Plan. It is directly related to the ***North Star 3 – Realizing tomorrow's government today; Focus Area Goal A: Communications and Public Access; Strategy 1: Customer Service***: applying the language access lens to the entire County's operations contributes to accessible and equitable services.

The County's efforts to promote language access were originally rooted in the Department of Consumer and Business Affairs' (DCBA) Office of Immigrant Affairs' (OIA) work to address immigration as a Board-directed priority. Community listening of over 100 community stakeholders conducted in support of OIA's Immigrant Protection and Advancement (IPAA) implementation plan affirmed that language access was the one issue that, if addressed, would have the broadest and most immediate impact on the region's 3.6 million immigrants.

Language access is also directly related to the Countywide Racial Equity Strategic Plan: addressing language barriers can be the difference for speakers of Languages Other Than English ("LOTE speakers") in accessing County programs and services that have the potential to significantly and positively impact their life-course outcomes. Language access aligns with all the Racial Equity Principles especially:

- ***Reduce Disparities***: Language access focuses on reducing racial disparities in life outcomes, as well as disparities in public investment to shape those outcomes.
- ***Effectively Support***: Language access is about developing and implementing strategies that identify, prioritize, and effectively support the most disadvantaged geographies and populations.
- ***Disaggregate Data***: Language access is about disaggregating data and analyzing data within racial/ethnic and other demographic subgroup categories.

Ultimately, language access isn't just about transposing information in one language into another; it's an orientation that is about linguistic and cultural responsiveness that meets every resident where they are at.

## Progress to Date on the Countywide Language Access Strategy

The goal of the countywide language access strategy is **consistent, high-quality language access**.

Over the course of just two years, OIA has led efforts that have elevated language access as a priority for the entire County:

- In January 2022, the Board unanimously adopted a board motion that declared the Board's commitment and intention to address language access.
- In October 2022, OIA submitted a report back to the Board that articulated the countywide language access strategy. This strategy was informed by community listening of over 80 community and County stakeholders as well as a landscape analysis of over 40 local, state and federal language access programs.
- In March 2023, the Board unanimously adopted the recommendations of the October 2022 report and designated OIA as the coordinating agency for language access countywide.
- In January 2024, OIA submitted a follow-up report to the Board that lifted up the key County systems and structures that would have to be addressed in order to align with the new countywide language access strategy.
- In February 2024, OIA launched the Language Access Working Group (LAWG), which has become a community of practice for department representatives in which they share best practices, resources and ideas for improving language access.
- In April 2024, the Board adopted the new Countywide Language Access Policy. The Policy established a new operational floor for the provision of consistent, high-quality language access by requiring departments to align with a new Departmental Language Access Plan (DLAP) template. This template addresses the key language barriers lifted up by community stakeholders.
- In fiscal year 2023-24, for the first time ever, Language Access was included as a requirement for Department heads' Management Appraisal and Performance Program (MAPP) goals. By June 30, 2024, all departments had to submit a complete draft DLAP to OIA for review. Almost all County departments successfully met that MAPP goal.

- OIA was able to secure its second Language Access Department Heads' Management Appraisal and Performance Program (MAPP) goals for fiscal year 2024-25. This fiscal year's MAPP goals are focused on key levers to support departments in implementing the countywide language access strategy

This report will lay out a roadmap for where the County should look in the future to sustain the momentum in advancing language access.

## Next Steps in Implementing the Countywide Strategy

The next 18 to 24 months will be critical in ensuring that this new trajectory is set for the County and that permanent changes can be enacted that contribute to more consistent, high-quality language access.

For OIA, the focus will be on the following:

### **Implement Improvements**

The Countywide Language Access Policy and the Departmental Language Access Policies provide a solid foundation and shared understanding of the County's new vision for language access. The focus will continue to be on supporting departments in removing language barriers for LOTE speakers and generating wins that help build confidence in their efforts. This includes:

- Assisting the 39 County departments, their offices, and commissions in delivering linguistically and culturally responsive service
- Supporting departments in completing their Fiscal Year 2024-2025 MAPP goal, which include the following actions:
  - All Departmental Language Access Liaisons complete required training on the Countywide Language Access Policy, ISD
  - On-Demand Interpretation & Translation Services (ODITS), and language access reporting requirements
  - Assisting County departments in identifying methods and best practices for identifying client language preferences, data tracking, and service procedures
  - Supporting departments in updating their public-facing language access information, including posting final Departmental Language Access Plans (DLAPs), Departmental Language Access Liaison contact details, and complaint submission processes

- Building the OIA's capacity to fulfill its role as the coordinating agency for countywide language access, and
- Leveraging vetted technologies to increase language accessibility.

## **Sustain Improvements**

A sustainable countywide language access effort has arguably been decades in the making. This makes it even more critical that the County and its departments build on their successes and reinforce confidence in the long-term viability of the strategic vision. This involves:

- Transforming the narrative around language access and the linguistically marginalized
- Continuing to build credibility in the OIA-coordinated effort through the Language Access Working Group and new technical assistance and training resources for departments, and
- Strengthening and deepening partnerships with community-based language service providers

## **Institutionalize Improvements**

OIA will continue to articulate the importance of applying the language access lens to County services and draw connections between new language access improvements and the County's strategic commitment to realizing tomorrow's government today. This involves evaluating and improving key County systems and practices and proposing new policies and initiatives to increase language access. This includes:

- Ensuring that the County and its departments have the dedicated resources to continually implement their language access strategies
- Working with the Board and County departments to develop and implement policies that make implemented changes permanent, and
- Continuing to increase the County workforce's linguistic and cultural competence.

