
Lost in Translation: Language access solutions to increasing uptake of CDSS programs

POLICY BRIEF | CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

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DISCLAIMER

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EXECUTIVE SUMMARY

Project Overview

In 2018, the California Department of Social Services (CDSS) launched a review of race and equity in the Department through the Government Alliance on Race and Equity (GARE), in which a key outcome is that “language will not be a barrier to full participation in CDSS programs.”

In the processing of discrimination complaints, the Department’s Civil Rights Unit (CRU) has noted that language access is the second-most common type of complaint received (after disability). The purpose of this report is to answer the question: *How can CDSS increase uptake of its programs by individuals with limited English proficiency (LEP) through language access solutions?*

While CDSS is interested in language access solutions for all of its programs, this report dives specifically into CalFresh, the name for Supplemental Nutrition Assistance Program (SNAP) in California, as a case study. The goal of the project is to use the CalFresh case study as an example within the Department to demonstrate the gaps and opportunities for both program-level and Department-wide policies to address language access issues in the delivery of services.

Analysis

In estimating the size of the enrollment gap between English-speakers and LEP individuals in CalFresh, we compare “likely-CalFresh-eligible Medi-Cal Participants” (January 2017, MEDS) to actual CalFresh recipients (July 2018, ABCD 350). Using this methodology, we note the following observations about the CalFresh enrollment gap:

- If enrollment rates for all languages were equivalent to the English rate, then an estimated **1.037 million additional individuals** would be enrolled and participating in CalFresh.
- The English participation rate is quite high at 93%, which would compare favorably to the national average (for all languages) of 86%. However, given that statewide participation is 72.2%, there is considerable evidence that the low overall participation rate is being driven by low enrollment rates in LEP populations.
- There is considerable variation between enrollment rates between different language groups—while languages like Arabic, Hmong, and Armenian have high enrollment rates, languages like Mandarin and Korean see particularly low enrollment figures.
- Of the estimated 1.037 million who could be enrolled, an overwhelming majority would be Spanish-speaking individuals.

In addition to estimating the enrollment gap, three policy alternatives for language access solutions were analyzed in this report: **Threshold Language Determination**, **Commitment to Website Accessibility**, and **Fixing Language-Based Churn**. These alternatives were then evaluated based on their performance and the criteria of Equity, Scalability across CDSS programs, and Compliance with the spirit of relevant regulations.

Recommendations

Based on results of the analysis, it is recommended that CDSS pursue the **Threshold Language Determination** alternative to shift the focus from “population served” to “eligible population”. This strategy would institute a uniform way in which threshold languages and the associated bilingual staffing needs are determined by task-shifting it away from county offices. In addition to easing the administrative burdens for county offices, this strategy will improve the compliance review process. In doing so, CDSS has an opportunity to set a new precedent within state government agencies in meeting the spirit of the Dymally-Alatorre Bilingual Services Act.

The second key recommendation is to **add Spanish to the CDSS website**—based on the analysis, simply adding Spanish to the CDSS website is estimated to result in an additional 9,000-18,000 LEP enrollees, which offers considerable “bang for buck” compared to other languages.

Other minor recommendations include:

- Extend community validation process (i.e. verifying accuracy and cultural appropriateness of translations) for all applications and essential forms;
- Develop glossaries of key terms for language line translators, interpreters, public contact staff, and outreach workers;
- Send GEN 1365 (“Notice of Language Services”) form with all untranslated communications;
- Invest in more culturally-aware outreach activity; and
- Make information about public charge more accessible on the CDSS website.

Though this report presents several potential strategies to increase uptake of CDSS programs, it is important to recognize that the enrollment gap reflects a host of issues beyond language access that may contribute to LEP individuals enrolling at lower rates than English-speakers, including cultural barriers, distrust of government, or lack of knowledge about the program. CDSS should continue to explore and research other opportunities to reach eligible LEP individuals, such as behavioral approaches to tackling bias and social norms, streamlining processes to reduce friction costs, and multiple-enrollment strategies.

INTRODUCTION

Client description: CDSS Civil Rights Unit

The California Department of Social Services (CDSS) is a California state agency that delivers many social safety net programs, including cash assistance, food and nutrition, child services, adult services, and refugee services. The CDSS mission is “to serve, aid and protect the needy and vulnerable children and adults in ways that strengthen and preserve families, encourage personal responsibility, and foster independence.”

The CDSS Civil Rights Unit (CRU) administers civil rights programs based on State and Federal laws and regulations, with a mission to ensure effective access and nondiscrimination to all applicants and/or recipients of benefits and services provided by CDSS and county welfare departments. Core activities include discrimination complaint investigations, county compliance monitoring, technical assistance, training, and ongoing monitoring for state and federal regulatory compliance.ⁱ The CRU, though housed in the Family Engagement and Empowerment Division (FEED), has oversight of equitable and effective delivery of all services administered or supervised by CDSS.

In 2018, CDSS launched a review of race and equity in the Department through the Government Alliance on Race and Equity (GARE) process. One of the four primary outcomes listed in the 2018-2019 CDSS Racial Equity Action Plan is that “language will not be a barrier to full participation in CDSS programs.” The associated indicator for the language access outcome is that “program participation reflects the overall population of those in need.”ⁱⁱ The co-leads for the language access outcome are Maureen Keffer (Policy Specialist, Civil Rights Unit) and Brian Kaiser (Bureau Chief, CalFresh and Nutrition Programs).

Problem definition

In the processing of discrimination complaints, the CRU has noted that language access is the second-most common type of complaint received (after disability). While acknowledging language access to be an area for improvement in the delivery of CDSS benefits and services, the issues are multifaceted, involve multiple implementing bodies, and can present challenges in identifying focus areas for investment.

How can CDSS increase uptake of its programs by individuals with limited English proficiency (LEP) through language access solutions?

Project scoping

While CDSS is interested in language access solutions for all of its programs, this report dives specifically into CalFresh, the name for Supplemental Nutrition Assistance Program (SNAP) in California, as a case study. The goal of the project is to use the CalFresh case study as an example within the Department to demonstrate the gaps and opportunities for both program-level and Department-wide policies to address language access issues in the delivery of services.

To this end, the project will discuss to what extent recommendations from the CalFresh case study can be applied to other contexts, including the In-Home Supportive Services (IHSS) and CalWORKs programs.

While understanding that the gap in participation for LEP individuals may be due to a larger set of factors, this analysis focuses specifically on the opportunities for CDSS to increase uptake of its programs through language access solutions.¹ Additionally, this report, given the fact that SNAP is a federal program and the CRU is limited in its direct influence, will focus only on policies that would not change any of the following core elements of CalFresh operations and delivery:

- Key pieces of legislation that guide the design and delivery of CalFresh;
- State-level solutions (beyond CDSS) for language access (e.g. legislation, Cal HR);
- Structure and timeline of CalFresh operations (e.g. SAR 7, recertification, interview requirement); or
- Autonomy of counties and consortia to develop customized solutions best suited to their needs.

Program in focus: CalFresh

CalFresh was selected as a case study in part due to its openness to addressing its own language access concerns and breadth of its reach. According to the USDA's 2015 report on SNAP participation, California ranked 48th out of 51 states (including DC) with only an estimated 70% of eligible people participating in the program (as compared to a national average of 86%)ⁱⁱⁱ—the CalFresh team believes that a large portion of this gap may be due to language access issues. Despite its poor relative performance, CalFresh's Program Reach Index (PRI)² has increased steadily from 55.2% in 2011^{iv} to 72.2% in 2017,^v showing a generally positive trend in program reach.

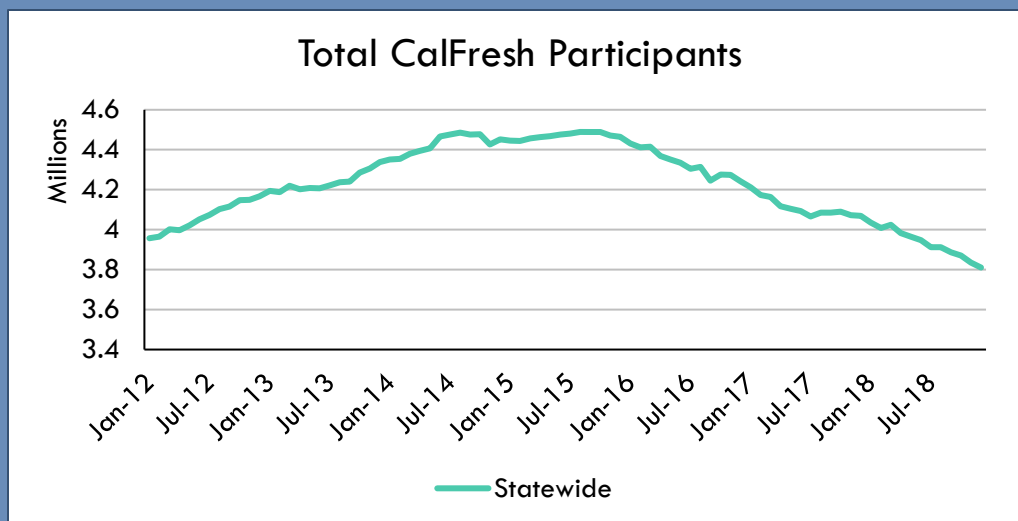
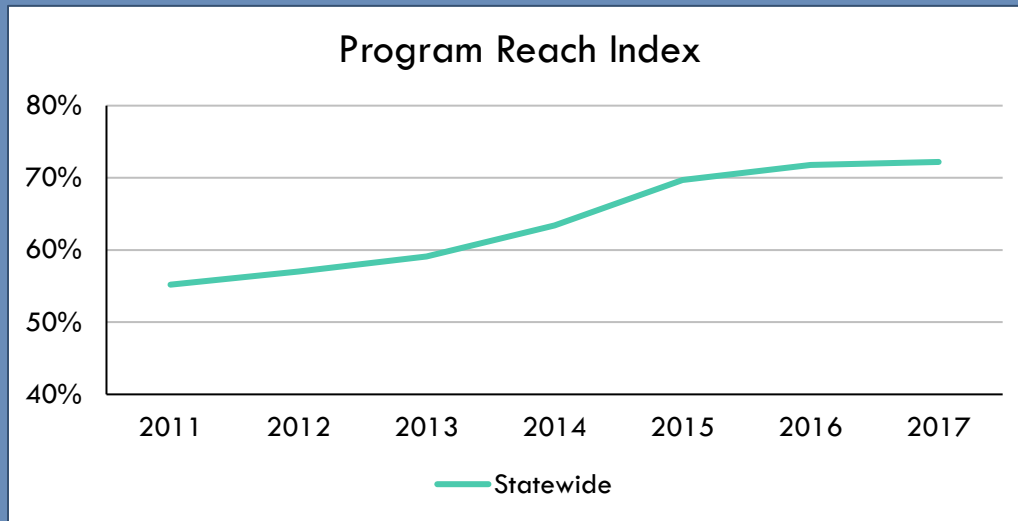
While PRI has increased in recent years, the total number of CalFresh participants has been decreasing³ since 2016, falling below 4 million in 2018.^{vi} The decline in the number of CalFresh participants has also been reflected in LEP populations, with the CalFresh team noting that the number of Hispanic caseloads has been falling in particular. This is further reflected by a decline in the more general "CalFresh ESL Population" from 1.3 million in 2014 to 1.1 million in 2018.^{vii}

