

October 20, 2020

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

Dear Commissioners,

We greatly appreciate your willingness to incorporate the expertise and experience of community partners to inform your public outreach and engagement plans. We also are pleased to see that you are initiating your discussion of best practices for community outreach early on in your work and are open to hearing a broad range of perspectives on this issue.

The 22 undersigned organizations make up a diverse network across California united by a mission to strengthen the political empowerment of low-income communities, communities of color, and disability communities in the redistricting process. Our network includes base-building grassroots organizations, civil rights litigation and advocacy organizations, good government organizations, and voter education organizations. We are also committed to ensuring that the maps the Commission develops comply with the Constitution, the federal Voting Rights Act (VRA), and respect communities of interest (COIs) to help ensure our communities obtain fair representation. We write to share our initial views on best practices in community outreach and engagement that would help achieve the foregoing goals. We envision this letter as merely the start of an on-going dialogue with the Commission about these best practices, and we intend to continue to work closely with the Commission as it implements its outreach and engagement efforts. In addition, our members are very much interested in the opportunity to provide a formal presentation to you on these recommendations, or any of the topics the recommendations address. We have also provided a summary of these recommendations in an Appendix to this letter.

Our partners focused on five components to public outreach and engagement:

- I. Outreach, mobilization, and community engagement
- II. Overall accessibility and logistics for hearings
- III. Accessibility for people with disabilities
- IV. Language access
- V. Initial mapping and compilation of COI information

I. Outreach, Mobilization and Community Engagement

Outreach, mobilization, and engagement of traditionally underrepresented communities will require the participation of a multitude of stakeholders to reach the diverse communities in our state. A critical role for the Commission is to build partnerships with and strengthen the network of nonprofit organizations and public institutions (e.g. K-12 school districts, colleges/universities, public libraries, etc.), together with other key stakeholders (ethnic media, labor, business, etc.), as well as trusted messengers, who have a track record of engaging and mobilizing communities. Being in partnership will enable the sharing of resources, ideas, and tools, and facilitate the coordination of events and public hearings between the Commission and community partners. This may help foster and strengthen the sense of shared ownership and responsibility of partners to maximize outreach, mobilization, and engagement for the redistricting process. It will also provide the Commission the opportunity to promote the value of civic engagement by all Californians. In order to strengthen outreach, mobilization, and engagement of communities we offer the Commission the following recommendations:

- **Build partnerships with and create a network of community stakeholders.**
- **Help raise awareness about the importance of participation in the redistricting process.**
- **Support local community groups' capacity to outreach and mobilize.**

Build partnerships with and create a network of community stakeholders:

The Commission is already on the right track in its approach to engage a variety of organizations and stakeholders to inform its plans for community outreach and engagement. The Commission should continue to identify and engage with regional and statewide networks and organizations to help the Commission further identify and become connected to local groups and organizations from a broad spectrum of sectors and COIs. In Section II of this letter, we also provide recommendations about how certain meetings of the Commission can be structured to build and strengthen relations with community partners and enhance the mobilization of members of underrepresented communities to provide input on their COIs.

Once you have established partnerships with groups and institutions, consult these partners based on their expertise, community base, and/or geographic presence, on key issues, such as language and disability access, communications strategy, messaging for distinct communities, and other related matters. These could take place as forums led by two commissioners and/or as part of the Commission's public meetings. The commission could also set up ongoing community working groups, similar to Language Accessibility Advisory Committees (LAACs) and Voter Accessibility Advisory Committees (VAACs) in the election arena, led by two commissioners, to provide guidance and direction on particular issues.

Help raise awareness about the importance of participation in the redistricting process:

The Commission's communications team will play an essential role in creating awareness of the redistricting process and motivating communities to participate. We recommend that you direct your communications team to engage with diverse partners and their bases to inform the Commission's communication strategy, narrative, and messaging; disability, cultural and language competency; and overall accessibility to information, prioritizing communities that face greater barriers to participation. In addition, we recommend that the Commission consult any language and accessibility working groups the Commission establishes, the signatories to this letter, and other stakeholders and community groups.

In addition to your communications strategy, make yourselves available to participate in community-led events, meetings, webinars, as well as interviews with local and ethnic media, to educate community members about the redistricting process, share your personal stories, and answer questions. Along with your engagement with traditional media outlets, have a strong social media presence that targets a diversity of audiences and specific regions.