## Countywide Language Access (2024-2026)

### Implement Improvements

- Assist Departments in delivering linguistically and culturally responsive service
- Build OIA capacity
- Leverage technology

### Sustain Improvements

- Transform the language access narrative
- Continue to build coordinated countywide strategy
- Strengthen community partnerships

### Institutionalize Improvements

- Ensure dedicated language access resources for Departments
- Develop and implement new policies
- Continue to increase County workforce's linguistic and cultural competence

## Long-Term Strategies for Sustainable Countywide Language Access

OIA is focused on embedding language access into County processes and building the infrastructure to support collaboration and resource-sharing across departments.

In the January 2024 report, OIA highlighted five strategies that need to be addressed to sustainably support consistent, high-quality language access countywide.

- A. Establish minimum standards for language access (including defining countywide threshold languages)
- B. Equity in contracting with community-based language service providers
- C. Leverage technology to provide language assistance
- D. Language access in emergency / rapid response situations
- E. Empower County staff (including through a strengthened bilingual bonus system)



In addition to the above, the following surfaced as an additional strategy that warrants more attention to guarantee increased language access:

#### F. Bilingual staff recruitment



#### A. Strategy #1: Establish minimum standards for language access

As mentioned in prior reports to the Board, threshold languages have been misapplied and used either to determine whether any language assistance is offered or to justify the lack of meaningful language assistance in less commonly spoken languages.

In its June 2024 policy brief, "[Next-Generation Strategies to Improve Language Access in Federally-Supported Language Access Programs](#)," the Migration Policy Institute (MPI) offered a recommendation to help clarify the issue of threshold languages. MPI reframed

threshold languages from the perspective of “baseline levels of compliance with language access requirements.”<sup>1</sup> Expanding baseline compliance should include “evidence of addressing language access obligations such as the existence and use of language service contracts or multilingual staff to meet service area needs, the development of language access procedures and/or plans, and the provision of public notice (such as signage or other public outreach) to inform communities of the availability of language assistance.”<sup>2</sup>

Of the DLAPs that have been submitted, the following languages are the ones the majority of County departments identified as being priority for their work:

- Spanish (100%)
- Mandarin (73%)
- Cantonese (61%)

It is clear that County departments’ language access strategies would benefit tremendously from more consistent documentation of clients’ preferred written and spoken languages. Per the Countywide Language Access Policy adopted by the Board in April of last year, the standard for all County departments should be for public-facing County staff to ask all residents, regardless of perceived English proficiency, to ascertain language preferences by asking, “In what language would you like assistance today?”

As stated in prior reports to the Board, as the frontline service providers to the public, each County department should have the flexibility to determine how best to meet the linguistic needs of their specific client population within their staffing and resource constraints.

This does not contradict the goal of establishing minimum standards for language access, including the identification of threshold languages that apply countywide. The OIA must continue to support County departments in being able to establish and raise the floor for how they meet their language access responsibilities.

## **Serving the Deaf and Hard of Hearing**

There are an estimated 800,000 Deaf and Hard of Hearing (DHH) individuals in the County – about seven percent of the County population. The Greater Los Angeles Agency on Deafness (GLAD), Inc. (which contributed to this report section) estimates that

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<sup>1</sup> Migration Policy Institute, [“Next-Generation Strategies to Improve Language Access in Federally-Supported Language Access Programs”](#) (June 2024), p. 15.

<sup>2</sup> Ibid, p. 15.

90 percent of DHH individuals come from homes where other family members do not know or use American Sign Language (ASL). The average reading level for the DHH community is the 5th grade level. This underscores the importance of using plain language in written materials provided by the County.

These challenges are worsened by the discrimination faced by the DHH community. Due to their English proficiency levels, DHH individuals experience neglect and discrimination from their hearing peers, including sometimes from their own family members. Deficit-based vocabulary like “hearing impaired” and “deaf and dumb/mute” reinforce stereotypes about the abilities of DHH individuals.

This dynamic contributes to a key challenge faced by DHH individuals when interacting with the County system: limited communication accessibility. DHH individuals are regularly told that their preferred communication method is not available. As has been the case with requests for spoken language interpretation, DHH individuals are often told that the burden of providing an interpreter falls on them, even though there are federal and state nondiscrimination laws, like the American Disabilities Act, which govern the provision of language assistance.

Advocates for the DHH community report many instances where County departments postpone and reschedule appointments with DHH individuals for weeks and sometimes months because they have not scheduled a Certified Deaf Interpreter (CDI) for the appointment or the scheduled interpreter does not show up for the appointment.

DHH clients have expressed challenges with some of the County’s sign language interpretation providers, including concerns about interpreter qualifications and community trust. Additionally, GLAD clients have shared that some departments were unable to provide sign language interpretation services due to vendor unavailability. To better meet the needs of the DHH community, departments should adopt multiple strategies to ensure consistent and accessible support for DHH community members.

The COVID-19 pandemic saw an overreliance on Video Remote Interpretation (VRI) to communicate with DHH individuals. In general, as has been explained in prior reports to the Board, language assistive technology is limited for those who are digitally-marginalized due to low-quality technology, lack of reliable internet connectivity, and technology skills proficiency. However, in the case of the DHH community, VRI can actually create more language barriers rather than bridging gaps: the VRI unit or the internet connection may be blurry, grainy and/or choppy. County personnel might deem the VRI connection “good enough,” but for signed language interpretation, whole words and context are getting lost because of poor resolution and connection.

