Appendix B2

Secretary of State's Office Summary

California Voter's Choice Act: Language Access During the November 2020 General Election

The Secretary of State's office commissioned research from the Voting Rights Project of the University of California, Los Angeles (UCLA) to provide an overview of voting access for language minorities in Voters Choice Act (VCA) counties during the 2020 General Election. This analysis uses data from the Secretary of State's VoteCal system, supplemented by information reported by each county, to highlight voter behavior for persons requiring language assistance – here, defined as voters who have indicated a language preference on their voter registration. UCLA's report, *California Voter's Choice Act: Language Access During the November 2020 General Election,*[1] also provides useful information about county budgets and expenditures and varying strategies that counties employed to provide services to their communities.

Background

The statutory framework for language assistance derives from Section 203 of the Voting Rights Act[2] and Section 14201 of the California Elections Code.[3] In short,

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[1] Barreto, M., Waknin, S., Venzor, V., Alejandre, A., Rios, M., (2021). *California Voter's Choice Act: Language Access During the November 2020 General Election*. University of California, Los Angeles, Voting Rights Project.

[2] Section 203 provides: "Whenever any State or political subdivision [covered by the section] provides registration or voting notices, forms, instructions, assistance, or other materials or information relating to the electoral process, including ballots, it shall provide them in the language of the applicable minority group as well as in the English language.".

[3] EC 14201(a) provides: "In counties and precincts where the Secretary of State has determined that it is appropriate, the county elections official shall provide facsimile copies of the ballot, as described in subdivision (b), with the ballot measures and ballot instructions printed in Spanish, one of which shall be posted in a conspicuous location in the polling place and at least one of which shall be made available for voters at the polling place to use as a reference when casting a private ballot. Facsimile ballots shall also be printed in other languages and provided in the same manner if a significant and substantial need is found by the Secretary of State. A facsimile copy of the ballot available for voters to use in casting a private ballot shall be sufficiently distinct in appearance from a regular ballot to prevent voters from attempting to vote on the facsimile copy."

these statutes place obligations on the state and covered county jurisdictions to provide various levels of language assistance services; generally, translation of ballots and election materials for Section 203; and posting of translated facsimile ballots and recruitment of bilingual poll workers on Section 14201.[4]

The November 2020 General Election occurred during the COVID-19 pandemic and under varying local public health protocols throughout the state. Local business shutdowns, stay-at-home orders, social distancing and the transition toward predominately virtual environments required county elections officials to adjust their outreach and engagement strategies and required voters to adjust to these changes. As a result of the pandemic, Governor Gavin Newsom signed Executive Order N-64-20 which required all county elections officials to send vote-by-mail ballots to all active registered voters across the state.[5]

Findings

Research from UCLA found that turnout overall increased due to expanded vote by mail across the state.[6] Their research also found similar turnout and vote by mail usage rates in VCA counties compared to non-VCA counties (excluding Los Angeles County). Voters throughout the state preferred voting by mail, and voters in non-VCA counties voted by mail slightly more, 90.2%, than in VCA counties, 88.4%.[7]

UCLA's research also found that turnout rates were only slightly lower among language minority voters, 68.5%, than for English speakers, 70.6%[8]—a difference in participation that is consistent with the Secretary of State's analysis of voter participation data. Language minority voters preferred to vote by mail more than English-speaking voters, with 89.9% of language minority voters and 70.6% of English-speaking voters casting a mail ballot.[9]

Voters preferring translated ballots had slightly lower rates of ballot rejection, 2.3%, than voters using English ballots, 3.0%.[10] Perhaps this suggests that understanding the content of a vote by mail ballot envelope—which includes

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[4] We note that section 14201, first enacted in 1994 has a coverage trigger formula that may create some structural impediments to more providing more cost-effective language assistance services.

[5] https://www.gov.ca.gov/wp-content/uploads/2020/05/05.08.2020-EO-N-64-20-signed.pdf

[6] California Voter's Choice Act: Language Access During the November 2020 General Election (Page 3)

[7] *Id.*

[8] *Id.*

[9] *Id.*

[10] *Id.*

various instructions on how to submit information that allows a registrar to correctly process it in one's language—helps avoid rejections.

County-specific findings for each of the 15 VCA counties include spending on education and outreach, translation services and bilingual staffing, ballots requested in languages other than English, turnout among language minority voters and any formal complaints about language access.

Recommendations

This report did not contain any recommendations; however, the Secretary of State's Office used these key findings to inform future implementation of the Voter's Choice Act.

2020

California Voter's Choice Act: Language Access During the November 2020 General Election

BY UCLA VOTING RIGHTS PROJECT IN PARTNERSHIP WITH THE CALIFORNIA SECRETARY OF STATE OFFICE

This report was written by the UCLA Voting Rights Project in partnership with the California Secretary of State.

About the UCLA VRP
The UCLA Voting Rights Project (UCLA VRP) is a nonpartisan, educational project housed within the Latino Policy and Politics Initiative (LPPI) at the University of California, Los Angeles. The UCLA VRP educates undergraduate, graduate, and professional degree students through our flagship voting rights clinic. The UCLA VRP works with experts and election officials across the country to ensure equitable access to voting.

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Executive Summary

With the rise of COVID-19, county clerks and voters had to find new, innovative, and flexible ways to vote. Election officials had to adjust the ways in which they were recruiting new voters and providing helpful resources and materials, all while providing a safe and sanitized environment. At the same time, voters were adjusting to new ways of voting, whether that was voting by mail for the first time or getting informed about the new voting devices some counties were providing.

In this report, we utilized VoteCal data to provide a comprehensive analysis on language access in the Voters Choice Act (VCA) counties. Our summary of the VCA counties averages and totals excludes Los Angeles County to prevent the skewing of the findings due to the size of Los Angeles County. Outlined below is the general landscape of language access in VCA counties, how the VCA counties compared to the non-VCA counties, and separate, individual analysis of each VCA county.

Major findings of this report are that turnout rates significantly increased across California counties as a result of more accessible voting by mail and that both non-VCA and VCA counties (excluding Los Angeles) had comparable vote-by-mail usage rates. In fact, non-VCA counties voted by mail at a slightly higher rate, 90.2% compared to the VCA counties average of 88.4%. In VCA counties, turnout among English-speaking and non-English speaking voters was similar. Voters who speak a primary language other than English had an average turnout rate of 68.5% compared to 70.6% for English voters. Additionally, both English and minority language voters in VCA counties chose to vote by method at similar rates.

It was clear that the preferred method of participation during the 2020 General Election was by mail ballot; 88.3% of English-speaking participants voted by mail, while 89.9% of minority language voters cast a mail ballot. Given the increased use of vote-by-mail, there were no significant disparities in mail ballot rejection rate between English and minority language voters. The rejection rate for English mail ballots was 3.0%, while the rate of rejection for all other language ballots was 2.3%.

As with any data analysis, there are limitations to the various data sources used in this report. The UCLA VRP utilized VoteCal data for our analysis because provides insights on voters who have their language preference on file with the county and/or state. Even though this dataset is of high quality, it does not contain totally complete information about all voters' racial and ethnic backgrounds. For instance, there is no requirement to self-report race or ethnicity in California, and only a small percent of voter report this information. Moreover, the objective of this report was to assess VCA counties compliance with language access requirements. Additional research could study voter satisfaction with language access services, however that was beyond the scope

here. Finally, not all voters who might need language assistance requested language assistance when registering to vote. There are potentially thousands of voters across California who might be interested in language services as they become aware and knowledgeable of this option.

Further, data about voter characteristics and method of voting gathered from county registrars and county election officials was varied from county to county. There is no state-mandated standard across VCA counties on how to maintain and report this information, which could be an opportunity for further guidance from the state. For example, some counties provided estimates, but not necessarily validated records, while other counties were unable to answer requests at all because they did not keep detailed records. While some counties did have better organized data related to language services, there is a need for more consistent and uniform reporting of this information.

Introduction

Signed into law in 2016, the California Voter's Choice Act (VCA) ushered in an election model used by fifteen counties during the November 2020 General Election: Amador; Butte; Calaveras; El Dorado; Fresno; Madera; Mariposa; Napa; Nevada; Orange, Sacramento; San Mateo; Santa Clara; and Tuolumne. This new election model expanded early voting opportunities and methods for voters to return their ballots. Designed to provide greater flexibility and convenience for voters, this new election model allows voters to choose how, when, and where to cast their ballot.

Under the VCA, each voter is mailed a ballot which they can then return by mail, to a secure drop box, or at a vote center. Voters may also cast a ballot at any vote center within their county or through other expanded in-person early voting options. Additionally, 2020 was the first time that all fifteen counties implemented the VCA.

This report, commissioned by the California Secretary of State's office pursuant to California Elections Code Section 4005(g)(1)(A), provides a comprehensive overview of voting access for language minorities in VCA counties during the November 2020 General Election. This report primarily focuses on VoteCal Data and County Reported Data to present research and findings related to minority language access to the ballot in the fifteen VCA counties during the November 2020 General Election.

Methodology

The purpose of this report is to provide an analysis of language access efforts and voter turnout rates for the November 2020 General Election in California's fifteen VCA counties.

Data Sources

VoteCal Data: This report primarily relies on data from VoteCal, California's single uniform, centralized voter registration database. This data includes information about voter registration, voter participation method, and voter participation by primary language group.

County Reported Data: Requests were sent to registrars in the fifteen VCA counties for data concerning various aspects of election administration, such as the issuance of ballots, the number of ballots dropped off at each vote center, and the accessibility requests made by limited-English voters. In addition, these same officials were asked to provide any additional information that could be relevant in assessing the impact of the VCA.

Data Limitations

As with any data analysis, there are limitations to the various data sources used in this report. The UCLA VRP used VoteCal data for our analysis because it provides insights on voters who have their language preference on file with the county and/or state. Even though this dataset is of high quality, it does not contain totally complete information about all voters' racial and ethnic backgrounds. For instance, there is no requirement to self-report race or ethnicity in California, and only a small percent of voters report this information. Moreover, the objective of this report was to assess VCA counties compliance with language access requirements. Additional research could study voter satisfaction with language access services, however that was beyond the scope of this report. Finally, not all voters who might need language assistance requested language assistance when registering to vote. There are potentially thousands of voters across California who might be interested in language services as they become aware of this option.

Further, data about voter characteristics and method of voting gathered from county registrars and county election officials varied from county to county. There is no state-mandated standard across VCA counties regarding how to maintain and report this information, which could be an opportunity for further guidance from the state. For example, some counties provided estimates, but not necessarily validated records, while other counties were unable to answer requests at all because they did not keep detailed records. While some counties did have better organized data related to language services, there is a need for more consistent and uniform reporting of this information.

Presentation of Data

This report includes the following tables for each county: 1) general election participants; 2) preferred voting methods; 3) voters by language type; 4) minority language share of eligible voter; 5) turnout by language; 6) preferred voting method by language; 7) Vote-By-Mail ("VBM") rejection rate; and 8) VBM rejection rate by language.

Table Type 1: General Election Participants
These tables present the total number of eligible voters, the number of eligible voters that participated in the election, the number of eligible voters that did not participate in the election, and voter turnout rate.

Table Type 2: Preferred Voting Method
These tables present the preferred voting method and share of voters that chose that method across the county.

Table Type 3: Voters by Language Type
These tables show the share of voters whose primary language is English and those who speak a primary language other than English, often defined in our analysis as minority language voters.

Table Type 4: Minority Language Share of Eligible Voter
These tables show the number of eligible voters in each non-English speaking language group and their respective share of the total eligible voters and total minority language voters.

Table Type 5: Turnout by Language
These tables show the number of eligible voters in each language group, the number that voted in the general election, the number that did not vote or had their vote rejected, and the turnout rate.

Table Type 6: Preferred Voting Method by Language
These tables show the preferred voting method and share of voters that chose that method across each language.

Table Type 7: VBM Rejection Rate
These tables show the number of mail ballots cast, the number received and accepted, the number rejected, and the rejection rate across a county.

Table Type 8: VBM Rejection Rate by Language
These tables show the number of mail ballots cast, the number received and accepted, the number rejected, and the rejection rate across each language.

VCA Counties Performance Overall Compared to Non-VCA Counties

Using the available VoteCal data for the 2020 General Election, we joined the voter file, vote by mail ballot file, and voter participation history file by the voter ID. We repeated this process for VCA and non-VCA counties to estimate voter turnout and mail ballot rejection rates. We determined the total number of eligible voters to assess voter turnout in each county by counting unique voter IDs.[1]

As shown in figure 1 below, in the 43 non-VCA counties, there were a total of 12,996,166 eligible voters. Of these eligible voters, more than 8.9 million, or 68.8%, voted in the 2020 General Election. According to the VoteCal data, more than 4.0 million voters did not participate in the election. In the 2020 primary, we observed a turnout rate of 40.7% in these non-VCA counties. Based on this data, there was an increase of 28.1 percentage points, along with a 77.8% overall increase, in voter turnout for the 2020 General Election.

Figure 1: Participation in the 2020 General Election for Non-VCA Counties

Total Non-VCA Counties	
Total Eligible Voters	12,996,166
Voted	8,946,215
Did Not Vote	4,049,951
Turnout	68.8%

As shown in figure 2 below, in the 14 VCA counties (excluding Los Angeles County), there were a total of 6,204,118 eligible voters. Of these eligible voters, nearly 4.4 million, or 70.5%, voted in the 2020 General Election. According to the VoteCal data, over 1.8 million voters did not participate in the election. In the 2020 primary, we observed a turnout rate of 35.2% in these VCA counties. This data means that there was an impressive 35.3 percentage point increase in voter turnout for the General Election.

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[1] VoteCal election data includes the method of participation by voter ID. The dataset lists a "*NA*" observation for voters who did not vote or whose participation method was unknown. In our analysis, we assume all *NA*s are for non-participants in the 2020 General Election.

Figure 2: Participation in the 2020 General Election for VCA Counties (Excluding Los Angeles County)

Total VCA Counties (Excluding Los Angeles)	
Total Eligible Voters	6,204,118
Voted	4,371,942
Did Not Vote	1,832,176
Turnout	70.5%

Figure 3 below shows the 70.5% average VCA voter turnout compared to each VCA county's voter turnout. Eight counties – Orange, Calaveras, Nevada, Amador, Tuolumne, Mariposa, El Dorado, and Napa –all had voters turn out at rates above the average. Napa had the highest voter turnout rate at 81.9%, and Fresno had the lowest rate at 63.7%.

Figure 3: Voter Turnout in Each VCA County Compared to the VCA County Average (Excluding Los Angeles County)
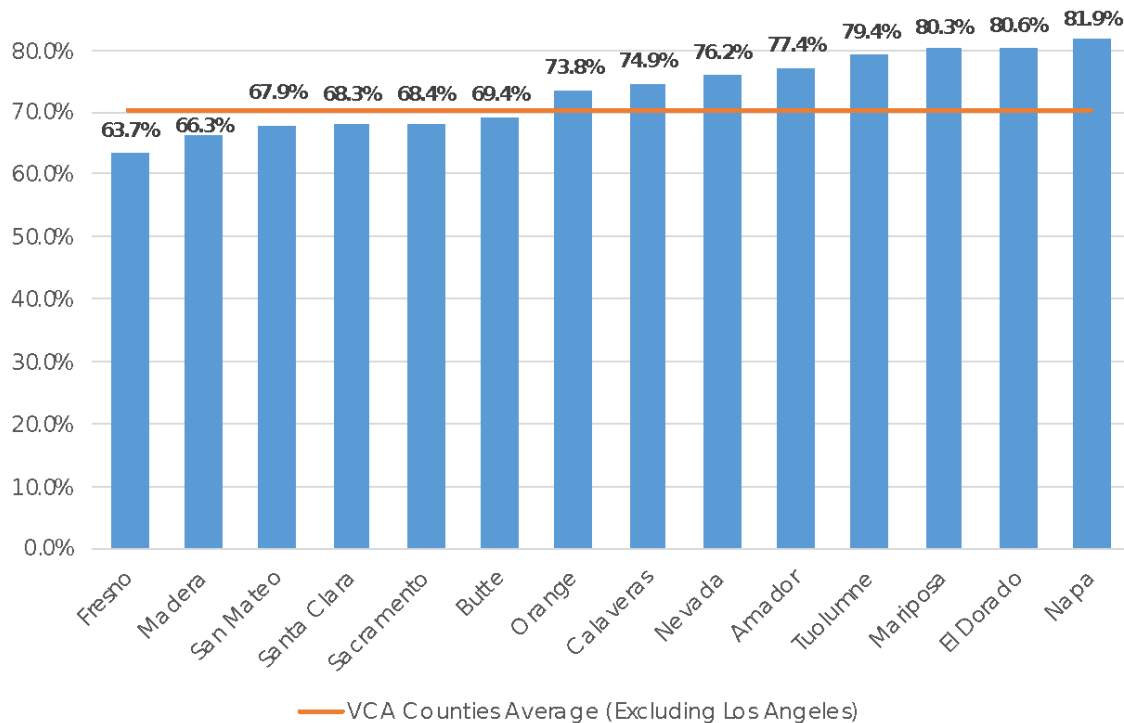
Figure 4 below shows the preferred voting methods for General Election participants in the non-VCA counties during the 2020 General Election. Nine out of ten voters in non-VCA counties voted by mail. More than 500 thousand voters, or 5.6%, chose to vote in person at an assigned polling place. The next most preferred methods were, in descending order, voting in person at a vote center, Conditional Voter Registration (CVR)/non-provisional CVR,[2] and in person early voting at 3.0%, 1.1%, and 0.2%, respectively.

Figure 4: Participation Using Voting Methods in the 2020 General Election for Non-VCA Counties (Excluding Los Angeles County)

Total Non-VCA Counties	
General Election Participants	8,946,215
Voted-by-Mail	8,072,292
% Voted-by-Mail	90.2%
Vote Center (In Person)	270,027
% Vote Center	3.0%
CVR / Nonprovisional CVR	99,435
% CVR / Nonprovisional CVR	1.1%
Precinct Polling Place (In Person)	503,939
% Precinct Polling Place	5.6%
Early (In Person)	22,289
% Early	0.2%

Figure 5 below shows the preferred voting methods for general election participants in the VCA counties. Similar to non-VCA counties, a significant majority of voters (88.4%) selected to vote by mail in the General Election. The most significant difference between non-VCA and VCA counties is that voters in VCA counties chose to vote in person at a vote center over their assigned precinct polling place. It is unknown why this disparity exists, but one theory is that VCA counties made vote centers more accessible.

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[2] A ""CVR voter" is a person who, on Election Day or the fourteen (14) days immediately preceding Election Day, does both of the following: Delivers an executed affidavit of registration to the county elections official in order to register to vote in California for the first time, or re-register to vote in the same or a different county in California. The executed affidavit of registration can be submitted either in person at the office of the county elections official, at a vote center, or at a satellite office designated by the county elections official or online through the Internet Web site of the Secretary of State. Requests a CVR provisional ballot at the office of the county elections official, at a vote center, or at a satellite office designated by the county elections official. A "CVR provisional ballot" is the type of provisional ballot issued to a CVR voter.

Figure 5: Participation Using Voting Methods in the 2020 General Election for VCA Counties (Excluding Los Angeles County)

Total VCA Counties (Excluding Los Angeles)	
General Election Participants	4,371,942
Voted-by-Mail	3,862,710
% Voted-by-Mail	88.4%
Vote Center (In Person)	458,630
% Vote Center	10.5%
CVR / Nonprovisional CVR	55,132
% CVR / Nonprovisional CVR	1.3%
Precinct Polling Place (In Person)	722
% Precinct Polling Place	0.0%
Early (In Person)	3
% Early	0.0%

In non-VCA counties, more than 12.6 million, or 97.2%, of voters listed English as their primary and preferred language. Conversely, over 400 thousand, or 3.1%, of voters in these counties speak a language other than English as their primary language.

