

# Breaking Barriers to the Ballot Box

*Expanding Language Access  
for California Voters*





## Acknowledgements

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# CONTENTS

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I.	Executive Summary .....	2
II.	Introduction to the California Language Access Workgroup .....	6
III.	Background .....	8
	A. The Voting Experiences of Californians With Limited English Proficiency .....	8
	B. Federal and State Elections Laws That Govern Language Access .....	10
	C. Importance of In-Language Election Materials .....	12
	D. Data Limitations for Identifying LEP Populations in California .....	13
IV.	Findings.....	15
	A. LEP Voters Are Not Getting the Assistance They Need to Cast a Ballot.....	15
	B. LEP Voters Receive Inconsistent Levels of Language Assistance .....	16
	C. Reference Ballots Are Not Meeting Voters’ Needs .....	18
	D. Vote-By-Mail Measures Do Not Account For California’s Language Diversity.....	19
	E. LEP Voters Know What They Need to Fully Participate in Elections .....	20
V.	Roadmap to California’s Multilingual Democracy.....	21
VI.	Our Approach .....	24
VII.	Conclusion.....	26



## I. EXECUTIVE SUMMARY

“Some don’t even vote at all even though they are eligible due to [language] barriers.”

—Californian in 2022 listening session with Arabic speakers

Our democracy is under real and urgent threat, from rampant disinformation and a surge in voter suppression legislation to politicians deliberately sowing distrust in election outcomes in order to maintain their own power. And while the state of California and counties in California have adopted various pro-democracy voting practices and procedures, reforms such as vote-by-mail ballots and ballot drop boxes are only beneficial if voters receive election materials in a language they understand. Any confusion can unintentionally disenfranchise voters, particularly low-income, immigrant voters who are “limited English proficient” (LEP).<sup>1</sup>

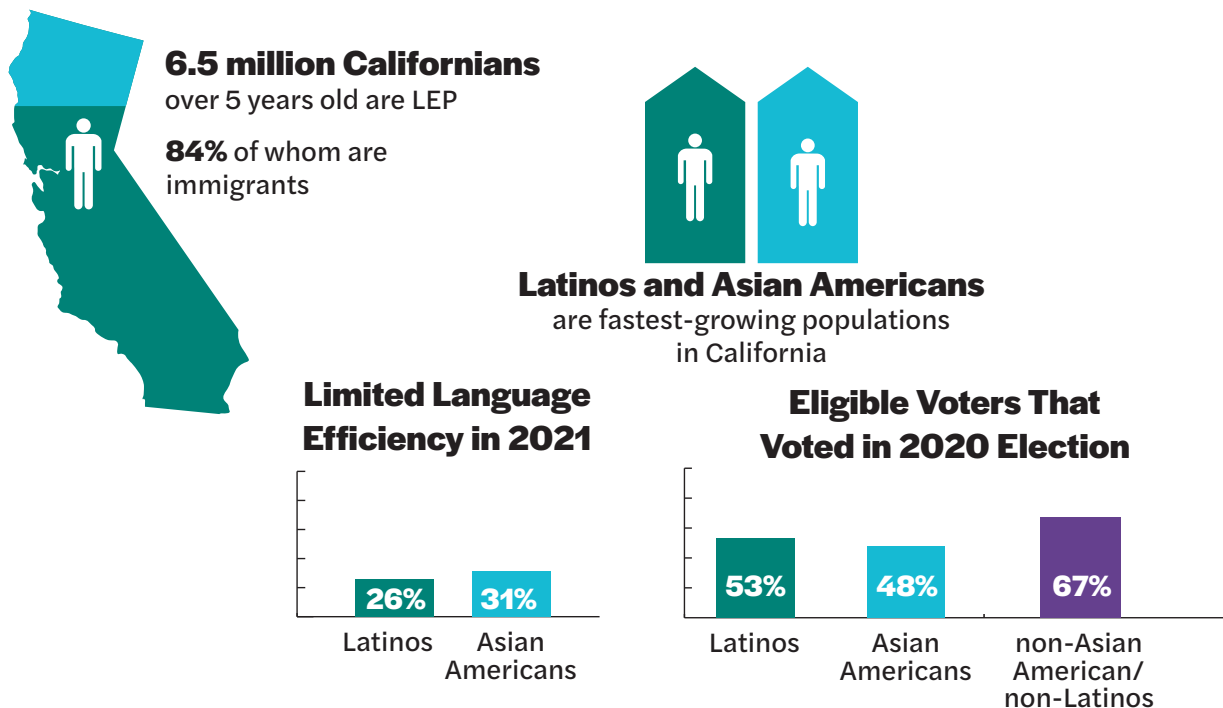
It has never been more important to bolster the foundational tenets of our democracy. Our democratic institutions are stronger when all voters have access to the polls and have confidence in and an understanding of the electoral process. Unfortunately, voters who are not fluent in English face unique hurdles to understanding the voting process and the content on their ballots. In listening sessions, LEP voters described many of the barriers to their participation. These barriers included lack of assistance in their specific language, having to rely on friends or family to provide translations, poor translation quality, difficulty using

<sup>1</sup> We recognize that the terms “limited English proficient” and “language assistance” are problematic because they are deficit oriented. We use the terms throughout this document, however, to avoid confusion given that the term is used in established frameworks for language services and are linked to long-standing civil rights protections.



translated reference ballots, and the information gap they face to understand what is on the ballot. All too often, language communities, particularly those in immigrant communities of color, are disenfranchised by policies or procedures that ignore their needs. Protecting and advancing their right to vote must be a priority. Without the full participation of California’s large multilingual electorate, our state cannot be a leader in the election sphere, and it cannot be said that California is a true, representative democracy. Moreover, as long as language barriers persist and LEP communities have difficulty raising their electoral voice, elected officials will not feel pressured to improve the lives of immigrant communities through forward thinking immigrant rights and racial equity policies.

According to the U.S. Census Bureau, California is home to 6.5 million individuals over 5 years old who are LEP, 84% of whom are immigrants. California’s two fastest-growing populations—Asian Americans and Latinos—are also the groups most likely to speak English less than very well and the least likely to vote. As of 2021, 26% of Latino residents and 31% of Asian residents have limited English proficiency.<sup>2</sup> Meanwhile, in California, just 48% of eligible Asian Americans and 53% of eligible Latinos turned out to vote in the November 2020 general election, compared to 67% of eligible non-Asian Americans and non-Latinos.<sup>3</sup> Language barriers are a key factor driving these disparities: Latinos and Asian Americans are more likely than all other voters to cite “difficulty with English” as the main reason for not registering to vote.<sup>4</sup> And we know that when robust language assistance is provided during elections, voter registration and turnout increases in these communities.<sup>5</sup>



2 2021 5-year American Community Survey Public Use Microdata Sample, U.S. Census Bureau.

3 *November 2020 General Election: Latino and Asian-American Vote*, USC Sol Price School of Public Policy (“PPIC”): Center for Inclusive Democracy (“CID”)(Mar. 2021), <https://bit.ly/3lRaBbR>.

4 United States Census Bureau, 2020 Current Population Survey Voting and Registration Supplements

5 See, for example, Bernard L. Fraga & Julie Lee Merseth, *Examining the Causal Impact of the Voting Rights Act Language Minority Provisions*, 1:1 J. of Race, Ethnicity, & Pol. 31 (2015).

As the demographics above suggest, California is a rich place of diversity, with immigrants from around the world. While the public sector has made strides to make the state a welcoming place for immigrants,<sup>6</sup> our democracy policies have failed to keep up. In California, federal and state language access provisions for elections are triggered when certain language groups meet specific population thresholds. While the language assistance required under federal law is comprehensive, the threshold of 5% or 10,000 adult citizens in a county that triggers these services is relatively high. The state language assistance threshold of 3% in a precinct is much lower but provides few services and very limited translated materials. This means LEP voters who

are not covered under federal law do not have sufficient language assistance and do not have equal access to the polls. Worse, some communities in California, including Middle Eastern and African immigrant communities, receive no language assistance in the voting process at all because they are not included under the federal or state language access laws.



## The California Language Access Workgroup

The California Language Access Workgroup (CA LA Workgroup), a collaboration of 12 civil rights and community organizations, has spent the last year organizing seven focus groups with language communities; researching existing language access policies and practices; training Californians on their voting and language rights; assisting community groups in nonpartisan voter outreach; and monitoring compliance with language access laws throughout the state. Beginning in 2021, the group embarked on a first-ever investigation into the most urgent barriers to vote for California's LEP voters and the most effective state and local mechanisms for removing those barriers. Through our work and investigation, we developed a roadmap that ensures all voters, regardless of their English language proficiency, can vote fairly and equally. The roadmap includes four overarching goals:

- **Build the nation's first multilingual election system by translating all election materials and expand the languages that receive assistance to serve more LEP voters.** The existing language assistance structure is failing many LEP voters and should be improved to ensure that any language group that reaches a statewide population threshold has access to election materials provided by the state and that any language group that reaches a county threshold has access to county created election materials.

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<sup>6</sup> See, e.g., Governor Newsom Signs Suite of Legislation to Support California's Immigrant Communities and Remove Outdated Term "Alien from State Codes, Office of Governor Newsom (Sep. 24, 2021) <https://bit.ly/42PxxAY>.