¹ Many other potential intervention areas not specific to language access could include strategies like increasing investment in targeted outreach or funding for county offices, implicit bias training for public contact staff, or redesigning application forms. Particularly promising interventions worth discussing will be discussed in [Areas for future research](#).

² The PRI is a modified version of the Program Access Index (PAI) that was created by the team at CDSS to adjust for poor individuals who are likely not eligible for CalFresh (e.g. undocumented residents).

³ A decrease in participants is not necessarily a negative outcome if there are fewer eligible people overall (e.g. improving economic conditions), but we would need to compare with the most recent PRI figures to determine whether that is the case.

CALFRESH REACH: AT A GLANCE



Source: CalFresh Data Dashboard

An important factor in these recent trends may be due in part to concerns around “public charge,” which describes people who cannot support themselves and depend on cash benefits—such as Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF)—for their income in the long term. An individual who is likely to become a public charge is inadmissible to the U.S. and ineligible to become a lawful permanent resident. While public charge rules do not apply to programs like CalFresh, the Trump administration’s stance on immigration and proposed changes to the public charge rule (and the confusion surrounding them) appear to be having a negative impact on discouraging immigrants from accessing services—this is often referred to as the “chilling effects” of public charge.

CalFresh operations and delivery structure

In order to receive CalFresh benefits, individuals must apply through the following process:^{viii}

- 1) Fill out an application either at a local county office or online;
- 2) Have either a phone or in-person interview (depending on the county) within 30 days of the application submission to go over the application; and
- 3) Submit verifications of proof of income and certain costs (e.g. proof of identity, proof of residence, proof of income, social security number, proof of housing costs, proof of child support payments, proof of disability, proof of medical costs if 60+ or disabled) within 10 days.

If approved via the above process, CalFresh recipients will be given an Electronic Benefit Transfer (EBT) card. In order to stay on benefits, CalFresh recipients must regularly update eligibility information. At six months after initial application, participants must submit a form to notify the county of any household circumstances that may have changed; and at one year, recipients must re-verify all household information and complete an interview.

An important aspect of CalFresh's structure is that, though the program is supervised by CDSS, most of service delivery and administration is managed by county offices themselves. This structure has allowed counties to develop many of their own processes for how CalFresh is delivered, leading to a wide range of tools and capabilities for county offices

Additionally, CalFresh is a part of the CDSS Statewide Automated Welfare System (SAWS) Project, the automation of county welfare business process in the state. There are currently three county-level consortia welfare systems (CalACES North, CalACES South, CalWIN) to support eligibility determination, benefit computation, benefit delivery, case management, and information management. These three consortia have been mandated by law to merge into a single entity by 2023.

Regulatory structure for language access

CDSS operations and program delivery is subject to federal and state regulations that provide guidance and restrictions to ensure programs are administered equitably and effectively. Regulations specifically relevant to CDSS and the subject of language access are described below.

Notes: CDSS will be completing the process of updating its own Civil Rights Nondiscrimination (Division 21) guidelines in 2019. SB 285 (Wiener) is a new piece of legislation on CalFresh that is currently in review in the California Senate—more discussion in [Other relevant considerations](#).

Federal regulations

Civil Rights Act of 1964

The [Civil Rights Act of 1964](#) outlaws discrimination based on race, color, religion, sex, or national origin. [Title VI](#) of the Act requires recipients of federal financial assistance to take reasonable

steps to provide meaningful access to their program, services, and activities to eligible LEP individuals.

Executive Order 13166

[Executive Order 13166](#), titled “Improving Access to Services for Persons with Limited English Proficiency” requires federal agencies and recipients of federal financial assistance to examine the services they provide, identify any need for services to LEP individuals, and develop and implement a system to provide those services so LEP individuals can have meaningful access to them.

Food & Nutrition Service Civil Rights Instruction 113-1

The [Instruction](#) provides guidance and direction to the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) and its recipients and customers to ensure compliance with and enforcement of the prohibition against discrimination in all FNS nutrition programs and activities, whether federally funded in whole or not.

State regulations

California Civil Code section 51 (Unruh Civil Rights Act)

The [Unruh Civil Rights Act](#) outlaws discrimination based on sex, race, color, religion, ancestry, national origin, age, disability, medical condition, genetic information, marital status, or sexual orientation.

Dymally-Alatorre Bilingual Services Act

The [Dymally-Alatorre Bilingual Services Act](#) requires state agencies that serve a “substantial number” of non-English-speaking people employ a sufficient amount of bilingual persons in order to provide certain information and render certain services in a language other than English. State agencies are required to conduct a survey of its local offices every 2 years regarding their public contact positions and provision of bilingual services. “Substantial number” is defined as the lesser of the following: 1) One thousand or more residents of a county in which the local office of a state agency is located; 2) Five percent or more of the residents of a county in which the local office of a state agency is located; and 3) Five percent or more of the people served by any local office or facility of a state agency.

Be Vu Settlement

The [settlement of the Be Vu et al v. Mitchell and Bolton lawsuit](#) in 2008 specified that in addition to Chinese, Russian, Spanish, and Vietnamese translations on Food Stamp Program (FSP) forms, CDSS must translate FSP forms and forms jointly used with the CalWORKs program into Arabic, Armenian, Cambodian, Farsi, Hmong, Korean, Lao, and Tagalog.

LANGUAGE ACCESS AND CALFRESH

Estimating the enrollment gap

CDSS utilizes a measure called the [Program Reach Index \(PRI\)](#)⁴ to estimate CalFresh access among individuals who may meet CalFresh eligibility requirements. However, while the PRI provides a reasonable measure of program reach more broadly, it does not provide a breakout by language, so understanding the varying levels of program reach by preferred language requires some additional estimation.

Using a CDSS summary of January 2017 MEDS Data⁵, Diana Jensen with the SF-Marin Food Bank generated an estimate of “likely-CalFresh-eligible Medi-Cal Participants not Enrolled” by language. While the pool of Medi-Cal participants does not represent the entirety of individuals eligible for CalFresh, given that ~93% of CalFresh recipients are also on Medi-Cal, we can consider Jensen’s estimate an approximation of eligible individuals and their preferred languages.^{ix} (See [Appendix A](#) for specific estimates.)

By comparing this data set to the CDSS [ABCD 350 report](#)⁶, an annual report on the ethnic origins and primary languages of recipients of various CDSS programs, we find the following rough statewide estimates for the percentage of eligible populations enrolled in CalFresh for the Be Vu languages (in order of population size) and the estimated additional enrollment if each population in each group were enrolled at the English-equivalent rate:

Preferred Language	Estimated % of eligible population enrolled	Estimated additional enrollment if at English-equivalent rate
English	93%	--
Spanish	58%	773,000
Vietnamese	51%	64,000
Cantonese	33%	60,000
Mandarin	16%	45,000
Korean	18%	25,000
Tagalog	40%	18,000
Armenian	97%	--
Farsi	56%	9,000
Russian	56%	9,000
Arabic	~100% ⁷	--
Hmong	97%	--
Cambodian	69%	2,000

⁴ The PRI is a modified version of the Program Access Index (PAI) that was created by the team at CDSS to adjust for poor individuals who are likely not eligible for CalFresh (e.g. undocumented residents).

⁵ The Medi-Cal Eligibility Data System (MEDS) is a data source managed by the California Department of Health Care Services (DHCS) that primarily captures individual-level data on Medi-Cal enrollment and eligibility as well as data on other welfare benefits.

⁶ The ABCD 350 report only captures data on Non-Assistance CalFresh, which accounts for ~90% of the CalFresh caseload according to CDSS’s [CF 296 Report](#) on CalFresh Monthly Caseload Movement.

⁷ Due to methodological challenges, the estimate for Arabic went over 100%, which has been interpreted as nearly 100% reach in this table.

There are several noteworthy observations from the chart above:

- If enrollment rates for all languages were equivalent to the English rate, then an estimated **1.037 million additional individuals** would be enrolled and participating in CalFresh.
- The English participation rate is quite high at 93%, which would compare favorably to the national average of 86%. However, given that CalFresh's PRI is only 72.2%, there is considerable evidence that the low overall participation rate is being driven by low enrollment rates in LEP populations.
- There is considerable variation between enrollment rates between different language groups—while languages like Arabic, Hmong, and Armenian have high enrollment rates, languages like Mandarin and Korean see particularly low enrollment figures.
- Of the estimated 1.037 million who could be enrolled, an overwhelming majority would be Spanish-speaking individuals. This points to interventions that target Spanish-speaking populations as being an especially ripe opportunity to closing this enrollment gap.