To better serve DHH community members, the County should focus on three levers. These levers can be applied to spoken languages as well:

- Strengthening County staff engagement of DHH community members
- Increasing cultural awareness of the unique experiences of the DHH community
- Centralizing DHH interpretation services

### **Strengthening County Staff Engagement of DHH Community Members**

Just as it is best practice to ask a hearing individual in which language they would prefer to have assistance, DHH community members should be asked what method they prefer to have communication. Even if ASL is designated as a threshold language countywide, a Certified Deaf Interpreter may still be needed to address specific needs of a DHH individual, e.g., tactile interpretation for someone who is Deaf-Blind.

Given the discrimination and marginalization confronted by the DHH community, it is especially important that the County move towards making signed interpretation a regular feature of Board and other County public meetings. This will ensure that DHH community members can participate in the policy discussions that directly impact their lives.

### **Increasing Cultural Awareness of the Unique Experiences of the DHH Community**

Cultural awareness and sensitivity trainings focused on the DHH community should be completed by County staff on a regular basis. OIA, with support from ARDI, is developing a “Serving the Deaf Community” video training that will be uploaded to the Department of Human Resources (DHR) TalentWorks employee learning platform. This and other cultural trainings produced by OIA for the countywide language access initiative should be completed by all County staff.

GLAD has also extended an open invitation to Department staff who regularly interact with the public to visit the GLAD Center, see the services GLAD provides to DHH community members and meet with DHH GLAD staff to hear their first-hand experiences.

### **Centralizing DHH Interpretation Services**

As trusted community experts and messengers, GLAD should be one of the first resources departments consider reaching out to when developing their signed interpretation services strategy.

The District Attorney’s Office and the Department of Children and Family Services have dedicated Deaf Services Units, the County might consider exploring the development of a countywide Deaf Services Unit that might serve as a central resource for all departments.

In addition to a dedicated team that can provide linguistically and culturally-responsive services to DHH community members, creating a dedicated physical space in the County where DHH culturally-competent County staff and Certified Deaf Interpreters can be available to the public would go a long way in improving language accessibility for this community.

Such a County Center for Multilingual Services would be equipped with reliable video phones and strong internet connection to ensure the effectiveness of Video Remote Interpreting. It could be a space where interpreters of other languages might also work. It could also have workers who can provide assistance to the majority of County programs and services that DHH community members and immigrants might want to access.

### **Recommendations for Defining Countywide Threshold Languages**

- A-1. OIA should provide departments with clear minimum standards for language assistance for each section of the Departmental Language Access Plan template outlined in the Countywide Language Access Policy.
- A-2. OIA should form a community advisory committee to explore the feasibility of adopting a policy for countywide threshold languages. The scope of the policy might initially begin with the County's unincorporated areas.
- A-3. OIA should work with departments to develop an implementable policy requiring all County staff to identify and document preferred written and spoken languages for the public.
- A-4. OIA should assist members of the Deaf and Hard-of-Hearing community to be included in key County community advisory groups including the Language Access Community Consultation Group.
- A-5. OIA should work with CEO to explore the feasibility of establishing a dedicated physical space/s in which interpreters might be able to work with County workers to provide programs and benefits enrollment assistance in their preferred language.

## **B. Strategy #2: Equity in Contracting with Community-Based Language Service Providers**

ISD has taken great efforts to expand both the number and quality of vetted language service vendors into which County departments might tap. These qualified vendors have the ability to service upwards of 60 languages and are able to provide language assistance in a variety of the most common interactions with the LOTE-speaking public, including over-the-phone and video remote interpretation, in-person oral and signed interpretation, and document translation.

Community-based language service providers, who specialize in serving specific linguistic and cultural communities, play a key role in supporting language access in addition to ISD-vetted vendors. These community-based specialists come from the linguistic communities most impacted by the County's language access efforts. They are trusted communicators of information in their communities. They also tend to specialize in directly assisting, in language, LOTE speakers in accessing County benefits, programs and services. And yet, due to resource and time constraints, the staff of these community-based providers have not had the opportunity to complete formal interpretation certification training.

As County departments continue to explore how to access and build strategic partnerships with community-based language service providers, they should keep in mind the following considerations:

1. **Vendor Recruitment:** How are County departments reaching out to and contracting with community-based language specialists?
  - What eligibility criteria should we have for these community-based language specialists?
  - How might we actively reach out to prospective community-based language service providers to raise awareness about the opportunity to work with the County as registered vendors?
  - What role does community input play in vetting and selecting community-based language service providers for County contracts?
2. **Effective Utilization of Vendors:** How are we setting up community-based vendors for success?
  - What are the most common use cases for language assistance?
  - For which use cases are community-based vendors most appropriate?
  - What glossaries of technical terms might be provided to community-based vendors to ensure that validated and translated technical terms are consistently used?
3. **Contract Administration:** How might we reduce the burden to and increase the quality of language assistance provided by community-based vendors?
  - How might we ensure prompt and timely payment to community-based vendors?
  - How do we continue to ensure the quality of language service provision by community-based vendors?

- How might we support community-based vendors in improving the quality of their language service provision?

OIA is currently working with ISD to expand the current ODITS master services agreement to allow for community-based language specialists to become qualified ODITS vendors.