- **Set statewide standards to improve and expand the dissemination of in-language resources.** Once election officials translate the election materials, they must ensure the materials actually reach voters who need them and that poll workers are trained on properly displaying the materials.
- **Allocate public and private funding to community-based organizations (CBOs) and local elections offices so they can effectively and consistently help all Californians cast a ballot.** Outreach to LEP voters by trusted CBOs and government institutions helps combat misinformation and demystify the voting process. Resources must be provided to CBOs and counties for multilingual voter outreach.
- **Mandate reporting on county language access services and work with state officials to develop and implement language access law enforcement mechanisms.** In order to better understand whether local election officials are adequately providing language access services, counties should provide reports on basic information to the state, and the Secretary of State and Attorney General should develop processes to monitor and enforce compliance with language access laws in California.

This brief includes specific projects to achieve the vision outlined in the roadmap. They include advocacy for translated votable ballots, development of best practices for bilingual poll worker recruitment and training, and expanded language access at both the state and county levels. It also includes implementation after policy and best practice improvements are adopted.

For California to be a leader and build the nation's first truly inclusive and representative democracy, it must build the nation's first multilingual democracy.

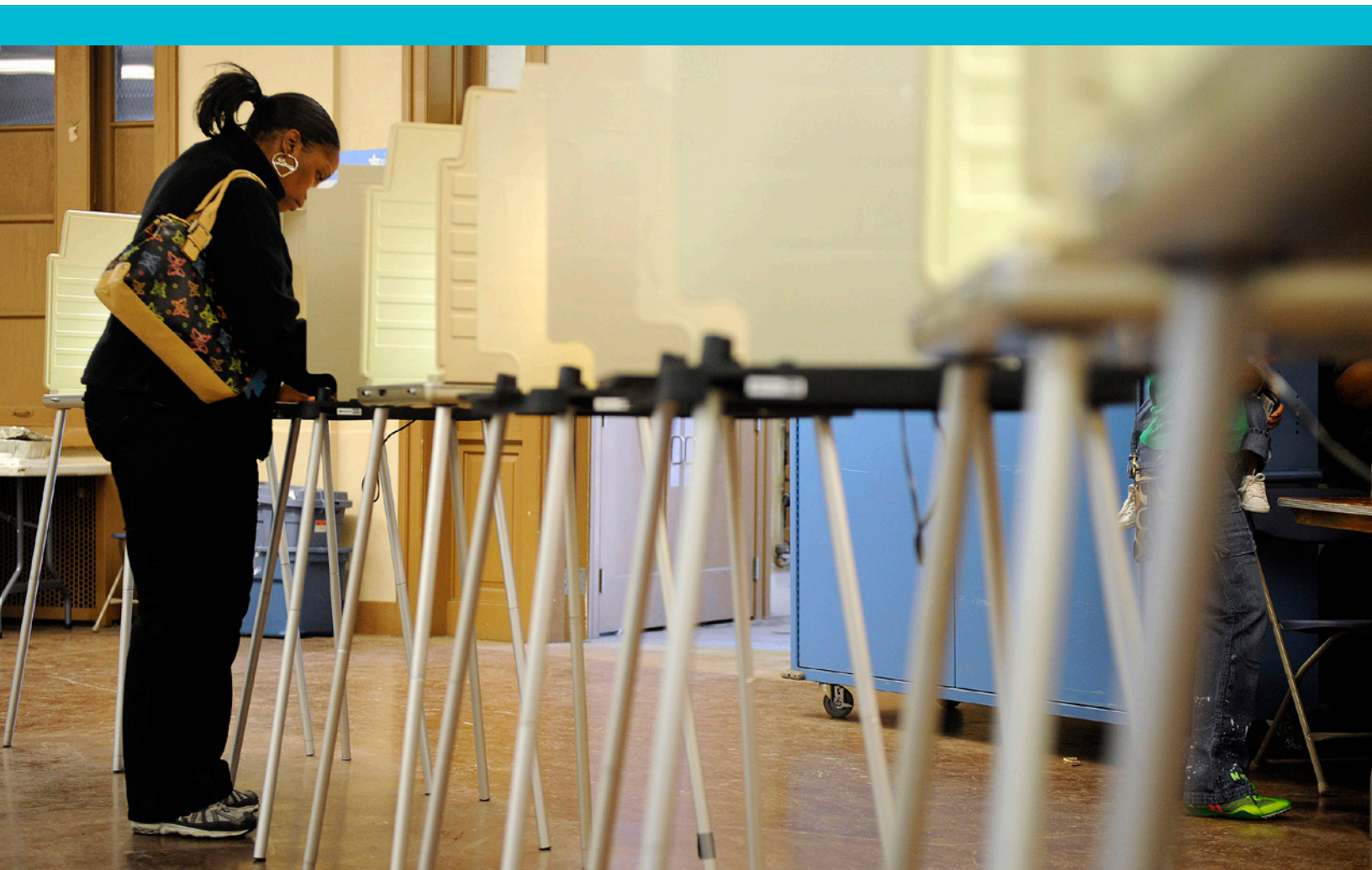


## II. INTRODUCTION TO THE CALIFORNIA LANGUAGE ACCESS WORKGROUP

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The California Language Access Workgroup (CA LA Workgroup) launched in fall 2021 with the vision that improving our language access laws and policies will strengthen our democracy by increasing electoral participation of LEP voters, most of whom are also immigrants and members of historically disenfranchised communities. This brief summarizes the CA LA Workgroup's findings to date and also provides an overview of California's LEP communities, the state and federal laws that govern language access, and a roadmap for funders, policymakers, and advocates to ensure that all LEP voters in California have equal access to the polls and full confidence in electoral processes.

The CA LA Workgroup represents the first time in recent history that voting rights advocates in California convened with a singular and specific focus on language access in elections. Previously, Workgroup members and other organizations have tackled these issues as part of broader election reform tables and coalitions. However, it became clear that the complex impact of recent election reforms on LEP communities are not well understood by elections officials and improvements to date have not addressed the needs of the full language diversity of California voters.



In its first year, the CA LA Workgroup engaged in the following priorities:

- Assess and expand coverage of existing state law requirements for language access;
- Review county language access practices, develop best practices, and monitor implementation, in a subset of counties, to ensure there is accountability of the law;
- Deepen knowledge of current language access by taking a national inventory of existing policies, practices, data, and research;
- Gain understanding of LEP voter experiences and need through community listening sessions; and
- Explore and research forward-looking policies to serve voters with limited English proficiency.

Throughout its work, the CA LA Workgroup maintained a culturally literate approach to understand the real needs of LEP voters. The group held seven listening sessions in 2022 with voters who use and speak Arabic, Chinese, Khmer, Korean, Somali, and Spanish. The group also interviewed experts, evaluated existing research, and conducted its own research to inform and support final recommendations and the roadmap.

The 12 organizations in the CA LA Workgroup have a depth of expertise, understanding, and connection to California's LEP residents. Together, the organizations have decades of outreach directly to LEP voters, and experience expanding language access to reach and support LEP voters. The group's work on these issues includes everything from providing direct community services, to serving on local language accessibility advisory committees, to securing policy improvements at the state and local levels.

### California Language Access Workgroup participants

Asian Americans Advancing Justice - Asian Law Caucus  
Asian Americans Advancing Justice Southern California  
AAPIs for Civic Empowerment Education Fund  
ACLU of Northern California  
ACLU of Southern California  
Chinese for Affirmative Action  
Council on American-Islamic Relations (CAIR)  
California Common Cause  
Coalition for Humane Immigrant Rights (CHIRLA)  
Mexican American Legal Defense and Educational Fund (MALDEF)  
NALEO Educational Fund  
Partnership for the Advancement of New Americans (PANA)

The CA LA Workgroup was convened with the support of the Evelyn and Walter Haas, Jr. Fund. The group was supported by project advisors, Mindy Romero, Center for Inclusive Democracy at USC Price School; Tammy Patrick, formerly of the Democracy Fund; and Astrid Ochoa, Ochoa Consulting Partners.



### III. BACKGROUND

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#### A. The Voting Experiences of Californians With Limited English Proficiency

**“They don’t have a voting guide in language, unless PANA provides them with one.”**

—2022 listening session with Somali speakers

**“I [voted] in-person, but didn’t get help. I didn’t even request [translated ballot] because I knew they didn’t have one.”**

—Californian in 2022 listening session with Korean speakers discussing if they’ve received language assistance from a poll worker

**“For the Khmer translation, I have to read it 2-3 times in order to understand.”**

—Californian in 2022 listening session with Khmer speakers discussing reference ballots

In 2022, the CA LA Workgroup conducted seven listening sessions with Californians who prefer to use one of six languages: Arabic, Chinese, Khmer, Korean, Somali, and Spanish. We wanted to understand their perspectives on reference ballots and the language assistance they need as voters.

In listening sessions, LEP voters described many barriers to their participation, including:

- Lack of assistance in their specific language;
- Relying on friends or family to provide translations;
- Poor quality translations;
- Difficulty using translated sample/reference ballots; and
- The information gap they faced to understand what was on the ballot.

LEP voters and the community groups that serve them often spend untold hours trying to get basic information on the voting process in the languages people use and prefer. Still, those efforts are often stymied by our current systems. For example, in 2022, PANA, a San Diego-based organization serving refugee communities offered to act as an interpreter for the county elections office’s voter information workshop. Instead, the registrar of voters hired an outside service to provide interpretation by phone. Unfortunately, that service did not live up to its promise. Workshop attendees who use Somali could not understand the interpretation because it was not in the dialect they speak. This missed opportunity to help Somali voters was critical: San Diego was transitioning from neighborhood precincts to countywide vote centers and the Somali voters were elderly, did not have the ability to access more or better information online, and could not receive voting materials in their language because Somali is not covered under current language access laws. While the registrar of voters had commendable intentions, the language assistance provided did not meet the needs of community members.