Figure 6: Eligible Voters by Language Type in the 2020 General Election for Non-VCA Counties

Total Non-VCA Counties	
Total Eligible Voters	12,996,166
English	12,634,407
% English	97.2%
Total Minority Languages	403,937
% Minority Languages	3.1%

In VCA counties, nearly 6.0 million voters, or 95.7%, speak English as their primary language. VCA counties have a slightly larger limited-English electorate, with 4.3% of voters speaking a language other than English.

Figure 7: Eligible Voters by Language Type in the 2020 General Election for Non-VCA Counties

Total VCA Counties (Excluding Los Angeles)	
Total Eligible Voters	6,204,118
English	5,935,354
% English	95.7%
Total Minority Languages	268,764
% Minority Languages	4.3%

Figure 8 below shows the proportion of eligible voters that speak a minority language compared to the average across all VCA counties, which is represented by the orange line. As shown, only Orange and Santa Clara counties, have more limited-English voters than the VCA counties average. Seven counties have less than one percent of minority language voters that make up their electorate.

Figure 8: Minority Language Composition in Each VCA County Compared to the VCA County Average (Excluding Los Angeles County)

Legend: — VCA Counties Average (Excluding Los Angeles)

Bar chart values: Tuolumne 0.1%, Calaveras 0.1%, Nevada 0.2%, Amador 0.2%, Mariposa 0.2%, Butte 0.3%, El Dorado 0.3%, Sacramento 1.7%, Fresno 2.6%, San Mateo 2.8%, Napa 3.0%, Madera 3.4%, Orange 5.8%, Santa Clara 7.3%
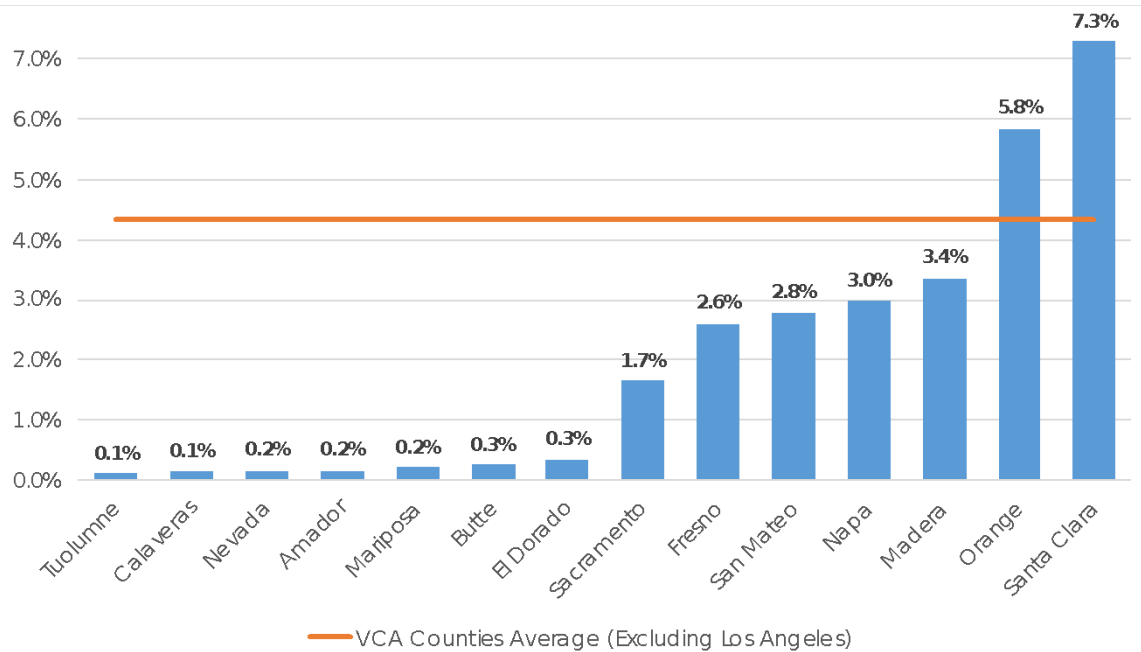
In non-VCA counties, Spanish speaking voters make up the majority of non-English speakers at 72.8% and comprise 2.3% of the total eligible voters. Chinese speaking voters represent the next largest group, comprising 16.4% of minority language voters and 0.5% of the total eligible voters. The remaining language groups make up 0.1% or less of total eligible voters.

Figure 9: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Non-VCA Counties

Total Non-VCA Counties			
	Eligible Voters by Language	Share of Total Eligble Voters	Share of Minority Language Voters
Spanish	294,204	2.3%	72.8%
Chinese	66,409	0.5%	16.4%
Vietnamese	18,823	0.1%	4.7%
Korean	8,593	0.1%	2.1%
Tagalog	7,151	0.1%	1.8%
Other (Not Listed)	3,456	0.0%	0.9%
Hindi	2,060	0.0%	0.5%
Thai	1,260	0.0%	0.3%
Japanese	1,218	0.0%	0.3%
Khmer	763	0.0%	0.2%

In VCA counties, Spanish speaking voters still make up the majority of non-English speakers at 38.5% and comprise 1.7% of total eligible voters. However, VCA counties are collectively more diverse in non-English speaking groups. Voters that speak Vietnamese comprise 34.0% of minority language voters and 1.5% of total eligible voters, similar to Spanish speakers. Chinese and Korean speaking voters make up 13.9% and 7.8% of non-English speaking voters, respectively. The remaining groups make up less than three percent of the share of minority language voters each.

Figure 9: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for VCA Counties (Excluding Los Angeles)

Total VCA Counties (Excluding Los Angeles)			
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	103,575	1.7%	38.5%
Vietnamese	91,501	1.5%	34.0%
Chinese	37,484	0.6%	13.9%
Korean	20,832	0.3%	7.8%
Tagalog	7,309	0.1%	2.7%
Other (Not Listed)	4,488	0.1%	1.7%
Hindi	1,318	0.0%	0.5%
Japanese	1,194	0.0%	0.4%
Thai	572	0.0%	0.2%
Khmer	491	0.0%	0.2%

Figure 10 below presents the breakdown of turnout by language in VCA counties. English, Vietnamese, Korean, Hindi, Japanese, Thai, and other non-listed languages all have a higher turnout than the 70.5% VCA counties average. Tagalog speaking voters are the only language group to have a turnout rate under 50% at 44.0%. The next group with the lowest turnout is Chinese speaking voters at 66.3%. This suggests that significant efforts need to be made to make voting more accessible and to engage Tagalog speaking voters.

Figure 10: Voter Turnout by Language in the 2020 General Election for VCA Counties (Excluding Los Angeles)

| VCA Counties Total (Excluding Los Angeles)				
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	5,936,441	4,188,587	1,747,854	70.6%
Spanish	103,262	69,403	33,859	67.2%
Vietnamese	91,250	64,990	26,260	71.2%
Chinese	37,417	24,798	12,619	66.3%
Korean	20,757	14,968	5,789	72.1%
Tagalog	7,291	3,207	4,084	44.0%
Other	4,455	3,673	782	82.4%
Hindi	1,311	1,024	287	78.1%
Japanese	1,188	877	311	73.8%
Thai	566	411	155	72.6%
Khmer	490	314	176	64.1%

Figure 11 below presents a more detailed look at the preferred method of voting in VCA counties by language. No language group diverted too far from the participation methods discussed earlier. The differences in preferred method seem to occur with some voters that voted CVR/nonprovisional CVR. No language group selected to vote at a precinct polling place or early above 0.1%.

Figure 11: Preferred Voting Method by Language Group in the 2020 General Election for Non-VCA Counties (Excluding Los Angeles County)

VCA Counties Total (Excluding Los Angeles)										
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	4,188,587	3,697,663	88.3%	443,788	10.6%	51,192	1.2%	717	0.0%	3	0.0%
Spanish	69,403	61,425	88.5%	6,658	9.6%	1,405	2.0%	5	0.0%	0	0.0%
Vietnamese	64,990	57,633	88.7%	5,656	8.7%	1,764	2.7%	0	0.0%	0	0.0%
Chinese	24,798	23,328	94.1%	1,223	4.9%	253	1.0%	0	0.0%	0	0.0%
Korean	14,968	14,057	93.9%	741	5.0%	179	1.2%	0	0.0%	0	0.0%
Other	3,673	3,222	87.7%	221	6.0%	230	6.3%	0	0.0%	0	0.0%
Tagalog	3,207	2,969	92.6%	200	6.2%	39	1.2%	0	0.0%	0	0.0%
Hindi	1,024	940	91.8%	56	5.5%	28	2.7%	0	0.0%	0	0.0%
Japanese	877	828	94.4%	39	4.4%	10	1.1%	0	0.0%	0	0.0%
Thai	411	378	92.0%	22	5.4%	11	2.7%	0	0.0%	0	0.0%
Khmer	314	267	85.0%	26	8.3%	21	6.7%	0	0.0%	0	0.0%

The purpose of figure 12 is to visually compare the preferred voting methods across languages. As shown below, an overwhelming majority of voters chose to vote by mail, regardless of language.

Figure 12: Voting Method by Language in the 2020 General Election for Non-VCA Counties (Excluding Los Angeles County)
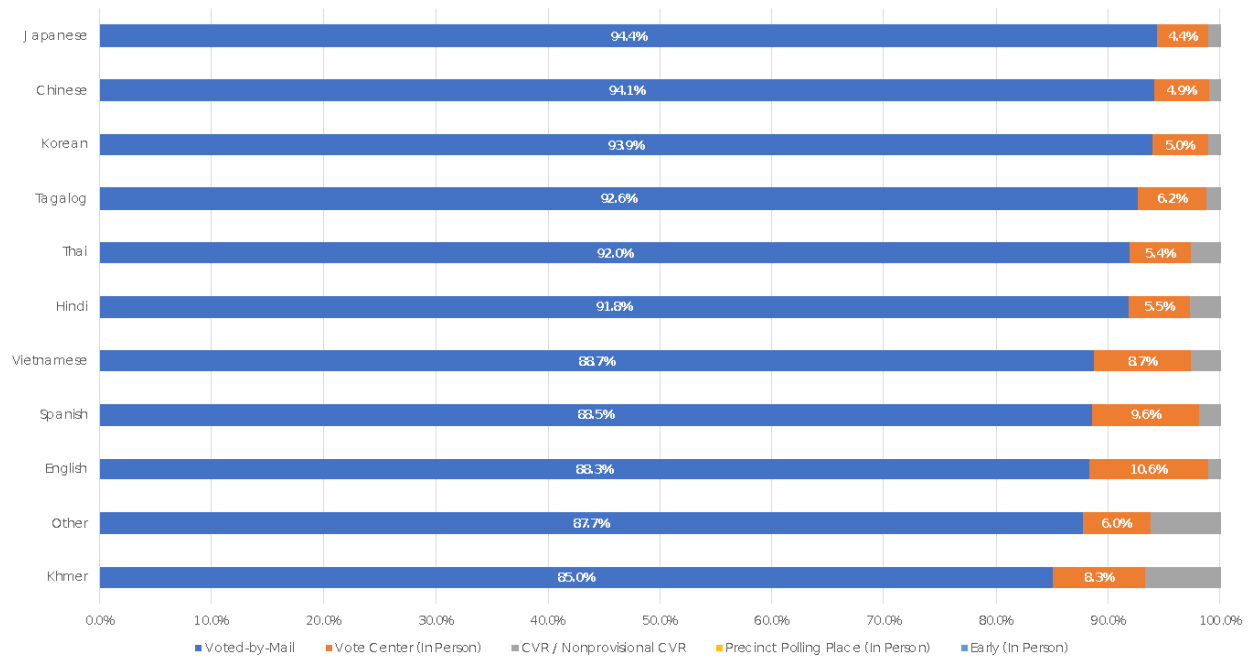
Given that approximately 90% of voters selected to vote by mail in both non-VCA counties and VCA counties, it is important to take a deeper look at this method of participation. For non-VCA counties, over 180 thousand, or 2.2%, of mail ballots were rejected.

Figure 13: Vote-by-Mail Statistics in the 2020 General Election for Non-VCA Counties

Total Non-VCA Counties	
Attempted to Vote-by-Mail	8,253,129
Accepted	8,072,292
Rejected	180,837
Rejection Rate	2.2%

In VCA counties, the mail ballot rejection rate was slightly higher, with 3.0% of ballots being rejected.

Figure 14: Vote-by-Mail Statistics in the 2020 General Election for VCA Counties (Excluding Los Angeles County)

Total VCA Counties (Excluding Los Angeles)	
Attempted to Vote-by-Mail	3,981,974
Accepted	3,862,710
Rejected	119,264
Rejection Rate	3.0%

Figure 15 below shows the average mail ballot rejection rate for all VCA counties compared to each county's individual rejection rate. Nine of the fourteen VCA counties are at or above the 3.0% average mail ballot rejection rate. The county with the highest rejection rate is Santa Clara, while Sacramento had the lowest rejection rate. Santa Clara also has the largest non-English speaking voter base of the VCA counties excluding Los Angeles, so it is possible that additional outreach needs to be done to prevent minority language voters from having their votes rejected.

Figure 15: Average Mail Ballot Rejection Rate for All VCA Counties Compared to the Rate in Each County in the 2020 General Election (Excluding Los Angeles County)
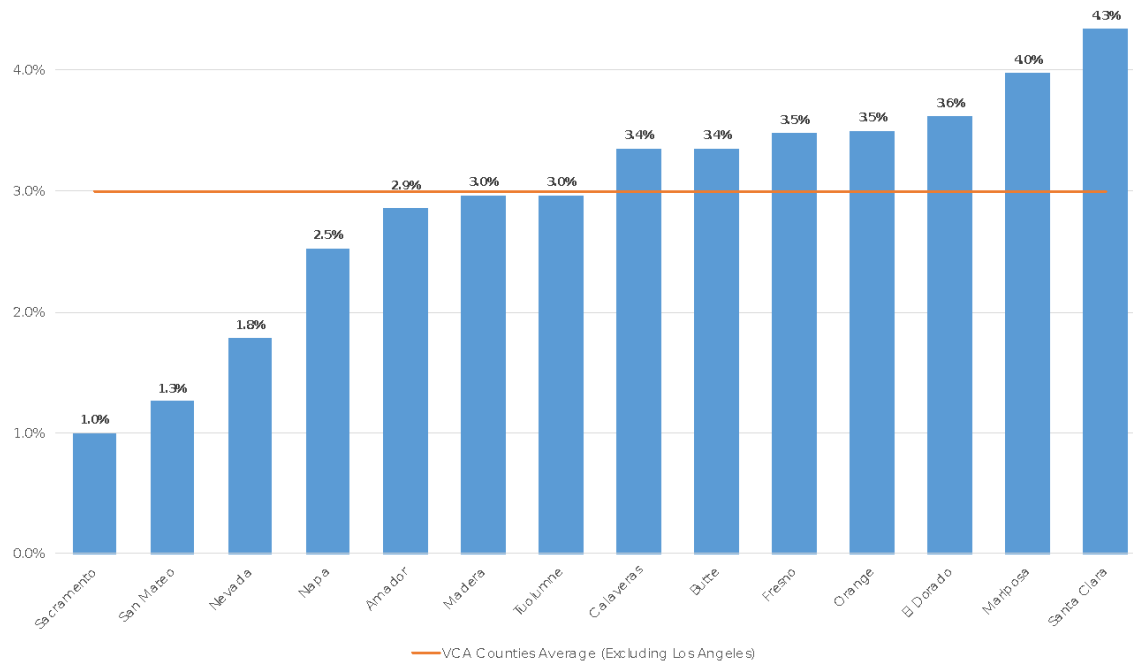
Language Access Strategies in VCA Counties in the November 2020 General Election

This section of the report evaluates the language access obligations and strategies for the fifteen VCA counties. It likewise presents data regarding voter registration and activity in each county.

Amador County

Amador County is covered by Cal. Elec. Code §14201 for Spanish but is not covered by §203 of the Voting Rights Act (VRA). The county spent less than $1000 on advertising for voter education.[3] Voter education advertisements took several forms, including public service announcements (PSA), newspaper (Ledger Dispatch), radio (KGVC radio), and community organizations and services (ESL courses, LAAC, county website).[4] Amador County does not have any media outlets that are specific to the Spanish speaking population. Therefore, the County enlisted the aid of community partners to educate the Spanish speaking communities.[5] The County also provided a toll-free voter assistance hotline for Spanish speakers. The hotline was in partnership with an interpreter relay service that was operational for 29 days before the election and approximately 30 days following election night.[6]

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[3] Email from Mark Hammergren, Chief Deputy Registrar of Voters, Amador County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 23, 2021) (on file with author).
[4] *Id*.
[5] Amador County, Voter's Choice Act Election Administration Plan, at 7 https://www.amadorgov.org/home/showpublisheddocument?id=34376 [hereinafter Amador Election Administration Plan].
[6] *Id.* at 7.

As mandated by SB 450, which requires counties send out mailers to voters, Amador County provided mailers and facsimile ballots in Spanish.[7] Mailers are mailed if requested by a voter at a vote center, however, the county reports that no one has ever requested to receive one.[8] The County Clerk & Register of Voters currently has two permanent staff members, but neither are bilingual.[9] The Chief Deputy Register of Voters stated that the office hires bilingual poll workers when possible.[10] For the 2020 General Election, two bilingual poll workers were hired.[11] Poll workers were trained on how to engage with language access voters through LanguageLine, a video translator service.[12] The county reported that they knew of two voters who were assisted at the polls—one was helped at the clerk's office using LanguageLine, and the other was aided by a poll worker at one of the vote centers.[13]

At Vote Centers, ExpressVote ballot marking devices were available to assist voters. ExpressVote is a paper-based voting system that uses touch-screen technology to produce a paper record for tabulation.[14] Each vote center also provided iPads with LanguageLine live video translation though which voters could access video or audio live interpreters in over 200 languages, including American Sign Language.[15]

Amador County's Language Access Advisory Committee (LAAC) is joined by the County's Accessibility Committee thus housing a VLAAC.[16] The VLAAC was composed of 6 members in 2020.[17] Committee members are required to serve one year (6 meetings). The committee met 5 times in preparation for the 2020 General Election.[18] On the VLAAC website, only select meeting minutes from 2019 are publicly available.[19] Through suggestions and partnerships developed by the LAAC, Amador County held four public events; no one from the community attended.[20]

VoteCal Data Analysis

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[7] Hammergren, *Supra*, note 8.

[8] *Id.*

[9] *Id.*

[10] *Id.*

[11] *Id.*

[12] *Id.*

[13] *Id.*

[14] Amador County, Express Vote, https://www.essvote.com/products/expressvote/

[15] Hammergren, *Supra*, note 8.

[16] *Id.*

[17] *Id.*

[18] *Id.*

[19] Amador County, Voting and Language Accessibility Advisory Committee, https://www.amadorgov.org/government/elections/vlaac-home

[20] Hammergren, *Supra*, note 8.

Amador County had just over 29 thousand eligible voters, 22,494 of whom, or 77.4%, participated in the 2020 General Election. From the primary election, we observed more than a 20-percentage point increase in voter turnout from the 57% rate.

Figure 16: Participation in the 2020 General Election for Amador

	Amador
Total Eligible Voters	29,075
Voted	22,494
Did Not Vote	6,581
Turnout	77.4%

The preferred method of voting for participants in the County was by mail, with 91.2% of voters opting to vote by mail. The next most popular method, used by 7.8% of voters, was in person at a Vote Center.

Figure 17: Participation Using Voting Methods in the 2020 General Election for Amador

	Amador
General Election Participants	22,494
Voted-by-Mail	20,523
% Voted-by-Mail	91.2%
Vote Center (In Person)	1,763
% Vote Center	7.8%
CVR / Nonprovisional CVR	213
% CVR / Nonprovisional CVR	0.9%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

In terms of a breakdown by language, Amador only has 51, or 0.2%, of voters that are limited-English speaking.