While noting these enrollment figures, it is also important to recognize that the observed enrollment gap reflects a host of issues beyond language access that may contribute to LEP individuals enrolling at lower rates than English-speakers, including cultural barriers, distrust of government, or lack of knowledge about the program.

These challenges, while not directly addressed in this report, are key areas for the CalFresh program to address in its efforts to increase participation in LEP communities. In this report, we focus solely on opportunities to bridge the enrollment gap by addressing issues of language access.



Existing efforts to address language access challenges

In order to address challenges in reaching LEP populations, the CalFresh program is already taking some steps to provide greater language access. These solutions are provided at numerous stages and by various different actors in the provision of CalFresh benefits and services.

County offices: Bilingual staff, Interpreters, Language lines

For most CalFresh applicants and recipients, communication with their county offices can be the most vital piece to their enrollment in the program. County offices are responsible for processing applications, including delivering interviews, and the actual provision of benefits themselves.

In accordance with the Dymally-Alatorre Bilingual Services Act, county offices are required to perform bi-annual surveys on the constituents they serve, and, based on the survey results, they determine which languages meet the five-percent threshold requiring bilingual staffing. In order to

be certified as bilingual, public contact staff must pass a mandatory oral bilingual certification⁸ and receive a bonus in pay for maintaining their certification.

When LEP individuals require additional support beyond what is available by staff on site, county offices must provide interpreters and/or telephonic language line interpretation.

CDSS: Forms, Compliance Reviews, Complaint Investigations, Outreach

Per the Be Vu Settlement, CDSS is required to provide all CalFresh-related forms in the Be Vu languages. When new forms are generated, or existing ones updated, CDSS Language Services⁹ produces translated versions of the forms—documents of 2-5 pages take 3-5 weeks to process on average.

Additionally, the CRU performs regular compliance reviews of county offices on whether they have sufficient certified bilingual staff in accordance with the results of their language surveys. Besides performing compliance reviews, the CRU also investigates discrimination complaints, working with individuals and county offices to address them. When complaints are submitted in a language that requires translation and interpretation, the CRU works with the Language Services team to resolve the complaint.

The CalFresh Outreach team works with outreach partners to disseminate information about the program both widely and through targeted efforts to certain populations. As a result, the team provides some of its [outreach materials](#) in a limited number of languages and works with community-based organizations to reach under-represented groups, many of which are LEP. Outreach efforts also include the CalFresh Information Line, which is currently offered in five different languages, and language access training webinars for county offices and outreach contractors.

Websites: CDSS, Consortia, Counties, Contractors

While regulations exist for forms, bilingual staffing, and nondiscrimination more broadly, there is no specific legal guidance on language access and the provision of other information and websites. Despite this lack of official guidance, some steps have been taken to improve access to information on CalFresh through different languages.

The CDSS website, though currently only officially offered in English, contains a Google Translate dropdown bar that can use Google Translate to automatically translate the website into over 100 different languages. The CDSS website itself does not process any actual applications or screen for eligibility—those functions are conducted by one of the consortia (i.e. CalACES and CalWIN) or CalFresh contractors (e.g. GetCalFresh, mRelief).

⁸ The current bilingual certification is determined by the standards utilized by the Los Angeles School District and can be administered by Cal HR or the LA School District.

⁹ With assistance from a language translation vendor.

According to the CDSS Statewide Automated Welfare System (SAWS) Project, the consortia portals through which individuals apply, check eligibility, and find information on available benefits all present their websites in at least 9 different languages.¹⁰

As for other key CalFresh contractors, GetCalFresh (CalFresh's official outreach and application portal) and mRelief (CDSS's multi-program screening contractor) currently only offer their websites in English and Spanish.¹¹ BenefitsCal is offered in 12 languages.

Language access barriers to accessing CalFresh

Despite efforts made by CDSS, county offices, consortia, and other contractors to reach LEP populations through language access solutions, a number of well-documented issues remain in terms of providing equitable CalFresh services in languages other than English. Language access barriers like these can complicate the process for prospective applicants and can result in lower enrollment rates for LEP populations. Misunderstandings due to language issues can cause individuals to fill out their application incorrectly, fail to follow up on important steps, or choose to simply forego the process altogether.

Incorrect or culturally inappropriate translations

Even though official forms undergo multiple checks for accuracy, some materials or communications have been noted to be translated incorrectly or in a way that is culturally inappropriate, particularly for less commonly-spoken languages where there is limited expertise available. A common complaint with mistranslations is that the translated versions of the texts are often too literal and do not make sense within context. This issue extends to oral communication and instructions for county offices and outreach workers as well, where mistranslations can cause providers and advocates to utilize an incorrect approach.

Communications sent in the wrong language

There are a number of cases in which individuals are sent communications in a language that they had not selected as their preferred language. These issues can be due to internal (or back-end) mix-ups or to some of the communications simply not having been translated in time before the communication has been sent. An additional complicating factor is that there is often no way for the individual to indicate back to county offices that they received their communications in the wrong language—and so once they have received a communication in the wrong language, they may then continue to receive all of their future communications in that language.

¹⁰ As of April 2019, C-IV Yourself is offered in 12 languages, Your Benefits Now is offered in 9 languages, and My Benefits CalWIN is offered in 18 languages. These websites translations are provided either in-house by the consortia or through vendor agreements with translation companies. According to SAWS, the consortia utilize these contractors for forms and notices as well.

¹¹ GetCalFresh is planning to add Mandarin and Cantonese by the summer of 2019.

IN-DEPTH: LANGUAGE ACCESS CHALLENGES ON THE GROUND

In November 2017, the Alliance to Transform CalFresh presented a [Racial Impact Statement](#) to draw attention to challenges of racial and ethnic equity within CalFresh. The report surveyed CalFresh outreach assistors across the state to gain their perspective. Below are some select quotes depicting some of the language access challenges encountered in the delivery of CalFresh:

- ❖ *“I believe that our county only has 1 or 2 Vietnamese speaking eligibility workers, so all cases have to go through them. When they are on vacation/out sick/unavailable, the client has to wait extended periods of time for benefits determination or language line has to be used once the case is reassigned.”*
- ❖ *“I was told by a partner agency staff that sometimes the county would provide translators that didn’t speak the dialect the client spoke. They told me that the client didn’t want to offend the translator so they wouldn’t say that they didn’t understand.”*
- ❖ *“Client has stated on application that they prefer correspondence in Spanish but keep receiving documents in English.”*
- ❖ *“Clients just usually come in to the office asking me to read and explain the notification to them because they don’t read English.”*
- ❖ *“Students who have foreign last names have been asked for proof of citizenship; similar students with ‘Anglo’ last names are never requested for proof of citizenship.”*

Increased wait times for non-English languages

Though county offices are legally bound to make sure all individuals receive access to interpretive services, provision of those services can sometimes be very time-consuming, particularly for less commonly-spoken languages. Some LEP individuals have remarked that they have been told to come back several hours later without much of an explanation as to why it would take so long to process their case. This challenge can be exacerbated by the fact that, even with compliant bilingual staffing, bilingual staff may not be adequately distributed across functions and locations for each threshold language. For instance, according to an internal study by the San Francisco Human Services, while call intake wait times were less than two minutes on average for English-speakers, Spanish speakers and Tagalog speakers waited five minutes and over ten minutes on average, respectively. This led to a third of Chinese and Tagalog callers abandoning the calls before receiving service (compared to only 9% for English).^x

Poor customer service and treatment

Both applicants and county office staff have noted that non-English speakers are often asked more invasive questions, admonished for their employment or family status, and caused embarrassment for incorrectly filling out forms or not understanding questions.

POLICY ALTERNATIVES

As discussed previously, increasing the participation rate of LEP individuals in CalFresh can be achieved through both solutions that increase participation across the board for all populations as well as solutions that specifically target LEP populations. Here we focus on the latter to most directly achieve the stated goal of reaching greater equity in the delivery of CalFresh services. Below is a description of potential policy alternatives to address language access in the delivery of CDSS programs.

Status Quo

Under the status quo, CDSS will continue to make incremental improvements to increase language access, including current efforts to have the CalFresh information line available in six different languages and to add Chinese to GetCalFresh.org. CDSS will continue to provide all forms in accordance with the Be Vu settlement, include Google Translate functionality in over 100 languages on its website, and Outreach partners will seek to improve upon existing methods of outreach, including adding additional language access capacity as directed and funded by CDSS grants. Counties will ensure that bilingual staff are available according to the 5% threshold required by the Dymally-Alatorre Act and annual language survey. The CRU will continue to monitor county office compliance with bilingual staffing and process discrimination cases. By 2023, the consortia will have merged into a single entity, which will result in more standardized service on the back end for counties.

While official forms will be translated, they may have some inaccuracies or use culturally inappropriate language, and communications other than forms will not be held to the same standards. Some communications may be sent in the wrong language, Non-English speakers will continue to see longer wait times and receive a poorer level of service compared to English speakers.

Participation amongst LEP populations, particularly Hispanics, may continue to decrease as in recent trends due to public concern about public charge.

Alternative 1: Threshold language determination

As currently implemented, counties are responsible for collecting their own data on the population they serve, which is most often interpreted as the intake population (i.e. people that walk in through the door). As such, the language survey currently does

POLICY ALTERNATIVES

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STATUS QUO

Continuation of current trends; incremental improvements (e.g. additional languages)

THRESHOLD LANGUAGE DETERMINATION

Focus shifted from population served (i.e. intake population) to eligible population; threshold determination process brought in-house

COMMITMENT TO WEBSITE ACCESSIBILITY

Requirement for major CalFresh-related websites to be translated into all twelve Be Vu languages

FIXING LANGUAGE-BASED CHURN

SAWS-led investigation into causes for recertification notice being sent in the wrong language

not capture individuals who never apply in the first place or get turned away at the front desk due to language issues, leaving county offices generally understaffed in handling non-English cases.