OIA is also currently implementing a Community Interpreter Pilot project aimed at increasing the capacity of immigrant-serving organizations to provide linguistically-and culturally-responsive services. Through American Rescue Plan Act funds invested by ARDI, this pilot will support select community-based language specialists in completing a formal interpretation certification training.

### **Recommendations for Equity in Contracting with Community-Based Language Service Providers**

- B-1. OIA should work with ISD to ensure the continued integration of community input in selecting ODITS language services vendors.
- B-2. OIA should develop a directory of vetted, community-based language specialists that all County departments can access.

## **C. Strategy #3: Leverage Technology**

Given the linguistic diversity across the County, even with qualified language service vendors, departments will confront situations in which using technology might help to facilitate language assistance.

The January 2024 report to the Board identified four types of technology that might be considered by departments in their language access strategies. However, through work with departments through the interdepartmental Language Access Working Group, OIA identified three additional technology areas that would have even more immediate and positive impact on language accessibility:

- Website accessibility
- Artificial Intelligence (AI)-Driven Document Translation
- Translation Management

## Website Accessibility

OIA has been working with [U.S. Digital Response](#) — which helps governments, nonprofits, and public entities respond quickly to critical public needs by activating highly-skilled talent and leveraging new technology — to utilize human-centered design to develop an online language access hub. This website would aggregate language access resources countywide and serve as a doorway through which speakers of Languages Other Than English (LOTE) might access the County system.

The USDR volunteers supporting OIA bring extensive expertise in software development, content strategy, design, user experience research and product design. Past volunteers include a content strategist who helped develop the content management system for a well-known, international fashion designer, manufacturer and retailer, and a website development consultant with decades of experience developing websites for U.S. federal government agencies.

As part of the development of this online language access hub, USDR volunteers conducted a landscape analysis of the County's 150+ websites. Their general assessment was that the vast majority of County websites need to do more to incorporate basic usability and accessibility principles into their design.

USDR volunteers have developed a language-first, mobile-optimized language access hub built on the following key principles:

### Content Design & Management

- **Use Plain Language:** Writing text for a 5<sup>th</sup> or 6<sup>th</sup>-grade reading level ensures that it is readable for the majority of the public. Further, plain language tends to lead to fewer words, and given that document translation costs are on a per-word basis, plain language is a cost-saving strategy for departments when conducting document translation.

In the past, the County conducted a countywide initiative to understand and promote plain language as a strategy for information accessibility. To build upon that effort, more attention can be placed on operationalizing plain language by providing departments with the policy guidance and the tools that will help them make plain language the default protocol for sharing information with the public.

- **Create Clear Calls to Action:** Most government websites use lots of technical text to explain background information about programs, benefits and services. However, users often just want to know what the next steps are they need to take to enroll in a government program or access a government service to address their issue. By creating clear calls to action and using plain language, constituents can more easily navigate complex government systems with a clear path of action.



- **Consider Long-Term Content Management:** The prototype design for the online language access hub assumes a “single door” point of entry that leads to a curated set of links to County programs, services and benefits for which LOTE speakers might qualify. To maintain over 100 different links, add links to new County programs and services, and oversee translation into different languages, staffing considerations should include both someone who can manage the content and someone who has the technical expertise to make changes to the website itself, especially as new translated sections are added.

### Visual Design

- **Make a Site Easy to Navigate:** Many County websites are organized based on their program logic models rather than what is intuitive for users. In particular, with regard to departments’ language access strategies, it is more often the case that it is difficult to find any information about language assistance on a department’s website. Department websites would benefit from direct feedback from constituents about how information is organized and how difficult it is for them to find the information for which they are searching.
- **Create a Visual Hierarchy:** Greater attention should be paid to font style (e.g., bold, italics, and font size) and where the most important information is located on a webpage. The bigger and bolder the font is, the more that style communicates the importance of that information.

### Technical Design

- **Optimize for Mobile:** There is considerable research now that underscores that digitally-marginalized communities, including LOTE speakers, rely on their mobile phones as a low-cost way of accessing the internet. As a result, websites should be designed with mobile optimization in mind.
- **Prioritize Accessibility Over Features:** mobile optimization is focusing more on accessibility than fancy features. Many off-the-shelf website development platforms rely on features like animation, video and scrolling/flash effects, to capture a user’s attention. However, such features often are not good for mobile phones. Even more, they are not good for those with visual accessibility needs.

Ultimately, the takeaway from applying a human-centered design approach to the development of the online language access hub is that **website accessibility is language accessibility**, and that the broader opportunity for the County is to develop a coordinated countywide strategy for digital services that looks at how digital engagement is leveraged to improve public services.

## **Challenge: County Websites and ISD Templates**

Many County websites are designed using ISD templates that do not conform to language access and disability access standards.

### **Key Issues:**

- ISD manages approximately 160 County websites, the majority of which lack a uniform approach to ensuring accessibility, including language access and disability accommodations.
- ISD charges a \$10,000 annual hosting and maintenance fee per website, resulting in at least \$1.6 million spent annually on websites that are inaccessible and for which departments receive public criticism.

## **AI-driven Document Translation**

On May 7, 2024, the Board adopted the motion on the “Development of Los Angeles County’s Artificial Intelligence Policy Framework,” recognizing the potential for the County to be more effective, transparent, innovative and equitable by strategically embracing artificial intelligence (AI). One of the ways this can happen is for generative artificial intelligence (“Gen AI”) to be leveraged to accelerate the translation of vital information for the public.