Figure 18: Eligible Voters by Language Type in the 2020 General Election for Amador

	Amador
Total Eligible Voters	29,075
English	29,024
% English	99.8%
Total Minority Languages	51
% Minority Languages	0.2%

Spanish speaking voters make up 54.9% of minority language voters, but only 0.1% of total eligible voters. The next largest group is an assortment of minority language voters from unlisted languages. No other minority language group makes up more than 10%of non-English speakers.

Figure 19: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Amador

	Amador		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	28	0.1%	54.9%
Other (Not Listed)	8	0.0%	15.7%
Chinese	4	0.0%	7.8%
Vietnamese	4	0.0%	7.8%
Korean	2	0.0%	3.9%
Tagalog	2	0.0%	3.9%
Japanese	2	0.0%	3.9%
Hindi	1	0.0%	2.0%
Thai	0	0.0%	0.0%
Khmer	0	0.0%	0.0%

The county had a 77.4% turnout rate among English speaking voters. No other language group served as a significant outlier in terms of voter turnout.

Figure 20: Voter Turnout by Language in the 2020 General Election for Amador

	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	29,025	22,455	6,570	77.4%
Spanish	27	19	8	70.4%
Other	8	6	2	75.0%
Chinese	4	4	0	100.0%
Vietnamese	4	4	0	100.0%
Japanese	2	1	1	50.0%
Korean	2	2	0	100.0%
Tagalog	2	2	0	100.0%
Hindi	1	1	0	100.0%

While the vast majority of voters in Amador voted by mail, a sizeable share of the minority language groups chose to vote in person at a vote center.

Figure 21: Preferred Voting Method by Language Group in the 2020 General Election for Amador

	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	22,455	20,497	91.3%	1,755	7.8%	208	0.9%	0	0.0%	0	0.0%
Spanish	19	11	57.9%	3	15.8%	5	26.3%	0	0.0%	0	0.0%
Other	6	4	66.7%	2	33.3%	0	0.0%	0	0.0%	0	0.0%
Chinese	4	3	75.0%	1	25.0%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	4	2	50.0%	2	50.0%	0	0.0%	0	0.0%	0	0.0%
Korean	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tagalog	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Hindi	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Japanese	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

With more than 9 out ten voters choosing to vote by mail, the County's mail ballot rejection rate was slightly higher than the VCA counties average of 2.2%.

Figure 22: Vote-by-Mail Statistics in the 2020 General Election for Amador

	Amador
Attempted to Vote-by-Mail	21,128
Accepted	20,523
Rejected	605
Rejection Rate	2.9%

While most minority language groups maintain a small share of the overall County electorate, the figure below shows that with additional outreach on proper vote-by-mail procedures, the non-English turnout rate would be closer to 100%. For example, there are two Japanese speaking voters in Amador, but only one voted in the general election. Further inspection shows that both of these voters attempted to cast a mail ballot, but one was rejected, reducing turnout by one-half.

Figure 23: Mail Ballot Rejection Rates by Language in the 2020 General Election for Amador

Amador			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	21,098	20,497	601	2.8%
Spanish	13	11	2	15.4%
Other	5	4	1	20.0%
Chinese	3	3	0	0.0%
Japanese	2	1	1	50.0%
Korean	2	2	0	0.0%
Tagalog	2	2	0	0.0%
Vietnamese	2	2	0	0.0%
Hindi	1	1	0	0.0%

Butte County

Butte County is not covered by §203 of the Voting Rights Act (VRA), but it is covered by the Cal. Elec. Code §14201 for Hmong and Spanish. The County invested in non-English advertisements for voter education through different forms of Public Service Announcements (PSAs) and a toll-free assistance hotline. The PSAs were distributed through minority language media, including radio stations, and the County worked with local agencies that consisted of language minority groups to provide support and services.[21] Additional strategies used to educate language assistance voters was to translate the amended Elections Administration Plan (EAP) in Spanish and Hmong, flyers, ballot types, as well as offer year-round over-the-phone translations by full-time staff proficient in both languages.[22] The County spent an estimated $5,000.[23] For the 2020 General Election, language assistance was provided via phone or in-person interpretation, however there are no recorded instances of voters requesting or using these services.[24]

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[21] Butte County Clerk-Recorder/ Registrar of Voters Election Administration Plan, at 10. https://elections.cdn.sos.ca.gov/vca/2020/eap/butte/butte-eap-amended-draft-11.5.2019.pdf [hereinafter Butte County Election Administration Plan].
[22] Email from Madison Wyman, Assistant County Clerk – Registrar of Voters, Butte County, to Vivian Alejandre, UCLA Voting Rights Project (Jan. 26, 2021) (on file with author).
[23] *Id.*
[24] *Id.*

Butte also provided facsimile ballots in Spanish and Hmong. The facsimile ballots were available via website, email, mail, and in Voter Assistance Centers.[25] The County had a total of five bilingual staff, two Hmong-speaking (one full-time and one temp) and three Spanish-speaking (two full-time and two temp).[26] They made efforts to work with a temp agency that could assist with hiring bilingual poll workers during election periods. Butte attempted to place at least one Spanish-speaking and one Hmong-speaking temp worker at each Voter Assistance Center, but with COVID-19, they instead had two call-in language assistance options. One option was with their main office and allowed voters to talk with staff, and the other was offered via Language Solutions Translation services.[27] The County also had poll workers who were trained on how to provide assistance, how to contact the main office, who to ask for help, and what steps to take to use Language Solutions.[28] For the 2020 General Election, no assistance calls were received by the County.[29]

The County had a Language Access Advisory Committee (LAAC) to assist the Hmong and Spanish community. Election officials stated that they had phone conversations with the Hmong and Spanish community leaders at times that were most convenient to them, since they were not in their office as much due to COVID-19.[30] While the County did partner with Language Solutions for translation services, it did not provide mailers. Instead, the County offered fliers in Spanish and Hmong.[31] Different ballot making devices were also made available, which included Image Cast X (ICX) and Remote Accessible Vote by Mail (RAVBM). ICX is a voting device with a touchscreen display and can be used as either a ballot marking device (without tabulation capabilities) or as a Direct Recording Electronic Device (DRE).[32] As for the RAVBM system, it allows voters to mark their selections using their own compatible technology to vote independently and privately from home, so long as they return the printed and signed selections either by mail or at a voting location.[33]

VoteCal Data Analysis

Butte County had nearly 150 thousand eligible voters, more than 103 thousand, or 69.4%, of whom participated in the 2020 General Election. The General Election yielded more than a 23-percentage point increase from the approximately 46% turnout rate in the primary.

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[25] *Id.*

[26] *Id.*

[27] *Id.*

[28] *Id.*

[29] *Id.*

[30] Email from Madison Wyman, Assistant County Clerk – Registrar of Voters, Butte County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 8, 2021) (on file with author).

[31] Wyman, *Supra*, note 25.

[32] Butte County, Dominion Voting Systems ImageCast X https://verifiedvoting.org/election-system/dominion-imagecast-x/

[33] *Id.*

Figure 24: Participation in the 2020 General Election for Butte

	Butte
Total Eligible Voters	149,203
Voted	103,556
Did Not Vote	45,647
Turnout	69.4%

Most voters preferred vote by mail, with 96.2% casting a mail ballot. This number exceeds the 88.4% VCA counties average. The next most utilized method was in person at a vote center, although only 2.9% of voters selected this option.

Figure 25: Participation Using Voting Methods in the 2020 General Election for Butte

	Butte
General Election Participants	103,556
Voted-by-Mail	99,638
% Voted-by-Mail	96.2%
Vote Center (In Person)	3,012
% Vote Center	2.9%
CVR / Nonprovisional CVR	1,002
% CVR / Nonprovisional CVR	1.0%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

Similar to Amador County, Butte's electorate is comprised of more than 99% English-speaking voters and only 376, or 0.3%, minority language voters.

Figure 26: Eligible Voters by Language Type in the 2020 General Election for Butte

	Butte
Total Eligible Voters	149,203
English	148,827
% English	99.7%
Total Minority Languages	376
% Minority Languages	0.3%

Three quarters of limited English voters speak Spanish. Vietnamese, Chinese, and other language speaking groups have over 20 eligible voters.

Figure 27: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Butte

	Butte		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	282	0.2%	75.0%
Vietnamese	24	0.0%	6.4%
Chinese	22	0.0%	5.9%
Other (Not Listed)	22	0.0%	5.9%
Korean	12	0.0%	3.2%
Japanese	6	0.0%	1.6%
Thai	4	0.0%	1.1%
Hindi	3	0.0%	0.8%
Tagalog	1	0.0%	0.3%
Khmer	0	0.0%	0.0%

English-speaking voters had the same exact turnout rate as the total county. Of the three next largest language groups – Spanish, Vietnamese, and Chinese – two had lower turnout rates than the 69.4% county average.

Figure 28: Voter Turnout by Language in the 2020 General Election for Butte

	Butte			
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	148,832	103,294	45,538	69.4%
Spanish	280	203	77	72.5%
Vietnamese	23	15	8	65.2%
Chinese	22	11	11	50.0%
Other	22	17	5	77.3%
Korean	12	9	3	75.0%
Japanese	6	3	3	50.0%
Thai	4	3	1	75.0%
Hindi	3	2	1	66.7%
Tagalog	1	1	0	100.0%

Voting by mail was significantly preferred across all language groups. Only one language group, Vietnamese speakers, had a vote-by-mail utilization rate under 90%, but this has more to do with the group being small rather than a difference in preferences.

Figure 29: Preferred Voting Method by Language Group in the 2020 General Election for Butte

	Butte									
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	103,294	99,383	96.2%	3,005	2.9%	1,000	1.0%	0	0.0%	0	0.0%
Spanish	203	197	97.0%	4	2.0%	2	1.0%	0	0.0%	0	0.0%
Other	17	16	94.1%	1	5.9%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	15	13	86.7%	2	13.3%	0	0.0%	0	0.0%	0	0.0%
Chinese	11	11	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Korean	9	9	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Japanese	3	3	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Thai	3	3	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Hindi	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tagalog	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

The County rejected 3,459, or 3.4%, of the mail ballots cast. This rejection rate is noticeably higher than the VCA counties average of 2.2%.

Figure 30: Vote-by-Mail Statistics in the 2020 General Election for Butte

	Butte
Attempted to Vote-by-Mail	103,097
Accepted	99,638
Rejected	3,459
Rejection Rate	3.4%

While this rejection rate is relatively high compared to other counties, it does not reflect a disparity amongst minority language voters. Only 8 non-English mail ballots were rejected in the General Election.

Figure 31: Mail Ballot Rejection Rates by Language in the 2020 General Election for Butte

Butte				
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	102,835	99,383	3,452	3.4%
Spanish	202	197	5	2.5%
Other	17	16	1	5.9%
Vietnamese	14	13	1	7.1%
Chinese	11	11	0	0.0%
Korean	9	9	0	0.0%
Japanese	3	3	0	0.0%
Thai	3	3	0	0.0%
Hindi	2	2	0	0.0%
Tagalog	1	1	0	0.0%

Calaveras County

Calaveras County is covered by Cal. Elec. Code §14201 for Spanish but is not covered by §203 of the Voting Rights Act (VRA). For the 2020 General Election, the County provided facsimile ballots that were translated into Spanish. Facsimile ballots were only mailed if a voter requested one. Otherwise, the translated ballots were located at every vote center and were available to voters who opted to use Touch Writers to vote.[34] Specifically for language assistance voters, the County Registrar sent out postcards informing registered voters of a voter education workshop where they could go over how to obtain a facsimile ballot. They taught voters how to cast a translated ballot using a Touch Writer at vote centers. Finally, the County sent out a postage-paid postcard with information in English and Spanish, either directing voters to the website or asking voters to return the mailed card if they needed assistance in Spanish.[35] Each voter information pamphlet that was provided also included a Spanish translated copy of all voting locations, dates, and times.[36] In total, the County spent $1,350.97 on translation services and Spanish language materials. This figure does not include staff time to compile, print, and make materials available to voters.[37]

Calaveras County provided mailers for Spanish as mandated by SB 450. Currently, the County Clerk & Registrar of Voters only has one permanent bilingual worker.[38] During voting periods, the County actively recruits bilingual poll workers and was able to obtain eight active bilingual poll workers for this past election cycle, five of whom worked at vote centers throughout the County during the November 2020 Election.[39] Calaveras tries to place at least one bilingual poll worker at each voting site, or at a minimum at a site where 3% or more of the registered voters are members of a single language minority.[40] Additional pay is given to bilingual workers.[41] Furthermore, poll workers are specifically trained on how to engage with language access voters. Poll workers are trained to post facsimile ballots in vote centers and have two copies of facsimile ballots available for voters. If a voter brings a translator, poll workers are trained to make eye contact with the voter and speak directly to the voter, and if they have difficulty understanding a voter,[42] they are trained to write down their communications and use a bilingual election worker or telephone interpreter service.[43]

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[34] Email from Robin Glanville, Assistant Clerk-Recorder, Calaveras County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 3, 2021) (on file with author).
[35] *Id.*
[36] *Id.*
[37] *Id.*
[38] *Id.*
[39] *Id.*
[40] *Id.*
[41] *Id.*
[42] *Id.*
[43] *Id.*

At vote centers, Calaveras provided Touch Writers to assist voters. The Touch Writers are programmed both in English and Spanish, so voters are able to choose their language preference between the two.[44] Aside from facsimile ballots being provided at vote centers, voters also had the option to ask for verbal Spanish language assistance; poll workers could call a language line to reach an interpreter to translate between the voter and the poll worker.[45] Poll workers did not keep track of how many voters were assisted at the polls. However, poll workers did have a tally sheet to track how many voters requested assistance in Spanish and the number of voters who used the translation line, but there were none for Spanish language assistance in the November 2020 General Election.[46]

Calaveras County has a Language Access Advisory Committee (LAAC). They are made up of five members. Two of these members, County Elections Staff, and regular attendees from Disability Rights California (DRC) and Disability Resource Agency for Independent Living (DRAIL) actively participate in every meeting.[47] The LAAC met once in preparation for the 2020 General Election and did not publicly report the meeting minutes.[48] In addition to having a LAAC, Calaveras had contracted with AvantPage for translation services but did not enter into a contract for media services.[49] AvantPage translated ballots, had online and voter pamphlet information regarding polling locations within the County, different languages available to voters at each location, and translated the Election Administration Plan (EAP) updates due to COVID.[50] The County holds at least two events before each statewide election at which voters are provided with language and disability information, but attendance tends to be low.[51] Furthermore, posters and flyers are posted throughout the Count. Calaveras also uses press releases, social media postings, and mass emails to all voters in order to get the word out to the community about each workshop.[52]

VoteCal Data Analysis

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[44] Email from Robin Glanville, Assistant Clerk-Recorder, Calaveras County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 10, 2021) (on file with author).

[45] Email from Robin Glanville, Assistant Clerk-Recorder, Calaveras County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 3, 2021) (on file with author).

[46] *Id.*

[47] Email from Robin Glanville, Assistant Clerk-Recorder, Calaveras County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 10, 2021) (on file with author).

[48] Calaveras County, Voting and Language Accessibility Advisory Committee VAAC/LAAC, https://elections.calaverasgov.us/Voter-Services/Accessible-Voting/VAAC-LAAC

[49] Glanville, *Supra*, note 50.

[50] *Id.*

[51] *Id.*

[52] *Id.*

27,478, or 74.9%, of the nearly 37 thousand eligible voters participated in the General Election. As anticipated, this is a significant increase in voter turnout compared to the 55% rate observed in the primary.

Figure 32: Participation in the 2020 General Election for Calaveras

	Calaveras
Total Eligible Voters	36,706
Voted	27,478
Did Not Vote	9,228
Turnout	74.9%

While 86.6% of voters chose to cast a mail ballot, a sizeable share of voters, 3,352 or 12.2%, selected to vote in person at a vote center.

Figure 33: Participation Using Voting Methods in the 2020 General Election for Calaveras

	Calaveras
General Election Participants	27,478
Voted-by-Mail	23,792
% Voted-by-Mail	86.6%
Vote Center (In Person)	3,352
% Vote Center	12.2%
CVR / Nonprovisional CVR	347
% CVR / Nonprovisional CVR	1.3%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

Only 55, or 0.1%, of eligible voters in Calaveras speak a primary language other than English.

Figure 34: Eligible Voters by Language Type in the 2020 General Election for Calaveras

	Calaveras
Total Eligible Voters	36,706
English	36,651
% English	99.9%
Total Minority Languages	55
% Minority Languages	0.1%

41, or 74.5%, of minority language voters speak Spanish. No other minority language group has more than 3 voters.

Figure 35: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Calaveras

	Calaveras		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	41	0.1%	74.5%
Khmer	3	0.0%	5.5%
Chinese	2	0.0%	3.6%
Hindi	2	0.0%	3.6%
Japanese	2	0.0%	3.6%
Thai	2	0.0%	3.6%
Korean	1	0.0%	1.8%
Vietnamese	1	0.0%	1.8%
Other (Not Listed)	1	0.0%	1.8%
Tagalog	0	0.0%	0.0%

Minority language voters had a collective turnout rate of 64.8%, more than 10 percentage points under the English voter turnout. While small in numbers, there is a concerning trend with no voter turnout for Chinese, Hindi, and other language speaking voters.

Figure 36: Voter Turnout by Language in the 2020 General Election for Calaveras

Calaveras				
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	36,652	27,443	9,209	74.9%
Spanish	41	28	13	68.3%
Khmer	3	3	0	100.0%
Chinese	2	0	2	0.0%
Hindi	2	0	2	0.0%
Japanese	2	1	1	50.0%
Korean	1	1	0	100.0%
Other	1	0	1	0.0%
Thai	1	1	0	100.0%
Vietnamese	1	1	0	100.0%

Most language groups had a similar vote-by-mail utilization rate to the county average. However, a considerable share of English-speaking voters selected to vote in person at a vote center.

Figure 37: Preferred Voting Method by Language Group in the 2020 General Election for Calaveras

Calaveras										
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	27,443	23,762	86.6%	3,348	12.2%	346	1.3%	0	0.0%	0	0.0%
Spanish	28	24	85.7%	3	10.7%	1	3.6%	0	0.0%	0	0.0%
Khmer	3	2	66.7%	1	33.3%	0	0.0%	0	0.0%	0	0.0%
Japanese	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Korean	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Thai	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Similar to Butte County, Calaveras had a relatively high rejection rate compared to other counties. This rate does not indicate a disparity in ballot rejection against minority language voters.

Figure 38: Vote-by-Mail Statistics in the 2020 General Election for Calaveras

	Calaveras
Attempted to Vote-by-Mail	24,617
Accepted	23,792
Rejected	825
Rejection Rate	3.4%

As shown in figure 39 below, all but one rejected mail ballot was from an English-speaking voter.

Figure 39: Mail Ballot Rejection Rates by Language in the 2020 General Election for Calaveras

	Calaveras			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	24,586	23,762	824	3.4%
Spanish	24	24	0	0.0%
Khmer	2	2	0	0.0%
Thai	2	1	1	50.0%
Japanese	1	1	0	0.0%
Korean	1	1	0	0.0%
Vietnamese	1	1	0	0.0%

El Dorado County

El Dorado County is covered by Cal. Elec. Code §14201 for Chinese and Spanish but is not covered by §203 of the Voting Rights Act (VRA). For the 2019/2020 budget, the County spent an estimated $25,000 in advertising for voter education.[53] This included ads via public service announcements, flyers, radio stations, social media, department website, and newspapers.[54] The County also provided voter guides containing information regarding other County services designed to assist limited-English voters in the voters' requested languages.[55] The County also provided facsimile ballots in Chinese. Facsimile ballots were mailed if a voter requested one and also in person at both the County Clerk's office and at vote centers.[56]

As mandated by SB 450, El Dorado County provided mailers for Spanish.[57] The County Clerk & Register of Voters has no bilingual full-time staff but hires additional bilingual help staff at vote centers during election season.[58] During the voting period, the County actively recruited 15 bilingual poll workers who are allocated based on how close they live to a vote center.[59] Further, poll workers are trained to operate a service called Language Line, which gives staff immediate access to a translator via video call or phone call at vote centers.[60] Though the number of assistance calls through Language Line were not tracked by poll workers, the County does know of a few voters who were assisted by a language interpreter.[61] The County is looking to create a procedure to track the amount of bilingual calls for future elections .[62]

At vote centers, El Dorado County provided a minimum of 3 Image Cast X (ICX) as well as a Mobile Ballot Printing module that prints ballots on demand in all required languages.[63] A RAVBM ballot marking device was also available to voters who requested an accessible VBM ballot.[64] Voters must request access in order to receive a postage paid envelope to mail their ballot in. The RAVBM system allows voters to cast their vote using a compatible technology device, print, and mail the ballot from the comfort of their own home.[65]

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[53] El Dorado County Voter Registration and Elections, Voter's Choice Act Election Administration Plan, (Sept. 2019) at 9, https://edcgov.us/Government/Elections/Documents/EDC%202019%20English%20Final.pdf [hereinafter El Dorado County Election Plan].