Under this alternative, the CDSS Research Services Branch would take over the responsibility of determining threshold languages by estimating the eligible population in each county by preferred language. Utilizing a process similar to how the PRI is calculated, CDSS can dictate county office bilingual staffing needs based on eligible populations in a standardized fashion. This is likely to increase bilingual staffing overall, decreasing the disparity in service provision at the county office level.

Alternative 2: Commitment to website accessibility

Though official CalFresh forms are offered in all languages specified under the Be Vu settlement, the CDSS website itself is currently only available in English (and information on public charge concerns is only available in English and Spanish). Some of the forms are also difficult to find and not listed on the CalFresh page.

Feedback from outreach partners as well as academic literature¹² suggests that the Google Translate functionality provides poor translations that can be confusing or misleading. As such, under this alternative, CDSS would require that its own website, GetCalFresh.org, and other online portals through which individuals access key program information or apply, be translated into versions in each of the Be Vu languages through either in-house translation or with the support of a translation vendor. For the most commonly spoken languages¹³, website translations would be required to enlist the support of language-specific outreach organizations in a community validation capacity.¹⁴ The state of California's [Immigrant Guide website](#) has been mentioned as a best practice by Governor Newsom's administration in terms of offering website translations in different languages.

Alternative 3: Fixing language-based churn

Improvements in translation play an important role in helping applicants fill out their application properly and take the appropriate steps to submit verification documents, but perhaps an even more salient intervention point is in other communications, such as those relevant to recertification or submission of the SAR 7 form. Unlike during application in which the case worker interview reviews the application and checks for accuracy and completeness, recertification requires initiative on the part of the recipient to adhere to the recertification process and deadlines. For CalFresh recipients who may have completed their initial applications with the assistance of a family member or a nonprofit organization, the recertification process and submission

¹² A [2019 research paper](#) (Khoong, et al.) from UC San Francisco on the accuracy of Google Translate on emergency discharge orders say that the tool was 92 percent accurate for Spanish and 81 percent accurate for Chinese (the two languages that were studied). The researchers found that 2 percent of Spanish and 8 percent of Chinese translation errors had the potential to cause "clinically significant harm."

¹³ As determined by CDSS.

¹⁴ Community validation refers to the process by which translated documents, communications, or websites are reviewed by community-based organizations that understand both the CalFresh program and the cultures of the target populations.

requirements may be particularly daunting. As a result, proper translations (as well as forms sent in the right languages) are essential to helping individuals properly file for recertification.

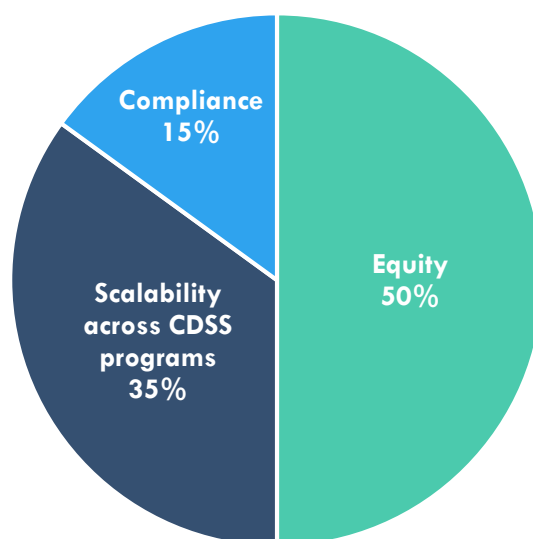
“Churn” is a term that refers to when eligible families exit the program only to reapply for those same benefits within a short period of time. These affected individuals are people who plan to stay on CalFresh but have failed to do so for administrative issues. Churn can therefore be problematic because it means families lose out on crucial benefits while off the program and the state is burdened with avoidable, duplicative tasks (e.g. re-processing eligibility).

Under this alternative, CDSS SAWS would place increased investment in addressing churn that stems from recertification notices being sent in the wrong language. Though the specific details depend on how each county and consortium manages its back-end systems, this alternative would require SAWS to launch an evaluation of current systems and identify specific points where CalFresh cases are being miscategorized by language. A solution to language-based churn may involve both addressing issues with automation and county office processes for capturing language preferences.

CRITERIA FOR ANALYSIS

In analyzing the previously detailed policy alternatives, it is useful to consider the premise under which this research has been undertaken—namely that the CRU is seeking to address the low uptake of CDSS programs by LEP populations as compared to those who primarily use English. Policy recommendations will be implemented at the department level, and while each alternative will undoubtedly be accompanied by its associated financial considerations, costs have not been highlighted as a determining criterion for recommendation from a civil rights perspective.¹⁵ Also not directly included as a criterion is the increase in overall CalFresh participation rate—while increasing LEP participation will invariably increase overall participation as well, this is not a specific aim of this particular analysis.

While the criteria below are not necessarily quantitative, a weighting percentage has been applied (in parentheses) to indicate the relative importance of each criterion to the CRU.



Equity (50%)

The primary purpose of this analysis is to identify how CDSS can close the gap in program participation for LEP populations. The delivery of CalFresh benefits to participants involves many different steps, all of which can introduce challenges in terms of equity in language access. Policy alternatives may address one or multiple parts of the CalFresh delivery process and will be assessed as to how much each policy is estimated to close this gap. For the purposes of measurement, LEP populations will be grouped together as opposed to treating each language separately.¹⁶ As such, the metric used to measure equity will be the estimated additional annual number of LEP enrollees per year as a result of the intervention.

¹⁵ While cost is an important consideration, potential costs go far beyond simply the cost of implementation—they also include time spent/saved processing cases and complaints as well as the potential for lawsuits (e.g. *Be Vu, Hinkle v. Kent*).

¹⁶ Note: Given the wide array of languages spoken by residents of California, it may be challenging for every single language to be accounted for at the same level as English and other commonly spoken languages.

Scalability across CDSS programs (35%)

While the initial analysis focuses on CalFresh, the Civil Rights Unit hopes to adopt policy recommendations that would broadly benefit CDSS programs in terms of language access. Scalability across CDSS programs will therefore incorporate considerations around broad applicability of the alternatives and cost-effectiveness (i.e. “hitting two birds with one stone”—having a single solution improve language access across multiple programs). Measurement of scalability is according to a High/Medium/Low scale based upon feedback from conversations with the IHSS and CalWORKs programs as well as non-program units like SAWS and Language Services.

Compliance with regulations (15%)

Though more of an ancillary assessment criterion, compliance remains an important consideration in terms of protections of civil rights of California residents. The three most relevant regulations for analysis are the Dymally-Alatorre Bilingual Services Act, Be Vu settlement, and Title VI (using the four factors¹⁷ identified by the U.S. Department of Justice describing “meaningful access” for LEP individuals). Starting with a focus on the status quo, assessment of other alternatives will highlight how compliance with the policies will increase in relation to the current state. As with all civil rights policies, 100% compliance and nondiscrimination may never be possible in practice—instead this analysis will focus on the extent to which CDSS will take steps to be in greater compliance with the spirit of the law. Compliance will be scored on a 1-3 scale, where 1 = small improvement, 2 = moderate improvement, and 3 = large improvement.

¹⁷ The four-factor analysis considers: 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program; 2) the frequency with which LEP individuals come in contact with the program; 3) the nature and importance of the program, activity, or service provided by the program to people’s lives; and, 4) the resources available to the program and costs.

ANALYSIS AGAINST CRITERIA

Below is a summary table of how each policy alternative measures up against the criteria of equity, scalability, and compliance. Effect size estimations involved several layers of calculations based on assumptions informed by literature and data on CalFresh.

Policy Alternative	Equity	Scalability	Compliance					
			D-A	Be Vu	Title VI			
					#	Freq	Imp	Res
Status Quo	9,000 additional LEP enrollees	--	--	1	--	--	--	--
Threshold Language	20,000 – 61,000 additional LEP enrollees	High	3	--	3	2	2	2
Website Accessibility	44,000 – 57,000 additional LEP enrollees	Low	--	3	--	3	2	2
Language-based churn	24,000 – 32,000 additional LEP enrollees	Medium	--	--	--	2	3	1

While a full description of methods and rationale for this evaluation can be found in [Appendix D](#), here are descriptions of the primary drivers for the equity estimates for the number of additional LEP enrollees under each policy alternative:

- **Status Quo:** Addition of Mandarin and Cantonese to the GetCalFresh website (*Note: this effect is also reflected in the estimates for all the following alternatives as well.*)
- **Threshold Language Determination:** Difference in withdrawal¹⁸ and denial rates between English-speaking and LEP applicants.
- **Website Accessibility:** Current languages offered on CalFresh and major related websites (e.g. consortia, GetCalFresh); application rates after viewing informational websites.
- **Fixing language-based churn:** Difference in churn rates between English-speaking and LEP participants; months spent “on churn”.

Confronting trade-offs and feasibility

In comparing the proposed policy alternatives, the table above presents some interesting takeaways to consider before recommending a course of action. Several of the alternatives have overlapping ranges of estimated additional LEP enrollees, making it challenging to explicitly identify a most effective strategy. While keeping the equity figures in mind, it therefore becomes important to incorporate results from the scalability and compliance criteria.