Moreover, create infographics and other informational material that can be easily accessible and shared through multiple channels and informed by input from community groups. Many of our partners already have materials, which can be shared upon request.

Support local community groups' capacity to outreach and mobilize:

As uplifted by several commissioners, resources are needed for community organizations to outreach, mobilize, and engage community residents effectively in the redistricting process. Therefore, consider contributing to existing philanthropic funds for redistricting, specifically targeting community organizations rooted in harder-to-reach communities (e.g. American Indian/Alaskan Native reservations, Northern California, rural areas etc.) and communities that face disproportionate barriers to public participation (e.g. communities of color, low-English proficiency, low-income, people with disabilities, immigrant, etc.).

II. Overall Accessibility and Logistics for Hearings

Fundamentally, to engage community members in the redistricting process and to provide them with a meaningful opportunity to be heard by the Commission, the hearings scheduled by the Commission should be accessible to community members, and community members should have the information they need for well-informed participation. Thus, we recommend the following:

- **Hold robust hearings which focus on different areas throughout California.**
- **Hearing structure and procedures that enhance accessibility.**

Hold robust hearings which focus on different areas throughout California:

There must be a robust number of hearings that focus on obtaining testimony about COIs throughout the state. In the redistricting conducted by the 2011 Commission, there were 34 public meetings held in 32 cities and 23 counties to obtain this testimony. The information obtained during these meetings played an important role in shaping the maps adopted by the Commission. The breadth of these hearings also built public confidence in the transparency of the Commission's work. We recommend that you hold a similarly robust number of meetings throughout California, to help obtain perspectives from community members who are particularly knowledgeable about their regions or areas. Several of these meetings should be structured as smaller-scale 1-2 hour public meetings which create opportunities for community organizations, networks, educational institutions that work with underrepresented communities to engage with at least a smaller group of Commissioners directly on their particular COIs (we provide more information on how to obtain information on COIs in Section V of this letter). These smaller-scale meetings could be a space where different partners collaborate to share the stories of the communities they work with, their recommendations on COI boundaries, and respond to questions directly from commissioners to paint a picture of how their COIs fit in the larger region and among other COIs. The Commission should examine the feasibility of having community partners host these meetings, which would enable the partners to mobilize more community members from their networks, given that this is a special opportunity for them to speak with the Commission as a collective.

We also suggest scheduling multiple hearings in different areas of regions which will feature more complicated redistricting decisions, such as Los Angeles County (25% of plan districts and multiple VRA mandated districts among multiple protected-classes). For these regions, the Commission should also hold multiple hearings during each stage of the redistricting process.

We note that the public health environment may make it difficult to conduct in-person meetings in different parts of the state. If the Commission must hold these meetings virtually, we recommend that it devote individual meetings to specific regions of the state and ensure that its agendas clearly inform the public of the region being discussed at specific meetings. This will help the Commissioners focus on specific regions at each meeting and promote more coherence in the testimony provided. It will also help community members prepare for the meetings and enhance the ability of community-based organizations to effectively mobilize community members to testify. We do not recommend that the Commission limit these meetings solely to testimony relating to one specific region or area, because there may be other issues that community members wish to raise. However, we do believe it is valuable for the Commission to clearly inform the public that it intends to focus on a particular area in a specific meeting.

In this connection, we also suggest the Commission consider whether it should have at least one Commissioner who is familiar with the region of focus to preside over or take a leadership role at

the related meeting. In 2011, we found that the knowledge individual Commissioners had of their own communities helped facilitate a more informative and robust dialogue with community members.

Hearing structure and procedures that enhance accessibility:

The Commission hearings, particularly those where testimony is obtained on COIs and draft maps, must be held in a manner that enhances community participation. The following section of our letter focuses on overall issues of accessibility – recommendations specific to accessibility for persons with disabilities and language accessibility are provided later in this letter.

The Commission should offer the public diverse hearing days and times. Hearings on weekday evenings should be mixed with at least some hearings on weekends, to allow community members with a variety of job and family commitments to participate. Weekday hearings during business hours should be used rarely, as they are least accessible.

If at some point the Commission is able to hold in-person meetings, it should consult with community-based organizations about finding locations where community members will feel comfortable attending and providing testimony. All locations should be accessible by public transit and ADA-compliant. Buildings associated with law enforcement are not considered comfortable or safe locations for many communities and should be avoided. The Commission should strongly examine the feasibility of locations which do not require ID for access.