[54] *Id.* at 10.

[55] Email from Jonathan Podkomorka, Elections Technician, El Dorado County, to Vivian Alejandre, UCLA Voting Rights (Jan. 26, 202) (on file with author).

[56] *Id.*

[57] *Id.*

[58] *Id.*

[59] *Id.*

[60] *Id.*

[61] *Id.*

[62] *Id.*

[63] El Dorado County Election Plan, *supra* note 49, at 4.

[64] El Dorado County Election Plan, *supra* note 49, at 4.

[65] El Dorado County, Remote Accessible Vote-By-Mail (RAVBM), https://www.sos.ca.gov/elections/voting-resources/remote-accessible-vote-mail

El Dorado County's language access advisory committee (LAAC) did not meet in preparation for the 2020 General Election.[66] The committee's meeting minutes are not publicly recorded, except for those regarding meetings held in 2019.[67] The County has not disclosed the number of LAAC members due to privacy concerns.

VoteCal Data Analysis

Over 117 thousand, or 80.6%, of the nearly 146 thousand eligible voters participated in the General Election. This is significantly higher than the 70.5% VCA counties average. From the primary election, there was more than a 25 percentage point increase in voter turnout from the previous rate of 55%.

Figure 40: Participation in the 2020 General Election for El Dorado

	El Dorado
Total Eligible Voters	145,715
Voted	117,378
Did Not Vote	28,337
Turnout	80.6%

Like most of the analyzed VCA counties, most voters in El Dorado selected to vote by mail in the General Election. Voting in person at a vote center was the next preferred method with over 10 thousand, or 8.6%, of voters selecting this option.

Figure 41: Participation Using Voting Methods in the 2020 General Election for El Dorado

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[66] El Dorado County, Language Accessibility Advisory Committee, https://edcgov.us/Government/Elections/Pages/LAAC-About.aspx
[67] *Id.*

	El Dorado
General Election Participants	117,378
Voted-by-Mail	106,235
% Voted-by-Mail	90.5%
Vote Center (In Person)	10,120
% Vote Center	8.6%
CVR / Nonprovisional CVR	1,140
% CVR / Nonprovisional CVR	1.0%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

El Dorado, like some of the counties detailed above, has a small share of minority language voters. Only 503, or 0.3%, of voters in the county speak a primary language other than English.

Figure 42: Eligible Voters by Language Type in the 2020 General Election for El Dorado

	El Dorado
Total Eligible Voters	145,715
English	145,212
% English	99.7%
Total Minority Languages	503
% Minority Languages	0.3%

Spanish speaking voters represent the only minority language group with a noticeable share of the total eligible voters at 0.2%. Similarly, the Spanish language group makes up 64.6% of the non-English-speaking voters in the county. The next three largest language groups in order are Chinese, Korean, and Vietnamese residents with 57, 32, and 29 voters, respectively.

Figure 43: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for El Dorado

	El Dorado		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	325	0.2%	64.6%
Chinese	57	0.0%	11.3%
Korean	32	0.0%	6.4%
Vietnamese	29	0.0%	5.8%
Tagalog	17	0.0%	3.4%
Other (Not Listed)	14	0.0%	2.8%
Japanese	11	0.0%	2.2%
Thai	9	0.0%	1.8%
Hindi	7	0.0%	1.4%
Khmer	2	0.0%	0.4%

Of the five largest language groups, Spanish speaking voters had the lowest turnout; 108, or 33.7%, did not participate in the General Election.

Figure 44: Voter Turnout by Language in the 2020 General Election for El Dorado

El Dorado				
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	145,221	117,037	28,184	80.6%
Spanish	320	212	108	66.3%
Chinese	57	42	15	73.7%
Korean	32	24	8	75.0%
Vietnamese	29	25	4	86.2%
Tagalog	17	10	7	58.8%
Other	14	11	3	78.6%
Japanese	11	8	3	72.7%
Thai	9	8	1	88.9%
Hindi	7	3	4	42.9%
Khmer	2	2	0	100.0%

Like most VCA counties, the preferred method of voting was by mail ballot for all language groups.

Figure 45: Preferred Voting Method by Language Group in the 2020 General Election for El Dorado

El Dorado										
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	117,037	105,918	90.5%	10,100	8.6%	1,129	1.0%	0	0.0%	0	0.0%
Spanish	212	195	92.0%	13	6.1%	7	3.3%	0	0.0%	0	0.0%
Chinese	42	42	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	25	18	72.0%	5	20.0%	2	8.0%	0	0.0%	0	0.0%
Korean	24	24	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other	11	10	90.9%	1	9.1%	0	0.0%	0	0.0%	0	0.0%
Tagalog	10	10	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Japanese	8	7	87.5%	1	12.5%	0	0.0%	0	0.0%	0	0.0%
Thai	8	7	87.5%	0	0.0%	1	12.5%	0	0.0%	0	0.0%
Hindi	3	2	66.7%	0	0.0%	1	33.3%	0	0.0%	0	0.0%
Khmer	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

El Dorado had the third highest ballot rejection rate among all VCA counties at 3.6%. Nearly 4 thousand of the 110 thousand ballots cast by mail were rejected in the county.

Figure 46: Vote-by-Mail Statistics in the 2020 General Election for El Dorado

	El Dorado
Attempted to Vote-by-Mail	110,225
Accepted	106,235
Rejected	3,990
Rejection Rate	3.6%

While English speaking voters comprised the majority of rejected mail ballots, the rejection rate among minority language voters was slightly higher at 5.1%.

Figure 47: Mail Ballot Rejection Rates by Language in the 2020 General Election for El Dorado

El Dorado				
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	109,891	105,918	3,973	3.6%
Spanish	208	195	13	6.3%
Chinese	43	42	1	2.3%
Korean	25	24	1	4.0%
Vietnamese	18	18	0	0.0%
Tagalog	11	10	1	9.1%
Other	10	10	0	0.0%
Japanese	7	7	0	0.0%
Thai	7	7	0	0.0%
Hindi	3	2	1	33.3%
Khmer	2	2	0	0.0%

Fresno County

Fresno County is covered by §203 of the Voting Rights Act (VRA) for Spanish and by Cal. Elec. Code §14201 for Chinese, Hmong, Korean, Cambodian/Khmer, Punjabi, Filipino, and Vietnamese. The County invested in non-English advertisement for voter education through different forms of Public Service Announcements (PSA) and toll-free assistance hotline. The PSAs were distributed through minority language media, including radio and television stations, and the County worked with local agencies made up of language minority groups that provide support and services.[68] Additional strategies used to educate language assistance voters included mailing ballot translation and voter information guides in Chinese, Hmong, Korean, Cambodian/Khmer, Punjabi, Filipino, Vietnamese, and Spanish, offering over-the-phone translations, postcards informing registered voters of voter information guides, social media advertisements, and public events in all seven languages.[69] Fresno County has not finalized calculating their estimated expenses pertaining to the language assistance provided.[70] For the 2020 General Election, language assistance was provided via phone or in-person.[71] Non-Spanish speaking bilingual election workers' placement at vote centers were determined by precinct designations provided by the State.[72]

Fresno County provided mailers for Spanish language voters as mandated by SB 450 for the 2020 General Election. The County also provided facsimile ballots in Chinese, Hmong, Korean, Cambodian/Khmer, Punjabi, Filipino, Vietnamese, Laos, Tagalog, and Spanish.[73] The facsimile ballots were available via mail to any registered voter, anyone who requested voting assistance, and was also made available at all vote centers.[74] The County's bilingual staff varies from month to month, but there are generally eight to ten members, with at least one Spanish-speaking and two to six other bilingual staff working in the office.[75] With COVID-19, the County expanded the availability of bilingual staff through language assistance options and recruited bilingual poll workers for the 2020 General Election.[76] Poll workers were trained on how to provide assistance and informed of the rules surrounding language assistance. For the 2020 General Election, the County is unaware of how many assistances call they received, as the data was not collected.[77]

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[68] Fresno County, Elections Administration Plan (Nov. 2019), at 5, https://www.co.fresno.ca.us/home/showdocument?id=39855 [hereinafter Fresno County Elections Administration Plan].

[69] Email from James A. Kus, County Clerk/Registrar of Voters, Fresno County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 4, 2021) (on file with author).

[70] *Id.*

[71] *Id.*

[72] *Id.*

[73] *Id.*

[74] *Id.*

[75] *Id.*

[76] *Id.*

[77] *Id.*

The County has a Language Access Advisory Committee (LAAC) to assist the County's Chinese, Hmong, Korean, Khmer, Punjabi, Vietnamese, Tagalong, and Spanish communities.[78] Based on advice from the LAAC, Fresno held bilingual Voter Education Workshops and worked with all language access communities in the region to ensure the workshops were effective and strategically located.[79] The ballot marking device, Image Cast X (ICX), was also made available to use at vote centers this General Election.[80] ICX is a voting device with a touchscreen display and it can be used as either a ballot marking device (without tabulation capabilities) or as a Direct Recording Electronic Device (DRE).[81]

VoteCal Data Analysis

Nearly 368 thousand, or 63.7%, of the 577 thousand eligible voters participated in the General Election. While this is a significant increase from the 36% turnout rate during the primary, Fresno had the lowest turnout among all VCA counties.

Figure 48: Participation in the 2020 General Election for Fresno

	Fresno
Total Eligible Voters	577,027
Voted	367,619
Did Not Vote	209,408
Turnout	63.7%

More than 318 thousand, or 86.6%, of voters cast their ballot by mail for the General Election. An additional 42 thousand, or 11.5%, voters went to a vote center to vote in person.

Figure 49: Participation Using Voting Methods in the 2020 General Election for Fresno

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[78] Email from James A. Kus, County Clerk/Registrar of Voters, Fresno County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 5, 2021) (on file with author).
[79] Fresno County Elections Administration Plan, *supra* note 64, at 7.
[80] Fresno County Elections Administration Plan, *supra* note 64, at 12.
[81] Fresno County, Dominion Voting Systems ImageCast X, https://verifiedvoting.org/election-system/dominion-imagecast-x/

	Fresno
General Election Participants	367,619
Voted-by-Mail	318,491
% Voted-by-Mail	86.6%
Vote Center (In Person)	42,110
% Vote Center	11.5%
CVR / Nonprovisional CVR	7,538
% CVR / Nonprovisional CVR	2.1%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

Fresno was one of seven VCA counties that had a minority language composition above one percent. Specifically, it was the county with the sixth highest share of minority voters at 2.6%.

Figure 50: Eligible Voters by Language Type in the 2020 General Election for Fresno

	Fresno
Total Eligible Voters	577,027
English	561,926
% English	97.4%
Total Minority Languages	15,101
% Minority Languages	2.6%

Spanish speaking voters comprise the largest share of minority language voters at 88.1% and make up 2.3% of total eligible voters.

Figure 51: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Fresno

Fresno			
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	13,299	2.3%	88.1%
Other (Not Listed)	875	0.2%	5.8%
Vietnamese	353	0.1%	2.3%
Chinese	282	0.0%	1.9%
Korean	123	0.0%	0.8%
Khmer	94	0.0%	0.6%
Tagalog	73	0.0%	0.5%
Hindi	1	0.0%	0.0%
Japanese	1	0.0%	0.0%
Thai	0	0.0%	0.0%

Like most counties, English speaking voters largely determine county turnout. Among the minority language groups, Korean, Khmer, and Hindi speaking voters had turnout rates that were lower than the county average.

Figure 52: Voter Turnout by Language in the 2020 General Election for Fresno

Fresno				
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	561,979	357,267	204,712	63.6%
Spanish	13,273	9,025	4,248	68.0%
Other	873	668	205	76.5%
Vietnamese	352	290	62	82.4%
Chinese	282	196	86	69.5%
Korean	122	77	45	63.1%
Khmer	94	59	35	62.8%
Tagalog	73	59	14	80.8%
Hindi	1	0	1	0.0%
Japanese	1	1	0	100.0%

A considerable share of voters from each language group voted in person at vote centers in the General Election. However, most voters, regardless of language, cast their ballot by mail.

Figure 53: Preferred Voting Method by Language Group in the 2020 General Election for Fresno

	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
Fresno											
English	357,267	309,320	86.6%	41,227	11.5%	7,203	2.0%	0	0.0%	0	0.0%
Spanish	9,025	7,972	88.3%	794	8.8%	272	3.0%	0	0.0%	0	0.0%
Other	668	612	91.6%	31	4.6%	25	3.7%	0	0.0%	0	0.0%
Vietnamese	290	229	79.0%	36	12.4%	25	8.6%	0	0.0%	0	0.0%
Chinese	196	176	89.8%	13	6.6%	7	3.6%	0	0.0%	0	0.0%
Korean	77	76	98.7%	2	2.6%	0	0.0%	0	0.0%	0	0.0%
Khmer	59	50	84.7%	5	8.5%	4	6.8%	0	0.0%	0	0.0%
Tagalog	59	56	94.9%	2	3.4%	1	1.7%	0	0.0%	0	0.0%
Japanese	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%

Fresno tied with Orange for the fourth highest mail ballot rejection rate among VCA counties at 3.5%. The County had the lowest turnout rate and rejected 11,485 mail ballots in the general.

Figure 54: Vote-by-Mail Statistics in the 2020 General Election for Fresno

	Fresno
Attempted to Vote-by-Mail	329,976
Accepted	318,491
Rejected	11,485
Rejection Rate	3.5%

The majority of rejected mail ballots came from English-speaking voters. For minority language groups, there were no significant outliers.

Figure 55: Mail Ballot Rejection Rates by Language in the 2020 General Election for Fresno

	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
Fresno				
English	320,529	309,320	11,209	3.5%
Spanish	8,203	7,972	231	2.8%
Other	633	612	21	3.3%
Vietnamese	234	229	5	2.1%
Chinese	186	176	10	5.4%
Korean	81	76	5	6.2%
Tagalog	56	56	0	0.0%
Khmer	54	50	4	7.4%

Madera County

Madera County is covered by §203 Voting Rights Act (VRA) for Spanish and by Cal. Elec. Code §14201 for Punjabi. The County invested approximately $24,000 in non-English advertisement for voter education through television and radio Public Service Announcement (PSA).[82] Additional strategies used to educate language assistance voters were legal notices and advertisements in newspaper publications alongside direct voter contact mail to Spanish and Punjabi communities.[83] Though the County does not provide facsimile ballots, live ballots in Spanish and Punjabi are available at in-person vote centers through ballot marking devices such as Image Cast X (ICX) and Mobile Ballot Printing (MBP).[84] As a result of COVID-19, Spanish and Punjabi ballots were mailed in the 2020 General Election, regardless of if the voter indicated a language preference other than English.[85] In total, the County spent $60,000 on translation materials, excluding staff time to compile, print, mail and make materials available to voters.[86]

Madera County provided mailers for Spanish and Punjabi as mandated by SB 450. The County Clerk & Register of Voters does not track the total number of its employees that are bilingual.[87] During the 2020 General Election, 31of the 73 vote center poll workers were bilingual, and there was a minimum of 2 bilingual poll workers per vote center.[88] Vote centers that were designated with more than 2 bilingual poll workers were determined based on voter registration data for non-English preference voters residing in the area of the vote center.[89] Poll workers are specifically trained on how to engage with language access voters. For all registered voters, a pre-paid postage voter assistance card was mailed with a telephone number that would connect voters to a bilingual poll worker at their nearby vote center if they needed language assistance.[90] The County did not track the number of voters who called and used the language assistance telephone number.[91]

For the 2020 General Election, Madera County deployed the Image Cast Voting System (ICVS) from Dominion Voting Systems (DVS). At each vote center, the ICVS included a minimum of three Image Cast X (ICX) ballot marking devices and a Mobile Ballot Printing (MBP) module

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[82] Madera County Registrar of Voters Election Administration Plan E.C. 4005 (a)(10)(1) (Final November 2019 V3.2), at Appendix E https://votemadera.com/wp-content/uploads/2019/12/MadCo-v3.2-Final-November-2019.pdf [hereinafter Madera County Election Administration Plan].

[83] *Id.*

[84] Email from Justin White, Chief Assistant County Clerk, Madera County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 17, 2021) (on file with author).

[85] *Id.*

[86] *Id.*

[87] *Id.*

[88] *Id.*

[89] *Id.*

[90] *Id.*

[91] *Id.*

that allowed all the County's vote centers to print ballots on demand in Spanish, Punjabi, and English.[92] Additionally, Madera County provided a DVS Remote Accessible Vote-by-Mail system for all registered voters accessing a VBM ballot in Spanish and Punjabi.[93]

The County has a seven-member Language Access Advisory Committee (LAAC). The 2019-2020 Madera County LAAC members were Samuel Molina (co-Chair), Leticia Gonzalez (Co-Chair), Alexander Salazar, Johanna Torres, Nadeem Ahmad, Felipe Grimaldo Jimenez, and Humberto Avila.[94] The LAAC met twice in preparation for the 2020 General Election and did not publicly report meeting minutes.[95] In collaboration with the LAAC, Madera County held bilingual voter education workshops in Spanish and Punjabi where language interpreters were in attendance.[96] The workshops provided language access voters information about materials and assistance available in the specified language, in addition to the vote center model voting process.[97]

VoteCal Data Analysis

Over 53 thousand, or 66.3%, of the nearly 81 thousand eligible voters participated in the General Election. Although this is an increase from the 40% turnout rate during the primary, Madera still had the second lowest turnout among all VCA counties.

Figure 56: Participation in the 2020 General Election for Madera

	Madera
Total Eligible Voters	80,903
Voted	53,641
Did Not Vote	27,262
Turnout	66.3%

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[92] *Id.*

[93] *Id.*

[94] Madera County, Language Accessibility Advisory Committee (LAAC) Member Roster, https://votemadera.com/wp-content/uploads/2019/08/LAAC-2019-2020-Roster.pdf

[95] Madera County, Language Accessibility Advisory Committee (LAAC), https://votemadera.com/language-accessibility-advisory-committee-laac-2/

[96] Madera County Election Administration Plan, supra note 77, at 11.

[97] *Id.*

The preferred method of participation in the County reflected the VCA counties average, with 89.1% of voters selecting to vote by mail. An additional 5 thousand, or 9.4%, of voters went in person to vote at a vote center.

Figure 57: Participation Using Voting Methods in the 2020 General Election for Madera

	Madera
General Election Participants	53,641
Voted-by-Mail	47,773
% Voted-by-Mail	89.1%
Vote Center (In Person)	5,030
% Vote Center	9.4%
CVR / Nonprovisional CVR	875
% CVR / Nonprovisional CVR	1.6%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

Of the nearly 81 thousand eligible voters, 2,727, or 3.4%, speak a primary language other than English.

Figure 58: Eligible Voters by Language Type in the 2020 General Election for Madera

	Madera
Total Eligible Voters	80,903
English	78,176
% English	96.6%
Total Minority Languages	2,727
% Minority Languages	3.4%

Spanish speaking voters make up an overwhelming majority of the minority language voters in the County at 97.1%. They also make up a noticeable portion of the total eligible voters with 3.3% share.