In terms of scalability, policies that require the involvement of fewer actors appear to be easier to implement. For instance, the Threshold Language Determination alternative would decrease the

¹⁸ I.e. Withdrawing from the eligibility determination process after application had been submitted.

number of external stakeholders involved by relieving county offices of data collection on their populations and respective language thresholds. On the other hand, a strategy like focusing on Website Accessibility would require involving many external stakeholders, including GetCalFresh, mRelief, the consortia, translation vendors, and community-based organizations.

Additionally, though the policy alternatives (not including the Status Quo) all appear to improve compliance on Title VI, each individual alternative can only address either the Dymally-Alatorre Bilingual Services Act or the Be Vu Settlement but not both. Therefore, in order to improve compliance on all of the regulations of interest, CDSS would need to implement multiple solutions.

POLICY RECOMMENDATIONS

Recommendation: Pursue the **Threshold Language Determination** strategy and add **Spanish language translations** to the CDSS website.

Based on results of the analysis, it is recommended that CDSS pursue the **Threshold Language Determination** alternative. Compared to the other policy alternatives, Threshold Language Determination was the most scalable to other CDSS programs while still maintaining a high equity potential. Implementing this strategy could make the bilingual staffing process more efficient by instituting a uniform way in which threshold languages and the associated bilingual staffing needs are determined by task-shifting it away from county offices. In addition to easing the administrative burdens for county offices, this strategy will improve the compliance review process. In doing so, CDSS has an opportunity to set a new precedent within state government agencies in meeting the spirit of the Dymally-Alatorre Bilingual Services Act.

The second key recommendation is to **add Spanish to the CDSS website**—based on the analysis, simply adding Spanish to the CDSS website is estimated to result in an additional 9,000-18,000 LEP enrollees, which offers considerable “bang for buck” compared to other languages. While this would only be a marginal improvement in terms of compliance on the spirit of the Be Vu Settlement, having Spanish available across the CDSS website feels like an appropriate step, especially given that all of the other major external websites working on CalFresh already have Spanish translations.

Note: While working towards Fixing Language-Based Churn should also be considered, that is a process that may be more complicated in the midst of the consortia merger process and should be reconsidered in the lead up to the merger in 2023.

Implementation guidelines

Developing a threshold language determination strategy to focus on eligible population instead of population served should be co-designed by the CalFresh team (and other programs for which this will be implemented) along with the Research Services Branch. Ultimately, it will be the Research Services Branch that will develop annual reports on eligible populations and required bilingual staffing for each county, so it is essential that the team is heavily involved in defining the methodology for how the analysis would be completed.

Utilizing this data, CDSS should develop an annual CDSS Language Access and Bilingual Staffing Report, focusing on county-office-level summaries of eligible populations, current reach within those populations, current and required bilingual staffing, and discrimination complaints. This report can inform program teams like CalFresh, the Civil Rights Unit, Language Services, and the counties themselves to better reach and serve the eligible populations in each region. An option that CDSS could pursue is to adopt a report format to that of the California Employment Development Department (EDD), which launched a statewide bilingual staffing report in 2018.

It is likely that determining bilingual staffing needs based on eligible population rather than population served will increase the number of bilingual staff that will need to be hired. Given that bilingual staff receive a higher salary than non-bilingual staff, CDSS must also consider reviewing funding levels for county offices that may need additional resources for staffing as a result of this policy.

Finally, for the CDSS website, while CDSS Language Services team has in-house Spanish language capabilities, it is recommended that the websites also undergo a review by community-based organizations that have experience with Spanish-speaking communities and understand the nuances of the communities' needs and experiences with programs like CalFresh.

Application to other CDSS programs

While the analysis has focused on the perspective of the CalFresh program, it is worthwhile to consider how the above recommendations might work in other CDSS programs. CalWORKs, which is similar in many regards to CalFresh—considerable overlap in county office staff and similar delivery structure—will likely see similarly great value in revamping the bilingual staffing process and bringing outreach needs for eligible populations to light. However, given its block grant structure, some financial maneuvering may be required to hire the appropriate bilingual staff.

On the other hand, IHSS providers are often themselves bilingual, so the program may not experience the same level of benefit that programs like CalFresh and CalWORKs would experience under this policy. However, in the case that providers are not bilingual, some challenges may persist—not only for the program recipients but also for the providers themselves.¹⁹

Minor recommendations

In addition to the key recommendations detailed above, this review of language access challenges and best practices has also yielded the following recommended actions for CDSS.

- **Extend community validation process for all applications and essential forms:** In addition to working with community-based organizations on website translations, CDSS programs should also engage community-based organizations in a community validation capacity for all major languages and all applications and essential forms to ensure that information is being conveyed accurately and in a culturally appropriate way.
- **Develop glossaries of key terms:** For the most commonly spoken languages, CDSS should develop glossaries for key terms so that language line translators, interpreters, public contact staff, and outreach partners can use standardized, culturally appropriate language in describing the program and eligibility criteria. This can be particularly useful for individuals like language line operators or interpreters who may have limited contextual knowledge of programs like CalFresh.

¹⁹ The County Welfare Directors Associate of California (CWDA) has raised the issue of translating materials (e.g. timesheet instructions) for providers through the introduction of [Assembly Bill 229](#) in January 2019.

- **Send GEN 1365 form with all untranslated communications:** Given that translations through Language Services can take 3-5 weeks for a regular-length document²⁰, some communications may have to be sent without having had time or an opportunity to be translated before sending. The GEN 1365 form, which includes a notice in 19 languages informing recipients of their right to reach out to county workers for translation if needed, should be included with all such untranslated communications.
- **Invest in more culturally-aware outreach activity:** While not as directly specific to language access, there is considerable evidence that cultural challenges have impeded the uptake of CDSS programs in certain communities. Providing translated versions of English outreach materials is only one step—some communities require their own specific outreach strategies and materials that may differ from simply replicating English outreach efforts.
- **Make information about public charge more accessible:** While CDSS has made a public charge notice available on its website, it is currently only offered in English and Spanish and is difficult to locate—at the time of this report, the notice exists on the [CalFresh Outreach Resource page](#). CDSS should strive to make this notice more visible on the main pages of interest (e.g. CalFresh home page) and should ensure that this important information is translated into more languages beyond just English and Spanish.

²⁰ Described by the Language Services Branch as being 2-5 pages.

Other relevant considerations

Looking forward to implementing the recommended policies, there are shifts in some other policies that could have an effect on both LEP enrollment as well as to how programs like CalFresh are resourced and delivered.

Public charge and its “chilling effect”

Perhaps the biggest threat to reaching LEP populations is the proposed expansion of the public charge rule, which was [published](#) to the Federal Register for public comment in October 2018. Even prior to the actual proposed changes to the rule, CalFresh had been witnessing a decline in enrollment figures amongst minority populations, especially Hispanic communities. Anecdotal evidence from the California Food Policy Advocates also supports these claims, citing that deportation concerns have forced Latino families to change their behavior to not travel to places alone, stop going to places where Latinos congregate (like Latino supermarkets), choose not to enroll for programs like CalFresh due to concerns about negative effects to their immigration status.^{xi}

The proposed changes to the public charge rule would expand the definition of public charge to include utilization of public programs like CalFresh, Medi-Cal, and Section 8 housing vouchers. Under the current system, public charge only applies to those primarily dependent on the government for subsistence—i.e. receiving majority of income from cash aid or relying on government institutionalization. Research from the UCLA Center for Health Policy Research estimates that the proposed changes to the public charge rule could lead to 765,000 individuals (15-35% of participating immigrants) disenrolling from CalFresh and Medi-Cal and losses of \$1.67 billion in federal benefits.^{xii}

Even if the changes to public charge do not take place, the “chilling effect” of the Trump administration’s general policies towards immigrants can still cause disenrollment to occur. In order to combat these effects within LEP populations, there needs to be considerable effort placed into education campaigns for clients, county staff, and outreach workers as there appears to be considerable confusion in immigrant communities across the state. Advocates have suggested reaching out through local media (particularly media outlets targeted to immigrant communities), in which immigrant communities are more likely to place their trust as compared with the government. Additionally, as described in [Minor recommendations](#), while CDSS has posted information about public charge in English and Spanish in the CalFresh Outreach Resources section of its website, given the essential nature of the information and applicability to all immigrant groups, the Department should make sure to have the information in all of the Be Vu languages and in a much more prominent location.

IN-DEPTH: ECONOMIC IMPACT OF THE “CHILLING EFFECT”

Based on disenrollment data after welfare reforms in 1996, the UCLA Center for Health Policy Research produced [projections](#) of the potential impact of changes to “public charge” rules on federal benefits and the economy of California. Their analysis showed that if just 35 percent of those touched by the “chilling effect” disenroll from Medi-Cal and CalFresh:

- ❖ *California could lose up to \$1.67 billion in federal benefits, which would result in \$2.8 billion lost throughout the broader state economy.*
- ❖ *As many as 17,700 jobs could be eliminated, with an estimated 57 percent of job losses coming from California’s health care sector (8,400 jobs) and food-related industries (1,800 jobs).*

Expansion of CalFresh to SSI Recipients

As of Summer 2019, Supplemental Security Income (SSI) recipients will be able for CalFresh (as is the case in all other states in the U.S). SSI is a federally funded program that provides monthly benefits to low-income people who are 65 or older, blind, or disabled—in California, an estimated 500,000 SSI recipients will become eligible for CalFresh. This presents both a challenge and an opportunity to commit to reaching LEP individuals through reinvigorated resourcing and outreach efforts.