Furthermore, the Commission should strongly consider making a public space, that is accessible to individuals with disabilities, available to stream virtual meetings for those who may not have computers or internet access, particularly for regional meetings that they may be holding. This could be an opportunity to partner with local organizations or have space at a public library or school for this type of public streaming.

For both in-person and virtual meetings, the Commission should schedule meetings well in advance, and provide clear and specific information in its notices and agenda about the topics which will be covered in the meetings. This will enhance the ability of community partners to mobilize community members to participate in meetings. Thus, it is particularly important for meetings that focus on a specific region of the state or on obtaining COI input from members of underrepresented communities.

For virtual meetings, the Commission should consider improving the technology used for the public to provide comments during meetings, so that members of the public have a meaningful opportunity to participate. In the short-term, this means that when members of the public are providing comment through the telephone, the operator who puts them in the queue, and whomever is chairing the Commission meeting at the time, should provide clear instructions on how commenters should let the Commission know they want to speak. After announcing that it

is taking public comment, the Commission should provide sufficient time by waiting for a few minutes for individuals to conduct whatever telephone operation is required to indicate they want to speak. We note that there has been some improvement in this regard, but the Commission should work with its telecommunications provider to continue to improve the system. In the longer term, if and when the Commission changes the technology for obtaining public comment, it should provide clear instructions to members of the public about those changes.

In addition, when the Commission starts to hold meetings on COIs throughout the state, it should consider implementing a system which enables individual community members to have some certainty about the time during the meeting the member will be able to testify. In the 2011 redistricting, community members often lined up well in advance to gain entrance to the meeting, and then would sometimes have to wait several hours for their opportunity to testify. Further, for weekday evening meetings, it was often those privileged enough to get to hearing two hours before a 5:00 pm or 6:00 pm start time that were able to sign-up for the first-come, first-serve public comment process, usually pushing the working-class and/or disenfranchised communities to the back of the line. The Commission should consider implementing a system which provides community members with an appointment or a window of time for their testimony. This will provide community members with some predictability about when they will testify, and prevent situations where community members have to endure long waits, and may ultimately be discouraged from or leave a hearing before testifying.

For both virtual and in-person hearings, the Commission should ensure that members of the public have the capability to share maps or other visuals in the meeting in “real time,” so that both the Commission and meeting participants can view these materials. This may be something that can be integrated into the COI tools the Statewide Database is developing, but there should also be capabilities for sharing maps and other visual materials beyond the use of the COI tool.

III. Accessibility for People with Disabilities

There are over 4 million people with disabilities in California, making up over 10% of the California population. Los Angeles County alone has over 990,000 individuals with disabilities. People with disabilities, including physical, intellectual/developmental, sensory, and mental health disabilities are integral to the redistricting process and their participation depends on how accessible and inclusive the process is at every point. People with disabilities are a part of all communities, including Black, Indigenous, communities of color, LGBTQI+ communities. People with disabilities are also part of low-income communities, with twice as many people likely to live in poverty as compared to their non-disabled peers. Prioritizing accessibility for people with disabilities is paramount throughout all written and online information, as well as throughout all public hearings, both in-person and online. As a first step, we recommend the

Commission consult with its attorney to ensure that its website, tools, meetings and other materials and activities are accessible to people with disabilities in compliance with state and federal law. We also recommend consulting with disability rights organizations, such as Disability Rights California and a multitude of other [organizations by expertise and region](#)¹ to obtain input and for ways to enhance access throughout the redistricting process. County Voting Accessibility Advisory Committees (VAAC) may also be a resource. In addition, consider the following recommendations to further enhance the accessibility to participate for people with disabilities:

- **Ensure full access to written and online information.**
- **Ensure accessibility to in-person and online public hearings.**

Ensure full access to written and online information:

Written and online information is for most, the first step to getting engaged in the redistricting process. It is important that written information, wherever they will be used, online, in meeting notices, in documents or on outreach flyers, should be done in plain language to maximize the number of people who can access this information (this includes individuals with low literacy and immigrants who may not speak English as their first or primary language). It is important to provide advance meeting notice that asks attendees if they need reasonable accommodations (e.g., ASL interpreters, closed captioning, etc.) and designate a staff in advance that they can contact should they have questions.