Figure 59: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Madera

	Madera		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	2,648	3.3%	97.1%
Other (Not Listed)	21	0.0%	0.8%
Chinese	15	0.0%	0.6%
Hindi	15	0.0%	0.6%
Vietnamese	10	0.0%	0.4%
Korean	9	0.0%	0.3%
Thai	4	0.0%	0.1%
Tagalog	2	0.0%	0.1%
Japanese	2	0.0%	0.1%
Khmer	1	0.0%	0.0%

Unlike some of the other counties discussed above, Madera had a near identical turnout rate for both English-speaking and minority language voters. The County's English-speaking voters turned out at 66.3%, and non-English speaking voters collectively turned out at 66.4%. Minority language voters were widely led by the Spanish speaking group, which had a turnout rate above the County average at 66.0%.

Figure 60: Voter Turnout by Language in the 2020 General Election for Madera

Madera				
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	78,181	51,834	26,347	66.3%
Spanish	2,645	1,746	899	66.0%
Other	21	16	5	76.2%
Chinese	15	11	4	73.3%
Hindi	15	13	2	86.7%
Vietnamese	10	8	2	80.0%
Korean	9	8	1	88.9%
Thai	4	4	0	100.0%
Japanese	2	1	1	50.0%
Tagalog	2	1	1	50.0%
Khmer	1	1	0	100.0%

Like all the VCA counties, Madera voters widely preferred to vote by mail, regardless of their primary language.

Figure 61: Preferred Voting Method by Language Group in the 2020 General Election for Madera

Madera										
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	51,834	46,114	89.0%	4,897	9.4%	857	1.7%	0	0.0%	0	0.0%
Spanish	1,746	1,601	91.7%	128	7.3%	18	1.0%	0	0.0%	0	0.0%
Other	16	15	93.8%	1	6.3%	0	0.0%	0	0.0%	0	0.0%
Hindi	13	11	84.6%	2	15.4%	0	0.0%	0	0.0%	0	0.0%
Chinese	11	11	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Korean	8	7	87.5%	1	12.5%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	8	7	87.5%	1	12.5%	0	0.0%	0	0.0%	0	0.0%
Thai	4	4	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Japanese	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Khmer	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tagalog	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

The County rejected 1,460 of the near 50 thousand mail ballots it received. The 3.0% rejection rate essentially places Madera as the median among VCA counties.

Figure 62: Vote-by-Mail Statistics in the 2020 General Election for Madera

	Madera
Attempted to Vote-by-Mail	49,233
Accepted	47,773
Rejected	1,460
Rejection Rate	3.0%

Spanish speaking voters had their mail ballots at a slightly higher rate than English speaking voters. However, other than English and Spanish mail ballot rejections, the County rejected only one other mail ballot.

Figure 63: Mail Ballot Rejection Rates by Language in the 2020 General Election for Madera

	Madera			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	47,518	46,114	1,404	3.0%
Spanish	1,656	1,601	55	3.3%
Other	16	15	1	6.3%
Chinese	11	11	0	0.0%
Hindi	11	11	0	0.0%
Korean	7	7	0	0.0%
Vietnamese	7	7	0	0.0%
Thai	4	4	0	0.0%
Japanese	1	1	0	0.0%
Khmer	1	1	0	0.0%
Tagalog	1	1	0	0.0%

Mariposa County

Mariposa County is not covered by §203 of the Voting Rights Act (VRA), but it is covered by Cal. Elec. Code §14201 for Spanish and Filipino. At vote centers, there were zero voters assisted either by a language interpreter or by someone they brought or chose.[98] There were also zero assistant calls received in a different language.[99] In general, Mariposa County worked with County Departments (such as Health and Human Services, Community Services and Veteran's Services), and radio (KRYZ radio 98.5 FM) to educate voters.[100] To educate language assistance voters, the County had community meetings, used social media outreach, had postings in public areas, used the County website, VBM inserts, and newspaper articles.[101] The budget information specifically for non-English advertising is unknown and available upon request.

The County provided facsimile ballots in Spanish and Tagalog, which were provided upon request by the voter.[102] The County also sent out mailers in Spanish and Tagalog as mandated by SB 450.[103] Mariposa County hired bilingual poll workers when possible, and these workers were dispersed equally among vote centers (if any were hired).[104] The County did, however, conduct training for their poll workers on how to provide language assistance and concerning the rules for language assistance from third parties. The number of bilingual staff that the county has is currently unknown.[105]

Mariposa County also had a Language Access Advisory Committee (LAAC). The LAAC is composed of four members who met once in preparation for the 2020 General Election, and the meeting minutes are publicly reported.[106] There were accessible ballot marking devices at the vote centers for any registered voter to use. Voters could mark the ballots using the touchscreen display, provided audio tactile device or their own assistive technology to cast their vote

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[98] Email from Courtney Progner Morrow, Chief Deputy County Clerk, Mariposa County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 18, 2021) (on file with author).
[99] *Id.*
[100] Mariposa County Department of Elections, Election Administration Plan (2019), at 3, https://www.mariposacounty.org/DocumentCenter/View/81705/Final-EAP [hereinafter Mariposa County Election Administration Plan].
[101] Email from Courtney Progner Morrow, Chief Deputy County Clerk, Mariposa County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 18, 2021) (on file with author).
[102] *Id.*
[103] *Id.*
[104] *Id.*
[105] *Id.*
[106] Email from Courtney Progner Morrow, Chief Deputy County Clerk, Mariposa County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 5, 2021) (on file with author).

privately and independently.[107] Lastly, vote centers provided literature in alternate languages and access to translators if needed.[108]

VoteCal Data Analysis

Over 10,450, or 80.3%, of the 13 thousand eligible voters participated in the General Election. Mariposa had a significant rise in participation from the 59% turnout during the primary. As a result, Mariposa had the second highest turnout among all VCA counties.

Figure 64: Participation in the 2020 General Election for Mariposa

	Mariposa
Total Eligible Voters	13,006
Voted	10,450
Did Not Vote	2,556
Turnout	80.3%

Nearly every voter in the County, 98.9%, selected to vote by mail.

Figure 65: Participation Using Voting Methods in the 2020 General Election for Mariposa

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[107] Mariposa County Election Administration Plan, *supra* note 95, at 7.
[108] Email from Courtney Progner Morrow, Chief Deputy County Clerk, Mariposa County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 18, 2021) (on file with author).

	Mariposa
General Election Participants	10,450
Voted-by-Mail	10,340
% Voted-by-Mail	98.9%
Vote Center (In Person)	97
% Vote Center	0.9%
CVR / Nonprovisional CVR	16
% CVR / Nonprovisional CVR	0.2%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

Almost the entire electorate, 99.8%, in Mariposa speaks English as their primary language. Only 29 voters in the County speak a primary language other than English.

Figure 66: Eligible Voters by Language Type in the 2020 General Election for Mariposa

	Mariposa
Total Eligible Voters	13,006
English	12,977
% English	99.8%
Total Minority Languages	29
% Minority Languages	0.2%

The 29 minority language voters are comprised of three language groups: Spanish speaking voters (75.9%); Korean speaking voters; and Chinese speaking voters.

Figure 67: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Mariposa

Mariposa			
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	22	0.2%	75.9%
Korean	4	0.0%	13.8%
Chinese	3	0.0%	10.3%
Vietnamese	0	0.0%	0.0%
Hindi	0	0.0%	0.0%
Tagalog	0	0.0%	0.0%
Japanese	0	0.0%	0.0%
Thai	0	0.0%	0.0%
Khmer	0	0.0%	0.0%
Other (Not Listed)	0	0.0%	0.0%

Although few in numbers, just over half of the minority language voters turned out for the General Election.

Figure 68: Voter Turnout by Language in the 2020 General Election for Mariposa

Mariposa			
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	12,977	10,435	2,542	80.4%
Spanish	22	14	8	63.6%
Korean	4	1	3	25.0%
Chinese	3	0	3	0.0%

At an even higher rate than other VCA counties, voters in Mariposa chose to cast their ballots by mail. All 15 of the minority language voters that participated in the election voted by mail.

Figure 69: Preferred Voting Method by Language Group in the 2020 General Election for Mariposa

Mariposa											
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	10,435	10,325	98.9%	97	0.9%	16	0.2%	0	0.0%	0	0.0%
Spanish	14	14	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Korean	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

While it was just 429 ballots, Mariposa rejected mail ballots at a 4.0% rate, the second highest among all VCA counties.

Figure 70: Vote-by-Mail Statistics in the 2020 General Election for Mariposa

	Mariposa
Attempted to Vote-by-Mail	10,769
Accepted	10,340
Rejected	429
Rejection Rate	4.0%

All non-English ballots were accepted. Every rejected mail ballot was cast by an English-speaking voter.

Figure 71: Mail Ballot Rejection Rates by Language in the 2020 General Election for Mariposa

Mariposa				
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	10,754	10,325	429	4.0%
Spanish	14	14	0	0.0%
Korean	1	1	0	0.0%

Napa County

Napa County is not covered by §203 of the Voting Rights Act (VRA) but is covered by Cal. Elec. Code §14201 for Spanish and Filipino. For the 2020 General Election, the County had a 2019/2020 outreach budget of $64,200[109] that covered Public Service Announcements (PSA) in Spanish, translated election materials, news broadcasts (translation provided by the Secretary of State), radio, newspaper ads, and community and social media outreach.[110] The County also provided signage in three languages at each vote center but did not account for these costs.[111] Some of the specific strategies used to educate language assistance voters involved outreach at fairs and community days (pre-pandemic) led by Napa County's Community Leaders Coalition and the Voters Choice Napa consortium in order to provide information and materials.[112]In addition, the County's outreach team hosted a number of workshops promoting voter registration and voter participation.[113] Napa County has a Language Access Advisory Committee (LAAC). The LAAC has 22 members who met once in preparation for the General Election.[114] Meetings minutes are publicly recorded, except for two meetings held before the end of the 2020 year.[115]After the March 3, 2020, Primary, no public events were held.[116] Instead, in-person events transitioned to zoom meetings, which the LAAC and VAAC attended with community members.[117]

As mandated by SB 450, the County provided mailers for Spanish and Tagalog.[118] Facsimile ballots were available in Tagalog upon request and at all vote centers.[119] Vote centers were also equipped with ballot printers that translated ballots and voter information guides in the supported languages.[120] Further, touchscreen Image Cast X (ICX) ballot marking devices were available, which allowed voters to insert a "voter activation card" that was configured with a voter's ballot style (language) during the voter check-in process.[121] Once the activation card was inserted, the

[109] Napa County, Voter's Choice Act Updated Election Administration Plan, at 9, https://www.countyofnapa.org/DocumentCenter/View/15927/Napa-County-Election-Administration-Plan-PDF [hereinafter Napa County Election Administration Plan].

[110] Email from John Tuteur, Registrar of Voters, Napa County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 12, 2021) (on file with author).

[111] Email from John Tuteur, Registrar of Voters, Napa County, to Vivian Alejandre, UCLA Voting Rights Project (Jan. 26, 2021) (on file with author).

[112] Tuteur, *Supra*, note 113.

[113] *Id.*

[114] Email from John Tuteur, Registrar of Voters, Napa County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 15, 2021) (on file with author).

[115] Tuteur, *Supra*, note 113.

[116] *Id.*

[117] *Id.*

[118] Tuteur, *Supra*, note 114.

[119] *Id.*

[120] Tuteur, *Supra*, note 113.

[121] Napa County, Dominion Voting Systems ImageCast X, https://verifiedvoting.org/election-system/dominion-imagecast-x/

ICX automatically displayed an electronic ballot in the voter's requested language.[122] Poll workers were stationed on the side of the ICX and cleaned the screen after each use to prevent the spread of COVID-19.[123]

Napa has one permanent bilingual worker but hired seven staff members during this election season.[124] Napa County also hires bilingual poll workers and does their best to place bilingual Tagalong speaking workers in American Canyon vote centers where many Filipino residents reside.[125] Poll workers are specifically trained on how to engage and assist language access voters with facsimile ballots and signage in three languages, and directed to call the County's bilingual phone bank operators if they need further assistance.[126] Information on the number of voters who were assisted was not tracked by the County.[127] The County's phone bank has English and Spanish operators. For the 2020 General Election, the County did not track the number of voters who used and called the language assistance telephone bank.[128]

VoteCal Data Analysis

More than 73 thousand or 81.9% of the 89 thousand eligible voters participated in the General Election. Napa had a significant increase in turnout from the 56% rate during the primary. In fact, Napa had the highest turnout rate among all VCA counties.

Figure 72: Participation in the 2020 General Election for Napa

	Napa
Total Eligible Voters	89,242
Voted	73,047
Did Not Vote	16,195
Turnout	81.9%

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[122] *Id.*
[123] Tuteur, *Supra*, note 114.
[124] *Id.*
[125] *Id.*
[126] *Id.*
[127] *Id.*
[128] *Id.*

A significant majority of voters chose to cast a ballot by mail, the 95.2% usage rate exceeds the 88.4% VCA counties average.

Figure 73: Participation Using Voting Methods in the 2020 General Election for Napa

	Napa
General Election Participants	73,047
Voted-by-Mail	69,553
% Voted-by-Mail	95.2%
Vote Center (In Person)	2,661
% Vote Center	3.6%
CVR / Nonprovisional CVR	904
% CVR / Nonprovisional CVR	1.2%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

As figure 74 shows below, 2,676 or 3.0%, of the 89 thousand eligible voters speak a primary language other than English.

Figure 74: Eligible Voters by Language Type in the 2020 General Election for Napa

	Napa
Total Eligible Voters	89,242
English	86,566
% English	97.0%
Total Minority Languages	2,676
% Minority Languages	3.0%

Of the minority language voters, 2,525 or 94.4% speak Spanish. These Spanish-speaking voters comprise 2.8% of the total eligible voters in the County.

Figure 75: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Napa

	Napa		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	2,525	2.8%	94.4%
Vietnamese	45	0.1%	1.7%
Tagalog	38	0.0%	1.4%
Chinese	28	0.0%	1.0%
Korean	15	0.0%	0.6%
Hindi	10	0.0%	0.4%
Japanese	5	0.0%	0.2%
Thai	4	0.0%	0.1%
Khmer	3	0.0%	0.1%
Other (Not Listed)	3	0.0%	0.1%

From English-speaking voters to Spanish-speaking voters there is a near 5-percentage point drop off in turnout. Given the small number of voters in the other language groups, turnout is relatively consistent for these minority language voters.

Figure 76: Voter Turnout by Language in the 2020 General Election for Napa

Napa				
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	86,586	70,988	15,598	82.0%
Spanish	2,508	1,944	564	77.5%
Vietnamese	45	36	9	80.0%
Tagalog	38	28	10	73.7%
Chinese	28	23	5	82.1%
Korean	14	9	5	64.3%
Hindi	10	10	0	100.0%
Japanese	5	3	2	60.0%
Thai	4	4	0	100.0%
Khmer	3	2	1	66.7%
Other	3	2	1	66.7%

Across all languages, the considerable chosen method of participation was by mail ballot.

Figure 77: Preferred Voting Method by Language Group in the 2020 General Election for Napa

Napa										
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	70,988	67,628	95.3%	2,596	3.7%	827	1.2%	0	0.0%	0	0.0%
Spanish	1,944	1,827	94.0%	54	2.8%	69	3.5%	0	0.0%	0	0.0%
Vietnamese	36	28	77.8%	2	5.6%	6	16.7%	0	0.0%	0	0.0%
Tagalog	28	24	85.7%	4	14.3%	0	0.0%	0	0.0%	0	0.0%
Chinese	23	19	82.6%	3	13.0%	1	4.3%	0	0.0%	0	0.0%
Hindi	10	9	90.0%	1	10.0%	0	0.0%	0	0.0%	0	0.0%
Korean	9	8	88.9%	1	11.1%	0	0.0%	0	0.0%	0	0.0%
Thai	4	4	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Japanese	3	3	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Khmer	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other	2	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%

Napa rejected 1,804 or 2.5% of the over 71 thousand mail ballots it received for the General Election.

Figure 78: Vote-by-Mail Statistics in the 2020 General Election for Napa

	Napa
Attempted to Vote-by-Mail	71,357
Accepted	69,553
Rejected	1,804
Rejection Rate	2.5%

The County had a comparable rate of rejection for both English- and Spanish-speaking voters. Other than the two largest language groups, the county only rejected 2 mail ballots.

Figure 79: Mail Ballot Rejection Rates by Language in the 2020 General Election for Napa

	Napa			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	69,381	67,628	1,753	2.5%
Spanish	1,876	1,827	49	2.6%
Vietnamese	28	28	0	0.0%
Tagalog	24	24	0	0.0%
Chinese	19	19	0	0.0%
Hindi	9	9	0	0.0%
Korean	9	8	1	11.1%
Thai	4	4	0	0.0%
Japanese	3	3	0	0.0%
Khmer	2	2	0	0.0%
Other	2	1	1	50.0%

Nevada County

Nevada County is not covered by §203 of the Voting Rights Act (VRA) but is covered by the Cal. Elec. Code §14201 for Spanish. In general, the County invested over $100,000 in advertising for voter education, translation services, toll-free hotline, public service announcements (PSA), flyers, advertisements in Spanish-language newspapers, and the mailing of translated voting materials.[129] The County also provided facsimile ballots in Spanish to voters upon requested either through the County Voter Instruction Guide postcard or in-person at the County Clerk office.[130] However, there are no reported instances of voters requesting these services.[131] Additionally, the County invested in a LanguageLine subscription that provided over the phone translation services to language access voters.[132]

Nevada County provided mailers for Spanish as mandated by SB 450. The County Clerk & Register of Voters has one permanent bilingual worker, but their job is not to process voter requests.[133] The County hires bilingual workers when possible, but always asks and encourages vote center workers and volunteers who speak languages other than English to assist during elections.[134] For the 2020 General Election, Nevada County had 3 bilingual Spanish poll workers throughout all its vote centers.[135] Bilingual poll workers are assigned based on worker availability and Secretary of State guidelines on language needs by precinct.[136] Moreover, poll workers are trained on how to provide language assistance through LanguageLine, how to work with the LanguageLine translator, and are instructed to speak to the voter directly.[137] Language access voters are allowed to be assisted by up to 2 people so long as they are not an employer or union representative in Nevada County.[138]

All vote centers in Nevada were equipped with at least three HART Intercivic Verify Scan ballot marking devices.[139] The HART Intercivic Verify Scan is a ballot scanning and tabulating device; voters hand-feed paper ballots into the scanner in order to cast the ballot.[140] Aside from the

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[129] Email from Natalie Adona, Assistant Clerk-Recorder/Registrar of Voters, Nevada County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 11, 2021) (on file with author).
[130] *Id.*
[131] *Id.*
[132] *Id.*
[133] *Id.*
[134] *Id.*
[135] *Id.*
[136] *Id.*
[137] *Id.*
[138] *Id.*
[139] Nevada County, Election Administration Plan (Mar. 2, 2020), at 3, https://www.mynevadacounty.com/DocumentCenter/View/34021/2020-Election-Administration-Plan_FINAL-Rev-3-2-2020 [hereinafter Nevada County Election Administration Plan].
[140] Nevada County, Hart Intercivic Verity Scan, https://verifiedvoting.org/election-system/hart-intercivic-verity-scan/

BMDs provided at vote centers, in-person translators from Avant Page and LanguageLine translators were available over the phone upon requests.[141] The Clerk-Recorder/Register of Voters knows that at least two assistance calls were made in the 2020 General Election, but estimates that other voters asked for language assistance based on past election experience.[142]

The Nevada language access advisory committee (LAAC) is composed of one committee chair and three or four additional committee members. No meetings were held in preparation for the 2020 General Election, nor were meeting minutes publicly recorded.[143]

VoteCal Data Analysis
Over 65 thousand or 76.2% of the 85 thousand eligible voters participated in the General Election. This turnout rate places Nevada above the VCA counties average of 70.5%.