In many ways, it can be expected that SSI recipients who are also LEP may face even greater challenges in accessing CalFresh services than non-SSI LEP individuals. They are likely to be harder of hearing (i.e. language lines even more challenging to use), less tech savvy (i.e. limited knowledge of Google Translate features), and more limited in English than younger LEP individuals who may have more regular interactions with English-speakers (i.e. exposure to English through work experience or school). A 2018 study from the National Bureau of Economic Research suggests that one policy that might be useful for SSI recipients would be to provide assistance in applying for CalFresh.^{xiii}

SB 285 (Wiener)

[Senate Bill 285](#), introduced by Senator Scott Wiener in February 2019, would require CDSS to oversee a state and local accountability partnership to increase CalFresh participation and retention. The bill would also allow for more flexible options for individuals to apply and recertify for CalFresh in person, by mail, online, or by telephone and would extend the option of interviewing with case workers by telephone. Finally, the bill would require CDSS to create a single, universal application interface for applying for benefits.

Though many elements of this bill are in progress (e.g. consortia merger and expansion of application options), passage of SB 285 would put more legal ramifications behind existing efforts and may speed up the process to some extent.

LIMITATIONS AND AREAS FOR FURTHER RESEARCH

Data limitations

In the process of this research, a number of data-related issues presented some challenges in developing a more robust investigation of language access at CDSS:

- **Limited access to data sources:** More-detailed data on CalFresh (as well as other CDSS programs) participation were available within the MEDS dataset, consortia systems, and within internal tracking performed by the CalFresh team, but these pieces of data were difficult to utilize given concerns of sensitivity and lengthy approval processes to receive access. While this report made use of workarounds and estimations where possible, access to this individual-level and rich data could have assisted in making more accurate estimates of calculations made in this report.
- **Limited measurement of language cross-sectional data:** While language preference information is collected in an aggregate fashion, CDSS currently lacks a capacity to perform additional analyses using cross-sectional data on language because it is not reported to the Department at the individual level.
- **Limited formal analysis of discrimination complaints:** The Civil Rights Unit collects and tracks information on discrimination complaints through Salesforce, but it currently does not run any standard reports to perform analysis on the types of complaints received.
- **Limited insight into non-CDSS data sources:** The data CDSS receives from counties, outreach partners, and consortia is typically limited to regular reporting requirements, which can present a challenge when trying to obtain rich, micro-level data beyond the scope of those requirements.
- **Limited insight into Google Translate metrics:** Though CDSS can track web traffic to its website, it unfortunately lacks the capability to track the use of its Google Translate function, which means that it currently has no visibility into the language preferences of its audience.
- **Limited quantification of observed issues:** Many of the common issues raised by advocacy groups and communities are collected in anecdotal fashion, and CDSS has limited insight into the prevalence of these issues.

Areas for future research

Though this report presents several potential strategies to increase uptake of CDSS programs, it is important to recognize that language access remains only a part of the solution in terms of closing the enrollment gap between English-speakers and LEP individuals. There exist several other types of interventions that could have an outsized positive impact on increasing enrollment among LEP populations. It is recommended that CDSS continue to research into the following possible solutions as opportunities to better reach eligible LEP individuals.

Behavioral approaches to tackling bias and social norms

Many studies have been performed on how behavioral science elements can lead to significant improvements in uptake of government programs. CDSS should explore opportunities to incorporate behavioral insights into program design, including but not limited to considering accompaniment models^{xiv}—where advocates or other helpers attend interviews with applicants to ensure a fair and accurate process—and messenger effects^{xv} in program outreach—the idea that the identity of the messenger can enhance the effect of the delivered information.

One popular approach that CDSS should *not* pursue, however, is implicit bias training for staff, which studies have steadily shown have no positive impact and can even sometimes result in the opposite of the intended effect (i.e. individuals who have attended implicit bias training feel that they are no longer biased but continue to perpetuate their biases in practice).^{xvi}

Streamlining processes to reduce friction costs

Another behavioral concept that has been applied to welfare programs (e.g. the Earned Income Tax Credit) is the simplification of forms and processes to reduce “friction costs” to taking up benefits.^{xvii} Simplifying applications is not a new concept and has already been applied to CalFresh, but more can still be done. Simplifying applications and other processes ease the burden on translators and interpreters as well, reducing the opportunity for mistranslations or misrepresentations of key information. Beyond this, CDSS should consider exploring ways it can cut out additional administrative steps (e.g. lengthening the benefit period to two years, removing the interview requirement for recertification) via which LEP individuals can fall through the cracks in the system.

Multiple enrollment

CDSS has already been pursuing multiple- and pre-enrollment strategies for a number of its programs—this is a strong strategy to reach individuals who are likely eligible for multiple programs but may only be engaging in one or two of them. Automatic enrollment and multiple enrollment allow individuals to submit fewer pieces of paperwork and can be particularly effective for reaching individuals who may have less awareness of programs like CalFresh or CalWORKs.

APPENDIX A: MEDI-CAL RECIPIENTS LIKELY ELIGIBLE FOR CALFRESH BUT NOT ENROLLED, BY LANGUAGE

For California statewide and 20 largest counties. MEDS Extract 2017 Q1.

(Source: Diana Jensen, [CalFresh Dual Enrollment with Medi-Cal](#))

	ENG	SPA	VIET	CAN	MAN	KOR	TAG	ARM	FAR	RUS	ARA	HMO	CAM
STATEWIDE	3,295,395	1,392,490	100,648	74,780	49,899	28,410	23,821	17,031	15,084	14,484	13,094	6,366	5,775
LOS ANGELES	934,960	496,266	15,249	23,345	27,478	18,066	4,974	16,154	5,071	3,247	2,040	15	3,056
ORANGE	225,924	98,503	37,361	310	1,478	5,064	769	77	3,372	179	1,210	13	224
SAN DIEGO	238,936	96,232	6,511	681	1,176	590	3,598	18	1,330	689	3,860	39	262
RIVERSIDE	222,190	92,530	1,208	232	500	478	494	13	162	70	520	25	105
SAN BERNARDINO	224,286	72,909	1,539	297	920	711	319	19	113	63	660	4	118
SANTA CLARA	108,972	36,253	22,412	2,449	6,756	1,162	3,514	30	1,568	669	320	6	342
SACRAMENTO	137,895	21,078	4,841	4,119	1,041	288	1,015	379	688	6,682	665	1,969	134
ALAMEDA	117,550	28,171	4,562	13,372	4,578	720	1,912	12	760	197	1,061	2	263
FRESNO	93,305	56,300	491	240	167	96	156	239	92	107	378	2,675	313
KERN	93,886	46,001	89	27	27	33	161	1	9	8	144	-	20
CONTRA COSTA	79,667	28,073	968	800	1,195	311	1,155	9	901	346	472	-	31
SAN JOAQUIN	76,409	24,638	804	209	42	17	193	2	51	15	84	285	560
SAN FRANCISCO	49,263	11,201	2,237	26,141	2,377	253	1,319	10	43	747	188	2	61
STANISLAUS	64,375	25,863	231	99	64	7	54	4	96	21	210	11	87
VENTURA	58,274	31,782	337	53	179	110	314	19	153	49	143	3	21
TULARE	39,692	27,089	54	36	34	15	59	1	9	1	87	16	12
MONTEREY	33,545	28,885	144	13	24	59	75	-	14	12	57	1	2
MERCED	27,653	17,162	20	15	11	7	8	-	-	1	20	586	5
IMPERIAL	11,043	20,071	6	10	3	6	8	-	-	-	6	-	1

APPENDIX B: NON-ASSISTANCE CALFRESH CASES, BY LANGUAGE

For California statewide and 20 largest counties. Annual Recipient Report (ABCD 350), July 2018.

(Source: CDSS, [ABCD 350](#))

	ENG	SPA	VIET	CAN	MAN	KOR	TAG	ARM	FAR	RUS	ARA	HMO	CAM
STATEWIDE	1,329,255	350,009	22,395	10,638	3,363	2,256	4,152	7,130	3,664	3,421	6,267	2,674	1,722
LOS ANGELES	325,884	117,007	2,244	1,567	1,304	1,283	540	6,911	1,261	654	565	*	680
ORANGE	65,544	29,197	9,442	51	80	384	127	*	531	35	481	0	37
SAN DIEGO	88,062	24,979	1,315	52	99	60	857	13	411	131	3425	14	110
RIVERSIDE	89,402	19,429	109	*	37	38	36	*	21	*	125	15	16
SAN BERNARDINO	122,494	21,800	280	32	87	82	44	*	31	*	240	*	50
SANTA CLARA	27,086	8,715	5,196	241	450	120	470	*	225	112	78	*	94
SACRAMENTO	71,885	5,251	1,287	589	65	41	211	134	406	1,747	490	878	47
ALAMEDA	38,761	7,751	1132	2047	511	79	300	0	266	31	233	*	82
FRESNO	61,052	13,763	72	54	17	11	21	40	24	21	85	831	115
KERN	48,990	10,908	*	*	0	*	44	0	*	*	57	0	*
CONTRA COSTA	22,678	4,069	107	55	59	28	136	*	186	47	78	0	*
SAN JOAQUIN	34,254	5,421	274	16	*	*	38	0	17	*	15	162	372
SAN FRANCISCO	20,581	3,804	531	5,634	441	47	488	*	16	232	38	0	*
STANISLAUS	29,811	4,681	41	*	*	*	*	*	91	15	88	11	52
VENTURA	22,954	9,021	45	*	19	*	101	*	29	*	60	0	*
TULARE	33,227	13,857	*	11	*	0	22	0	*	*	26	12	*
MONTEREY	10,736	7,397	22	*	0	*	*	0	*	*	15	0	0
MERCED	16,040	3,845	*	*	*	*	*	0	0	0	*	360	0
IMPERIAL	7,681	7,501	*	0	*	*	*	0	0	0	*	0	0

APPENDIX C: ENROLLMENT GAP, BY LANGUAGE (LARGEST COUNTIES)

Data is from [Appendix A](#) and estimated individual enrollment based on [Appendix B](#). For California statewide and 20 largest counties.