It is important to distinguish between machine translation and AI-driven translation. Machine translation, like Google Translate, typically generates translations based on individual words. Words are not considered within the context of their usage, and thus also lose any cultural nuance in translation. Machine translation typically does not learn from the source material from which it draws.

By contrast, AI-driven translation uses so-called Large Language Learning Models (LLMs). AI is trained using available information about a language and prior translated content. The more information that AI can be fed, the more comprehensive the knowledge base from which the LLM can draw. Engineers input prompts that direct the AI to perform a certain task, in this case, translate content from one language to another; this is called “prompt engineering.” The more precise the prompt, the more likely that the translation is accurate.

Google.org Fellows at USDR recently conducted research into generative AI in two use cases: benefits enrollment and document translation. What they discovered is that translations by human translators had the highest degree of accuracy, and they also discovered that AI-generated translations had a similar degree of accuracy to translations by humans. Machine translations had the least degree of accuracy, largely for the previously mentioned reasons.

Translations were created using ChatGPT and often were able to be completed with free accounts, meaning that translations were done at no cost.

The key principle the Fellows emphasized for the responsible use of AI is to always ensure human involvement in the process. In the case of document translation, this means that AI might be leveraged to accelerate the translation process while resources are invested in human translators to validate and refine the translations on the back end.

### **Translation Management**

One of the key challenges identified by County departments in their planning is tracking which versions of source information are translated into which languages. OIA is exploring how technology can be leveraged to automate this workflow and make it easier for County departments to stay on top of translation versions. Such a centralized solution will make it easier for OIA to work with County departments to make sure that translation versions are current. There are now enterprise-level translation management systems offered on the market which other public agencies, like the Government of Canada, have used effectively.

### **Recommendations for Leveraging Technology in Language Assistance**

- C-1. Ensure that OIA has sufficient staffing for the long-term maintenance of the online language access hub. At least, a content manager should be recruited whose primary responsibility is staying on top of the various links to other County webpages and adding links to new County programs and services when available.
- C-2. The CEO Countywide Communications team should convene a content council, comprised of department communications / public information staff to focus on developing and implementing a countywide plain language policy to set standards for all County communications with the public.
- C-3. OIA should work with such a content council to develop website accessibility best practices and standards to be applied to County websites.
- C-4. C-4. ISD should collaborate with OIA to create countywide guidance on accessible and inclusive website design. This guidance should include best practices for language and disability access compliance, drawing inspiration from existing federal Limited English Proficiency (LEP) guidance used during the pandemic.
- C-5. C-5. Departments should conduct accessibility assessments of their websites to ensure that they are optimized for disability and language accessibility considerations.
- C-6. C-6. Departments should have adequate budgets to conduct human validation of translated information.
- C-7. C-7. OIA should explore the feasibility of building a bench of translators under its guidance that can provide validation for other departments' translations.
- C-8. C-8. OIA should be included in the County's Generative AI Initiative to ensure the language access lens is included.
- C-9. C-9. The County should invest in translation management software, which would be managed by OIA, to help centralize and track translation of vital documents across the County.

- C-10. The County should consider launching a Digital Services Initiative that would integrate conversations regarding language accessibility, disability accessibility, and generative AI under one directive to ensure that the County's digital engagement with the public is accessible and equitable.

## D. Strategy #4: Language Access in Emergency / Rapid Response Situations

The January 2024 report back to the Board on "Improving Language Access in Los Angeles County" laid out a framework for how the language access lens might be applied across each phase of emergency / disaster management, from prevention and readiness to emergency response to recovery.

Three important considerations have risen to the surface since that report-back that might have a positive impact on the County's ability to provide effective language assistance in emergency / rapid response situations:

- Incorporating a trauma-informed lens to language assistance
- Emergency navigator training for ARP-funded community partners
- Using AI to translate emergency information

### **Incorporating a Trauma-Informed Lens to Language Assistance**

A key principle in trauma-informed care is to assume that any client is a survivor of trauma.<sup>3</sup> The likelihood that this assumption is true is high in the County, especially during emergencies, as LOTE speakers seek out County programs and services that they hope will address life challenges they are trying to navigate and resolve.

According to SAMHSA, a trauma-informed approach is when a program, organization, or system:

- Realizes the widespread impact of trauma and understands potential paths for recovery;
- Recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system;
- Responds by fully integrating knowledge about trauma into policies, procedures, and practices; and
- Seeks to actively resist re-traumatization.<sup>4</sup>

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<sup>3</sup> Pennsylvania Coalition Against Rape (PCAR), "[Trauma-informed Interpreting](#)" (2018), p. 2.

<sup>4</sup> The National Child Traumatic Stress Network, "[A Socio-Culturally, Linguistically-Responsive, and Trauma-Informed Approach to Mental Health Interpretation](#)" (2019), p. 20.

When this trauma-informed approach is applied to language assistance, it is important to see the role that bilingual staff and contracted service providers play not only as facilitators of communication but also as cultural mediators.<sup>5</sup> This includes having an understanding of and sensitivity to the cultural norms and nuances that impact how clients interact with the County system even in non-emergency situations. For example, a LOTE speaker might be seeking financial literacy resources may bring with them cultural taboos regarding personal finances, past interactions with banking systems, and viewpoints on the economy which can impact their comfort in seeking out County resources.

To ensure County staff integrate trauma-informed practices when they are providing language assistance, it is important to ensure that all staff have a general awareness of the importance of trauma-informed care. Bilingual staff might be further empowered through training on the principles and best practices of trauma-informed interpretation.