Figure 80: Participation in the 2020 General Election for Napa

	Nevada
Total Eligible Voters	85,373
Voted	65,092
Did Not Vote	20,281
Turnout	76.2%

Nearly 60 thousand or 92.1% of election participants chose to vote by mail. The next most selected method was in person at a vote center with a 6.9% share of the ballots cast.

Figure 81: Participation Using Voting Methods in the 2020 General Election for Nevada

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[141] Email from Natalie Adona, Assistant Clerk-Recorder/Registrar of Voters, Nevada County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 11, 2021) (on file with author).

[142] *Id.*

[143] Nevada County, Language Accessibility Advisory Committee, https://www.sos.ca.gov/elections/laac

	Nevada
General Election Participants	65,092
Voted-by-Mail	59,947
% Voted-by-Mail	92.1%
Vote Center (In Person)	4,484
% Vote Center	6.9%
CVR / Nonprovisional CVR	715
% CVR / Nonprovisional CVR	1.1%
Precinct Polling Place (In Person)	722
% Precinct Polling Place	1.1%
Early (In Person)	2
% Early	0.0%

As shown in figure 82 below, Nevada only has 136 or 0.2% of voters that speak a primary language other than English. This proportional share of minority language voters is the second lowest among all VCA counties, tied with Amador and Mariposa.

Figure 82: Eligible Voters by Language Type in the 2020 General Election for Nevada

	Nevada
Total Eligible Voters	85,373
English	85,237
% English	99.8%
Total Minority Languages	136
% Minority Languages	0.2%

Spanish is the primary language for 110 or 80.9% of the non-English speaking voters in the County. However, Spanish-speaking voters only make up 0.1% of the County's total eligible voters.

Figure 83: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Nevada

	Nevada		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	110	0.1%	80.9%
Chinese	12	0.0%	8.8%
Thai	5	0.0%	3.7%
Vietnamese	4	0.0%	2.9%
Korean	2	0.0%	1.5%
Japanese	2	0.0%	1.5%
Hindi	1	0.0%	0.7%
Tagalog	0	0.0%	0.0%
Khmer	0	0.0%	0.0%
Other (Not Listed)	0	0.0%	0.0%

While 76.3% of English-speaking voters participated in the General Election, only 60.0% of all minority language voters turned out.

Figure 84: Voter Turnout by Language in the 2020 General Election for Nevada

	Nevada			
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	85,243	65,014	20,229	76.3%
Spanish	105	65	40	61.9%
Chinese	11	5	6	45.5%
Thai	5	3	2	60.0%
Vietnamese	4	2	2	50.0%
Japanese	2	1	1	50.0%
Korean	2	2	0	100.0%
Hindi	1	0	1	0.0%

Like other VCA counties, the majority of voters in Nevada selected to vote by mail. Beside English- and Spanish-speaking voters, all other language speaking voters cast a mail ballot in the General Election.

Figure 85: Preferred Voting Method by Language Group in the 2020 General Election for Nevada

	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
						Nevada					
English	65,014	59,883	92.1%	4,475	6.9%	710	1.1%	717	1.1%	2	0.0%
Spanish	65	51	78.5%	9	13.8%	5	7.7%	5	7.7%	0	0.0%
Chinese	5	5	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Thai	3	3	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Korean	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Japanese	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

As shown in figure 86 below, Nevada rejected 1,087 or 1.8% of the mail ballots received. This rejection rate was the third lowest among all VCA counties.

Figure 86: Vote-by-Mail Statistics in the 2020 General Election for Nevada

	Nevada
Attempted to Vote-by-Mail	61,034
Accepted	59,947
Rejected	1,087
Rejection Rate	1.8%

The County only rejected 3 minority language mail ballots during the General Election.

Figure 87: Mail Ballot Rejection Rates by Language in the 2020 General Election for Nevada

Nevada				
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	60,967	59,883	1,084	1.8%
Spanish	52	51	1	1.9%
Chinese	7	5	2	28.6%
Thai	3	3	0	0.0%
Korean	2	2	0	0.0%
Vietnamese	2	2	0	0.0%
Japanese	1	1	0	0.0%

Orange County

Orange County is covered by §203 of the Voting Rights Act (VRA) for Chinese (including Taiwanese), Spanish, Korean, and Vietnamese. The County is also covered by Cal. Elec. Code §14201 for Filipino and Persian.[144] The County spent $1,500,000 in advertising, $50,000 in newspaper legal ads, $84,945 in miscellaneous advertising, $500,000 in outreach, $45,000 in miscellaneous outreach operations, and $10,000 in voter outreach events.[145] Particularly for limited-English proficient voters, the County spent an estimated $598,425.87 toward outreach.[146] Some of the specific strategies used to educate language assistance voters were year-round full-time Language Community Program Specialists, bilingual phone bank operators and election workers, voter information guides, speaking engagements and more.[147] The County also held workshops at which voters were given information about the vote center model, voting equipment demonstrations, language assistance services, ballot drop-off options, and how to request translated election materials.[148]

As mandated by SB 450, the County provided mailers for Spanish, Vietnamese, Chinese, and Korean.[149] The County also has facsimile ballots available in Hindi, Japanese, Gujarati, Persian, and Tagalog.[150] Voters could access the facsimile ballots at vote centers, by request through the postage-paid postcard in the Voter Information Guide, in person, online, or by phone. Additionally, a translated reference ballot was automatically mailed to voters living in a targeted precinct who indicated a language preference for one of the supported languages.[151] Orange County recorded that 435 voters were assisted at the polls by either a language interpreter or by someone the voter had brought or chosen.[152] On the other hand, the County did not track how many assistant calls were received in different languages, since the total number of calls go through a general phone number.[153] Orange County has 373 bilingual staff.[154] They had 211 Spanish speaking bilingual poll workers, 68 Vietnamese speaking bilingual poll workers, 29

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[144] This report mirrors the language used by the Secretary of State, and thus uses "Persian," instead of "Farsi."

[145] Orange County, Election Administration Plan, at 44, https://www.ocvote.com/fileadmin/vc/assets/eap_final_v3.pdf [hereinafter Orange County Election Administration Plan].

[146] Email from Jackie Wu, Orange County Registrar of Voters, Orange County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 16, 2021) (on file with author).

[147] These were: multiple video series; website; election administration reports; paid advertising; print ads (English, Spanish, Chinese, Vietnamese); digital ads (English, Spanish, Vietnamese); billboard and transit ads (English, Spanish, Vietnamese); and direct mail pieces (1.7 million voters x2 in all targeted federal languages). *Id.*

[148] Orange County Election Administration Plan, *supra* note 148, at 32.

[149] Wu, *Supra*, note 149.

[150] *Id.*

[151] *Id.*

[152] *Id.*

[153] *Id.*

[154] *Id.*

Chinese speaking bilingual poll workers, and 36 Korean speaking bilingual poll workers.[155] The County follows the VCA language requirements for determining how these poll workers are placed.[156] Poll workers are trained on how to provide language assistance and what the rules are regarding language assistance from third parties. In particular, Orange County Vote Center Customer Service Representatives (CSRs) are instructed to display vote center signs, voting materials, Voter Information Guides, and translated reference ballots in different languages at the vote center.[157] Representatives are taught how to treat voters of all backgrounds with equal and the utmost level of respect, courtesy, and service.[158] CSRs are given written materials to appropriately offer ballots and voting materials in other languages, and voters can also request a translated reference ballot in Tagalog, Persian, Guajarati, Hindi, or Japanese to take to their voting booth as they mark their ballot.[159]

The County has a Language Access Advisory Committee (LAAC) to help non-English speaking voters. They have one Spanish speaking representative, two Vietnamese speaking representatives, four Chinese speaking representatives, three Korean speaking representatives, two Persian speaking representatives.[160] The LAAC met two times in preparation for the 2020 General Election and did not publicly report meeting minutes.[161] At vote centers, the County had ballot marking devices such as the Hart InterCivic Verity Touch Writer. With this ballot marking device, voters can select a ballot in English, Spanish, Vietnamese, Chinese, or Korean.[162] Additionally, vote centers provided language assistance for Spanish, Vietnamese, Chinese, and Korean through in-person assistance , internal and third-party telephone calls, video conferencing, official ballots, and Voter Information Guides.[163] For Hindi, Japanese, Tagalog, Persian, Gujarati, vote centers offered translated reference ballots, language assistance materials, and third-party telephone support.[164]

Orange County residents had news updates and information from a variety of sources including language media outlets, and the County employed dedicated full-time staff to serve as liaisons to language communities.[165] The County also provides an inclusive language assistance card, which

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[155] *Id.*

[156] *Id.*

[157] *Id.*

[158] *Id.*

[159] *Id.*

[160] Orange County, Voting Language Committee Members, https://www.ocvote.com/community/community-election-working-group/cew-committees/voting-language-committee-members

[161] *Id.*

[162] Email from Jackie Wu, Orange County Registrar of Voters, Orange County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 5, 2021) (on file with author).

[163] Email from Jackie Wu, Orange County Registrar of Voters, Orange County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 16, 2021) (on file with author).

[164] *Id.*

[165] Orange County Election Administration Plan, *supra* note 148, at 39.

not only described the availability of translated reference ballots, but listed all of language services available at vote centers.[166]

VoteCal Data Analysis

Orange County had over 2 million eligible voters, more than 1.5 million or 73.8% of which participated in the 2020 General Election. From the primary election, we observed more than a 32-percentage point increase in voter turnout from the 41% rate.

Figure 88: Participation in the 2020 General Election for Orange

	Orange
Total Eligible Voters	2,082,962
Voted	1,536,889
Did Not Vote	546,073
Turnout	73.8%

Nearly 1.3 million or 81.8% of election participants chose to vote by mail. Orange's vote-by-mail usage rate was under the 88.4% VCA counties average. Figure 89 below shows that 260 thousand or about 17% of voters went to a vote center to vote in person.

Figure 89: Participation Using Voting Methods in the 2020 General Election for Orange

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[166] Orange County Election Administration Plan, *supra* note 148, at 20.

	Orange
General Election Participants	1,536,889
Voted-by-Mail	1,257,088
% Voted-by-Mail	81.8%
Vote Center (In Person)	260,078
% Vote Center	16.9%
CVR / Nonprovisional CVR	21,377
% CVR / Nonprovisional CVR	1.4%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	1
% Early	0.0%

121,696 or 5.8% of voters speak a primary language other than English in the County. The proportional share of minority language voters in Orange is the second highest among all VCA counties.

Figure 90: Eligible Voters by Language Type in the 2020 General Election for Orange

	Orange
Total Eligible Voters	2,082,962
English	1,961,266
% English	94.2%
Total Minority Languages	121,696
% Minority Languages	5.8%

As detailed in figure 91 below, most of the minority language electorate in comprised of Vietnamese- and Spanish speaking voters at 40.0% and 37.0%, respectively. The following two largest language groups are Korean and Chinese.

Figure 91: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Orange

	Orange		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Vietnamese	48,690	2.3%	40.0%
Spanish	45,000	2.2%	37.0%
Korean	16,860	0.8%	13.9%
Chinese	8,732	0.4%	7.2%
Japanese	593	0.0%	0.5%
Other (Not Listed)	530	0.0%	0.4%
Tagalog	524	0.0%	0.4%
Hindi	287	0.0%	0.2%
Thai	275	0.0%	0.2%
Khmer	205	0.0%	0.2%

Turnout among minority language voters was 70.9%, compared to the 74.0% English voter turnout. Beside the Khmer language group, Spanish speakers had the lowest turnout rate at 66.4%.

Figure 92: Voter Turnout by Language in the 2020 General Election for Orange

Orange				
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	1,961,723	1,450,957	510,766	74.0%
Vietnamese	48,568	36,181	12,387	74.5%
Spanish	44,891	29,814	15,077	66.4%
Korean	16,814	12,085	4,729	71.9%
Chinese	8,714	6,191	2,523	71.0%
Japanese	592	451	141	76.2%
Other	526	431	95	81.9%
Tagalog	523	385	138	73.6%
Hindi	285	212	73	74.4%
Thai	270	201	69	74.4%
Khmer	204	129	75	63.2%

Figure 93 below shows that voting by mail was the method of choice across all language groups. However, a sizeable share of English- and Spanish-speaking voters selected to vote in person at a vote center.

Figure 93: Preferred Voting Method by Language Group in the 2020 General Election for Orange

Orange											
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	1,450,957	1,181,566	81.4%	251,277	17.3%	19,558	1.3%	0	0.0%	1	0.0%
Vietnamese	36,181	31,778	87.8%	3,490	9.6%	942	2.6%	0	0.0%	0	0.0%
Spanish	29,814	25,352	85.0%	3,897	13.1%	592	2.0%	0	0.0%	0	0.0%
Korean	12,085	11,274	93.3%	664	5.5%	150	1.2%	0	0.0%	0	0.0%
Chinese	6,191	5,525	89.2%	591	9.5%	77	1.2%	0	0.0%	0	0.0%
Japanese	451	420	93.1%	28	6.2%	3	0.7%	0	0.0%	0	0.0%
Other	431	361	83.8%	49	11.4%	21	4.9%	0	0.0%	0	0.0%
Tagalog	385	334	86.8%	42	10.9%	10	2.6%	0	0.0%	0	0.0%
Hindi	212	198	93.4%	8	3.8%	6	2.8%	0	0.0%	0	0.0%
Thai	201	178	88.6%	15	7.5%	8	4.0%	0	0.0%	0	0.0%
Khmer	129	102	79.1%	17	13.2%	10	7.8%	0	0.0%	0	0.0%

With voting by mail the overwhelmingly preferred participation method, it is important to note that Orange had a 3.5% mail ballot rejection rate, tied for the fourth highest among all VCA counties.

Figure 94: Vote-by-Mail Statistics in the 2020 General Election for Orange

	Orange
Attempted to Vote-by-Mail	1,302,671
Accepted	1,257,088
Rejected	45,583
Rejection Rate	3.5%

Compared to the English mail ballot rejection rate of 3.6%, Orange rejected 1,763 or 2.3% of mail ballots.

Figure 95: Mail Ballot Rejection Rates by Language in the 2020 General Election for Orange

	Orange			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	1,225,386	1,181,566	43,820	3.6%
Vietnamese	32,312	31,778	534	1.7%
Spanish	26,095	25,352	743	2.8%
Korean	11,569	11,274	295	2.5%
Chinese	5,646	5,525	121	2.1%
Japanese	436	420	16	3.7%
Other	378	361	17	4.5%
Tagalog	344	334	10	2.9%
Hindi	205	198	7	3.4%
Thai	196	178	18	9.2%
Khmer	104	102	2	1.9%

Sacramento County

Sacramento County is covered by §203 of the Voting Rights Act (VRA) for Chinese (including Taiwanese) and Spanish. The County is also covered by Cal. Elec. Code §14201 for Vietnamese, Korean, Tagalog, Hindi, Punjabi, Japanese, Hmong, Mien, Laotian, Telugu, and Urdu. The County's outreach efforts included distributing materials at grocery stores and COVID testing sites, used local print and e-newsletters, conducting webinars, and running multiple workshops.[167] They also contracted with Hanna Interpreting Services to translate official election material for all mandated languages.[168] In total, the County spent $1,622,759.88.[169]

The County provided mailers in Spanish and Chinese[170] The County also automatically mailed facsimile ballots to voters that live in the 3% threshold for the county to provide language assistance or mailed upon request in Vietnamese, Tagalog, Hmong, Punjabi, Korean, Hindi, Laotian, Mien, Telugu, Urdu, or Japanese.[171] Sacramento has 38 permanent employees, 6 of whom 38 are bilingual.[172] For the General Election, the County hired 832 Spanish speaking poll workers, 158 Chinese speaking poll workers, 87 Vietnamese speaking poll workers, 118 Tagalog speaking poll workers, 64 Hmong speaking poll workers, 33 Punjabi speaking poll workers, 17 Korean speaking poll workers, 52 Hindi speaking poll workers, 2 Mien speaking poll workers, and 6 Telugu speaking poll workers.[173] These poll workers were placed in vote centers located in precincts in areas that corresponded where the high percentages of language minority voters live. Additionally, poll workers were trained to provide language assistance and informed of the rules for obtaining language assistance from third parties. Poll workers were trained to work with a bilingual Election Officer or call the elections office to provide language assistance in over 200 languages.[174] Most importantly, poll workers were trained to be patient, be compassionate, to pay attention, to not to finish voters' sentences, or to presume to know what voters were going to say.[175]

Sacramento County has a Language Access Advisory Committee (LAAC). It is composed of 10 members, met 6 times prior to the General Election, and meeting minutes after 2020 are

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[167] Sacramento County, Election Administration Plan COVID-19 Update, at 12, https://elections.saccounty.net/Documents/EAP%20-%202019/EAP-English%20COVID%20FINAL.pdf [hereinafter Sacramento County Election Administration Plan].

[168] Email from Hang Nguyen, Assistant Registrar of Voters, Sacramento County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 11, 2021) (on file with author).

[169] Email from Courtney Bailey-Kanelos, Registrar of Voters, Sacramento County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 2, 2021) (on file with author).

[170] *Id.*

[171] *Id.*

[172] *Id.*

[173] *Id.*

[174] *Id.*

[175] *Id.*

available upon request.[176] During the 2020 General Election the County received numerous assistant calls across several languages: 19,052 in English; 238 in Spanish; 33 in Chinese; 19 in Vietnamese; and 2 in Hmong.[177] Due to COVID-19, the County did not track how many voters were assisted at the polls by either a language interpreter or by someone they had brought. A ballot marking device called Dominion ICX that was programmed in English, Spanish, Cantonese, Mandarin, and Taiwanese was available at vote centers to assist voters in different languages if needed.[178] Additionally, the County partnered with Asian Resources, Inc (ARI), Asian Pacific Island American Public Affairs (APAPA), Council of Asian Pacific Islanders Together for Advocacy and Leadership (CAPITAL), League of Women Voter (LWV), and NextGen America to fulfill language needs.[179] The events that were held were Lunar New Year (Tet) Festivals, Día de los Muertos, United Latinos Town Hall, Yarmarka International Festival, Locke Asian Pacific Spring Festival, Filipino Fiesta, APAPA Voter Forum, and many more.[180] These events were well-attended, and at them, voters were informed of the different services available.

VoteCal Data Analysis

Sacramento County had over one million eligible voters, nearly 726 thousand or 68.4% of which participated in the General Election. While we observe an increase in turnout from the 41% rate in the primary, the County had a lower turnout than the VCA counties average and the fifth lowest among VCA counties.

Figure 96: Participation in the 2020 General Election for Sacramento

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[176] Email from Hang Nguyen, Assistant Registrar of Voters, Sacramento County, to Vivian Alejandre, UCLA Voting Rights Project (Mar. 11, 2021) (on file with author).

[177] Email from Courtney Bailey-Kanelos, Registrar of Voters, Sacramento County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 2, 2021) (on file with author).

[178] Sacramento County, County of Sacramento Voter Registration and Elections Election Administration Plan (January 2020), at 10 and 24. https://elections.saccounty.net/Documents/EAP%20-%202019/EAP-English-2020.pdf

[179] Nguyen, *Supra*, note 179.

[180] These were: District 8 Latino Festival; California Chinese American Day; Sac Aloha Festival; Pacific Outreach Fair; Elk Grove Multicultural Festival; Festa Italiana, Celebrasian Dinner; CAPITAL Meetings; and Voters Choice Act (VCA) Language Workshops. *Id.*

	Sacramento
Total Eligible Voters	1,060,945
Voted	725,755
Did Not Vote	335,190
Turnout	68.4%

As figure 97 shows below, Sacramento voters widely selected voting by mail over other participation methods. The 92.3% vote-by-mail usage rate is slightly above the VCA counties average.

Figure 97: Participation Using Voting Methods in the 2020 General Election for Sacramento

	Sacramento
General Election Participants	725,755
Voted-by-Mail	669,970
% Voted-by-Mail	92.3%
Vote Center (In Person)	46,090
% Vote Center	6.4%
CVR / Nonprovisional CVR	10,487
% CVR / Nonprovisional CVR	1.4%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

17,760 or 1.7% of the eligible voters in the County speak a primary language other than English.

