

BOARD of SUPERVISORS



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MEMORANDUM

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Date: May 5, 2022  
To: San Francisco Redistricting Task Force (2021-2022)  
From: Angela Calvillo, Clerk of the Board  
Office of the Clerk of the Board  
Subject: Redistricting Task Force – Clerk of the Board Report

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In accordance with Board of Supervisors Ordinance No. 94-21, File No. 210606, which convened the Redistricting Task Force (RDTF, Task Force) and amended the San Francisco Campaign and Governmental Conduct Code, stating the Secretary to the Task Force shall be the Office of the Clerk of the Board, the Director of the Department of Elections shall manage any technical consultant and set for the controlling standard for language access as the 48-hour standard.

The Office of the Clerk of the Board (Clerk's Office, Department) provides the following information on legislative establishment and appointments; staffing; early planning; outreach; costs incurred; language access; meetings, facilities and logistics; and digital accessibility, for the benefit of the next decennial RDTF and the staff that will be supporting them.

**LEGISLATIVE ESTABLISHMENT AND APPOINTMENTS**

Due to the COVID-19 health emergency that complicated the completion of the Census, the timeline followed was not the usual practice from years before. In anticipation of the delayed receipt of the Census results from the federal government, the City decided to form the Task Force prior to receiving the Census report, in order to get the Task Force informationally ready to begin their duties. Normally, the Ordinance that establishes the Task Force is introduced after the Director of Elections reports on the Census results and whether the District lines are in compliance. This year, the City decided to forego waiting for the Director of Elections' report and moved forward with establishment and appointing the Task Force beforehand. The Clerk's Office recommends that the establishment of the Task Force and appointments be made even earlier before the Director of Elections' report is released.

Additional time to establish the Task Force would provide more opportunities to review the duties, establish a timeline for action, set expectations, and execute those requirements and additional demands. The Task Force would be able to focus on the actual District lines and duties to accomplish that task by the time the Census results are released.

The Census results are released around April the year prior to the Task Force's April 15th deadline to adopt a Final Map. It would be advisable for the Board of Supervisors to introduce and pass an Ordinance establishing the Task Force at least six months to a year before the Census results are released in April. The Ordinance should include the member structure, appointing authorities (and that they serve at the pleasure of those authorities), seat qualifications, deadline for appointments, attendance requirements, minimum number of meetings, assignment of administrative/clerking/legal support, language access standards, and outreach directives, including where the funding will be derived for each of these.

The earlier establishment of the Task Force will allow the appointing authorities additional time to make their appointments and for the appointees to arrange their upcoming schedules since the duties will require a significant proportion of their time and energy. This will provide the City Attorney's Office additional time to brief appointees with the California Ralph M. Brown Act, the Sunshine Ordinance and in general the City Attorney's Good Government Guide to ensure adherence to rules and best practices. The Task Force members must be made aware of how much time will be required and that their schedule will need to adapt to the Task Force's majority.

### **STAFFING**

In addition to the time commitment of the Task Force members, the time and energy of the staff assigned to support them must also be taken into consideration. During the seven-month process, the entire leadership of the Clerk's office were committed to planning the critical administrative objectives of the Task Force. The clerking duties were done by an Assistant Clerk from the Clerk's Office who was still assigned to a committee at the Board of Supervisors. Additionally, backup Clerks, both remote and in-person each had their regular Board of Supervisors duties to perform, which was extremely draining on Department resources and caused focus to be diverted from the business of the Board. The Clerk's Office did an extraordinary job of stretching the limited staff resources on hand, while executing hybrid meetings at the Board that already doubled the workload of the Department.

In the future, it is recommended that a department or division is established to provide a structure that increases the ability of a team of individuals to plan and problem solve at a high level. At the very least, two Clerks should be assigned to the responsibility of Clerking the Task Force, with *not much else on their plate*, given that meetings may occur on consecutive days of the week. Those Clerks may be new hires or reassigned from other bodies, but reassignment of Board Clerks would not be suggested unless there is ample staffing available. The Clerk of the Board and staff could provide training for the Clerks if they do not come from the pool of Board Clerks. Staff who are assigned to the Task Force, especially the Clerks, should also have an intimate knowledge of the City neighborhoods, streets, and districts. In order to accurately capture the voluminous comments and discussions of the various areas, the Clerks must be able to articulate those concisely. During this current process, the Board was luckily able to loan a Clerk who already had that knowledge, and it benefitted the Task Force and the public tremendously.