As part of the County's procurement process, it is recommended that prospective contracted language service providers should explain how they train their interpreters in trauma-informed care. This ensures that contracted staff are equipped to communicate effectively and sensitively with individuals who may have experienced trauma.

### **Emergency Navigator Training for ARP-Funded Community Partners**

The County has successfully leveraged American Rescue Plan Act funds to work with and strengthen the capacity of a broad and diverse array of community-based organizations. The result is a network of CBOs who can be tapped to partner with the County during emergency situations.

Building on the recommendation from the January 2024 report-back to pilot an emergency response network pilot, an initial step that the County can take immediately is to provide an emergency navigator training to ARP-funded community partners. Leveraging existing and funded partnerships will help increase the capacity of the County to disseminate emergency information through trained trusted messengers.

### **Using AI to Translate Emergency Information**

As the January 2024 report-back highlighted, California State Assembly Bill 1638 (M. Fong) mandates that, starting on January 1, 2025, local jurisdictions must translate emergency information into other languages when five percent or more of the population in that jurisdiction speak a language other than English.

Timely translation of emergency information is critical, from evacuation orders due to a natural disaster to shelter-in-place to other public safety orders. Much of this information, like text alerts and standard emergency language, can be translated ahead of time.

Generative AI can be used to translate this information with relatively low cost, and departments then can focus on human validation of the translation. Not only should

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<sup>5</sup> Certification Commission for Healthcare Interpreters, "[Trauma-Informed Interpreting Handouts](#)" (2023)

professional interpreters review the AI-generated translation; translations should also be vetted with members of the community for comprehension.

Department Emergency Coordinators should be able to help their departments translate emergency information ahead of time, which then reduces translation costs over time because they do not have to translate the same standard emergency language over and over again.

### **Recommendations for Language Access in Emergency / Rapid Response Situations**

- D-1. OIA should work with DHR to ensure that all County staff complete a “Basics of Trauma-Informed Care” training.
- D-2. OIA should work with ISD to explore how the ODITS master services agreement might include trauma-informed care as a minimum qualification for contracted language service providers.
- D-3. OIA should work with OEM and the Departmental Emergency Coordinators working group to develop a plan to translate the most common standard emergency language that can be translated ahead of time.
- D-4. Resources should be identified to support OIA working with OEM to develop an emergency navigator training that can be offered to ARP-funded community partners.

## **E. Strategy #5: Empower Bilingual County Staff**

As mentioned in the October 2022 report to the Board, in an initial survey of County departments, the default strategy departments employed to provide language assistance is to rely on their bilingual staff.

As part of their fiscal year 2023-2024 MAPP goals for language access, departments had to submit to the OIA a report of the staff who at the time, were receiving the bilingual bonus. OIA found that there are more than 14,000 bilingual County staff receiving a bonus. The vast majority of them are approved for Spanish. According to an OIA survey, a majority of bilingual employees has not had standardized formal interpretation or translation training. OIA estimates that at least \$8.5 million is invested each year in bilingual bonuses.

Given the scale of investments the County is already making in bilingual bonuses to provide the current level of language assistance, it is important to explore how these investments might be maximized to increase the quality of language provided by bilingual employees.

In the near term, OIA has identified two opportunities for improvement:

- Raise the standards for bilingual bonus certification
- Raise the proficiency of bilingual staff through training

### **Raising the Standards for Bilingual Bonus Certification**

Each County Department has its own process for certifying a County employee for the bilingual bonus:

- All County departments conduct a language proficiency assessment to determine that the employee candidate has the requisite reading, writing and/or speaking skills in their language.
- Once the employee candidate demonstrates language proficiency, the department typically approves them for a bonus based on the anticipated level of language assistance associated with their current job position.

Oftentimes, departments will rely on other bilingual employees within the department to conduct proficiency assessments. Although this helps to facilitate the bilingual bonus certification process, in effect, what is happening is untrained bilingual employees are assessing the language skills of other untrained bilingual employees.

While departments assess employees' reading, writing, or speaking proficiency to determine bonus eligibility, language proficiency alone does not guarantee that staff are equipped to interpret in professional settings. Interpretation requires formal training in ethics, techniques, and cultural competency—skills that most bilingual staff have not received. Strengthening this gap will ensure that the County's investment in bilingual bonuses delivers higher-quality language assistance.

Ideally, in the future, departments will have the necessary resources to outsource language proficiency assessments to qualified external vendors who specialize in conducting these assessments.

Also, as mentioned in the January 2024 report to the Board, a new standard should be established whereby departments more regularly re-certify staff for their bilingual bonuses every three years or when they have shifted into a new position with new language assistance requirements, whichever comes first.

### **Raising the Proficiency of Bilingual Staff Through Training**

In its new role as the coordinating entity for language access countywide, OIA has focused on coordinating two types of trainings to support departments:

1. General, knowledge-based trainings aimed at raising the overall language access proficiency and cultural awareness of the entire County workforce

## 2. Skills-based trainings specifically for County staff who receive a bilingual bonus

With support from ARDI, a modular training curriculum on the “Basics of Interpretation” is being developed specifically for bilingual County staff. This training will introduce staff to the standards, ethics, strategies and skills for effective oral interpretation. Ideally, all bilingual County staff should complete this training in order to improve their understanding of how to provide effective oral interpretation when called upon to do so.