In the past decade, even as California’s election reforms have made it the gold standard for the U.S. voting experience, state and county practices, statutes, and regulations have failed to equally or fairly serve LEP voters. While these reforms are meant to make voting easier, LEP voters face new challenges due to dis-

Voters can only experience the benefit of these voting conveniences if they are aware and understand the voting process and if they receive election materials in the language they understand.



crepancies in voter education and discrepancies in the implementation of language assistance practices. For instance, California voters today can register to vote online, by mail upon requesting a form, or at the Department of Motor Vehicles, among other options. Additionally, in 2016 the state passed the Voter's Choice Act (VCA), a law that requires participating counties to send all voters a mail ballot, and in-person voting shifts from neighborhood-based assigned polling locations only available on Election Day, to a model where a much smaller number of locations, called vote centers, are available to any voter, regardless of where they reside, beginning 10 days before an election.

Later in 2021, the state made permanent the requirement that *all* counties mail voters a ballot ahead of an election. As a result of these reforms, voters can choose to return their ballot by mail, drop it off at a ballot box or voting location, or vote in person. Voters can also track their ballots via text or email and can fix problems with their vote-by-mail ballot after Election Day.

Voters can only experience the benefit of these voting conveniences, however, if they know and understand their options for registering to vote and voting and if they receive election materials in the language they understand. Disappointingly, amid all the recent improvements, California still does not require translation of critical election materials. Election observers have further highlighted that language access services at voting locations are inconsistent from county to county and even within the same county. In every listening session we held, LEP voters shared that they are often unaware of available resources or unaware that they have the right to language assistance. As California counties transition from precinct-based neighborhood polling places to mail ballots and vote centers,<sup>7</sup> we need to ensure that the state's LEP voters are not left out of the electoral process.

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7 Under the voter center model, any voter can go to any vote center in the county. They are not limited to their neighborhood polling place.

## B. Federal and State Elections Laws That Govern Language Access

For too long, California’s predominantly immigrant LEP voting population has faced discrimination and has been underserved. In 1894, voters in California approved a Constitutional requirement that all voters be able to read the Constitution and write their name in English. This shameful provision was struck down in 1970.<sup>8</sup> In its decision, the California Supreme Court recounted<sup>9</sup> how fear and hatred of immigrants played a key role in the passage of the English literacy test.<sup>10</sup> Not until 1975 did the federal government require language assistance during elections when it passed Section 203 of the federal Voting Rights Act (VRA). A year later, California enacted a statute requiring Spanish language sample ballots—ballots that can be used as a reference when filling out votable, English-language ballots. That statute was extended in 1982 to other language groups that met a specified population threshold.<sup>11</sup> However, until a 2019 court decision, every California Secretary of State improperly limited the state coverage only to languages that the federal government had identified for federal coverage.<sup>12</sup> In other words, until 2020, California election officials did not provide any legally required language assistance to many language groups.

Federal and state laws are meant to ensure that eligible voters can exercise their right to vote, regardless of English proficiency. Today, voting rights for language minority voters are protected primarily by Section 203 of the federal VRA and by California Elections Code Sections 14201 and 12303.

Section 203 of the VRA requires that counties provide election materials to specific “language minority” groups that meet specified population thresholds. By statute, Section 203 defines “language minority” to only include speakers of Spanish, Asian languages, Native American languages, and Alaskan Native languages. As of December 2021, federally covered languages in California include Chinese, Cambodian, Filipino/Tagalog, Korean, Vietnamese, and Spanish. The language minority group in a specific county must be more than 10,000 citizens of voting age or 5% of total voting age citizens, have low literacy rates, and not speak English very well. For federally covered languages, all election information provided in English must be provided in the covered language and counties must provide bilingual poll workers. The U.S. Census Bureau releases determinations every 5 years, and the next release will be in December 2026. See Appendix for a list of covered jurisdictions.

California Elections Code Section 14201 has a lower population threshold for language assistance coverage but requires only limited language services. Under Section 14201, the California Secretary of State must determine the voting precincts where 3% or more of the voting-age population are members of a “single language minority” and lack sufficient skills in English to vote without assistance. A court has limited the languages to the same categories found in Section 203: Spanish, Asian languages, Native American languages, and Native Alaskan languages. In precincts where this 3% threshold is met, the county must then provide translated sample ballots and translated instructions to voters. There is no requirement under state law to

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8 *Castro v. State of California*, 2 Cal.3d 223 (1970).

9 *Id.* at 231.

10 Starting with the Chinese Exclusion Act in 1882 until the passage of the Immigration and Nationality Act of 1952, various Asian immigrant categories were also prevented from voting by not being allowed to become citizens.

11 Cal. Elec. Code §14203 (passed in 1976, amended in 1982) replaced in 1994 by §14201.

12 See *Asian Americans Advancing Justice-LA et al. v. Padilla*, 41 Cal.App.5th 850 (2019). Prior to the court decision, the California Secretary of State limited a finding of need to languages covered by federal law in other parts of the state. In other words, if a language was not covered by Section 203 of the federal Voting Rights Act—which has a higher population threshold for coverage—in at least one county in California, the SOS did not find a need for coverage of the language even if it reached the state population threshold in another county. The appellate court found it improper to limit the finding to only languages covered by federal law in California but did not find a violation to limit coverage to the categories of language groups listed in the federal Voting Rights Act.

## CALIFORNIA LANGUAGE ACCESS TIMELINE

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- 1894** ● Californians passed a California Constitutional provision (added to article II, section 1) requiring that a voter be able to read the Constitution and write his or her name in the English language. Citizens who could not read English were prevented from registering to vote until the California Supreme Court struck down the provision in 1970 (*Castro v. State of California*).
- 1970** ● California Supreme Court strikes down the California Constitutional English literacy requirement for voting in *Castro v. State of California*.
- 1975** ● Congress passed Section 203 of the federal Voting Rights Act, which requires language assistance in **Spanish and Asian, Native American, and Native Alaskan languages**.
- 1976** ● California passed a language access statute that required the **statewide posting of sample ballots in Spanish**.
- 1982** ● California amended its language access statute **reducing the geographic scope** of Spanish coverage but **included additional languages**.
- 2019** ● *AAAJ v. Padilla*, an appellate court determined that California’s language access statute only applies to groups within the broader categories of “American Indian, Asian American, Alaskan Natives, or of Spanish heritage.” **It does not apply to Arabic, Somali, nor any other language not in one of the categories.**

translate materials related to the voter registration process, voter information guides, or votable ballots.<sup>13</sup>

Additionally, California Elections Code Section 12303 requires counties to make reasonable efforts to recruit bilingual poll workers for language communities that reach a certain threshold – 3% of Citizen Voting Age Population (CVAP) in a precinct. The California Secretary of State is required to make language determinations every four years. In its most recent determinations released in March 2022, the California

<sup>13</sup> Section 14201 also requires the California Secretary of State to find a need for the translated sample ballots if individuals or organizations provide information that gives the Secretary of State sufficient reason to believe a need exists. However, even though community groups have presented such information for different language groups, two Secretary of States have rejected requests to provide the language assistance.





Secretary of State identified 29 languages that were covered in specific precincts across the state.<sup>14</sup> See Appendix for a list of covered languages and jurisdictions.

### C. Importance of In-Language Election Materials

California has the nation's highest proportion of households that speak a language other than English at home. At 43.9%, this is more than double the national average of 21.5%. According to the latest American Community Survey (ACS), approximately 11.6% of California's citizen voting age population, or 2.94 million

Californians, speak English less than very well. For Latino and Asian American voters, language barriers remain a reason they do not register to vote.<sup>15</sup> And a 2015 study looking at states and counties nationwide found that language assistance significantly increases Latino voter registration rates and Asian American voter turnout.<sup>16</sup> In San Diego County, voter registration rose by more than 20% for Filipino Americans and by almost 40% for Vietnamese Americans when the county started providing translated voting materials and recruiting bilingual poll workers for those communities.<sup>17</sup> In addition to increasing voter participation, translated materials assist LEP voters in voting an informed ballot, and, thereby, combats disinformation. The needs and benefits are significant and the solutions are clear.

While California may have once been at the forefront of providing language access for elections, the state has not aligned language access with recent election reforms. Other states have already surpassed California by extending support to residents who use languages that are not covered under federal and California laws. For example, Oregon offers voter registration in Somali and Russian,<sup>18</sup> and county voter guides in Arabic, French, Portuguese, Russian, and Ukrainian.<sup>19</sup> Michigan also has gone beyond federal language access coverage<sup>20</sup> and offers voter registration forms in Arabic, Bengali, Dari, and French, and votable translated ballots in Arabic in two cities.<sup>21</sup> Additionally, other California agencies, including the Employment Development Department,<sup>22</sup> provide more language services than our election officials. California can and must do better.

14 Memorandum No. 22039 from Steve Reyes, Steve Counsel for the Secretary of State, to All County Clerks/Registrars of Voters (Mar. 1, 2022), <https://bit.ly/3kM3d9P>.

15 United States Census Bureau, 2020 Current Population Survey Voting and Registration Supplements.

16 Bernard L. Fraga & Julie Lee Merseeth, Examining the Causal Impact of the Voting Rights Act Language Minority Provisions, 1:1 J. of Race, Ethnicity, & Pol. 31 (2015).

17 Alberto R. Gonzales, U.S. Attorney General, Prepared Remarks at the Anniversary of the Voting Rights Act at the Lyndon B. Johnson Presidential Library in Austin, Texas (Aug. 2, 2005).

18 Oregon Online Voter Registration, Oregon Secretary of State Shemia Fagan, <http://bit.ly/3ZGo1ye>.

19 2022 State and County General Election Voters' Pamphlets, Oregon Secretary of State Shemia Fagan, <http://bit.ly/41Meesg>.