We cannot predict what the state of public meetings will be like in ten years, but we can only assume that access will be even more expanded and technology utilized to facilitate more access, and a need to employ a similar amount of staffing solely designated to manage the Task Force. In addition to the two Clerks, at least five other staff should be considered to manage public comment, organize off-site locations, setup/take down of meeting rooms, interpreters needs, broadcasting needs, IT assistance and a position to coordinate and manage these positions. Again, a temporary division should be established to support the Task Force and their needs. It must be remembered that supporting duties of staff are in addition to regular duties and the business of the City should not be disadvantaged.

### **EARLY PLANNING**

At the Inaugural Meeting of the Task Force, staff should present the Task Force with a draft framework of duties and a timeline on which they should be approximately achieved. The Task Force ultimately has the authority to approve a timeline, but it is highly recommended that a succinct proposal with specific duties be laid out for them to digest and adjust their schedules for (e.g., how many district-specific meetings, when draft maps will begin being published). While the Task Force has an April 15th deadline to approve a Final Map, the next Task Force should consider publishing a Draft Map well in advance of the final deadline to allow the public to visualize and comment on what changes are being considered.

A proposed calendar of meetings should also be provided by staff at the Inaugural Meeting so the Task Force has a starting place and less time is lost on back and forth negotiations amongst the members on their own individual schedules. Hopefully a limitation on the number of weekends will be established by the Ordinance since those days cost significantly more and personnel issues arise. While special meetings

may be called as needed, an early establishment of the regular meeting schedule must be done in order to provide the Task Force members, staff, and the public ample time to make those necessary adjustments. At the beginning of this process, the Clerk's Office provided a calendar of meeting dates to the Task Force, but there was a delay in approving a final schedule. Once a proposed calendar is provided, the expectation that a regular meeting schedule be approved at the next meeting should be established.

A public meeting should also be scheduled early in the process to show the Task Force Members and the public how to use the mapping tool and its features. The Task Force should be encouraged to use the mapping tool regularly to familiarize themselves with it so they can respond to the public with firsthand knowledge and experience. Even if the Census results are not yet available, a template starting map with the current lines could be uploaded to the website to begin the thinking process. The second part of the redistricting process should be smoother if Task Force Members and the public are already using the mapping tool, and familiarizing themselves with the streets and neighborhoods, by the time the Census results are released.

Informational hearings or workshops should also be held in the beginning to provide an overall picture of where established neighborhoods are, what area the various Benefit Districts cover, what encompasses the Cultural Districts, and any other areas that would assist in "painting a picture" for what San Francisco currently looks like. A listing of possible types of informational presentations should be offered to the Task Force early for their consideration and selection to agendaize.

#### **LESSONS LEARNED FROM THE PREVIOUS TASK FORCE – OUTREACH CONSULTANT**

The Final Report issued in 2012 by the previous Redistricting Task Force included the section titled "Lessons Learned and Recommendations" which addressed the need for a professional outreach consultant. The Report recommended that the outreach consultant demonstrate the ability to work with various neighborhoods, cultural and linguistic communities and organizations in San Francisco via print, digital, and social media and commence the community engagement process at the earliest possible time.