Moreover, materials and documents that are emailed in advance to the public include Word format so that individuals who are blind, who have low vision, or who use screen reader technology can access them more readily. In addition, materials should be made available in alternative formats such as large print or Braille as requested.

Ensure accessibility to in-person and online public hearings:

There are several steps the Commission should take to make it easier for people with disabilities to participate in public hearings, whether in-person or online. First, clearly state the meeting agenda up-front and let attendees know what they can expect, including time frame. Second, ask anyone speaking to say their name every time they speak so that the captioner, ASL interpreter and sign language interpreters for other languages/countries, and attendees with disabilities alike know who is talking. Third, speak clearly and at a normal pace and create pauses during and between activities so that captioners and ASL and all other sign language interpreters can keep up and/or catch up. Fourth, use plain language when presenting and be mindful of jargon, acronyms, and assumed knowledge. Lastly, describe visual content that is presented so that anyone with a visual or cognitive disability as well as anyone that may be dialing in can fully understand the presentation.

¹ <https://disabilitycounts2020.org/disability-orgs-accommodations/>

For in-person hearings, in particular, we recommend the Commission ensure that the event or meeting space is fully accessible before booking the location. In advance of meetings, the Commission should obtain any needed accommodations that were requested by individuals with disabilities and take the appropriate time and funding needed to secure them when planning meetings. In addition, prior to the event, consider which spaces that individuals using scooter, power chair and wheelchair can easily access.

For online hearings, offer the option for individuals with disabilities, or to those who may not have a computer or internet, to dial-in by phone. Before the meeting starts, explain any accessible features (i.e., clicking on “cc” button to get closed captioning) or any other features related to the meeting that will be used (e.g., mute, hand raising, chat, etc.). In addition, provide any computer shortcuts that may be helpful for those who do not use a mouse due to their disability that can be sent out before the meeting. During the hearing, make sure speakers are muted when not speaking and take turns speaking, so as not to speak over one another. Lastly, make sure the service you’re using to host the virtual event is compatible with assistive technology like screen readers. Here are some links to additional resources that we hope the Commission will find useful:

- [How to Have More Accessible Online Meetings](#)²
- [How to Make Your Virtual Meetings and Events Accessible to the Disability Community](#)³
- [Hot Keys and Keyboard Shortcuts](#)⁴
- [Accessible Information Exchange: Meeting on a Level Playing Field](#)⁵
- [Increasing Access to Public Meetings and Events for People with Disabilities](#)⁶

IV. Language Access

California is one of the most linguistically diverse states in our nation. Federal and state law set forth a broad range of requirements to protect the ability of its citizens to participate in the electoral process even if they are not fully fluent in English. All of the state’s residents are allowed to participate in the redistricting process, making it one of the most democratic opportunities for civic engagement for all Californians. For the Commission to have the best possible information about COIs and related issues, it is critical that residents be able to understand and participate in the Commission’s activities even if they have limited English proficiency (“LEP”). For these reasons, we make the following recommendations:

- **Translate all information to the top 12 languages.**

² <https://youtu.be/0eS3MrjFbCk>

³ <https://rootedinrights.org/how-to-make-your-virtual-meetings-and-events-accessible-to-the-disability-community/>

⁴ https://support.zoom.us/hc/en-us/articles/205683899-Hot-Keys-and-Key-board-for-Zoom?mobile_site=true

⁵ <https://www.ada.gov/business/accessiblemtg.htm>

⁶ http://www.ca-ilg.org/sites/main/files/file-attachments/increasing_access_to_public_meetings_and_events.pdf

- **Use professional translators.**
- **Use “plain language” for information provided by the Commission.**
- **Provide interpreter services at hearings.**
- **Translate written comments.**

Translate all information to the top 12 languages:

The Commission should translate all key information it provides into at least the top 12 languages other than English that are spoken in California. This information includes notices of hearings, agendas, the website the Commission maintains, and similar types of information and materials. The top 12 languages are Spanish, Chinese (simplified and traditional), Vietnamese, Tagalog, Korean, Armenian, Farsi, Arabic, Russian, Japanese, Punjabi, and Khmer.⁷

The Commission should also translate key educational and outreach materials into additional languages. Examples of materials that should be provided in additional languages might include a simple fact sheet explaining the redistricting process, an explanation of COI and information on how to provide COI testimony, and notices of upcoming regionally-focused hearings. To the extent that the Commission releases transcripts of the hearings, as promised on each hearing agenda, those should be translated and released to the public in a timely manner as well. We recommend ongoing consultation with stakeholders to determine which additional languages should be covered. As noted above, the Commission might consider establishing a LAAC to assist the Commission with identifying language needs.