20 Voter Information, Michigan Department of State, <http://bit.ly/3yucvL7> (linking to translated voter registration applications).

21 Francis Kai-Hwa Wang, Why Arabic Ballots are Now Being Offered in Michigan and what this Means for Voter Access in the U.S., PBS NewsHour (Nov. 4, 2022), <http://bit.ly/3ZjDdlN>.

22 Last year, the California Employment Development Department reached a settlement that requires it to provide robust language access in connection with its unemployment insurance program. In particular, the EDD must: provide claimants with real-time spoken and signed language services in any language a claimant needs; translate all documents with vital information in the top 15 non-English languages used by Californians; and make online portals available in the top seven non-English languages.



## D. Data Limitations for Identifying LEP Populations in California

### Census Data

There is no official data source available to get a complete picture of LEP voting populations in California. Currently, the California Secretary of State relies on a special tabulation provided by the U.S. Census Bureau to make language coverage determinations.<sup>23</sup> This data has limitations for small populations and small geographies because the Census Bureau suppresses some data to protect the privacy of individuals by ensuring that third parties cannot identify characteristics of individuals using decennial census and ACS results. The Census Bureau's privacy practices, which have changed over the years, have real impacts in California. In December 2021, for example, the California Secretary of State dramatically reduced the number of language coverage determinations due to relying solely on the incomplete data from the Census Bureau,<sup>24</sup> thereby reversing years of increasing language access. Recognizing that this reduction in coverage did not represent a reduction in need, members of this group wrote to the Secretary of State and demanded that she use her discretionary authority to reinstate previous determinations. In March 2022 the Secretary of State partially reinstated its May 2020 language determinations.

**“ [P]ublicly available data from both the U.S. Census Bureau and the ACS had significant limitations that failed to adequately capture the criteria set forth under Section 14201.”**

—California Secretary of State acknowledging the shortfalls of its December 31, 2021 Language Determinations<sup>25</sup>

There are also limitations in the way populations are counted by the Census Bureau. For example, Middle Eastern and North African immigrants have historically been counted as White on the census, making it difficult to ascertain the true size of these populations and the languages they use.<sup>26</sup> Because the US Census uses race and ethnicity as a proxy in the census data to make determinations, it is imperative to identify reliable data sources for these populations in order to make the case for coverage.

California's voter registration file, for example, contains information from voters who have expressed a language preference in election forms like the voter registration form. This data, however, is not systematically collected and is therefore also incomplete.

### School Data

To ensure that we have a full picture of California's language populations, the Workgroup has been exploring additional data sources.

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23 The U.S. Census provides user-defined tabulations upon request. These special tabulations vary in size and scope. More information see U.S. Census, Population and Housing Unit Estimates Special Tabulation Program, <https://bit.ly/3Bim29f>.

24 Sameena Kamal, *Lost in Translation: How Many Languages for California Elections Ballots?*, CalMatters (Feb. 21, 2022), <http://bit.ly/41JOHlg>.

25 Memorandum No. 21221 from Steve Reyes, Chief Counsel for the Secretary of State, to All County Clerks/Registrars of Voters (Dec. 31, 2021), <https://bit.ly/3Y1bu28>.

26 The U.S. Census defines white as “A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.” See 2020 Census Frequently Asked Questions About Race and Ethnicity (Aug. 12, 2021). <https://bit.ly/41v4Oez>. (last accessed May 9, 2023).



For example, another LEP population data source comes from schools. School districts are incentivized to track and re-report the number of English language learners, but the data is available only at the state, county, and school site level—not at the electoral precinct level. School enrollment data does, however, provide some key in-sights about the need for language assistance. This data shows that there are over 100 languages spoken by English Learners (EL).<sup>27</sup> California currently requires limited language assistance in only 29 languages for elections. This means that as these students turn 18 and become eligible to vote, some of them will be missing out on critical language assistance necessary for them to participate effectively in our democracy.

Although accurate data and more research are needed to fully understand the diversity of California voters and LEP voters' experiences, we know from available data and discussions with LEP voters that there is an urgent need for more robust language assistance in California. No matter the data sources used, any state that uses precinct-based thresholds or coverage formulas, as California does, will continue to see data problems.

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27 English Learner Students by Language by Grade for 2021-22, California Department of Education <https://bit.ly/3kK6DtE> (last accessed Feb. 9, 2023).

## IV. FINDINGS

The CA LA workgroup arrived at four findings in the course of its work: 1) LEP voters are not getting the assistance they need to cast a ballot; 2) LEP voters receive inconsistent levels of language assistance; 3) reference ballots are not meeting the needs of language communities; and 4) recent vote-by-mail reforms did not adequately account for California’s language diversity.

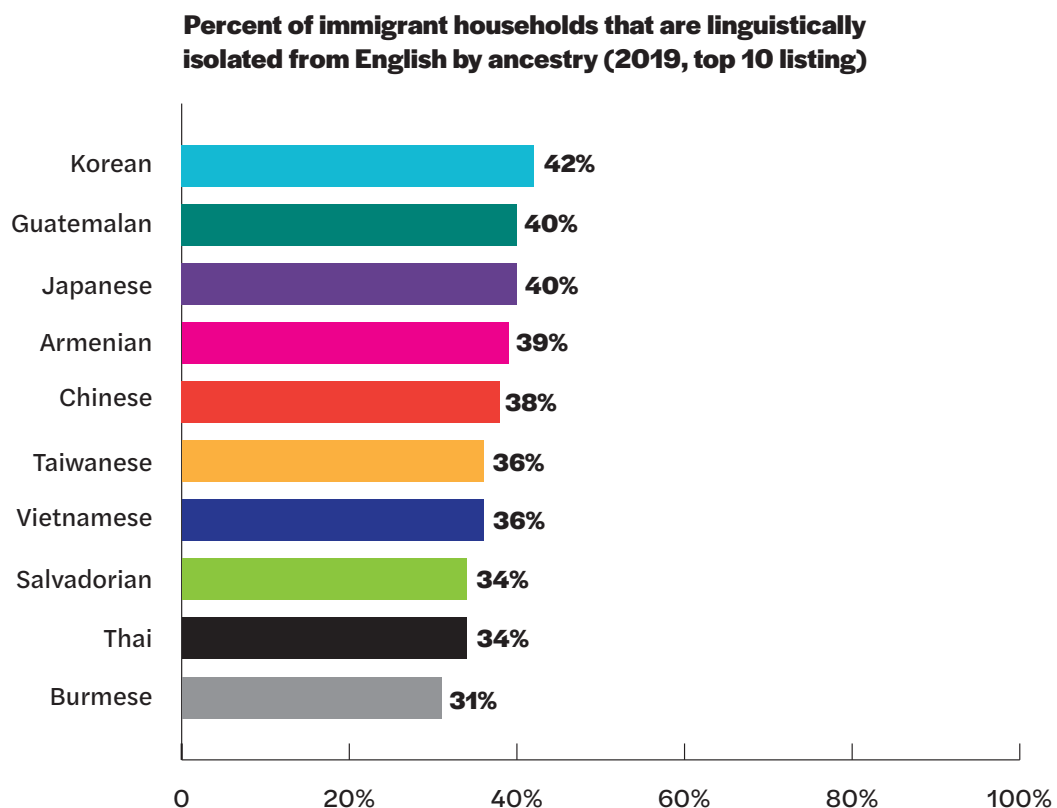
### A. LEP Voters Are Not Getting the Assistance They Need to Cast a Ballot

**“ I just asked for Korean [assistance] and if they say it’s not available, then I just ask a family member for help.”**

—Californian in 2022 listening session with Korean speakers discussing how they get election information.

Our listening sessions revealed that many LEP voters cannot access the assistance they need to cast a ballot. When they cannot get assistance from elections officials—either because the in-language assistance is not available or because voters are unaware that this assistance exists—LEP voters often rely on family members. However, family translations should not be a substitute for providing quality translations communities need to make informed decisions.

Moreover, many LEP voters cannot even rely on their family for assistance. As shown in the figure below, many LEP residents live in linguistically isolated households, or households that have no individuals 14 years of age or older who speak English very well, and it is well understood that linguistic isolation impacts







a person's ability to participate civically in their communities and to access information and services.<sup>28</sup> We expect that linguistically isolated households will continue to grow given that Californians who are 55 and older represent the state's fastest growing demographic, there are an estimated four million Californians in this age group who have limited English fluency,<sup>29</sup> and older adults are more likely to be single, live alone, and work longer.<sup>30</sup> California's changing demographics further underscores the need to strengthen state and county elections offices' services.

## B. LEP Voters Receive Inconsistent Levels of Language Assistance

LEP voters experience different levels of language assistance depending on where they live, what language they use, and what new election reforms apply to their county. For example, under the state's current language access threshold, communities concentrated in specific precincts are more likely to receive language assistance than language communities dispersed throughout a county. Currently, Korean LEP voters in Ventura County have no access to language services, even though 2018 data shows that 54 precincts in Ventura have homes in which LEP Korean speakers reside. In contrast, Korean voters in neighboring Santa Barbara County, which has 12 precincts covered for Korean under state law, receive language support simply because more Korean LEP individuals live in concentrated areas. Essentially, the current system most readily serves communities that are residentially segregated.

28 Linguistic Isolation, California Immigrant Data Portal (last access Feb. 9, 2023), <http://bit.ly/3mumYDa>.

29 California Senior Community Service Employment Program Stand-Alone State Plan, Program years 2020-2023 at 36, California Department of Aging (Mar. 20, 2020), <https://bit.ly/3lOwPLU>.