Heeding this recommendation, the Clerk's Office started the planning process for the 2021- 2022 Redistricting Task Force early. With the City's lengthy procurement process, including Civil Service Commission approval, it takes three months at minimum to bring in a consultant. The Department of Elections (DOE) requested that the Clerk's Office manage the procurement of an outreach consultant with \$100k provided by the DOE. The Clerk's Office leveraged the Controller's pre-qualified list for community outreach and stakeholder engagement and reached out to the top three consultants on the list. In that process, each of the top three consultants rejected the opportunity to bid on the project citing the amount of \$100k was insufficient to conduct a comprehensive citywide community outreach and were not interested in or able to provide the requested services. In effort to attract a qualified consultant, the Clerk's Office allocated \$20k of its own funding and removed the production of in-language outreach materials from the scope of work so that the available funding can be better utilized for various outreach strategies. The DOE agreed to provide the translation of all outreach materials in Chinese, Spanish, and Filipino. Civic Edge Consulting was the sole consultant responsive to the request and agreed to conduct a streamlined scope of work to maximize the outreach efforts within the budget constraints by focusing on digital outreach in light of the ongoing COVID-19 health emergency. It was expected the Outreach consultant would attend strategic meetings and create messaging and drive people to the meetings by providing them notice to attend and advise the Task Force where to place the lines. The contract was signed in September 2021, in time for the Redistricting Task Force's convening.

Once the Task Force began deliberating on the Outreach Plan, it immediately became evident that the expectations of the outreach strategy and implementation by the Task Force were different from the scope of work contained in the contract. Additionally, the Task Force requested that the consultant attend every Task Force meeting and scheduled bi-weekly meetings with assigned Task Force members. This required significantly more hours for the consultant than planned and included in the scope and the budget.

To address this issue, the Clerk's Office started the contract amendment process in November, aligning the scope of work with the Task Force's directives and allotted an additional \$100k from reauthorized funding from a pre-covid project. Despite the Clerk's office adding \$120k, to DOE's \$100,000 contract amount, a budget issue persisted, and Civic Edge Consulting transitioned out by mid-March prescheduling the remainder of the email notices opened by 40% of the 1,120 active subscribers. After a comprehensive knowledge transfer to the Clerk's Office, additional outreach support was provided until the end of the Task Force's work. Although, this put a huge burden on the already strained Clerk's Office, working overtime, the staff created an active list of 200 emails and began sending reminder emails and making phone calls for the remainder of the meetings for March and April. The Clerk's Office also enlisted the help of West Coast Consulting who sent out multiple reminder emails (three days before the meeting, and a 24-hour reminder) in language, for 10 of the final meetings. These emails reached about 45,000 emails and had an approximate 42% opened rate.

In order to establish outreach expectations early in the process, informational hearings may be scheduled to hear from those with expertise on what is currently working throughout the City to reach the various communities. Advice from the Office of Civic Engagement and Immigrant Affairs (OCEIA), the Mayor's Communications Officer, Neighborhood Services, and other agencies or entities who are well versed in reaching constituents should be provided to guide the Task Force in making final decisions on where they would like to see the funds allocated. A detailed proposal may also be provided if there are specific staff assigned to assist the Task Force with administration.

#### **NON-DIGITAL OUTREACH CONDUCTED BY THE CLERK'S OFFICE**

While Civic Edge Consulting focused on digital outreach by email, there was a clear need for non-digital outreach, expressed by the Task Force as well as the public. The Clerk's Office utilized the Outreach Fund to advertise the Redistricting Task Force meetings on nine Board approved neighborhood and community newspapers (World Journal, Wind Newspaper, El Tecolote, El Reportero, Bay Area Reporter, SF Business Times, SF Bayview, Noe Valley Voice, and Marina Times) bi-monthly from November 2021 through March 2022 at the cost of \$26k. The Clerk's Office also worked with the San Francisco Public Library to set up computers in libraries with a link to the mapping tool so that residents with no access to a computer at home could create a desired district map and submit it to the Task Force. Additionally, the Clerk's Office printed flyers in English, Spanish, Chinese and Filipino (approximately 250 for each meeting) and distributed them to the libraries within the Districts of focus. Window signs were also made available upon request through the Clerk's Office, 500 of each language (English, Spanish, Chinese and Filipino) were distributed to various community members for distribution. Once the Task Force started meeting in person, agendas, current City/District maps, proposed draft maps, flyers, and window signs were made available to the public for every meeting. Two large (42in. x 42in.) versions of each proposed draft map were also hung in the hallway for public viewing. There were other suggestions made, such as citywide mailers, public service announcements, and radio shows; however, they were not implemented due to the lack of funding, time, or resources.