Use professional translators:

The Commission should use professional translators for its information. Translations should be posted in a timely manner. The Commission should seek to obtain community review of translated educational and outreach materials before distributing them. Reviewing translations involves a significant amount of community time and resources, and the Commission should provide stipends for community members or organizations who assist with review. County LAACs may also be a resource.

Use “plain language” for information provided by the Commission:

Because of the complexity of the terms and concepts used in redistricting, many Californians who are proficient in English may experience barriers understanding information provided by the Commission, particularly Californians with lower literacy levels. As noted above, we recommend that the Commission use “best practices” for providing information in “plain language,” which can involve the vocabulary, syntax, and visual organization of the information it presents. The use of “plain language” in the English-language information and materials

⁷ See California Complete Count - Census 2020, “Language and Communication Access Plan - CA Census 2020,” May 17, 2019, page 4 at <https://census.ca.gov/wp-content/uploads/sites/4/2019/06/LACAP.pdf>.

provided by the Commission is also important to language access because it makes translations simpler and more understandable.

Provide interpreter services at hearings:

The Commission should provide interpreters at all hearings for the top 12 languages noted above. It should work with community-based organizations to help determine the most effective way to provide those services. For the regionally-focused hearings described in Section II, it should also provide interpreters for all languages which would be required under Section 14201 of California's Election Code for the relevant county the hearing is focused on (Section 14201 includes the state's language assistance requirements for elections). It should also provide interpreters for any languages that have more than 1,500 LEP speakers in the region. In this connection, the Commission should examine the feasibility of securing video conferencing services which incorporate a translation option, so that participants can opt into specific channels to hear live translations of all of the meeting proceedings. If the Commission is hosting virtual-hearings, it may wish to consider scheduling some hearings specifically in some additional languages, to encourage those with limited English proficiency to come forward.

In addition to the Commission providing interpreters, community members should be permitted to use their own interpreters, such as family members. Under circumstances where community members need interpreters for their testimony, the time limit on comments should be extended to allow for the additional time that may be needed for interpretation.

Translate written comments:

The Commission should permit the submission of written comments in any language and arrange for expedited translation of the comments.

V. Initial mapping and compilation of COI information

We understand that the Commission has started the process of determining how it will compile information about COIs, including the assessment of the Statewide Database's COI tool. We also understand that the Commission is starting to think about how to ensure its maps comply with the VRA. The ability of community members to clearly understand what the Commission is doing and provide meaningful input to the Commission is very much dependent on how the foregoing activities progress, and thus, we offer these recommendations:

- **Provide initial mapping, visualizations and sketching of districts.**
- **Further develop the Statewide Database's COI tool.**

Provide initial mapping, visualizations and sketching of districts:

The "real-time" visualizations offered by the mapping consultant in the Commission's 2011 redistricting provided invaluable information to the public, and significantly enhanced public

confidence in the transparency of the Commission's line-drawing process. We recommend that a similar process be instituted by the Commission.

When drawing commences, the Commission must begin with the "sketching" of districts which are mandated by the VRA. We understand that the Commission will likely have to change the precise contours of these districts as it continues to proceed with its line-drawing, but given the high priority of VRA compliance in the California Constitution's redistricting criteria, using the initial contours of VRA-compliant districts as building blocks for its ultimate maps will be extremely valuable.

Further develop the Statewide Database's COI tool:

There is a strong need for the COI tool that the Statewide Database has developed, and the Statewide Database should continue to coordinate closely as it moves forward with community groups that will be mobilizing community members to provide testimony on COIs. The Statewide Database has started this dialogue, and it should continue to examine the accessibility of the tool to persons with disabilities, and LEP residents. In this connection, we recommend that the COI tool be translated into all languages spoken by more than 3% of Californians and/or more than 3% of any county. The Statewide Database should also continue to provide a broad group of stakeholders with an opportunity to "beta test" the COI tool and provide feedback on it. As the Commission and the Statewide Database work with community groups on the tool, they should obtain feedback on a broad range of issues, including what prompts most effectively lead residents to identify their COIs and provide accurate information. Community groups can also provide guidance on the value of using plain language in the tool, and help ensure that the language and the format of the tool ensures that community members can easily understand and access it.