Figure 98: Eligible Voters by Language Type in the 2020 General Election for Sacramento

	Sacramento
Total Eligible Voters	1,060,945
English	1,043,255
% English	98.3%
Total Minority Languages	17,690
% Minority Languages	1.7%

8,819 or nearly half of the minority language voters are Spanish speakers. The following two largest non-English speaking groups are Vietnamese and Chinese at 18.0% and 15.2% share of minority voters, respectively.

Figure 99: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Sacramento

	Sacramento		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	8,819	0.8%	49.9%
Vietnamese	3,176	0.3%	18.0%
Chinese	2,688	0.3%	15.2%
Other (Not Listed)	1,080	0.1%	6.1%
Korean	721	0.1%	4.1%
Tagalog	494	0.0%	2.8%
Hindi	468	0.0%	2.6%
Thai	102	0.0%	0.6%
Japanese	88	0.0%	0.5%
Khmer	54	0.0%	0.3%

Minority language voters had a collective 75% turnout rate, compared to English-speaking voters at 68.3%. Other than Khmer-speaking voters, the English language group had the lowest turnout rate.

Figure 100: Voter Turnout by Language in the 2020 General Election for Sacramento

	Sacramento			
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	1,043,293	712,529	330,764	68.3%
Spanish	8,813	6,404	2,409	72.7%
Vietnamese	3,173	2,538	635	80.0%
Chinese	2,687	1,905	782	70.9%
Other	1,080	945	135	87.5%
Korean	721	565	156	78.4%
Tagalog	494	363	131	73.5%
Hindi	468	367	101	78.4%
Thai	102	70	32	68.6%
Japanese	88	64	24	72.7%
Khmer	54	33	21	61.1%

As shown in figure 101 below, the preferred method of participation in the County was by mail ballot and was mostly consistent across all languages.

Figure 101: Preferred Voting Method by Language Group in the 2020 General Election for Sacramento

	Sacramento									
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	712,529	657,704	92.3%	45,542	6.4%	10,040	1.4%	0	0.0%	0	0.0%
Spanish	6,404	6,015	93.9%	262	4.1%	132	2.1%	0	0.0%	0	0.0%
Vietnamese	2,538	2,287	90.1%	135	5.3%	117	4.6%	0	0.0%	0	0.0%
Chinese	1,905	1,828	96.0%	42	2.2%	36	1.9%	0	0.0%	0	0.0%
Other	945	738	78.1%	66	7.0%	141	14.9%	0	0.0%	0	0.0%
Korean	565	550	97.3%	12	2.1%	3	0.5%	0	0.0%	0	0.0%
Hindi	367	343	93.5%	14	3.8%	10	2.7%	0	0.0%	0	0.0%
Tagalog	363	347	95.6%	13	3.6%	3	0.8%	0	0.0%	0	0.0%
Thai	70	68	97.1%	1	1.4%	1	1.4%	0	0.0%	0	0.0%
Japanese	64	60	93.8%	2	3.1%	2	3.1%	0	0.0%	0	0.0%
Khmer	33	30	90.9%	1	3.0%	2	6.1%	0	0.0%	0	0.0%

Sacramento only rejected 6,722 or 1.0% of the nearly 677 thousand mail ballots received during the General Election. This rejection rate was the lowest of any VCA county.

Figure 102: Vote-by-Mail Statistics in the 2020 General Election for Sacramento

	Sacramento
Attempted to Vote-by-Mail	676,692
Accepted	669,970
Rejected	6,722
Rejection Rate	1.0%

As detailed in figure 102 below, there are so significant rejection differences across language groups.

Figure 102: Mail Ballot Rejection Rates by Language in the 2020 General Election for Sacramento

	Sacramento			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	664,344	657,704	6,640	1.0%
Spanish	6,068	6,015	53	0.9%
Vietnamese	2,297	2,287	10	0.4%
Chinese	1,833	1,828	5	0.3%
Other	744	738	6	0.8%
Korean	554	550	4	0.7%
Tagalog	348	347	1	0.3%
Hindi	345	343	2	0.6%
Thai	68	68	0	0.0%
Japanese	60	60	0	0.0%
Khmer	31	30	1	3.2%

San Mateo County

San Mateo County is covered by §203 of the Voting Rights Act (VRA) for Chinese (including Taiwanese) and Spanish and is covered by the Cal. Elec. Code §14201 for Korean, Japanese, Hindi, Tagalog, and Burmese. To educate limited-English proficient (LEP) voters, the County mailed a postcard that had four languages on it to areas with lower than average voter registration, held workshops on registering and voting in eight languages, purchased mobile phone web advertising in seven languages, provided grants to several community-based organizations, and prepared flyers and bookmarks in six languages.[181] Moreover, the County purchased TV, radio, and web advertisements in Spanish with Univision and the Azteca Network, purchased radio, web, and print advertisements in Chinese with Sing Tao, and purchased Spanish language ads at three DMVs for five months.[182] They also collaborated with community groups to hold voter workshops, mailed postcards targeting areas with lower than average registration, and the Registration & Elections Division sent text messages to reach an estimated 25,000 young voters.[183] The County ended up spending $23,196 in printing and postage, $2,388.95 in translations, $7,500 for mobile phone advertising, $7,988 for printing, $13,500 for TV, radio, and web advertising in Spanish, $3,811 for radio, web, and print advertising in Chinese, and $13,800 in DMV ads (half specifically for Spanish).[184]

San Mateo provided mailers for English, Spanish, and Chinese as mandated by SB 450.[185] They also provided facsimile ballots available upon request at vote centers for Japanese, Hindi, Korean, Tagalog, Burmese.[186] The County hired multiple staff members to work at vote centers, and some staff members spoke multiple languages.[187] Vote center staff were placed in proximity to their residence unless there was a special need for their skills, and all vote centers were assigned at least one multilingual staff member.[188] The vote center staff members were also trained to provide language assistance and taught how to provide language assistance from third parties. For instance, when dealing with a voter where there is no mutual intelligibility, training focused on directing these voters to tables with multilingual resources, and if the voter's

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[181] Email from Travis Dunn, Management Analyst, San Mateo County, to Vivian Alejandre, UCLA Voting Rights Project (Feb. 16, 2021) (on file with author).
[182] *Id.*
[183] San Mateo County, California Voter's Choice Act Supplement to January 2020 - January 2024 Election Administration Plan EAP p. 6 https://www.smcacre.org/sites/main/files/file-attachments/38_eng_supplement-jan2020eap_wpubliccomments.pdf?1604102761 [hereinafter San Mateo County Election Administration Plan].
[184] Dunn, *Supra*, note 184.
[185] *Id.*
[186] *Id.*
[187] These bilingual and multilingual staff members spoke: Bisaya (1); Burmese (2); Cantonese (16); Cebuano (1); Persian (1); French (1); Fuchien (1); Greek (1); Hebrew (1); Hindi (9); Hokkien (1); Ilonggo (1); Italian (2); Japanese (3); Kapampangan (2); Korean (4); Mandarin (19); Portuguese (3); Punjabi (3); Sinhalese (1); Russian (1); Turkish (1); Spanish (28); Tagalog (27); Tongan (1); Ukrainian (1); Urdu (1); and Vietnamese (2). *Id.*
[188] Dunn, *Supra*, note 184.

language is not available among these resources, workers were trained to contact third party translation vendors.[189]

The County made ballot marking devices available to voters as an additional resource. One of the new options for ballot marking devices used during the 2020 General Election was the Remote Accessible Vote by Mail (RAVBM) System. RAVBM allows voters to use any computer with access to the internet and a printer to mark their selections and print their ballot.[190] Additionally, Vote Center Representatives were trained to check-in voters, to provide printed ballots or cards for voters to use with the Ballot Marking Devices, and to clean and disinfect equipment.[191]

For the 2020 General Election, the County received 304 Spanish assistant calls and 123 Chinese assistant calls; no other non-English calls were received.[192] The County did not track how many voters were assisted at the polls by either a language interpreter or by someone they had brought. The County also contracted with language translation and media services to help educate voters about the election, including Foster City Islander (English); India Post (English); Myanmar Gazette (Burmese); Nextdoor (English); Nichi Bei (Japanese); and Nikkei West (Japanese).[193] Further, San Mateo has a Language Access Advisory Committee (LAAC) that helps with language accessibility issues in minority communities. The LAAC consists of four individual members and two organizations that rotate in attendance but do not publicly report meeting minutes.[194] San Mateo also contracted Telideo, who had language options and assistance for voters with disabilities in English, Spanish, and Chinese, as well as short videos in these same languages about how to use the new voting equipment.[195] The County contracted with Entercom and Ad Taxi for web ad placements, and ran print and web advertisements in English, Spanish, Chinese, Tagalog and Korean in-house.[196] Overall, the County invested [substantially?] in non-English advertising for voter education.

VoteCal Data Analysis

San Mateo had more than 378 or 67.9% of its 557 thousand eligible voters participate in the General Election. This turnout rate was the third lowest among VCA counties.

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[189] *Id.*

[190] San Mateo County Election Administration Plan, *supra* note 186, at 1.

[191] San Mateo County Election Administration Plan, *supra* note 186, at 3.

[192] Dunn, *Supra*, note 184.

[193] San Mateo county, California Voter's Choice Act Additions to the Appendix to the Supplements to January 2020 to Election Administration Plan January 2024, https://www.smcacre.org/sites/main/files/file-attachments/38_eng_appendix_supplementeap.pdf?1604712075

[194] Email from Travis Dunn, Management Analyst, San Mateo County, to Vivian Alejandre, UCLA Voting Rights Project (Apr. 1, 2021) (on file with author).

[195] *Id.*

[196] *Id.*

Figure 103: Participation in the 2020 General Election for San Mateo

	San Mateo
Total Eligible Voters	557,029
Voted	378,430
Did Not Vote	178,599
Turnout	67.9%

Over 346 thousand or 91.6% of election participants chose to cast a ballot by mail. The next preferred participation method was in person at a vote center with a 7.8% share of voters selecting this option.

Figure 104: Participation Using Voting Methods in the 2020 General Election for San Mateo

	San Mateo
General Election Participants	378,430
Voted-by-Mail	346,581
% Voted-by-Mail	91.6%
Vote Center (In Person)	29,560
% Vote Center	7.8%
CVR / Nonprovisional CVR	2,583
% CVR / Nonprovisional CVR	0.7%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

As shown in figure 105 below, San Mateo has 15,599 non-English speaking voters. The 2.8% share of eligible voters that minority language voters make up is the fifth highest among VCA counties.

Figure 105: Eligible Voters by Language Type in the 2020 General Election for San Mateo

	San Mateo
Total Eligible Voters	557,029
English	541,430
% English	97.2%
Total Minority Languages	15,599
% Minority Languages	2.8%

San Mateo's non-English speaking electorate is primarily comprised of Spanish- and Chinese-speaking voters at 53.1% and 36.5%, respectively.

Figure 106: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for San Mateo

San Mateo			
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	8,289	1.5%	53.1%
Chinese	5,693	1.0%	36.5%
Tagalog	613	0.1%	3.9%
Korean	364	0.1%	2.3%
Vietnamese	223	0.0%	1.4%
Japanese	145	0.0%	0.9%
Other (Not Listed)	126	0.0%	0.8%
Thai	77	0.0%	0.5%
Hindi	57	0.0%	0.4%
Khmer	12	0.0%	0.1%

Voter turnout among non-English speakers was 71.4%, compared to the 67.8% rate for English-speaking voters.

Figure 107: Voter Turnout by Language in the 2020 General Election for San Mateo

	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	541,464	367,325	174,139	67.8%
Spanish	8,279	5,935	2,344	71.7%
Chinese	5,691	3,993	1,698	70.2%
Tagalog	613	418	195	68.2%
Korean	362	273	89	75.4%
Vietnamese	223	176	47	78.9%
Japanese	145	120	25	82.8%
Other	126	101	25	80.2%
Thai	77	54	23	70.1%
Hindi	56	44	12	78.6%
Khmer	12	10	2	83.3%

(San Mateo)

Voting by mail was the preferred method of participation across all language groups with no significant divergence.

Figure 108: Preferred Voting Method by Language Group in the 2020 General Election for San Mateo

	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
San Mateo											
English	367,325	336,336	91.6%	28,796	7.8%	2,456	0.7%	0	0.0%	0	0.0%
Spanish	5,935	5,329	89.8%	529	8.9%	85	1.4%	0	0.0%	0	0.0%
Chinese	3,993	3,800	95.2%	168	4.2%	27	0.7%	0	0.0%	0	0.0%
Tagalog	418	394	94.3%	23	5.5%	1	0.2%	0	0.0%	0	0.0%
Korean	273	263	96.3%	12	4.4%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	176	158	89.8%	17	9.7%	1	0.6%	0	0.0%	0	0.0%
Japanese	120	116	96.7%	4	3.3%	0	0.0%	0	0.0%	0	0.0%
Other	101	83	82.2%	7	6.9%	11	10.9%	0	0.0%	0	0.0%
Thai	54	53	98.1%	1	1.9%	0	0.0%	0	0.0%	0	0.0%
Hindi	44	41	93.2%	2	4.5%	1	2.3%	0	0.0%	0	0.0%
Khmer	10	8	80.0%	1	10.0%	1	10.0%	0	0.0%	0	0.0%

Of the 351 thousand mail ballots received, the County rejected 4,424 or 1.3%. This rejection rate was the second lowest for any VCA county.

Figure 109: Vote-by-Mail Statistics in the 2020 General Election for San Mateo

	San Mateo
Attempted to Vote-by-Mail	351,005
Accepted	346,581
Rejected	4,424
Rejection Rate	1.3%

The rejection rate for minority language voters was 1.4%, comparable to the 1.3% for English-speaking voters.

Figure 110: Mail Ballot Rejection Rates by Language in the 2020 General Election for San Mateo

San Mateo			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	340,610	336,336	4,274	1.3%
Spanish	5,421	5,329	92	1.7%
Chinese	3,842	3,800	42	1.1%
Tagalog	398	394	4	1.0%
Korean	267	263	4	1.5%
Vietnamese	159	158	1	0.6%
Japanese	117	116	1	0.9%
Other	84	83	1	1.2%
Thai	54	53	1	1.9%
Hindi	44	41	3	6.8%
Khmer	9	8	1	11.1%

Santa Clara County

Santa Clara County is covered by Cal. Elec. Code § 14201 for Korean and Cambodian/ Khmer and by §203 Voting Rights Act (VRA) for Chinese (including Taiwanese), Filipino, Spanish, and Vietnamese. The County invested approximately $1,875,000 in total advertising for voter education, including non-English Public Service Announcements (PSA's) containing information about the vote center model, mail voting, and the Office of the Registrar of Voters' toll-free hotline.[197] Non-English PSA's were transmitted through multilingual local television and community cable stations[198] , and by both regional and community newspapers.[199] Further, information on language access was distributed through the County's social media and department website, language minority community newsletters, and multilingual radio stations including: Univision; Celina Rodriquez; Sound of Hope; Sing Tao; Vien Thao; Radio Zindagi; and Korean American radio.[200] Additional strategies used to educate language assistance voters included public transit messaging on Valley Transportation Authority buses, television monitor messages at various Santa Clara County's Department of Motor Vehicles (DMV) locations, and advertisements by major league sports franchises in the surrounding area.[201]

Santa Clara County provided mailers for Chinese, Spanish, Vietnamese, Filipino, Tagalog, Korean, and Cambodian/Khmer as mandated by SB 450. The County also provided facsimile ballots in Spanish, Chinese, Tagalog, and Vietnamese.[202] The County Clerk & Register of Voters had several bilingual full-time staff employees at the time of the General Election.[203] During the voting period, the County actively recruited bilingual poll workers, often contacting previous volunteers they had on record, who were then allocated to their assigned vote centers with respect to the region's language access voter demographics.[204] Poll workers were trained to operate phone lines connecting to the County Clerk's bilingual staff and to the County's phone translation service.[205] Further, vote centers were equipped with a set number of laptops through which poll workers could access the County's voting information in four federally mandated languages.[206]

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[197] Santa Clara County, Election Administration Plan, at 24, https://www.sccgov.org/sites/rov/VCA/EAP/Documents/Final%20EAP/Final%20EAP%20%28separated%29/VCA%20Election%20Administration%20Plan%20-%20ENG.pdf [hereinafter Santa Clara County Election Administration Plan].

[198] These were: Univision; Epoch Times; Telemundo; Namaste; and Crossing TT. *Id*. at 24.

[199] These were: El Observador (Spanish); Epoch Times (Chinese); Korea Times (Korean); Nichi Bei weekly (Japanese); Philippine News (Tagalog); Vietnam Daily (Vietnamese); World Journal (Chinese); China Press (Chinese); JWeekly (Japanese); Bayspo Magazine (Japanese); and India Currents (Hindi). *Id*.

[200] *Id.*

[201] *Id.* at 21.

[202] *Id.* at 43.

[203] *Id.* at 164.

[204] *Id.* at 24.

[205] *Id.* at 13.

[206] *Id.*

At vote centers, Santa Clara provided between three and six accessible Ballot Marking Devices (BMD).[207] The BMDs for each vote center had ADA compliant features and were programmed with all ballot types and mandated languages for Santa Clara County.[208]

Santa Clara's language access advisory committee (LAAC) met four times from May 2020 to August 2020 in preparation for the 2020 General Election.[209] The committee's meeting minutes were publicly recorded and are listed on their website.[210] Working with the LAAC, the County held bilingual voter education workshops that provided an opportunity for language access communities to receive information about the vote center model process and to obtain materials and assistance in nine languages.[211]Additionally, bilingual voter education workshops with Korean American Community Services were scheduled to begin at the end of 2019.[212] It is unclear if these workshops occurred due to Covid-19.

VoteCal Data Analysis

Santa Clara had over 1.2 million eligible voters, more than 859 thousand or 68.3% of which participated in the 2020 General Election. The County's turnout rate was the fourth lowest among VCA counties.

Figure 111: Participation in the 2020 General Election for Santa Clara

	Santa Clara
Total Eligible Voters	1,258,660
Voted	859,709
Did Not Vote	398,951
Turnout	68.3%

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[207] *Id.* at 12.

[208] *Id.*

[209] Santa Clara County, Language Accessibility Advisory Committee, https://www.sccgov.org/sites/rov/VCA/LAAC/Pages/home.aspx

[210] *Id.*

[211] Santa Clara County Election Administration Plan, *supra* note 200, at 24.

[212] Santa Clara County Election Administration Plan, *supra* note 200, at 24.

803 thousand or 93.5% of the election participations voted by mail.

Figure 112: Participation Using Voting Methods in the 2020 General Election for Santa Clara

	Santa Clara
General Election Participants	859,709
Voted-by-Mail	803,933
% Voted-by-Mail	93.5%
Vote Center (In Person)	48,857
% Vote Center	5.7%
CVR / Nonprovisional CVR	7,772
% CVR / Nonprovisional CVR	0.9%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

Among VCA counties, Santa Clara has the highest composition of minority language voters at 7.3%.

Figure 113: Eligible Voters by Language Type in the 2020 General Election for Santa Clara

	Santa Clara
Total Eligible Voters	1,258,660
English	1,166,581
% English	92.7%
Total Minority Languages	92,079
% Minority Languages	7.3%

The minority language electorate is mostly split across three groups – Vietnamese, Spanish, and Chinese. Unlike other VCA counties, these three language groups make up more than 1.5% of the total eligible voters each.

Figure 114: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Santa Clara

	Santa Clara		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Vietnamese	38,941	3.1%	42.3%
Spanish	22,148	1.8%	24.1%
Chinese	19,945	1.6%	21.7%
Tagalog	5,544	0.4%	6.0%
Korean	2,686	0.2%	2.9%
Other (Not Listed)	1,806	0.1%	2.0%
Hindi	466	0.0%	0.5%
Japanese	337	0.0%	0.4%
Khmer	117	0.0%	0.1%
Thai	89	0.0%	0.1%

Voter turnout for minority language voters was noticeably lower at 63.4% than their English-speaking counterparts at 68.7%.