### **Recommendations for Strengthening the County’s Bilingual Bonus System**

- E-1. The County should conduct an audit of the bilingual bonus system to understand the current deployment of these dollars and to make recommendations on how to better leverage bilingual bonuses towards improved language assistance.
- E-2. OIA should work with ISD to explore creating a vendor category in the ODITS master services agreement specifically for language proficiency assessments.
- E-3. OIA should work with a subgroup of the interdepartmental Language Access Working Group and the Department of Human Resources to develop standards and recommended procedures for departments on using third-party, professional language proficiency assessments.
- E-4. The County should adopt a policy requiring that future candidates for the bilingual bonus to complete the “Basics of Interpretation” training currently being developed by OIA before becoming eligible for certification and receiving the bonus.

## **F. Strategy #6: Build a Linguistically-Diverse and Representative Workforce**

The Countywide Language Access Policy articulates a strategic goal to have a County workforce that reflects the linguistic and cultural diversity of the County. This can be accomplished in two ways:

- Raising awareness among bilingual staff about the role they play in realizing the County’s commitment to effective linguistic and culturally-responsive service
- Intentional recruitment from linguistically-marginalized communities

As mentioned earlier in this report, more than 12 percent of the County workforce is approved for a bilingual bonus. However, the majority of County staff approved for a bilingual bonus are approved for Spanish, even though only a third of the County’s residents speak Spanish. The County should review its strategies so as to be more effective in its recruitment efforts to attract bilingual staff from other linguistic communities, especially the most linguistically-marginalized. This will contribute to building an increasingly diverse County workforce that better represents the region’s linguistic diversity.



## **Raising Awareness About the Role the County's Bilingual Staff Play**

Only 12 percent of the County workforce is approved for a bilingual bonus. The County should identify whether there are more County employees who have not applied to be certified for a bilingual bonus or who might not have enough spoken language proficiency to be approved for a bonus, but who have the skills to be useful for basic, non-technical interactions with the public.

To reach these staff, the County can engage in awareness-raising campaigns such as the ones in which the Department of Health Services has engaged. DHS has successfully implemented campaigns for its workforce that celebrate multilingualism and highlight the importance of linguistically and culturally-responsive service, e.g., DHS's Language Access Week proclaimed by the Board for September 24-30, 2023.

OIA could similarly advocate for a Bilingual Staff Day that could be used to raise awareness about the countywide language access effort. An award might even be given to a select bilingual County employee whose story of effective and caring service exemplifies the Board's commitment to consistent, high-quality language access.

Further, a language access conference might be hosted that brings together Departmental Language Access Liaisons and community-based language service providers. Such an event might help lift up the critical language barriers confronted by LOTE speakers and build connections between departments and community language specialists.

## **Intentional Recruitment from Linguistically Marginalized Communities**

Numerous efforts have been undertaken to build solid career pathways for members of systemically-marginalized communities to secure employment within the County.

The Community Interpreter pilot, in which OIA is currently engaged with support from ARDI, is one specific effort that has the potential to become a career pathway for prospective bilingual County employees. As of the time of writing this report, the pilot is on track to meet its goal to provide a 40-hour interpretation certification training to 40 qualifying bilingual community leaders. Not only does this training increase the capacity of partner immigrant-serving organizations but it also creates an opportunity for certified interpreters to serve as on-call interpreters with the County.

Further, the County has had much success leveraging fellowship models to pilot career pathway programs. From the Management Fellowship Program to the FUSE Corps Executive Fellowship Program to the Art and Culture Department's Cultural Strategist Program, fellowship programs have been effective vehicles for bringing in expertise from outside of the County. A fellowship model might be leveraged by select departments to determine how they might develop an in-house capacity to deliver language assistance, especially for languages of lesser diffusion.

## **Recommendations for Bilingual Staff Recruitment**

- F-1. The Board should designate a Bilingual Staff Day that OIA and DHR can leverage to raise awareness within the County workforce about the important role that bilingual staff play in providing language access.
- F-2. OIA and DHR should use the lessons learned from the Community Interpreter pilot to provide guidance on how a fellowship model might be developed to bring in community language service providers on a temporary basis.

## **Building Capacity for Sustainable Countywide Language Access**

County departments often worry about the cost of implementing the countywide language access initiative. They see language access as an added expense to already tight budgets. To help, OIA encourages departments to look at their budgets through a language access lens. By looking at budgets for existing activities, like community outreach and public communication, departments can find ways to leverage existing resources for language access needs.

Still, OIA views the resource needs for sustaining the countywide language access initiative on two levels:

- Building up the OIA's capacity to support departments in their language access efforts, and
- Strengthening the capacity of County departments to deliver linguistically and culturally-responsive service.

## **Building Up OIA Capacity to Support Departments' Language Access Efforts**

### **Staffing**

The most immediate resource constraint confronted by OIA is the lack of dedicated staffing for the countywide language access initiative. As mentioned in the August 20, 2024, report back to the Board on its "Supporting Immigrants in Los Angeles County" motion, currently, a portion of an OIA Program Manager's time and half of a DCBA-OIA consultant's time have been allocated to the OIA's countywide language access efforts.

The OIA studied language access programs in cities and counties like Boston, San Francisco, and Seattle. These cities have had language access policies for at least five years, with San Francisco's program starting in 2001.