It is critical that the COI tool should not be the sole manner in which members of the public can submit testimony on or drawings of COIs. While the Statewide Database is working with the Commission and stakeholders to make its tool as widely available and accessible as possible, there will still be community members who may not have access to it, because of technological equipment, access and/or literacy barriers. Thus, the Commission should ensure that members of the public can submit COI testimony and drawings in a wide variety of ways, including directly e-mailing testimony, or providing a hard-copy version through regular mail, or through phone calls with designated staff who can help receive the input. We believe the Commission should explore all the different ways, both low-tech and high-tech, that would afford the widest community input.

We hope that these recommendations are helpful and seriously considered for the Commission's outreach and engagement plans to ensure participation barriers are reduced and diverse communities' voices are enhanced throughout the redistricting process. Please contact Alejandra

Ponce de León with Advancement Project California and Rosalind Gold with NALEO Educational Fund to provide you with additional information.

Sincerely,

AAPIs for Civic Empowerment Education Fund
Advancement Project California
Alliance San Diego
Asian Americans Advancing Justice - Asian Law Caucus
Asian Americans Advancing Justice - Los Angeles
Black Census and Redistricting Hub
California Common Cause
California League of Conservation Voters
California Native Vote Project
Central Coast Alliance United for Sustainable Economy (CAUSE)
Coalition for Humane Immigrant Rights (CHIRLA)
Council on American-Islamic Relations - Los Angeles (CAIR - Los Angeles)
Disability Rights California
Dolores Huerta Foundation
Inland Empire United
League of Women Voters of California
Mexican American Legal Defense & Educational Fund (MALDEF)
Mi Familia Vota Education Fund
National Association of Latino & Appointed Elected Officials (NALEO) Educational Fund
Orange County Civic Engagement Table (OCCET)
PICO California
Power California

Summary of Recommendations

I. Outreach, Mobilization and Community Engagement

Outreach, mobilization, and engagement of traditionally underrepresented communities will require the participation of a multitude of stakeholders to reach the diverse communities in our state. A critical role for the Commission is to build partnerships with and strengthen the network of nonprofit organizations and public institutions (e.g. K-12 school districts, colleges/universities, public libraries, etc.), together with other key stakeholders (ethnic media, labor, business, etc.), as well as trusted messengers, who have a track record of engaging and mobilizing communities.

Build partnerships with and create a network of community stakeholders:

- Identify and engage with regional and statewide networks and organizations to help the Commission further identify and become connected to local groups and organizations from a broad spectrum of sectors and COIs.
- Consult partners based on their expertise, community base, and/or geographic presence, on key issues, such as language and disability access, communications strategy, messaging for distinct communities, and other related matters.

Help raise awareness about the importance of participation in the redistricting process:

- Direct your communications team to engage with diverse partners and their bases to inform the Commission's communication strategy, narrative, and messaging; disability, cultural and language competency; and overall accessibility to information. When accomplishing the foregoing, prioritize communities that face greater barriers to participation.
- Consult any language and accessibility working groups the Commission establishes, the signatories to this letter, and other stakeholders and community groups.
- Participate in community-led events, meetings, webinars, as well as interviews with local and ethnic media, to educate community members about the redistricting process, share your personal stories, and answer questions.
- Have a strong social media presence that targets a diversity of audiences and specific regions.
- Create infographics and other informational material that can be easily accessible and shared through multiple channels and informed by input from community groups.

Support local community groups' capacity to outreach and mobilize:

- Contribute to existing philanthropic funds for redistricting, specifically targeting community organizations rooted in harder-to-reach communities and communities that face disproportionate barriers to public participation.

II. Overall Accessibility and Logistics for Hearings

Fundamentally, to engage community members in the redistricting process and to provide them with a meaningful opportunity to be heard by the Commission, the hearings scheduled by the Commission should be accessible to community members, and community members should have the information they need for well-informed participation.