#### **OUTREACH SURVEY**

To better understand the public's needs and to assess the outreach efforts, the Clerk's Office created an Outreach Survey, available in English, Chinese, Spanish, and Filipino. The survey was included in every outreach email, as well as on the Redistricting Task Force webpage. A total of 20 responses, all in English, were received, and changes implemented throughout the process. The summary of survey results is attached.

#### **COST INCURRED BY THE CLERK'S OFFICE**

In addition to the outreach consultant and outreach advertising, the Clerk's Office incurred other costs for the Redistricting Task Force. Most notably, as with the previous Task Force, the Clerk's Office made an agreement with the DOE to clerk the Task Force. Due to the health emergency, the meetings were held by videoconference for the first 24 meetings and in a hybrid format for the remaining 21 meetings after March 7<sup>th</sup>. Both remote and hybrid meetings required significantly more staff resources compared to in-

person only meetings. A Clerk, a backup Clerk, a public comment monitor, and an IT administrator, at minimum, were required to manage these meetings. The leadership team, including the Clerk of the Board, was on hand at every meeting to present and/or answer questions about meeting schedules, logistics, procurement, and outreach. Additionally, staff spent many hours outside of the meetings, planning, researching, coordinating, and facilitating various action items for the Task Force. In all, it is estimated that the Clerk's staff spent approximately 5,000 hours supporting the Task Force in various capacities, at a total cost of approximately \$500,000 in salary and benefits, including overtime pay. If designated staff are assigned these duties, the resources of the Clerk's Office would not be as significantly impacted.

The Clerk's Office procured a Survey Monkey subscription for an outreach survey for \$1,435 and an Airtable subscription to receive Community of Interest (COI) forms for \$265.

The printing cost for flyers, window signs, and maps is \$2,266.

Below is the summary table of the RDTF expenditures incurred by the Clerk's Office.

<b>Description</b>	<b>Cost</b>
Personnel Cost	\$496,892
Outreach Consultant (Clerk's Office only)	\$120,000
Outreach Advertising	\$25,759
Hotspot	\$4,464
Printing	\$2,266
Survey Monkey	\$1,435
Airtable	\$265
Miscellaneous	\$1,117
<b>Total</b>	<b>\$652,198</b>

For comparison, the 2011-2012 RDTF budget was \$220,000, with a total expenditure of \$191,652; this includes the cost of a data consultant, which was paid for by DOE. The cost of a data consultant for the 2021-2022 RDTF is not included in the table above, which captures the Clerk's Office expenditures only, and not DOE.

Aside from costs incurred by the Clerk's Office, additional costs were also incurred by other City agencies for meeting facilities and language access to support the 2021-2022 RDTF; estimated figures will be referenced in the sections following.

### **LANGUAGE ACCESS**

In accordance with Board of Supervisors Ordinance No. 94-21, File No. 210606, which convened the RDTF and amended the San Francisco Campaign and Governmental Conduct Code, the RDTF was appropriately funded for language services consistent with all past Task Forces; it also requires that interpretation requests be provided upon request, if requested at least 48 hours in advance of a Task Force meeting, and translation of all Task Force public meeting notices, agendas and supplemental materials explaining the redistricting process.

In coordination with the Clerk's Office, the DOE and OCEIA went far above and beyond the requirements and provided written translation in over 10 languages and oral interpretation support and services to Limited English Proficient (LEP) speakers in over 8 languages, in both consecutive and simultaneous format, at the request of the RDTF.

The Task Force was provided with an initial budget from the DOE to OCEIA for interpretation services. Additional funding was subsequently provided by the DOE to OCEIA due to the increased scope of

language support, length of meetings, and additional meetings due to the Task Force missing the April 15, 2022 deadline.

Translations were provided in various languages for various outreach materials upon request by members. Languages included, but were not limited to, Traditional Chinese, Simplified Chinese, Spanish, Filipino, Vietnamese, Samoan, Russian, Laotian, and Mayan.