Though each city handled budgeting and staffing differently, they shared some key strategies:

- Staff focused on providing one-on-one support to departments with their language access plans.
- Language access staff had similar tasks:
  - Offering technical help and creating resources for departments.
  - Ensuring enough resources for key languages.
  - Recommending new policies and ensuring departments follow local language access rules.
  - Developing tools to support departments' language access work.

For the County, there should be enough staff to provide each County department with specific technical help and training.

A full-time position is currently being considered to support the OIA in carrying out the county's language access strategy. This person will:

- Assist County departments in developing and improving their language access plans.
- Review laws, regulations, and policies that affect how the County implements its language access strategy, and
- Use language access data to recommend changes to policies, procedures, and practices that will help departments improve services for people with limited English skills.

### **Three Positions in the Administrative Services Manager (ASM) Series**

In addition to a Program Manager who can manage the overall strategy, OIA needs a team of specialists who can provide individualized technical assistance to a portfolio of County departments that are grouped together based on their level of interaction with the public (i.e., departments with regular interaction with the public, departments with occasional interactions with the public, and departments that are primarily internal facing to the County). Ideally, three specialists can each be responsible for working with 12-15 County departments.

This staffing structure can be complemented by contractors with specialized knowledge, such as:

- Expertise in working with specific populations (e.g., Deaf communities).
- Experience in specific sectors (e.g., emergency or rapid response).

- Knowledge of particular issues (e.g., using technology to improve language access).

MPI highlights the importance of this kind of expertise adding to staff capacity in their most recent policy brief.<sup>6</sup>

### **Dedicated OIA Phone Line and Staff to Provide In-Language County System Navigation Support**

Additionally, with the launch of the countywide language access initiative, OIA has seen an increase in requests for in-language assistance. This will likely increase with the launch of the online language access hub, which is currently designed to connect users to OIA if they need additional in-language system navigation support. OIA currently relies on DCBA's main phone line for LOTE speakers to connect with OIA staff. OIA would benefit from its own phone line so that LOTE speakers can connect directly with OIA staff without having to navigate DCBA's phone tree. Even more ideal is for OIA to be assigned a phone line and a staff member who would be dedicated to providing in-language assistance for each countywide threshold language.

### **Shared Costs with Departments**

#### **Shared Costs for the Online Language Access Hub**

The current design of the online language access hub relies on the concept of a one-stop shop for multilingual content. Information about 100+ different County programs and services for which immigrants are eligible is provided in one curated self-help page. Over 20 County departments have information about major programs and services they administer included on this page. Given that the online language access hub has the potential to be a primary entry point for LOTE speakers to connect with the County system, it would be beneficial to explore how these 20+ departments might share costs

with OIA in the in-language promotion of their respective programs and services. Such a strategy would match OIA's growing reputation as the County's "go-to" for in-language assistance with individual departments' need to reach different linguistic communities.

#### **Shared Costs for Language Access Technology**

There are key parts of the language assistance process, like staff language proficiency assessment, translation validation and translation version management, which all

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<sup>6</sup> Migration Policy Institute, pp. 17-18.

departments have to think about. Given many of these key processes are technology-oriented, OIA might take a lead in procuring software and services that might benefit all departments and for which departments might share the costs of usage.

## **Strengthen Departments' Capacity to Deliver Linguistically and Culturally-Responsive Service**

### **Each Department Should Have Its Own Dedicated Language Access Manager**

Having guided County departments through the interdepartmental Language Access Working Group (LAWG), what is clear to the OIA team is that most departments do not have a dedicated Departmental Language Access Liaison who can oversee the Department's Language Access efforts. In most cases, the staff members designated by the department to represent it in the LAWG are individuals who do not have the decision-making or fiduciary authority to impact the department's language access work. It is recommended that departments need to have dedicated staff whose responsibility is to support their equity efforts, including language access.

### **Provide Departments with Funding for Document Translation**

What is also clear from Departmental Language Access Plan drafts is that there is concern about significantly increased costs for translating departments' vital documents into each of their priority languages. While OIA explores strategies to centralize shared costs, including translation, departments need resources dedicated specifically for language services including translation.

### **Incentivize Language Access Innovations**

Individual departments are already developing innovative and creative approaches to providing language assistance with their existing resource constraints. The County might consider leveraging innovation funding as a way of incentivizing departments to develop new language access practices that other departments might adopt. This could include applying for grants with County entities such as the Quality and Productivity Commission's Productivity Investment Fund, as well as other external sources.

### **Include Language Access in all Report-Backs**

Per the recommendations of MPI policy brief on federally-supported language access programs<sup>7</sup>, the County might consider requiring language access be incorporated into all County program launches and report-backs moving forward. This would include addressing the following:

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<sup>7</sup> Ibid, pp. 10-13.

- How County programs assess language access need, including evidence that population-level data was considered as part of a demographic analysis
- Plans and procedures to provide language access
- Reporting on evidence that language access efforts are achieving their intended goals

### **Staff Federally-Supported Programs with their Own Designated Language Access Coordinator**

Additionally, many of the County programs and services most accessed by LOTE speakers, like SNAP and WIC, are federally-supported programs. The County should monitor that such federally-supported programs include any required language support.

## **Conclusion**

Moving forward, OIA will continue to provide regular updates to the Board on the countywide efforts. This includes the submission of an annual Countywide Language Access Report that will highlight the efforts of the County and individual departments to provide consistent, high-quality language access.

Ultimately, these collective efforts will transform how the County provides effective and caring services to speakers of Languages Other Than English and taps into the full potential of the region's cultural and linguistic diversity.