30 *Id.* at 5.f



As another example, voters who speak languages not included in the federal definition of a language minority group receive no services at all. This disproportionately affects voters who use African and Middle Eastern languages. In Los Angeles County, there are 659 precincts with Arabic speakers and 123 of these precincts meet California's population threshold. However, because Arabic is not covered under the federal and state law's limited definition of a "minority language," election offices are not mandated to provide election language services in Arabic. This contrasts with the experience in San Diego County where advocate-led efforts have resulted in translations of reference ballots in Arabic, despite having a smaller LEP population.

Finally, the VCA requires participating counties to send all voters a postcard ahead of elections so that voters can indicate their language preferences for election-related materials. As an example, when Los Angeles County sent postcards before the November 2020 election, 70,000 voters requested a ballot in a language other than English. This demonstrates the large need and demand to have services in language.





## C. Reference Ballots Are Not Meeting Voters' Needs

**“It’s too much to put everything in one [reference ballot], just keep one city’s elections, choices in one ballot.”**

—Californian in 2022 listening session with Chinese speakers reflecting on translated countywide reference ballots

**“Instead of having side-by-side Korean and English translated ballots, it’d be better to have just one Korean language ballot to meet our language needs and save our time.”**

— Californian in 2022 listening session with Korean speakers

As discussed above, under California’s language access statute, certain language groups are entitled to a reference ballot when they reach the 3% population threshold in a precinct. To access language assistance in covered precincts, LEP voters must know to look for the posted reference ballot and find it or ask for it. If voters are able to find the reference ballot, it is burdensome and often confusing to read through the translated document to understand each contest and then find the corresponding place to mark their choice on the English language votable ballot. That said, while they pale in comparison to votable ballots, listening session participants found some value in being able to access translated reference ballots.

The challenges of precinct-based thresholds are further complicated by the VCA. The VCA allows voters to vote anywhere in their county and requires that counties provide translated reference ballots for covered precincts. Despite these measures, LEP voters are having a different experience than voters who are fluent in English. For example, under the VCA, Alameda County must provide a Punjabi reference ballot for 65 of its precincts. If an Alameda County voter wants to find their Punjabi reference ballot at a vote center, they will have to seek a reference ballot and find the correct ballot type among the 65 provided. If that voter does not live in one of the 65 covered precincts, that hunt is ultimately pointless and negates the VCA’s main benefit for voters.

VCA implementation is also undermining county-level language assistance. San Bernardino County must provide reference ballots in six languages at all vote centers, which means the county provides hundreds of different reference ballots to each location. To make things less expensive, San Bernardino and other counties create translated composite booklets, which contain every ballot type for all covered precincts. In San Bernardino’s case, this booklet includes every contest in the county translated into the six required languages. However, the booklets are organized by elected office and do not match the format of the voter’s English-language ballot. To find a translated version of each race, a voter would have to individually search for their relevant school board, city council, county supervisor, and other contests. Not surprisingly, many participants across our listening sessions did not find translated composite ballots helpful. Instead, they recommended that counties provide them with a votable ballot in their language to allow them to vote in the same way as voters who use English.

For those voting by mail, election officials in counties that have not adopted the VCA are not required to inform voters that reference ballots are available through the mail. Voters who learn their precincts are covered can request a translated reference ballot be mailed to them, but some counties require voters to make this request before every election.

## D. Vote-By-Mail Measures Do Not Account For California’s Language Diversity

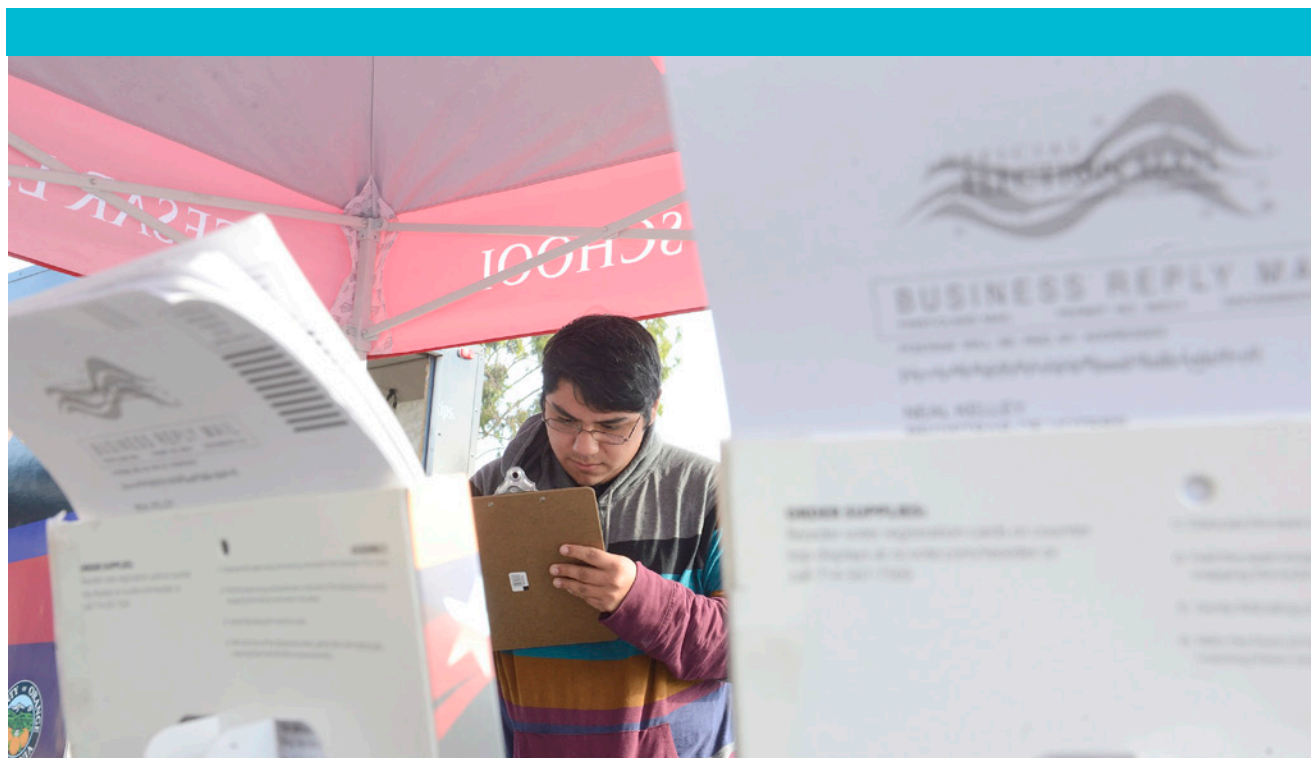
**“ Sometimes it’s hard to find the information available in my language about measures or candidates, especially education-related stuff—those are hard to understand.”**

—Californian in 2022 listening session with Korean speakers referring to obtaining information on how to vote

**“ We aren’t aware of any translated voting materials, but we need everything in Arabic in order to vote.”**

—Californian in 2022 listening session with Arabic speakers

Due to the pandemic, California expanded voting by mail. Today, every California voter automatically receives a ballot in the mail each election cycle and has different options on how to return the ballot. In 2022, 91% of voters who turned out cast a mail ballot during the primary and 87% of voters who turned out cast a mail ballot during the general election.<sup>31</sup> While most voters who are proficient in English can easily read instructions on how to vote, return their ballot, and find information about the contests on their ballot, LEP voters are often left in the dark. During the listening sessions, some LEP voters even expressed confusion at receiving an English ballot in the mail that they did not request. Others shared that they assumed the English ballot was a practice ballot and not their live ballot. One listening session participant who speaks Korean shared that they have received Chinese materials from time to time and have had to repeatedly request Korean materials.



31 Mail ballots can be returned by mail, at a drop box, or in-person at a polling place or vote center.

As the state continues to largely pivot to mail ballots, language access laws have fallen behind—some LEP voters will rely on the reference ballots made available at in-person voting sites, but most will not know that these resources are available. What’s more, in many counties, mailed translated information is often hidden inside dense English voter guides. In other counties, the instructions on how to request translated materials are only in English. LEP voters in our listening sessions shared that it is hard to understand how to vote under the new laws, how to know if translated materials are even available, and how to request a translated ballot or voter guide with enough time to review them and vote by Election Day.

Learning how to navigate government bureaucracy to request translated resources from home presents a new hurdle for LEP voters who are used to voting in-person and finding translated materials readily available on site.

## E. LEP Voters Know What They Need to Fully Participate in Elections

LEP voters in our listening sessions expressed that while the current lack of information leaves them feeling unsure or worried about making a wrong decision that could hurt their community, they see a clear path forward for California, including:

- providing multilingual assistance and education on how to register to vote and check their registration status;
- supporting their communities to be fully informed voters with deeper analysis of key issues and candidates and a full understanding of what is on their ballot; and
- enacting policies that enable them to be self-reliant voters who do not need to depend on family or friends to translate their election materials.

While California is currently falling behind states like Michigan<sup>32</sup> and Oregon,<sup>33</sup> there are signs of progress. Los Angeles and Madera counties have ballot-marking devices (BMDs) that provide votable ballots at poll sites for all languages covered by state law. LEP voters can select their preferred language and their ballot appears on a touchscreen in their language ready to mark. Advances in voting technology have also made it possible for many counties to print paper ballots in preferred languages on demand.

Despite the challenges LEP voters face, their perseverance in casting a ballot each election cycle is testament to their desire to fully participate in California’s democracy. By embracing the full extent of existing technology and implementing a roadmap that celebrates the full diversity of California, we can build a multiracial democracy that respects and honors the choices of every voter, no matter what language they use.