Hold robust hearings which focus on different areas throughout California:

- Hold a robust number of hearings that focus on obtaining testimony on COIs throughout the state to help obtain perspectives from community members who are particularly knowledgeable about their regions or areas.
- Structure several of these meetings as smaller-scale 1-2 hour public meetings which create opportunities for community organizations, networks, and educational institutions that work with underrepresented communities to engage with at least a smaller group of Commissioners directly on their particular COIs. Examine the feasibility of having community partners host these meetings.
- Schedule multiple hearings in different areas of regions which will feature more complicated redistricting decisions, such as Los Angeles County. For these regions, also hold multiple hearings during each stage of the redistricting process.
- If these meetings are held virtually, devote individual meetings to specific regions of the state and ensure that agendas clearly inform the public of the region being discussed at these specific meetings. Consider whether at least one Commissioner who is familiar with the region of focus should preside over or take a leadership role at such meetings.

Hearing structure and procedures must enhance accessibility:

- Offer the public diverse hearing days and times, such as a mix of weekday evenings and weekend hearing to allow community members with a variety of job and family commitments to participate. Weekday hearings during business hours should be used rarely, as they are least accessible.
- For in-person meetings, consult with community-based organizations about finding locations where community members will feel comfortable attending and providing testimony. All locations should be accessible by public transit and ADA-compliant. Buildings associated with law enforcement are not considered comfortable or safe locations for many communities and should be avoided. Examine the feasibility of locations which do not require ID for access.
- Strongly consider making a public space, that is accessible to individuals with disabilities, available to stream virtual meetings for those who may not have computers or internet access, particularly for regional meetings that they may be holding. This could be an opportunity to partner with local organizations or have space at a public library or school for this type of public streaming.
- For both in-person and virtual meetings, schedule meetings well in advance, and provide clear and specific information in related notices and agenda about the topics which will be covered in the meetings.
- For virtual meetings, improve the technology used for the public to provide comments during meetings by providing clearer instructions on how members in the public comment queue can let the Commission know they want to speak. After announcing the start of public comment, provide sufficient time for individuals to conduct whatever telephone operation is

required to indicate they want to speak. If and when the Commission changes the technology for obtaining public comment, provide clear instructions to members of the public about those changes.

- For meetings on COIs throughout the state, implement a system, such as an appointment or “window of time” schedule that will provide community members of the public some predictability about the time they will testify.
- For both virtual and in-person hearings, ensure that members of the public have the capability to share maps or other visuals in the meeting in “real time,” so that both the Commission and meeting participants can view these materials.

III. Accessibility for People with Disabilities

There are over 4 million people with disabilities in California, making up over 10% of the California population. Prioritizing accessibility for people with disabilities is paramount throughout all written and online information, as well as throughout all public hearings, both in-person and online.

Ensure full access to written and online information:

- Provide advance meeting notice that asks attendees if they need reasonable accommodations (e.g., ASL interpreters, closed captioning, etc.) and designate a staff in advance that they can contact should they have questions.
- Include Word format for materials and documents that are emailed in advance to the public so that individuals who are blind, who have low vision, or who use screen reader technology can access them more readily.
- Make materials available in alternative formats such as large print or Braille, as requested.

Ensure accessibility to in-person and online public hearings:

- Clearly state the meeting agenda up-front and let attendees know what they can expect, including time frame.
- Ask anyone speaking to say their name every time they speak so that the captioner, ASL interpreter and sign language interpreters for other languages/countries, and attendees with disabilities alike know who is talking.
- Ensure that anyone speaking speaks clearly and at a normal pace and create pauses during and between activities so that captioners and ASL and all other sign language interpreters can keep up and/or catch up.
- Use plain language when presenting and be mindful of jargon, acronyms, and assumed knowledge.
- Describe visual content that is presented so that anyone with a visual or cognitive disability as well as anyone that may be dialing in can fully understand the presentation.
- *For in-person hearings, in particular:*
 - Ensure that the event or meeting space is fully accessible before booking the location.
 - In advance of meetings, obtain any needed accommodations that were requested by individuals with disabilities and take the appropriate time and funding needed to secure them into account when planning meetings.

