

June 22, 2026

Commission on
State Mandates
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06/22/2026

Juliana Gmur
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

Test Claim 25-TC-03, Emergency Communications in Non-English Languages

Dear Director Gmur:

The Department of Finance has completed its review of test claim 25-TC-03 submitted to the Commission on State Mandates (Commission) by the County of Sonoma (Claimant), in which the Claimant alleges it incurred reimbursable, state-mandated costs associated with Chapter 587, Statutes of 2023 (Assembly Bill 1638 or AB 1638).

Existing law, under the Dymally-Alatorre Bilingual Services Act (Act), requires every local public agency that serves a substantial number of non-English-speaking people to employ qualified bilingual persons in public contact positions as interpreters. Existing law also requires that any materials explaining services available to the public shall be translated into any non-English language spoken by at least five percent of the public served by the agency.

AB 1638 added Section 7299.7 to the Government Code effective January 1, 2024, with operative requirements commencing January 1, 2025, to require local agencies that provide emergency response services to determine which languages are spoken jointly by five percent or more of the people within their jurisdiction that speak English less than "very well" (qualifying non-English languages) according to data from the American Community Survey (ACS) or data from an equally reliable source, and to reassess the data every five years.

Commencing January 1, 2025, in the event of an emergency, AB 1638 requires a local agency to provide information related to the emergency in the qualifying non-English languages in addition to English. The local agency providing emergency information must ensure that the quality of information translated is as comprehensive, actionable, and timely as the information provided to English-speaking persons. The local agency must also endeavor to utilize community members with the cultural competencies and language skills necessary to effectively communicate with those that speak English less

than “very well” using, whenever feasible, native speakers of the relevant languages who also speak English fluently.

The Claimant alleges it will incur \$42,720 in state-mandated, reimbursable costs in fiscal year 2025-26 to comply with Government Code section 7299.7 and estimates \$135,208 in such costs in fiscal year 2026-27.

Emergency Messaging Templates and Public Information Costs:

The Claimant alleges it will incur \$28,800 in 2025-26 to provide emergency information in qualifying non-English languages, which includes activities such as modifying existing messaging templates and updating public information.

“Prior to AB 1638, the County prepared emergency messaging templates and public information in English only. AB 1638 requires that all such templates and messaging now be prepared in both English and Spanish. This modifies existing County emergency communications workflows and requires additional staff time for bilingual template development, review, and dissemination.”

If the Commission determines the statute imposes a state-reimbursable mandate, Finance contends that updating messaging templates and public information is a one-time activity, and once such activity is completed, the Claimant should not incur any ongoing costs.

Culturally Competent Community Engagement Costs:

The Claimant alleges it will incur \$13,920 in 2025-26 to engage in culturally competent community activities, which include ongoing year-round collaboration with community-based organizations, hiring native-speaker translators, and expanding existing interpreter programs to include native-speaker ambassadors.

Government Code section 7299.7(c)(2) requires a local agency providing information related to an emergency to endeavor to utilize community members with the cultural competencies and language skills necessary by using, whenever, feasible, native speakers of the relevant languages who also speak English fluently. AB 1638 does not mandate the specific activities that the local agency must engage in to meet this requirement, such as ongoing year-round collaboration with community-based organizations.

Finance recommends the Commission examine the estimated costs cited by the Claimant while considering the requirements of Government Code section 8593.3.5, which requires counties to integrate cultural competence into their emergency plans.

“(a) A county, including a city and county, shall, upon the next update to its emergency plan, integrate cultural competence into its emergency plan by

addressing, at a minimum, how culturally diverse communities within its jurisdiction are served by the following:

- (1) Emergency communications, including the integration of interpreters and translators. . .
- (4) Emergency planning, including drawing on community-based values and customs, and incorporating qualified representatives from diverse population groups in the community, during the planning process.
- (5) Emergency preparedness, including the use of culturally appropriate resources and outreach techniques to educate and prepare community members for emergencies or disasters.”

If the Commission determines the statute imposes a state-reimbursable mandate, Finance notes that to the extent the activities cited by the claimant were already required by Government Code section 8593.3.5, or certain activities are not required by statute, such costs should be excluded from any calculation of mandated costs.

Language Determination and Reassessment Costs:

The Claimant states that it does not anticipate incurring costs in 2025-26 to conduct a reassessment of the qualifying language data but does anticipate incurring such costs in 2028-29.

“The County must reassess its qualifying language data every five years. This recurring obligation is entirely new; no comparable reassessment cycle existed under prior law. The first reassessment under this subdivision is anticipated in FY 2028–29.”

Finance notes that AB 1638 requires each local agency to reassess its ACS data, or data from an equally reliable source, every five years. If the Commission determines the statute imposes a state-reimbursable mandate, Finance notes that any costs related to the above activity should only be considered reimbursable in the years in which the reassessment is required and should not be included in any calculation of state-mandated costs on an annual basis.

In summary, Finance contends that some activities the Claimant performed or intends to perform are one-time in nature or already required by existing law. If the Commission determines AB 1638 imposes reimbursable, state-mandated costs on local agencies, Finance recommends the Commission examine the estimated costs to ensure any activities not required by statute are considered non-reimbursable.

If you have any questions regarding this letter, please contact Chris Hill, Principal Program Budget Analyst, at (916) 445-3274.

Sincerely,

Rosanna Nguyen

ROSANNA NGUYEN

Program Budget Manager

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

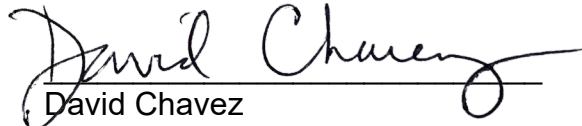
On June 22, 2026, I served the:

- **Current Mailing List dated June 9, 2026**
- **Finance's Comments on the Test Claim filed June 22, 2026**

Emergency Communications in Non-English Languages, 25-TC-03
Government Code § 7299.7; Statutes of 2023, Chapter 587 (AB 1638); effective
January 1, 2024 and operative January 1, 2025
County of Sonoma, Claimant

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on June 22, 2026 at Sacramento, California.



David Chavez
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 6/9/26

Claim Number: 25-TC-03

Matter: Emergency Communications in Non-English Languages

Claimant: County of Sonoma

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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