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32 Michigan offers language support to languages not covered by Federal and California law. Michigan provides voter registration forms in ten languages: Arabic, Bengali, Spanish, Chinese, Dari, Amharic, Pashto, Somali, French, Korean, Vietnamese, Russian, and offers in-language votable ballots in Arabic.

33 Oregon currently offers voter registration in Spanish, Chinese, Vietnamese, Somali and Russian, and provides voter information guides in 14 additional languages: Arabic, Chinese, French, German, Japanese, Korean, Marshallese, Portuguese, Russian, Spanish, Tagalog, Thai, Ukrainian, and Vietnamese.



## V. ROADMAP TO CALIFORNIA'S MULTILINGUAL DEMOCRACY

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CA LA Workgroup listening sessions confirmed that LEP voters want to fully engage in California elections, and are blocked from that goal by inadequate state and federal laws and by inconsistent and under-resourced implementation of those laws. Across listening sessions, we learned that voters want quality translations to understand the voting process, in-language information about what is on the ballot, and in-language votable ballots. Current language access requirements, however, provide inadequate and spotty coverage and leave out many Californians. To address gaps and barriers identified by LEP voters and the CA LA Workgroup, Workgroup organizations will work on four critical goals.

Over the next five years, Workgroup member organizations will introduce legislation, advocate for policy changes at the local and state agency level, and collaborate with CBOs and local and state elections officials to make these goals a reality. These detailed strategies are discussed in the next section of this report. Making these goals a reality will not only ensure that LEP voters have the information and resources they need to successfully cast ballots, but will also make California a leader and an example in creating an inclusive representative democracy.

→ **Translate all election materials and expand the languages that receive assistance to serve more LEP voters**, including voters who belong to language groups that are small but growing in numbers. LEP voters deserve the same assistance, information, and voting materials offered to every voter in their county and in the state, but many LEP voters are left out of the democratic process under existing language access laws. To address this problem, state law should provide coverage to *all* language groups that meet established population thresholds.

At the state level, the state should translate and disseminate all information and materials into languages spoken by 20,000 or more voting age LEP Californians. If implemented today, this requirement would cover 16 languages and reach more than five million LEP residents. If a language is covered, all



essential materials would be in-language, posted online, and accessible through language hotlines. Essential materials include the voter registration form, voting and elections notices, and the state voter information guide. Any voter with a documented preference for a covered language would receive the state voter information guide and all notices in-language. This reform is feasible because the Secretary of State already sends voter information guides to every voter, already translates key information into nine languages, some of which is evergreen from election to election, and already makes available a multilingual hotline to elections officials.

At the county level, California should supplement existing coverage with coverage that looks at the population at the county level. Under this framework, if there are over 1,000 voting age LEP citizens within a county that speak a particular language, the county would have to provide the same level of language assistance required for languages covered under federal law, including votable ballots. Voters would also receive translated county election materials and in-language services, including through hotlines, elections websites, and bilingual poll worker assistance. Supplementing coverage at the precinct-level with countywide coverage means that LEP voters will have more consistent access to the ballot, will have a more equitable voting experience, and will not have to decode their ballot with a confusing reference ballot.



- **Set statewide standards to improve and expand the dissemination of in-language resources.** Translated materials and in-language assistance are only useful if they reach voters. Elections officials must design all election communications and services with LEP voters in mind, including by prominently flagging in-language information at all touch points between elections offices and voters, publicizing in-language services, and making it easy for voters to request translated materials. State and county elections officials must work together to train poll workers to provide culturally competent services, understand what translations and language assistance is available to voters, and respect the needs of LEP voters. This should be done by setting statewide standards for training specifically on language access and that require elections officials to follow best practices for the dissemination of in-language resources. Live interpretation at elections offices and polling locations must also be available to all voters through bilingual poll workers, video-based interpretation, and telephone hotlines.
- **Allocate public and private funding to CBOs and local elections offices so they can effectively and consistently help all Californians cast a ballot.** Outreach to LEP voters from CBOs and trusted government institutions helps to demystify and normalize the process of voting and combat misinformation. A 2020 study conducted by the Center for Inclusive Democracy showed that more voters in VCA counties, which have more robust outreach requirements than non-VCA counties, knew about voting changes in 2020 compared to voters in non-VCA counties. Unsurprisingly, VCA counties have reported that collaborating with CBOs could help improve outreach to underrepresented communities, including LEP voters<sup>34</sup> California must invest in partnerships with CBOs that are trusted by LEP communities

34 Mindy Romero & Barbara Chami, *2020 General Election: Voter Outreach and Education in Counties Adopting the California Voter's Choice Act*, PPIC: CID, <https://bit.ly/3EVUXe6>.



and have the skills to provide in-language and culturally competent outreach to voters and help them navigate the voting process. A listening session participant who speaks Arabic stated that they would have more “trust and confidence” in elections and a greater ability to engage in voting processes with improved language assistance.

In addition to demystifying the voting process for LEP voters, official translated materials and translated materials by trusted messengers combat the scourge of misinformation afflicting voters, including immigrant voters. Before the 2020 U.S. election, the Latino community was targeted with misinformation and conspiracy theories on political and health issues. Misinformation tactics encourage racial resentment that pit ethnic communities against each other, or prey on distrust of authority. Unfortunately, access to accurate information remains in crisis – a 2020 Nieman Lab report suggested that Spanish-language media offered little to no response to misinformation, which allows conspiracy theories to spread.<sup>35</sup> There is also increasing misinformation and disinformation among Chinese Americans, who are the largest Asian community in the U.S.<sup>36</sup>

Investment in CBOs could be in the form of grant programs or by providing funding to elections offices to directly contract with CBOs for LEP voter education and outreach. California should also invest in outreach by local elections offices, including by funding for counties to hire designated outreach staff, funding for counties to engage in more robust bilingual poll worker recruitment, and ongoing and reliable funding for counties to work with ethnic media, conduct in-language outreach, and host in-language events. Each county should also have a Language Accessibility Advisory Committee or other voter outreach committee that works on language access. These committees provide elections officials with expertise on outreach and language accessibility issues and often help connect officials with CBOs and prospective bilingual poll workers and staff.

- **Mandate reporting on county language access services and work with state officials to develop and implement language access enforcement mechanisms.** Information about counties’ language access services, including how they resource and staff language access services, how many requests they receive for language assistance, and how they outreach to LEP voters, is key to helping officials and advocates understand whether existing language access laws are working as designed and to identify gaps in services. California should mandate more robust data collection and reporting to ensure counties are meaningfully investing time and resources in serving LEP voters and to ensure counties can assess the efficacy of their language assistance. While California already provides the Secretary of State and the Attorney General with some enforcement authority, in practice there are no mechanisms in place for the state to systematically monitor counties and confirm whether counties are complying with existing language access laws. The Secretary of State or Attorney General should develop and implement more effective mechanisms to monitor and enforce compliance with federal and state language assistance requirements. This includes ensuring that the Secretary of State conducts a robust and statewide election observation program during every election to monitor compliance with language access and other laws, and requiring that the Attorney General review poll monitoring reports to identify potential language access law violations.

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35 Laura Hazard Owen, *Spanish-language Misinformation is Flourishing – and Often Hidden. Is Help on the Way?*, Nieman Lab (Sept. 18, 2020), <http://bit.ly/3YkgDaM>.

36 *PiYaoBa Disinformation Report: Fake News, Real Consequences: The Growing Threat of Chinese-Language Disinformation*, Chinese for Affirmative Action (Sept. 2022), <https://bit.ly/3YjAarY>.

## VI. OUR APPROACH

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To achieve the CA LA Workgroup’s vision for language access, Workgroup organizations propose the following projects in the coming years.