Estimated percentage of eligible population enrolled in CalFresh

[Enrolled] / [Likely-Eligible Not Enrolled + Enrolled]

	ENG	SPA	VIET	CAN	MAN	KOR	TAG	ARM	FAR	RUS	ARA	HMO	CAM
STATEWIDE	93%	58%	51%	33%	16%	18%	40%	97%	56%	55%	100%	97%	69%
LOS ANGELES	81%	54%	34%	16%	11%	16%	25%	99%	57%	47%	64%	0%	51%
ORANGE	67%	68%	58%	38%	13%	18%	38%	0%	36%	45%	92%	0%	38%
SAN DIEGO	85%	60%	47%	18%	19%	23%	55%	100%*	71%	44%	100%*	83%	97%
RIVERSIDE	93%	49%	21%	0%	17%	18%	17%	0%	30%	0%	56%	100%*	35%
SAN BERNARDINO	100%*	69%	42%	25%	22%	27%	32%	0%	63%	0%	84%	0%	98%
SANTA CLARA	57%	56%	54%	23%	15%	24%	31%	0%	33%	39%	56%	0%	63%
SACRAMENTO	100%*	58%	61%	33%	14%	33%	48%	82%	100%*	60%	100%*	100%*	81%
ALAMEDA	76%	64%	57%	35%	26%	25%	36%	0%	81%	36%	51%	0%	72%
FRESNO	100%*	56%	34%	52%	24%	26%	31%	39%	60%	45%	52%	72%	85%
KERN	100%*	55%	0%	0%	0%	0%	63%	0%	0%	0%	91%	--	0%
CONTRA COSTA	66%	33%	26%	16%	11%	21%	27%	0%	48%	31%	38%	--	0%
SAN JOAQUIN	100%*	51%	79%	18%	0%	0%	45%	0%	77%	0%	41%	100%*	100%*
SAN FRANCISCO	97%	78%	55%	50%	43%	43%	85%	0%	86%	72%	47%	0%	0%
STANISLAUS	100%*	42%	41%	0%	0%	0%	0%	0%	100%*	100%*	97%	100%*	100%*
VENTURA	91%	66%	31%	0%	25%	0%	74%	0%	44%	0%	97%	0%	0%
TULARE	100%*	100%*	0%	71%	0%	0%	86%	0%	0%	0%	69%	100%*	0%
MONTEREY	74%	59%	35%	0%	0%	0%	0%	--	0%	0%	61%	0%	0%
MERCED	100%*	52%	0%	0%	0%	0%	0%	--	--	0%	0%	100%*	0%
IMPERIAL	100%*	86%	0%	0%	0%	0%	0%	--	--	--	0%	--	0%

Green = 86% and above (i.e. above overall national average); Red = Below 50%

* Due to methodological challenges, some estimates went over 100%, which have been interpreted as ~100% reach in this table.

Estimated additional enrollment in CalFresh if at English-equivalent enrollment rate

*[English rate – Other language rate] * [Likely-Eligible Not Enrolled + Enrolled]*

	ENG	SPA	VIET	CAN	MAN	KOR	TAG	ARM	FAR	RUS	ARA	HMO	CAM
STATEWIDE	-	772,883	63,662	59,927	44,755	25,160	17,680	-	8,728	8,645	-	-	2,370
LOS ANGELES	-	199,702	9,506	17,530	21,207	13,482	3,449	-	1,842	1,617	553	12	1,347
ORANGE	-	-	5,111	124	906	2,946	307	52	1,409	57	-	9	89
SAN DIEGO	-	38,755	3,675	541	923	449	1,680	-	313	409	-	2	-
RIVERSIDE	-	61,069	1,053	216	444	422	439	12	133	65	303	-	82
SAN BERNARDINO	-	38,127	1,267	279	876	661	287	19	68	63	194	4	5
SANTA CLARA	-	1,064	1,329	1,043	3,277	483	1,220	17	507	174	6	3	-
SACRAMENTO	-	14,098	3,015	3,670	1,019	257	781	126	-	4,245	-	-	46
ALAMEDA	-	5,811	1,353	7,387	2,901	459	1,040	9	-	107	407	2	19
FRESNO	-	38,347	435	175	158	89	141	203	59	85	276	1,297	88
KERN	-	32,199	89	27	27	33	97	1	9	8	24		20
CONTRA COSTA	-	12,094	489	462	724	169	566	6	240	156	180		20
SAN JOAQUIN	-	18,273	306	202	42	17	153	2	21	15	70	-	-
SAN FRANCISCO	-	3,609	1,443	18,294	1,822	194	270	10	8	318	137	2	59
STANISLAUS	-	21,342	192	99	64	7	54	4	-	-	13	-	-
VENTURA	-	13,378	265	48	148	100	91	17	104	45	-	3	19
TULARE	-	-	54	18	34	15	15	1	9	1	46	-	12
MONTEREY	-	6,793	75	10	18	44	55		10	9	12	1	1
MERCED	-	12,565	20	15	11	7	8			1	20	-	5
IMPERIAL	-	5,112	6	10	3	6	8				6		1

Blue = 1,000 – 4,999 additional enrollees; Red = Over 5,000 additional enrollees

APPENDIX D: DETAILED ANALYSIS OF POLICY ALTERNATIVES

Status Quo

In the status quo, the most significant change in language access from the present state will be the gradual expansion of languages offered through the GetCalFresh website, which expects by the end of 2019 Cantonese and Mandarin to its existing offerings of English and Spanish.

According to GetCalFresh, 20,000 applications are completed per month through the platform, which means 240,000 applications per year.^{xviii} According to Jensen's analysis, 92.27% of eligible the eligible population are either English- or Spanish-speakers (therefore already serviced by GetCalFresh) while only 2.45% of the eligible population have Cantonese or Mandarin as their preferred language.^{xix} Assuming that the population applying via GetCalFresh resembles the overall applicant population in terms of proportional language preference, this would suggest that the expansion of GetCalFresh to include Cantonese and Mandarin will generate ~6,370 additional applications ≈ 14,700 additional LEP individuals per year.²¹ Factoring in a 63% statewide approval rate, we would expect to see **~9,000 additional LEP individuals enrolled** in CalFresh.

Without any additional push from CDSS, the incremental improvements made by GetCalFresh will have no bearing on other CDSS programs and will **not be scaled** across the Department.

In terms of compliance, the gradual addition of languages will see a **small improvement** in compliance with the spirit of the Be Vu Settlement and the Resources component of Title VI.

Alternative 1: Threshold language determination

Adjusting the threshold language determination process to measure preferred language at the eligible population level will very likely increase the number of bilingual public contact staff at county offices. By increasing the number of bilingual public contact staff, several important processes would be enhanced, resulting in greater availability of on-site interpretation services, higher quality customer service for non-English speakers, and therefore, higher likelihoods of LEP individuals completing the application process and receiving fairer treatment during interviews.

In order to estimate the impact of this alternative, we would ideally need to know how often LEP individuals fail to complete the application process after intake and the relative denial rates of applicants by language.

²¹ This estimate utilizes a general multiplier of ~2.3 individuals per CalFresh case as determined by dividing the overall CalFresh population by the number of total non-assistance CalFresh cases.

While there is not much accessible data on either of these two measures—CDSS does not capture approval, denial, and withdrawal rates by language²²—a 2017 study by the San Francisco Human Services Agency showed no statistically significant differences between denial rates for applicants of different languages^{xx}. Given that San Francisco County is likely one of the higher performers on equity, we can treat this finding as a lower bound in terms of differential denial rates.

Though data on denial and withdrawal rates by preferred language is not readily accessible, we can aim to understand the potential magnitude by using a combined hypothetical range of LEP individuals being denied or withdrawing 1-5% more frequently than English-speaking applicants. Given that an estimated 980,000 LEP individuals are currently on CalFresh^{xxi}, a combined denial and withdrawal rate 1% more than statewide average would suggest that ~11,000 more LEP individuals who would have been approved for CalFresh withdrew or were denied from the process as compared to English-speakers. Similarly, a combined denial and withdrawal rate 5% more than statewide average would suggest that ~52,000 more LEP individuals who would have been approved withdrew or were denied from the process as compared to English-speakers. Combined with the 9,000 additional LEP enrollees due to GetCalFresh (from the status quo), we can expect an estimated **20,000 – 61,000 additional LEP individuals will be enrolled** in CalFresh under this alternative.

Since threshold languages determination would be brought in-house to CDSS under this scenario and is necessary for all CDSS programs, the scalability of this approach with undoubtedly be **High**.

From a compliance perspective, an update of the threshold language determination process is a fundamental reworking of how CDSS interprets the Dymally-Alatorre Bilingual Services Act and will be a **large improvement** over the status quo. In terms of Title VI, this policy alternative will produce a **large improvement** on measuring the eligible population, a **moderate improvement** on a frequent and important process for CalFresh enrollment, and a **moderate improvement** to resources available for CDSS and county offices to deliver better services.

Alternative 2: Commitment to website accessibility

If CalFresh relevant websites are made fully accessible, assuming equal internet access and facility across language²³, we would expect to see similar usage rates across all languages. While it is difficult to have translated versions of the websites available in every single language, we can use the Be Vu languages as a guideline for sufficient steps taken towards language access.

²² The statewide acceptance rate is 63%, denial rate is 33% (20% for procedural issues and 13% for ineligibility), and withdrawal rate is 4%, but these figures are not disaggregated by language. (Source: [Jensen, CalFresh Application Outcomes](#))

²³ While there may be some minor differences between how these populations utilize the internet (e.g. preferred social media platform), internet use in general appears to be similar across different ethnicities. (Source: [Pew Research](#))

The first step to estimating the language access gap in terms of enrollment is to take note of the main websites and which languages they are lacking.

