

Request for Diversity, Equity, and Inclusion approach  
for CalSAWS project and procurements.  
Statement submitted in advance of public comment.

To: CalSAWS Joint Powers Authority Board and Project Steering Committee  
From: CalSAWS Advocates

August 14, 2020

Today we want to lift up the importance of Diversity, Equity, and Inclusion (DEI) in the work that is being done by CalSAWS, its vendors, and other partners.

We know that everyone in the CalSAWS Stakeholder group wants to see an exemplary approach to the development of technological systems that fully support access for every Californian in need.

As one of the largest and most diverse states in the country, and as one of the most recognized leaders in the technology sector, California has an opportunity to lead the way in building technology platforms that reflect our shared commitment to ensuring neither language needs, disability, or the effects of racism inhibit people from freely accessing their benefits.

We know that many of you are working in your counties to improve the ways that DEI is not just included in formal efforts but also woven throughout your staffing, decision making, and outcomes measurements. For example, some counties and CDSS are using the GARE process to address and mitigate bias in their business processes, policies, and departments.

We too have been working to improve our understanding of and advocacy on DEI as part of our values and priorities. While many of us are familiar with the ways that racism and sexism have historically shaped our social safety net programs, we are often less familiar with how racism can unintentionally influence and impact technology. This has been documented in recent research such as Meredith Broussard's work on "technochauvinism" and ProPublica's exposé about machine bias in the legal system.

It is our understanding that the CalSAWS Project lacks its own dedicated effort to integrate Diversity, Equity, and Inclusion as part of the decision making and contracting processes. Research shows that without a centralized and shared approach to continually bring DEI into information gathering and decision making processes, groups can quickly default to cultural biases. Therefore, we urge CalSAWS to explicitly create an intentional process for DEI. With a full commitment to DEI, we expect to see greater transparency and intentionality to meet the needs of Californians who face systemic discrimination.

In the examples we share below, we understand that there are no doubt considerations that CalSAWS are weighing that advocates may not be aware of. Nevertheless, these examples show that the outcomes are still not meeting the needs of all Californians.

**First**, equitable language access is critical to address disparities for non-English speakers (see, “Lost in Translation” report by Joony Moon 2019) and prevent harm when these households cannot get food, medical care and other vital benefits. However we see opportunities for improvement in both the translation of notices and in ancillary systems.

- Notices or other documents sometimes become misleading, inaccurate or even unintelligible when translated, and frustrate the shared objective to provide benefits to people who need them. Even in English, documents may not have the appropriate literacy level. These documents are extremely expensive and time-consuming to create and automate, which also makes it difficult to make changes for improving them, and yet they are what beneficiaries rely on during key moments to enroll in or retain benefits. It’s unclear how translations are vetted with native-level speakers to ensure accuracy.
- Similarly, the web portal and contact center software are the most public facing aspects of CalSAWS, and are key platforms to reduce barriers to information that people need to access benefits. Yet full language translations have not been prioritized, with some languages being left until Phase 2 of the portal development. The contact center software enhancements do not appear to have clear plans for language expansion. CalSAWS should ensure that all vendors meet all access needs in every threshold language.

**Second**, the initial lack of communication with disability access experts in the development of the portal RFP has led to additional effort and funding requests to ensure that the portal will be accessible for people with disabilities. Advocates worked to bring in this perspective as we identified it as a gap, but ideally this would have happened as part of the RFP development early on. While the RFP may be in compliance with the ADA policies, ensuring that the web portal is truly accessible is a necessary step beyond letter-of-the-law compliance in order to achieve the vision of an accessible system.

**Third**, as the Alliance to Transform CalFresh noted to CDSS in 2017 through the Racial Impact Statement, the lack of intentional data gathering and analysis of program outcomes based on race or ethnicity is deeply troubling. Without this data, it is impossible to identify policies, business processes, and technology that may be unintentionally leading to disparate outcomes for low-income Californians.

Building a DEI vision into CalSAWS from the start will ensure that we identify problems early on, so that we can ensure equitable access from the beginning and avoid time-consuming and expensive changes down the road.

We are sharing these comments and examples to highlight areas where we have seen opportunities to center DEI in this work and the impact it would make. We see that you are

working every day to improve these systems, but we all have work to do to unlearn and mitigate systemic bias; even our best intentioned efforts will not be enough if DEI approaches are not at the forefront to shape decision making.

What we are asking for is an intentional effort to create patterns of engagement to reduce and eliminate the impacts of systemic racism, which affect our public benefits as it has in all of our policies and systems for many decades and which require proactive steps to address. DEI approaches have been proven to improve program outcomes and reduce costly errors.

Moreover, DEI is the right thing to do as we, as a society, are working to better understand and end the systemic racism that permeates virtually every aspect of our lives. We ask that CalSAWS consider this request and move quickly to seize this opportunity to address inequities that can only be corrected with a DEI-centered approach.

We strongly urge this body to take concrete action, including hiring a diverse team of experts to develop and implement DEI approaches within the CalSAWS Project, and to ensure that everyone in the project is aligned in a shared vision of how Diversity, Equity, and Inclusion need to be elevated at each step of the way.

Sincerely,

CalSAWS Advocates Group and Advocate Co-Leads

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