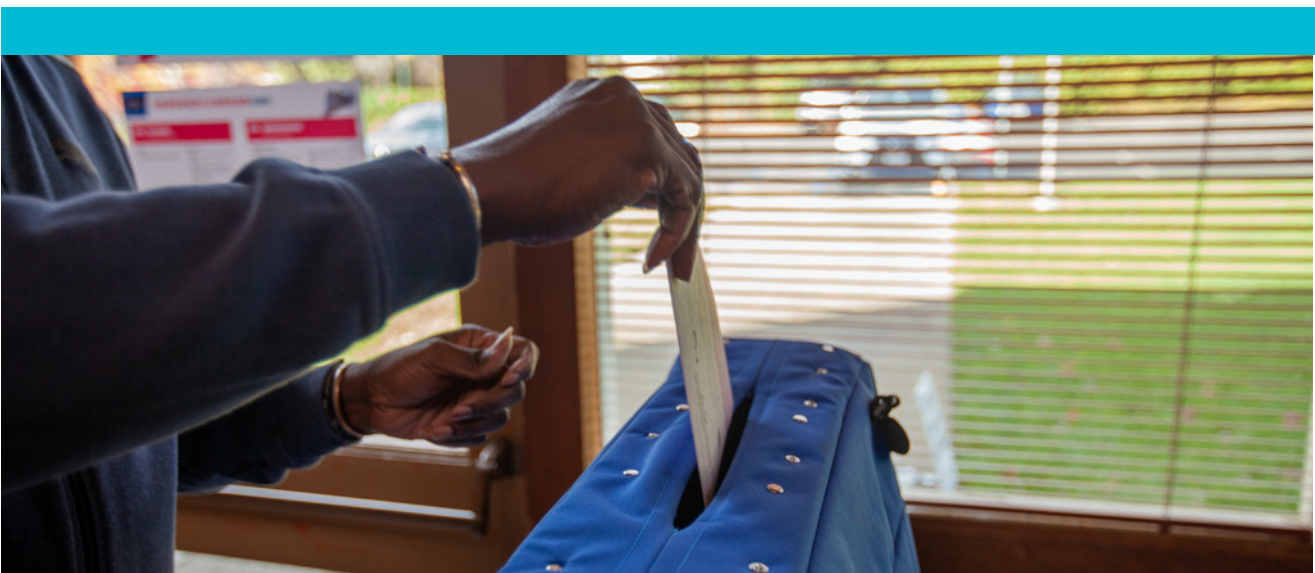
- 1. Advocating for Voluntary Adoption of Votable Ballots:** CA LA Workgroup organizations would work with local CBOs and the Secretary of State to push counties to voluntarily provide LEP voters whose languages are covered under state law with votable ballots. Current state law only requires counties to provide voters who speak a covered language with a reference ballot. VCA counties, however, use ballot-marking devices (BMDs) for in-person voting, and the touchscreen device largely eliminates printing costs associated with paper ballots. Because of this, Los Angeles County voluntarily uses its BMDs to provide voters covered under state law with votable in-language ballots. Counties are now also required to send all active registered voters a mail ballot ahead of each election. This means that all counties, not just VCA counties, can voluntarily opt to mail votable in-language ballots (instead of English-language ballots) to LEP voters covered under state law without incurring additional printing costs. Workgroup organizations will collaborate with local CBOs to push counties to provide LEP voters with votable in-language ballots in-person and/or by mail.
- 2. Expanding Language Assistance:** CA LA Workgroup organizations would collaborate with local CBOs to push county elections offices to expand language assistance by hiring more bilingual outreach staff, providing more translated materials, recruiting members for county Language Accessibility Advisory Committees (LAAC), and partnering with local organizations for education and outreach.
- 3. Advancing Statewide Standards for Poll Worker Training:** Current state law requires the Secretary of State to promulgate statewide standards for poll worker training, including training on language access. CA LA Workgroup organizations would research best practices for poll worker training and prepare draft training standards with the goal of having the Secretary of State adopt those standards.
- 4. Developing Best Practices Documents:** In the fall of 2022, the Secretary of State adopted and disseminated a portion of language access best practices developed by the CA LA Workgroup. In the coming years, the Workgroup would continue to partner with the Secretary of State to develop additional best practices. Topics include improving the information provided on election websites and standardizing polling place set up checklists for language access. Many CA LA Workgroup members are also on the California Language Accessibility Advisory Committee (“LAAC”) convened by the Secretary of State’s office and are interested in working through the LAAC to improve data collection about current practices.
- 5. Study Enforcement of Existing Language Access Laws:** State officials do not currently engage in consistent monitoring to ensure that county elections offices properly comply with existing language access laws. Workgroup members would meet with state agencies, including the Attorney General’s Office and the Secretary of State’s Office, to encourage them to better enforce language access requirements. Workgroup members would also continue to collect data through poll monitoring, informal requests made to elections officials, and Public Records Act Requests to understand the effectiveness of the state’s language access laws and the level of compliance with these laws. These efforts will inform current and future reforms, including potential proposals that empower communities and private individuals to hold county election officials accountable for providing language access services.

**6. Continuing State Language Access Advocacy:** Several Workgroup members are engaging in legislative advocacy during the 2023-2024 legislative calendar to pass a bill that would significantly expand language access in voting in California. The current draft of the bill incorporates many of the policy proposals outlined in our Roadmap. For example, the bill sets new requirements so that more language groups in more parts of the state receive language assistance. The legislation also expands requirements so that more voters receive language assistance that actually meets their needs and allows them to cast an effective ballot. This includes translated votable ballots, voter guides, and voter registration forms.

CA LA Workgroup participants and allied organizations are providing support for this important piece of legislation. These organizations are well-positioned to shape policy that expands language access because they serve or partner with organizations that serve language communities that are currently covered by state law but that are struggling with the lack of votable ballots and other materials, as well as language communities that are left out of state requirements altogether.

The workgroup members would continue to develop and advance reforms that would sow the ground for reforms that will make it easier for language communities to understand the election process and the substance of their ballots. For example, language access should be a key part in how California modernizes voting equipment, simplifies the Voter Information Guide, optimizes election information websites, and how it makes the public review process of ballot title and summary more accessible.

**7. Implementing New Language Access Laws:** If passed, the CA LA Workgroup and partners would collaborate with state and local election officials to implement the new language access law. Workgroup members will develop implementation strategies that would improve outreach efforts, study outcomes, and continue to problem-solve with officials to ensure that these efforts generate results.<sup>37</sup> CA LA Workgroup members are well-positioned to partner and monitor implementation, including several organizations that currently serve on county LAACs and run multi-county poll monitoring efforts.



<sup>37</sup> Counties in California that use the VCA have reported that collaborating with CBOs could help improve outreach to underrepresented communities, including LEP voters. Romero, *supra* note 35 at 40.





## VII. CONCLUSION

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California has adopted many election reforms in the last few years and is often seen as a leader in the election realm. Yet LEP voters have fallen behind through some of those reforms. The CA LA Workgroup will continue to advance culturally sensitive solutions, at the state and county level, that are informed by the LEP voter experience. This will require ongoing investments in a variety of functions and capacities on the Workgroup: user experience research, policy research and development, communications, project management, coalition-building and community education, and state and local advocacy. The Workgroup knows that passing election reforms is only an initial step, and that lasting solutions require mapping out culturally relevant implementations that center voters. The solutions and projects outlined in this brief will help ensure the equitable participation of LEP voters and also serve as an example for other agencies and states. California can and must continue to do better to create an inclusive democracy.

*This report was made possible with support from the*

evelyn & walter  
**HAAS JR.** fund

# **APPENDIX A**





# SHIRLEY N. WEBER, Ph.D.

## CALIFORNIA SECRETARY OF STATE

Elections Division | 1500 11<sup>th</sup> Street, 5<sup>th</sup> Floor | Sacramento, CA 95814  
Tel 916.657.2166 | Fax 916.653.3214 | [www.sos.ca.gov](http://www.sos.ca.gov)

March 1, 2022

County Clerk/Registrar of Voters (CC/ROV) Memorandum #22039

TO: All County Clerks/Registrars of Voters

FROM: /s/ Steve Reyes  
Chief Counsel

RE: Reinstated Languages Required under California Elections Code section 14201, Language Minority Determinations

This memorandum serves to notify you that the Secretary of State finds sufficient reason to believe a need for furnishing facsimile ballots exists pursuant to Elections Code section 14201(b)(1) and to reinstate prior precinct minority language determinations in addition to the designations made on December 31, 2021. Specifically, the Secretary of State is reinstating language assistance coverage as specified in our previous language determinations set forth in [CCROV #17148](#) and [CCROV #20096](#), which will be added to the December designations. These language determinations shall be effective for elections conducted on June 7, 2022, and thereafter and shall remain in effect until further notice.

### Background

On December 31, 2021, our office provided language minority determinations required under Elections Code section 14201. (See, [CCROV #21221](#).) The special tabulation language data set we received from the United States Census Bureau - data that the Secretary of State uses to make our determinations - was suppressed by the Census Bureau. As a result, some language data seen previously in 2017 was no longer available.

As specified in our December 31, 2021, [CCROV #21221](#), we noted that compared to our previous determinations (CCROV #17148, CCROV #20096), the number of language requirements dropped significantly. While our office began to explore the reason for such disparities, we encouraged counties to work with local community groups and to consider the needs of their communities before eliminating language services.

CCROV #22039

March 1, 2022

Page 2

Secretary Weber understands that a majority of counties, covering most of the state's affected voters, have already committed to providing the same level of Section 14201 language services as previously required. This memorandum formally reinstates the previous language designations made in 2017 and 2020 which may help to ensure that communities have access to language assistance services.

Attached please find an updated chart outlining the language requirements by county.

If you have any questions, please feel free to contact me at [sreyes@sos.ca.gov](mailto:sreyes@sos.ca.gov). For previously provided individual county data, contact Reina Miller at [rmiller@sos.ca.gov](mailto:rmiller@sos.ca.gov).

**Ballot Translations and Posting Requirements Summary by County**  
**Based on 2016 and 2020 General Election Precincts**  
**Effective: February 28, 2022, for Elections on June 7, 2022, and thereafter**

**KEY**

Asterisked (\*) language minority groups (Chinese and Filipino) include languages within that language group.