- o In addition, prior to the event, consider which spaces that individuals using scooter, power chair and wheelchair can easily access.
- *For online hearings, in particular:*
 - o Offer the option for individuals with disabilities, or to those who may not have a computer or internet, to dial-in by phone.
 - o Before the meeting starts, explain any accessible features (i.e., clicking on “cc” button to get closed captioning) or any other features related to the meeting that will be used (e.g., mute, hand raising, chat, etc.).
 - o Provide any computer shortcuts that may be helpful for those who do not use a mouse due to their disability that can be sent out before the meeting.
 - o During the hearing, make sure speakers are muted when not speaking and take turns speaking, so as not to speak over one another.
 - o Make sure the service you’re using to host the virtual event is compatible with assistive technology like screen readers.

IV. Language Access

California is one of the most linguistically diverse states in our nation. Federal and state law set forth a broad range of requirements to protect the ability of its citizens to participate in the electoral process even if they are not fully fluent in English. For the Commission to have the best possible information about COIs and related issues, it is critical that residents be able to understand and participate in the Commission’s activities even if they have limited English proficiency (“LEP”).

Translation of information provided by the Commission:

- Translate all key information the Commission provides into at least the top 12 languages other than English that are spoken in California. This information includes notices of hearings, agendas, the website the Commission maintains, and similar types of information and materials. The top 12 languages are Spanish, Chinese (simplified and traditional), Vietnamese, Tagalog, Korean, Armenian, Farsi, Arabic, Russian, Japanese, Punjabi, and Khmer.
- Translate key educational and outreach materials, as well as hearing transcripts into additional languages; release translated transcripts in a timely manner. In determining these additional languages, the Commission should engage in ongoing consultation with stakeholders.
- Consider establishing a Language Access Advisory Committee (“LAAC”) to assist the Commission in identifying language needs.

Use of translators for information and the translation process:

- Use professional translators for Commission information and post the information in a timely manner.
- Obtain community review of translated educational and outreach materials before distributing them and provide stipends for community members or organizations who assist with review. County LAAC’s may also be a translation resource.

Use of “plain language” for information provided by the Commission:

- Use best practices for “plain language” in Commission information and materials.

Interpreter services at hearings:

- Provide interpreters at all hearings for the top 12 languages, and work with community-based organizations to help determine the most effective way to provide those services.
- For regionally focused hearings, provide interpreters for all languages which would be required under Section 14201 of California’s Election Code for the relevant county the hearing is focused on. In addition, provide interpreters for any languages that have more than 1,500 LEP speakers in the region.
- Examine the feasibility of securing video conferencing services which incorporate a translation option, so that participants can opt into specific channels to hear live translations of all of the meeting proceedings. For virtual hearings, consider scheduling some hearings specifically in some additional languages.
- Permit community members to use their own interpreters, such as family members.
- Where community members need interpreters during hearings, extend the time limit on comments to permit additional time for interpretation.

Translation of written comments:

- Permit the submission of written comments in any language and arrange for expedited translation of the comments.

V. Initial mapping and compilation of COI information

The ability of community members to clearly understand what the Commission is doing and provide meaningful input to the Commission is very much dependent on how the Commission compiles information about COIs and how it ensures its maps comply with the VRA.

Provide initial mapping, visualizations and sketching of districts:

- Provide “real-time” visualizations by the mapping consultant during the mapping process.
- When drawing commences, start by “sketching” districts which are mandated by the VRA, and use these initial contours as building blocks for the ultimate maps.

Further develop the Statewide Database’s COI tool:

- Ensure that the Statewide Database continues to coordinate closely on the development of the COI tool with community groups who will be mobilizing community members to provide COI testimony.
- Ensure the Statewide Database continues to examine the accessibility of the COI tool to persons with disabilities, and LEP residents. Ensure the COI tool is translated into all languages spoken by more than 3% of Californians and/or more than 3% of any county.
- Ensure the Statewide Database continues to provide a broad group of stakeholders with an opportunity to “beta test” the COI tool and provide feedback on it. Obtain feedback on issues such as what prompts most effectively lead residents to identify their COIs and provide accurate information; the value of using plain language in the tool; and ensuring

that the language and the format of the tool allows community members to easily understand and access it.

- Ensure that the COI tool is not the sole manner in which members of the public can submit testimony on or drawings of COIs. Ensure that members of the public can submit COI testimony and drawings in a wide variety of ways, including directly e-mailing testimony, or providing a hard-copy version through regular mail, or through phone calls with designated staff who can help receive the input. The Commission should explore all the different ways, both low-tech and high-tech, that would afford the widest community input.