Figure 115: Voter Turnout by Language in the 2020 General Election for Santa Clara

Santa Clara			
	Total Eligible Voters	Voted	Did Not Vote	Turnout
English	1,167,039	801,638	365,401	68.7%
Vietnamese	38,817	25,713	13,104	66.2%
Spanish	22,019	13,967	8,052	63.4%
Chinese	19,900	12,416	7,484	62.4%
Tagalog	5,527	1,939	3,588	35.1%
Korean	2,661	1,911	750	71.8%
Other	1,779	1,475	304	82.9%
Hindi	462	372	90	80.5%
Japanese	332	223	109	67.2%
Khmer	117	75	42	64.1%
Thai	89	62	27	69.7%

Unlike turnout, vote-by-mail usage as the preferred participation method was mostly consistent across language groups.

Figure 116: Preferred Voting Method by Language Group in the 2020 General Election for Santa Clara

	Santa Clara									
	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
English	801,638	750,412	93.6%	45,259	5.6%	6,679	0.8%	0	0.0%	0	0.0%
Vietnamese	25,713	23,109	89.9%	1,966	7.6%	671	2.6%	0	0.0%	0	0.0%
Spanish	13,967	12,810	91.7%	962	6.9%	217	1.6%	0	0.0%	0	0.0%
Chinese	12,416	11,907	95.9%	405	3.3%	105	0.8%	0	0.0%	0	0.0%
Tagalog	1,939	1,799	92.8%	116	6.0%	24	1.2%	0	0.0%	0	0.0%
Korean	1,911	1,840	96.3%	48	2.5%	26	1.4%	0	0.0%	0	0.0%
Other	1,475	1,382	93.7%	62	4.2%	31	2.1%	0	0.0%	0	0.0%
Hindi	372	333	89.5%	29	7.8%	10	2.7%	0	0.0%	0	0.0%
Japanese	223	215	96.4%	4	1.8%	4	1.8%	0	0.0%	0	0.0%
Khmer	75	70	93.3%	1	1.3%	4	5.3%	0	0.0%	0	0.0%
Thai	62	56	90.3%	5	8.1%	1	1.6%	0	0.0%	0	0.0%

Santa Clara had the highest mail ballot rejection rate among VCA counties at 4.3%.

Figure 117: Vote-by-Mail Statistics in the 2020 General Election for Santa Clara

	Santa Clara
Attempted to Vote-by-Mail	840,442
Accepted	803,933
Rejected	36,509
Rejection Rate	4.3%

However, the rejection rate for minority language voters was distinctively smaller at 2.8%, compared to the 4.5% rate for English language ballots.

Figure 118: Mail Ballot Rejection Rates by Language in the 2020 General Election for Santa Clara

Santa Clara			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	785,369	750,412	34,957	4.5%
Vietnamese	23,603	23,109	494	2.1%
Spanish	13,394	12,810	584	4.4%
Chinese	12,132	11,907	225	1.9%
Korean	1,923	1,840	83	4.3%
Tagalog	1,871	1,799	72	3.8%
Other	1,436	1,382	54	3.8%
Hindi	351	333	18	5.1%
Japanese	228	215	13	5.7%
Khmer	73	70	3	4.1%
Thai	62	56	6	9.7%

Tuolumne County

Tuolumne County is covered by Cal. Elec. Code §14201 for Spanish but is not covered by §203 of the Voting Rights Act (VRA). The County spent over $42,000 on advertising for voter education.[213] Tuolumne does not have any media outlets that are specific to the Spanish speaking community, so instead, the County established a list of community partners that could assist with educating and distributed Spanish-language materials provided by the California Secretary of State to this community.[214] Likewise, community partners educated Tuolumne's Spanish-speaking community primarily through emails, newsletters, and by distributing flyers at public events or daily operations, such as riding public transportation.[215] Moreover, the local newspaper, The Union Democrat, also ran Spanish-language public service announcements (PSAs) informing voters about [language assistance? Voting in the county?] and promoting the toll-free voter assistance hotline.[216]

The Tuolumne County Elections Department held a bilingual voter education workshop to increase outreach to the County's Spanish-speaking community and to boost voter participation in December 2019 election.[217]

For the 2020 General Election, at least one bilingual poll worker was hired and directed to work at the Jamestown vote center.[218] At all vote centers, two different ballot marking devices were used — the Image Cast X (ICX) and Image Cast Precinct Ballot Tabulators.[219] The County Clerk has not released how many assistance calls were received, but the Clerk claimed that the County does collect and store this data in their election management system.[220] The number of voters that were assisted at the polls by either a language interpreter or by someone they had brought it is unknown.

Tuolumne's Language Access Advisory Committee (LAAC) has publicized their meeting minutes for meetings occurring from August 2019 through October 2019.[221]Whether the County provided mailers in a language other than English, and whether any facsimile ballots were given in a language other than English is unknown. Lastly, it is not known how many bilingual staff the County has or how the County conducts language assistance training for their poll workers.

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[213] Tuolumne County, Voter's Choice Act Election Administration Plan (January 30, 2020), at 17, https://www.tuolumnecounty.ca.gov/DocumentCenter/View/13867/Tuolumne-EAP-Amended-Final-2020-01-30 [hereinafter Tuolumne County Election Administration Plan].
[214] *Id*. at 14.
[215] *Id*.
[216] *Id*.
[217] *Id*.
[218] *Id*. at 5.
[219] *Id*. at Appendix F.
[220] *Id*. at 15.
[221] Tuolumne County, Election Information, https://www.tuolumnecounty.ca.gov/194/Election-Information

VoteCal Data Analysis

Tuolumne County had over 38 thousand eligible voters, 30,404 or 79.4% of which participated in the General Election. This turnout rate was fourth highest among the VCA counties.

Figure 119: Participation in the 2020 General Election for Tuolumne

	Tuolumne
Total Eligible Voters	38,272
Voted	30,404
Did Not Vote	7,868
Turnout	79.4%

Nearly 95% of voters chose to vote by mail during the General Election.

Figure 120: Participation Using Voting Methods in the 2020 General Election for Tuolumne

	Tuolumne
General Election Participants	30,404
Voted-by-Mail	28,846
% Voted-by-Mail	94.9%
Vote Center (In Person)	1,416
% Vote Center	4.7%
CVR / Nonprovisional CVR	163
% CVR / Nonprovisional CVR	0.5%
Precinct Polling Place (In Person)	0
% Precinct Polling Place	0.0%
Early (In Person)	0
% Early	0.0%

With just 46 minority language voters, Tuolumne has the smallest share of non-English speaking voters at 0.1%.

Figure 121: Eligible Voters by Language Type in the 2020 General Election for Tuolumne

	Tuolumne
Total Eligible Voters	38,272
English	38,226
% English	99.9%
Total Minority Languages	46
% Minority Languages	0.1%

Of the minority language voters, 39 or 84.8% speak Spanish.

Figure 122: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Tuolumne

	Tuolumne		
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	39	0.1%	84.8%
Other (Not Listed)	2	0.0%	4.3%
Chinese	1	0.0%	2.2%
Korean	1	0.0%	2.2%
Vietnamese	1	0.0%	2.2%
Tagalog	1	0.0%	2.2%
Thai	1	0.0%	2.2%
Hindi	0	0.0%	0.0%
Japanese	0	0.0%	0.0%
Khmer	0	0.0%	0.0%

Although proportionally small, Spanish-speaking voters had a noticeable lower turnout than English speakers.

Figure 123: Voter Turnout by Language in the 2020 General Election for Tuolumne

	Total Eligible Voters	Voted	Did Not Vote	Turnout
	Tuolumne			
English	38,226	30,371	7,855	79.5%
Spanish	39	27	12	69.2%
Other	2	1	1	50.0%
Chinese	1	1	0	100.0%
Korean	1	1	0	100.0%
Tagalog	1	1	0	100.0%
Thai	1	1	0	100.0%
Vietnamese	1	1	0	100.0%

Other than Korean and other non-listed languages, the vast majority of voters cast a mail ballot in the 2020 General Election.

Figure 124: Preferred Voting Method by Language Group in the 2020 General Election for Tuolumne

	General Election Participants	Voted-by-Mail		Vote Center (In Person)		CVR / Nonprovisional CVR		Precinct Polling Place (In Person)		Early (In Person)	
	Tuolumne										
English	30,371	28,815	94.9%	1,414	4.7%	163	0.5%	0	0.0%	0	0.0%
Spanish	27	27	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Chinese	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Korean	1	0	0.0%	1	100.0%	0	0.0%	0	0.0%	0	0.0%
Other	1	0	0.0%	1	100.0%	0	0.0%	0	0.0%	0	0.0%
Tagalog	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Thai	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Vietnamese	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tuolumne rejected 882 or 3.0% of the nearly 30 thousand mail ballots received. This rejection rate is comparable to the VCA counties average.

Figure 125: Vote-by-Mail Statistics in the 2020 General Election for Tuolumne

	Tuolumne
Attempted to Vote-by-Mail	29,728
Accepted	28,846
Rejected	882
Rejection Rate	3.0%

Other than the 881 English language mail ballots rejected, only 1 Spanish mail ballot was rejected.

Figure 126: Mail Ballot Rejection Rates by Language in the 2020 General Election for Tuolumne

	Tuolumne			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	29,696	28,815	881	3.0%
Spanish	28	27	1	3.6%
Chinese	1	1	0	0.0%
Tagalog	1	1	0	0.0%
Thai	1	1	0	0.0%
Vietnamese	1	1	0	0.0%

Los Angeles County

The languages mandated by California and federal law in Los Angeles County are Armenian, Chinese, Cambodian/Khmer, Persian, Korean, Spanish, Tagalog, Vietnamese, Hindi, Japanese, Thai, Russian, Bengali, Burmese, Gujarati, Indonesian, Mongolian, and Telugu.[222] This General Election, the County invested in non-English advertising for voter education and had a budget of $25,000 for outreach.[223] Some of that outreach included voter registration drives, deputy registrar trainings, new citizenship ceremonies, and voting equipment demonstrations. The Community & Voter Outreach team provided 5.9 million eligible voters with voter registration opportunities and materials, conducted Deputy Registrar training for interested citizens to register voters, conducted petition drives, regularly attended naturalization ceremonies in Los Angeles County to welcome new citizens to register to vote, and had demonstrations for setting up a polling place, using InkaVote vote recorders, using Precinct Ballot Readers (PBRs) and using Audio Ballot Booths (ABBs).[224] The County also hired bilingual poll workers to assist LEP voters. The specific number of poll workers or bilingual staff members for the County is unknown. Poll workers trained with the new voting system.by They attended a lab where they experienced interactive breakout sessions, which include additional hands-on-training with the Ballot Marking Device and the e-poll book.[225] On Election Day, most vote centers had access to ballot marking devices programmed with 13 languages, including audio ballots. Voters also had the option of calling a toll-free number to request that translated election materials be mailed to them.

Los Angeles County provided mailers in Armenian, Chinese, Persian, Hindi, Japanese, Khmer/Cambodian, Korean, Russian, Spanish, Tagalog, Thai, and Vietnamese as mandated by SB 450.[226] Further, the County had an Interactive Sample Ballot tool that does not store any identifiable information and allowed voters to access, review, and mark their selections prior to going to a vote center.[227] There was also an E-Sample Ballot available to voters that was an electronic version of their Sample Ballot, was accessible via email, and was then emailed to voters 30 days prior to Election Day.[228] Both were available in 13 languages. Los Angeles partnered with PlaceWorks to identifying vote centers using a geospatial analysis and held two

[222] Los Angeles County, Multilingual Services Program https://www.lavote.net/home/voting-elections/voter-education/multilingual-services-program/multilingual-services-program

[223] Los Angeles County, Election Administration Plan (2019), at 51, https://vsap.lavote.net/wp-content/uploads/2020/02/EAP_FINAL-ENGLISH.pdf [hereinafter Los Angeles County Election Administration Plan].

[224] Los Angeles County, Community & Voter Outreach Services, https://www.lavote.net/home/voting-elections/community-voter-outreach/community-voter-outreach/services#deputy-registrar-trainings

[225] Los Angeles County, Election Worker Training, https://www.lavote.net/home/voting-elections/election-worker-information/election-worker-training/training

[226] Los Angeles County, Multilingual Services Program https://www.lavote.net/home/voting-elections/voter-education/multilingual-services-program/multilingual-services-program

[227] Los Angeles County, Interactive Sample Ballot, https://www.lavote.net/isb

[228] *Id.*

rounds of grassroots community meetings specifically for persons with disabilities and minority language communities to ensure public input and involvement.[229]

The County has a Language Access Advisory Committee (LAAC) that helps advocate for language access needs. The committee is comprised of 22 representatives: Asian American Advancing Justice – Los Angeles; CA Common Cause; CAUSE, CHIRLA; City Clerk of Glendale; City Clerk of Pasadena; City Clerk of Sierra Madre; City of Bellflower; City of West Hollywood; Deputy Mayor of City of Bell; FarsiVote; Khmer Girls in Action; Korean American Coalition; L.A. City; LWV; Los Angeles; NALEO; National Iranian American Council (NIAC); Pars Equality Center; South Asian Network; South Asian Network (SAN); Thai CDC; and UCP.[230] The LAAC has quarterly meetings, but the meeting minutes are not publicly reported. Additionally, Los Angeles County contracted for language translation and media services. Multilingual media stations such as ABC, CBS, KTLA, FOX, NBC, Telemundo, Univision, iheart media, POWER 106, Entercom, Entravision, Los Angeles Times, LA Daily News, Daily Breeze, Pasadena Star News, Long Beach Press-Telegram and more.[231] The media services were used to raise awareness and educate residents about the upcoming election and language services, provide public service announcements and informational interviews, to promote departmental events, coordinate interviews and to disseminate election information.[232]

VoteCal Data Analysis

As show in figure 127 below, Los Angeles County had nearly 7.3 million eligible voters, over 4.2 million, or 58.9%, of whom voted in the General Election. Compared to the other VCA counties, this is the lowest turnout rate.

Figure 127: Participation in the 2020 General Election for Los Angeles

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[229] Los Angeles County Election Administration Plan, *supra* note 226, at 15 and 19-20.

[230] Los Angeles County, Language Accessibility Advisory Committee, https://www.lavote.net/home/voting-elections/community-voter-outreach/language-accessibility-advisory-committee

[231] These were: liberman broadcasting; KNX; KPCC; NPR; K-ABC; KFI; KJLH; San Gabriel Valley Tribune; LA Sentinel; La Opinion (Spanish-language); World Journal (Chinese-language); The Korea Times (Korean-language); and Whittier Daily News. Los Angeles County Election Administration Plan, *supra* note 226, at 8.

[232] Los Angeles County Election Administration Plan, *supra* note 226, at 7-8.

	Los Angeles
Total Eligible Voters	7,264,034
Voted	4,275,826
Did Not Vote	2,988,208
Turnout	58.9%

While the preferred method of voting for participants in Los Angeles was still by mail ballot, over 19% of voters selected to vote in person at a vote center.

Figure 128: Participation Using Voting Methods in the 2020 General Election for Los Angeles

	Los Angeles
General Election Participants	4,275,826
Voted-by-Mail	3,400,599
% Voted-by-Mail	79.5%
Vote Center (In Person)	822,305
% Vote Center	19.2%
CVR / Nonprovisional CVR	63,726
% CVR / Nonprovisional CVR	1.5%
Precinct Polling Place (In Person)	28
% Precinct Polling Place	0.0%
Early (In Person)	1
% Early	0.0%

In terms of a breakdown by language, Los Angeles has nearly 400 thousand, or 5.4%, non-English speaking voters.

Figure 129: Eligible Voters by Language Type in the 2020 General Election for Los Angeles

	Los Angeles
Total Eligible Voters	7,264,034
English	6,868,730
% English	94.6%
Total Minority Languages	395,304
% Minority Languages	5.4%

Spanish speaking voters make up 66.9% of minority language voters and 3.6% of total eligible voters. Chinese and Korean speaking voters are the next largest language groups, comprising 13.2% and 10.6% respectively of Los Angeles County minority language voters. No other minority language group makes up more than four percent of non-English speakers.

Figure 130: Eligible Voters by Minority Language and Each Group's Share of Eligible Voters in the 2020 General Election for Los Angeles

Los Angeles			
	Eligible Voters by Language	Share of Total Eligible Voters	Share of Minority Language Voters
Spanish	264,292	3.6%	66.9%
Chinese	52,343	0.7%	13.2%
Korean	41,919	0.6%	10.6%
Vietnamese	14,279	0.2%	3.6%
Tagalog	8,318	0.1%	2.1%
Other (Not Listed)	6,368	0.1%	1.6%
Japanese	3,421	0.0%	0.9%
Thai	2,512	0.0%	0.6%
Khmer	1,259	0.0%	0.3%
Hindi	593	0.0%	0.2%

Unlike the VCA Counties averages discussed earlier, the County had a 58.4% turnout rate among English speakers, the lowest for any language group. Every other language group had a turnout

rate higher than the County average, meaning that English speaking voters played a significant role in decreasing the turnout average. Other than Thai speaking voters and voters speaking another language not listed, Spanish speaking voters had the third highest turnout.

Figure 131: Voter Turnout by Language in the 2020 General Election for Los Angeles

	Total Eligible Voters	Voted	Did Not Vote	Turnout
Los Angeles				
English	6,869,536	4,010,454	2,859,082	58.4%
Spanish	264,009	182,071	81,938	69.0%
Chinese	52,295	32,388	19,907	61.9%
Korean	41,884	26,688	15,196	63.7%
Vietnamese	14,272	9,321	4,951	65.3%
Tagalog	8,311	4,926	3,385	59.3%
Other	6,364	5,259	1,105	82.6%
Japanese	3,420	2,098	1,322	61.3%
Thai	2,511	1,837	674	73.2%
Khmer	1,258	800	458	63.6%
Hindi	593	403	190	68.0%

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Figure 132: Vote-by-Mail Statistics in the 2020 General Election for Los Angeles

	Los Angeles
Attempted to Vote-by-Mail	3,425,085
Accepted	3,400,599
Rejected	24,486
Rejection Rate	0.7%

With a County-wide average of only 0.7%, no language group experienced a significant disparity in mail ballot rejections. The language group with the highest rejection rate was Hindi speaking voters at 1.2%, but there were only 4 rejected ballots from those voters.

Figure 133: Mail Ballot Rejection Rates by Language in the 2020 General Election for Los Angeles

	Los Angeles			
	Attempted to Vote-by-Mail	Accepted	Rejected	Rejection Rate
English	3,199,156	3,176,111	23,045	0.7%
Spanish	150,889	149,996	893	0.6%
Chinese	28,770	28,535	235	0.8%
Korean	24,990	24,811	179	0.7%
Vietnamese	7,802	7,767	35	0.4%
Other	4,556	4,511	45	1.0%
Tagalog	4,357	4,337	20	0.5%
Japanese	1,847	1,837	10	0.5%
Thai	1,676	1,662	14	0.8%
Khmer	701	695	6	0.9%
Hindi	341	337	4	1.2%

Conclusion

Our analysis of the VoteCal data for the 2020 General Election and responses provided by county officials shows that all VCA counties satisfied the minimum legal requirements to provide language access and outreach to language minority communities. As detailed above, one of the primary findings of this report is that turnout rates were comparable for limited-English voters and their English-speaking counterparts during the 2020 General Election.

Furthermore, non-English and English-speaking voters selected to vote by mail at similar rates. In other words, voting by mail, as the preferred method of participation, had consistent usage across languages. Given the increased pressure on counties to process mail ballots, our analysis shows that there was no discernible disparity in the mail ballot rejection rate regardless of primary language.

Practices that can be improved, based on the findings of this report, including creating a consistent and uniform process for data collection. All VCA counties should be required to track, collect, and maintain the same types of information around voter characteristics, methods of participation, and language access. Mandating and maintaining consistent data is important and will facilitate further research efforts.