**BOLD** languages under column, "14201 Covered Languages," are new requirements as of January 1, 2022.

**Red BOLD** highlighted languages are reinstated languages as of February 28, 2022, for elections conducted on June 7, 2022, and thereafter.<sup>1</sup>

County	Section 203 Covered Languages	14201 Covered Languages	Number of Precincts Meeting 14201 Coverage
Alameda	Chinese (includes Taiwanese)* Hispanic Filipino Vietnamese		
		<b>Burmese</b>	<b>12</b>
		<b>Cambodian/Khmer</b>	<b>2</b>
		<b>Hindi</b>	<b>19</b>
		<b>Korean</b>	<b>49</b>
		<b>Laotian</b>	<b>4</b>
		<b>Mien</b>	<b>5</b>
		<b>Mongolian</b>	<b>3</b>
		<b>Panjabi</b>	<b>65</b>
		<b>Telugu</b>	<b>8</b>
Alpine		NONE	
Amador		<b>Spanish</b>	<b>11</b>
Butte		<b>Hmong</b>	<b>68</b>
		Spanish	30
Calaveras		<b>Spanish</b>	<b>15</b>
Colusa	Hispanic	NONE	
Contra Costa	Chinese (includes Taiwanese)* Hispanic		
		<b>Filipino</b>	<b>104 (Tagalog-104)</b>
		<b>Hindi</b>	<b>2</b>
		<b>Korean</b>	<b>13</b>
		<b>Laotian</b>	<b>1</b>
		<b>Nepali</b>	<b>3</b>
		<b>Panjabi</b>	<b>4</b>
		<b>Tamil</b>	<b>2</b>
		<b>Telugu</b>	<b>6</b>
		<b>Vietnamese</b>	<b>10</b>
Del Norte		<b>Spanish</b>	<b>17</b>
El Dorado		<b>Chinese</b>	<b>2</b>
		<b>Spanish</b>	<b>212</b>
Fresno	Hispanic		
		<b>Cambodian/Khmer</b>	<b>2</b>
		<b>Chinese</b>	<b>13</b>
		<b>Filipino</b>	<b>1 (Tagalog-1)</b>
		<b>Hmong</b>	<b>170</b>
		<b>Korean</b>	<b>7</b>
		<b>Laotian</b>	<b>36</b>
		<b>Panjabi</b>	<b>171</b>
<b>Vietnamese</b>	<b>10</b>		
Glenn	Hispanic	NONE	
Humboldt		<b>Hmong</b>	<b>5</b>
		<b>Spanish</b>	<b>72</b>
Imperial	Hispanic	NONE	
Inyo		<b>Spanish</b>	<b>51</b>
Kern	Hispanic		



County	Section 203 Covered Languages	14201 Covered Languages	Number of Precincts Meeting 14201 Coverage
		<b>Filipino</b>	<b>73 (Ilocano-30; Tagalog-43)</b>
		<b>Panjabi</b>	<b>46</b>
<b>Kings</b>	Hispanic		
		<b>Filipino</b>	<b>30 (Tagalog-30)</b>
<b>Lake</b>		<b>Spanish</b>	<b>76</b>
<b>Lassen</b>		Spanish	18
<b>Los Angeles</b>	Cambodian		
	Chinese (includes Taiwanese)*		5464 (Chinese-2713; Cantonese-1172; Mandarin-1579)
	Korean		
	Hispanic		
	Filipino*		90 (Tagalog-90)
	Vietnamese		
		Armenian	1018
		<b>Bengali</b>	<b>5</b>
		<b>Burmese</b>	<b>9</b>
		<b>Farsi</b>	<b>10</b>
		<b>Gujarati</b>	<b>13</b>
		<b>Hindi</b>	<b>21</b>
		<b>Indonesian</b>	<b>10</b>
		Japanese	230
		<b>Khmer</b>	<b>109</b>
		<b>Mongolian</b>	<b>6</b>
		<b>Persian</b>	<b>1317</b>
		<b>Russian</b>	<b>11</b>
		<b>Telugu</b>	<b>31</b>
		Thai	7
<b>Madera</b>	Hispanic		
		<b>Panjabi</b>	<b>26</b>
<b>Marin</b>		<b>Chinese</b>	<b>13</b>
		Spanish	192
		Vietnamese	3
<b>Mariposa</b>		<b>Filipino</b>	<b>1 (Tagalog-1)</b>
		<b>Spanish</b>	<b>13</b>
<b>Mendocino</b>		Spanish	181
<b>Merced</b>	Hispanic		
		<b>Chinese</b>	<b>5</b>
		<b>Hmong</b>	<b>31</b>
		<b>Mien</b>	<b>7</b>
		<b>Panjabi</b>	<b>19</b>
<b>Modoc</b>		<b>Spanish</b>	<b>20</b>
<b>Mono</b>		Spanish	5
<b>Monterey</b>	Hispanic		
		<b>Filipino</b>	<b>8 (Tagalog-8)</b>
		Korean	4
		<b>Vietnamese</b>	<b>6</b>
<b>Napa</b>	Hispanic		
		<b>Filipino</b>	<b>14 (Tagalog-14)</b>
<b>Nevada</b>		Spanish	10
<b>Orange</b>	Chinese (includes Taiwanese)*		48 (Chinese-41; Mandarin-7)
	Korean		
	Hispanic		
	Vietnamese		
		<b>Filipino</b>	<b>63 (Tagalog-63)</b>
		<b>Gujarati</b>	<b>4</b>

County	Section 203 Covered Languages	14201 Covered Languages	Number of Precincts Meeting 14201 Coverage
		Hindi	1
		Japanese	2
		Persian	71
<b>Placer</b>		Filipino	3 (Tagalog-3)
		Korean	3
		Panjabi	4
		Spanish	7
<b>Plumas</b>		Spanish	20
<b>Riverside</b>	Hispanic		
		Chinese	47 (Chinese-32; Mandarin-15)
		Filipino	34 (Tagalog-34)
		Korean	26
		Vietnamese	36
<b>Sacramento</b>	Chinese (includes Taiwanese)*		
	Hispanic		
	Vietnamese		
		Filipino	103 (Tagalog-103)
		Hindi	16
		Hmong	93
		Japanese	4
		Korean	20
		Laotian	3
		Mien	17
		Panjabi	59
		Telugu	4
		Urdu	5
<b>San Benito</b>	Hispanic	NONE	
<b>San Bernardino</b>	Hispanic		
		Chinese	26 (Chinese-25; Mandarin-1)
		Filipino	44 (Tagalog-44)
		Indonesian	6
		Korean	2
		Vietnamese	37
		Thai	5
<b>San Diego</b>	Chinese (includes Taiwanese)*		57 (Chinese-53; Mandarin-4)
	Hispanic		
	Filipino		
	Vietnamese		
		Arabic	180
		Japanese	1
		Korean	4
		Laotian	15
<b>San Francisco</b>	Chinese (includes Taiwanese)*		367 (Chinese-193; Cantonese-174)
	Hispanic		
		Burmese	1
		Filipino	72 (Tagalog-72)
		Japanese	5
		Korean	15
		Thai	2
		Vietnamese	3
<b>San Joaquin</b>	Hispanic		
		Chinese	4
		Cambodian/Khmer	52
		Filipino	136 (Tagalog-129; Ilocano-7)
		Hindi	2
		Hmong	10
		Laotian	5
		Panjabi	179
		Urdu	6
		Vietnamese	44
<b>San Luis Obispo</b>		Filipino	8 (Tagalog-8)

County	Section 203 Covered Languages	14201 Covered Languages	Number of Precincts Meeting 14201 Coverage
		Spanish	70
<b>San Mateo</b>	Chinese (includes Taiwanese)*		82 (Chinese-53; Cantonese-29)
	Filipino		
	Hispanic		
		<b>Burmese</b>	<b>15</b>
		<b>Japanese</b>	<b>21</b>
		<b>Korean</b>	<b>12</b>
		<b>Hindi</b>	<b>1</b>
<b>Santa Barbara</b>	Hispanic		
		Chinese	9
		<b>Filipino</b>	<b>3 (Tagalog-3)</b>
		<b>Korean</b>	<b>2</b>
<b>Santa Clara</b>	Chinese (includes Taiwanese)*		294 (Chinese-220; Cantonese-14; Mandarin-60)
	Hispanic		
	Filipino		
	Vietnamese		
		<b>Cambodian/Khmer</b>	<b>6</b>
		<b>Gujarati</b>	<b>2</b>
		<b>Hindi</b>	<b>13</b>
		<b>Japanese</b>	<b>15</b>
		<b>Korean</b>	<b>105</b>
		<b>Nepali</b>	<b>2</b>
		<b>Panjabi</b>	<b>21</b>
		<b>Tamil</b>	<b>3</b>
		<b>Telugu</b>	<b>12</b>
<b>Santa Cruz</b>		Spanish	163
<b>Shasta</b>		<b>Spanish</b>	<b>50</b>
<b>Sierra</b>		<b>Spanish</b>	<b>20</b>
<b>Siskiyou</b>		Spanish	15
<b>Solano</b>		<b>Filipino</b>	<b>164 (Tagalog-164)</b>
		Spanish	131
<b>Sonoma</b>	Hispanic		
		<b>Cambodian/Khmer</b>	<b>3</b>
		<b>Filipino</b>	<b>2 (Tagalog-2)</b>
		<b>Vietnamese</b>	<b>1</b>
<b>Stanislaus</b>	Hispanic		
		<b>Cambodian/Khmer</b>	<b>12</b>
		<b>Panjabi</b>	<b>40</b>
		<b>Syriac</b>	<b>55</b>
<b>Sutter</b>		<b>Filipino</b>	<b>1 (Tagalog-1)</b>
		<b>Panjabi</b>	<b>189</b>
		Spanish	76
<b>Tehama</b>		Spanish	8
<b>Trinity</b>		NONE	
<b>Tulare</b>	Hispanic		
		<b>Burmese</b>	<b>5</b>
		<b>Filipino</b>	<b>31 (Tagalog-14; Ilocano-17)</b>
		<b>Laotian</b>	<b>1</b>
<b>Tuolumne</b>		<b>Spanish</b>	<b>23</b>
<b>Ventura</b>	Hispanic		
		<b>Chinese</b>	<b>15</b>
		<b>Filipino</b>	<b>46 (Tagalog-46)</b>
		<b>Gujarati</b>	<b>1</b>
		<b>Vietnamese</b>	<b>1</b>



County	Section 203 Covered Languages	14201 Covered Languages	Number of Precincts Meeting 14201 Coverage
<b>Yolo</b>		<b>Chinese</b>	<b>60 (Chinese-58; Cantonese-1; Mandarin-1)</b>
		<b>Korean</b>	<b>5</b>
		<b>Panjabi</b>	<b>1</b>
		<b>Spanish</b>	<b>259</b>
<b>Yuba</b>		<b>Hmong</b>	<b>11</b>
		Spanish	74

<sup>1</sup> Languages in **red BOLD** are based on 2016 General Election precincts and data.