Website	Website Use	Currently offered	Be Vu languages not offered
CDSS – CalFresh Homepage	Information	English	Arabic, Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Lao, Russian, Spanish, Tagalog, Vietnamese
GetCalFresh	Application	English, Spanish	Arabic, Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Lao, Russian, Tagalog, Vietnamese
mRelief	Information	English, Spanish	Arabic, Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Lao, Russian, Spanish, Tagalog, Vietnamese
C4Yourself	Application	English, Armenian, Cambodian, Chinese, Hmong, Korean, Lao, Russian, Spanish, Tagalog, Vietnamese	Arabic, Farsi
My Benefits CalWIN	Application	English, Spanish, Chinese, Russian, Arabic, Armenian, Cambodian, Farsi, Hmong, Japanese, Korean, Lao, Mien, Portuguese, Punjabi, Tagalog, Vietnamese	N/A
Your Benefits Now	Application	English, Spanish, Cambodian, Chinese, Armenian, Tagalog, Korean, Russian, Vietnamese	Arabic, Farsi, Hmong, Lao

Starting with websites through which individuals can apply to CalFresh, we can utilize a similar calculation methodology to that applied to GetCalFresh earlier. For GetCalFresh, the Be Vu languages not offered currently make up 6.91% of the eligible population.^{xxii} Since 240,000 applications are submitted through GetCalFresh each year (English and Spanish only), this would suggest that adding the rest of the Be Vu languages would lead to a ~18,000 additional applications (or ~41,300 individuals) submitted per year. At the statewide average 63% approval rate, expanding GetCalFresh to the rest of the Be Vu languages should result in ~26,000 additional LEP individuals enrolled in CalFresh.

Though the consortia are not necessarily evenly distributed in terms of population served, for the sake of estimate, we can roughly divide the eligible population served into three for each of the three consortia—1.7 million eligible individuals per consortia. C4Yourself would need to expand to Arabic and Farsi (0.55% of the eligible population combined), and Your Benefits Now would need to expand to Arabic, Farsi, Hmong, and Lao (0.71% of the eligible population combined)—CalWIN is already reaching more languages than the Be Vu list, so they will be excluded here. Utilizing similar methodology to that used for GetCalFresh, we estimate that expanding to all Be Vu languages would result in ~2,000 and ~3,000 additional LEP individuals enrolled for C4Yourself and Your Benefits Now, respectively.

For informational websites like the CDSS website and mRelief, an additional layer of analysis is required to understand the impact of information on submitting an application. Internal research

by GetCalFresh showed that 23% of CalFresh ad clicks resulted in application submissions^{xxiii}—this figure can serve as a proxy for application rate after visiting a CalFresh informational website. According to CDSS website analytics, there are ~16,600 unique visitors per month (or ~200,000 per year) on the CDSS CalFresh homepage. Using the 23% application submission figure, we can estimate that the CDSS website should be resulting in ~46,000 applications per year. However, since it is only offered in English (64.87% of the eligible population), we can further estimate that ~16,000 applications are being missed, or ~22,000 potential LEP enrollees.

Since 2016, mRelief has had 487,000 people access its website, or ~160,000 per year. Using the same methodology used for the CDSS website, we estimate that visiting the mRelief website should lead to ~37,000 applications per year. Since it is offered in English and Spanish (92.27% of the eligible population), we further estimate that only ~3,000 applications are being missed, or ~4,000 potential LEP enrollees.

Before tallying these figures up, it is also worth noting that just because an informational website was not translated into a given language does not mean that the individual was not able to find that information elsewhere. As a result, we apply a 0.5 discount factor on the potential enrollee figures to create a low-end estimate for the CDSS and mRelief websites, leaving us with ~11,000 and ~2,000 potential LEP enrollees for the low-end, respectively.

Now summing all of the various websites, we estimate a total of **44,000 – 57,000 additional LEP enrollees** as a result of implementing this policy alternative.

This policy alternative has **low scalability** due to the fact that website translations are specific to that particular version of the website—any new webpages or updates to existing pages would have to undergo review by translators for each of the Be Vu languages. While implementing this alternative for CalFresh can affect the entire CDSS website and consortia portals for programs that utilize SAWS, not all programs use SAWS and the variety of stakeholders involved in this process can make actualization beyond just CalFresh a challenge.

In terms of compliance, this alternative would create a **large improvement** on application of the Be Vu Settlement, a **large improvement** on nondiscrimination given the frequency of various websites' use, and **moderate improvements** on important parts of the CalFresh process and resources available to support the program.

Alternative 3: Fixing language-based churn

While the SF HSA's 2017 study did not yield any statistically significant differences in denial rates by language, it did note a difference in churn rates between English-speaking clients and non-English-speaking clients—English-speakers comprised 65% of the client population but only 57% of the churning population.^{xxiv} Given the nonsignificant findings in denial rate, this 8% difference in churn rate is where we turn our attention regarding translation quality.

In her report on CalFresh churn, Jensen reports that 56% of all applications statewide are a result of churn,^{xxv} which, when combined with overall enrollment, suggest that 2.27 million of CalFresh participants have been “churned” back into the program. Since churn is typically calculated by

looking at applications following recently receiving CalFresh benefits, it is a good indicator of administrative challenges with recertification. By applying the difference in churn rate from the SF HSA study to the statewide figure, we estimate that ~182,000 LEP individuals in a given year have churned specifically due to language issues. Since the average churning spends 1-1.5 months off of SNAP^{xxvi}, this is the equivalent of 15,000 – 23,000 LEP individuals at any particular moment that could stay enrolled if language-based churn were addressed. Adding on the 9,000 additional LEP enrollees as a result of expanding GetCalFresh from the status quo scenario, this policy alternative would result in an additional 24,000 – 32,000 LEP enrollees.

Implementing this solution would have **medium scalability**, because while SAWS would be able to use a similar strategy across other programs, not all CDSS programs utilize the SAWS project.

In terms of compliance, this fixing language-based churn would have a **moderate improvement** on a relatively frequent (annual) process, a **large improvement** in terms of critical process where there is a fixed window in which the individual must recertify, and a **small improvement** in saving CDSS and county offices resources that are needlessly spent processing churned applicants.

APPENDIX E: LIST OF INTERVIEWEES

CDSS:

- Maureen Keffer, Civil Rights Unit
- Christina Texeira, Civil Rights Unit
- Elsa Vazquez, Civil Rights Unit
- Brian Kaiser, CalFresh and Nutrition Programs
- Jessica Cooper, CaFresh Outreach
- April Kellison, CalFresh Outreach
- Eliana Kaimowitz, Immigration and Refugee Services
- Heidi Raveling, Family and Adult Programs Policy and Litigation Branch
- Aynalem Adugna, Research Services Branch
- Charissa Miguelino, Adult Programs Policy and Operations Bureau
- John Armenta, SAWS Unit
- Ali Sutton, Housing, Homelessness and Civil Rights Branch
- Shawn Dorris, CalWORKs Eligibility Bureau
- Elyas Bahramand, Language Services
- Michael Weston, Public Affairs and Outreach Programs

Nonprofit organizations:

- Becky Gershon, California Association of Food Banks
- Stephanie Nishio, California Association of Food Banks
- Jennifer Tracy, Alliance to Transform CalFresh
- Diana Jensen, SF-Marin Food Bank
- Tracey Patterson, California Food Policy Advocates
- Tia Shimada, California Food Policy Advocates
- Caitlin Docker, Code for America
- Danielle Thomas, mRelief

County offices:

- Stephanie Barnes, Alameda County Social Service Agency
- Teresa Hayes, Santa Clara County Social Services Agency

Other government agencies:

- Kimberly Clinton, Employment Development Department

Academics:

- Matt Unrath, Goldman School of Public Policy, UC Berkeley
- Jennifer Bussell, Goldman School of Public Policy, UC Berkeley
- Loan Kim, Pepperdine University

APPENDIX F: ADDITIONAL COMMENTS FROM INTERVIEWS

Due to the scoping of the project, a number of insights and comments from interviews were not included in the body of this report. In the spirit of documentation and for future efforts, below is a list of relevant comments raised by sources consulted in the course of the project and the organization from which the comment came in parentheses.

- Language line services, which are contracted separately by each county, vary in quality and often still struggle to find interpreters for rare languages (e.g. indigenous languages) and dialects. (Civil Rights Unit, Alliance to Transform CalFresh)
- Sometimes counties are not calling phone lines or hiring the required bilingual staff because of budget. (Alliance to Transform CalFresh, Civil Rights Unit)
- Caseloads among Hispanic populations in particular have been dropping during the Trump administration due to concerns about immigration status and public charge. It can be difficult to directly track this because it is difficult to know why someone chose to disenroll. (CalFresh Outreach, CFPA)
- A couple other sectors in which there has been a lot of discussion about language access and translations are in legal courts and in medicine. (Immigration and Refugee Services)
- There is a greater need for user experience (UX) testing and feedback for program and outreach materials. (CFPA)
- The treatment of LEP individuals in a county office can be heavily influenced by leadership and the tone they set. (Pepperdine University, CFPA)
- Eligibility criteria related to assets is inherently biased against immigrant groups because immigrants are often holding onto extra assets that cannot be used—e.g. money needed to fly to their native country, holding onto cash for family members intending to move to the U.S. (Pepperdine University)
- It would help to have more in-house translators and interpreters. (Language Services, CalWORKs)
- Case management structure can be a part of the challenge because it is difficult to have the same type of bilingual staffing support at each county office—sometimes this can lead to a tradeoff between timeliness of service and pairing with bilingual staff. (Alameda County, Santa Clara County)
- Documents provided from the state are typically encrypted and read-only. This can make any additional translations states needs to do very burdensome—it requires first re-making the form into an accessible format that then needs to be translated from there by a contractor. (Alameda County)
- Braille translations are impossible to provide in a timely way—there is an opportunity for forms to be made compatible with text-to-voice and for voice recognition tools to be adopted broadly. (Alameda County)
- There can be high turnover in amongst caseworkers. (Santa Clara County)

ENDNOTES

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