Interpretation was also provided in various languages for various Task Force meetings upon request by members. Languages included, but were not limited to, Cantonese, Mandarin, Spanish, Filipino, Taishanese, Russian, and Vietnamese.

Consistent with OCEIA and Language Access Ordinance practices, and per meeting agenda disclaimers, City staff provides language access to all LEP individuals upon request, with 48-hour notice, and makes every due diligent effort to secure available arrangements. As a standard practice and recommendation, OCEIA and department language liaisons communicate directly with LEPs or LEP organizers to provide language access upon request. This is to not only ensure that reasonable and appropriate language accommodations are being provided to the LEP, but also ensure utilization of language accommodations for accountability. It should also be noted that the Clerk's Office advised the RDTF that a consecutive interpretation format is recommended as standard practice as it is a more efficient and effective use of interpreter hours and provides a higher utilization by more LEP; simultaneous interpretation format is much more resource intensive and generally has a lower utilization rate, and not standard as it is most applicable for focused messaging.

However, at the request and direction of select Task Force members, the Clerk's office was tasked with coordinating with OCEIA to provide *standby* interpretation coverage for their meetings – rather than upon request – specifically, in *both* consecutive interpretation and simultaneous interpretation format. In addition to the significantly enhanced scope of interpretation, the Task Force subsequently tasked the Clerk's Office with coordinating with OCEIA to provide extended hours of interpretation coverage for longer meetings, effective April 2, 2022. This format and scope change resulted in several challenges in terms of logistics, resource, and accountability. First, the Task Force did not provide the Clerk's Office with any definitive or even approximate end time to their meetings, which provided challenges for logistics and scheduling; the Clerk's Office and OCEIA coordinated contract interpreters for extended coverage, with the risk of potential cancellation fees if services were not utilized, or the risk of not having sufficient staffing into the AM hours for extended deliberations. Second, due to the hybrid meeting format, simultaneous interpretation required additional resources to support additional WebEx meeting rooms. The seven (7) meetings held on April 2, 2022, April 4, 2022, April 6, 2022, April 8, 2022, April 9, 2022, April 11, 2022, and April 13, 2022 required a total of ten (10) interpreters to provide both simultaneous and consecutive interpretation and extended coverage in shifts. Also, because this accommodation was made at the request of the Members and not the LEP, departments were not able to identify or anticipate the number of LEP in attendance at each meeting to ensure utilization of services. On April 4, 2022, the Task Force added a meeting on April 7, 2022. Given that this additional meeting was on short notice and unplanned, interpretation resources for the April 7th interpretation request was not available. However, OCEIA was available to donate sufficient in-house staffing resources to provide consecutive interpretation for public comment until 7:00 p.m.

Due to the Task Force not being able to meet the April 15, 2022 deadline for adopting a final map, the Task Force subsequently added additional meetings on April 21, 2022, April 25, 2022, and April 28, 2022, which required additional overhead and expenditures for simultaneous and consecutive interpretation.

Due to the Task Force's deviation from standard and recommended City protocol for language accommodations, the utilization rate of language rate for consecutive interpretation was widely variable. Furthermore, our office observed a notable low utilization rate of simultaneous interpretation, which was

also a majority of the overall interpretation costs due to its staffing and resource demands. Cantonese and Spanish simultaneous interpretation rooms had limited-to-no attendance; attendees fluctuated between 0-5 attendees at any given time – a majority of the time being 0. While outreach may be a small factor, the underutilization of language services is ultimately due to the language accommodations being made at the request of Task Force members - who themselves were not limited English proficient – rather than the LEP's themselves, as our office could not confirm attendance and ensure utilization of the provided accommodations.

OCEIA provided over 186.5 hours of interpretation to the RDTF, donating over \$77,000 in staff time and resources. Furthermore, OCEIA went above and beyond to proactively coordinate and promote RDTF meetings to various community members and organizations, and coordinated over 281 hours of vendor interpretation. In several instances, OCEIA was able to anticipate language demands using their LEP population dashboard at a district level to supplement language needs.

The cost of vendor interpretation support to the Task Force was over \$97,000. This is primarily due to the extended hours of coverage and expanded scope of language demands by Task Force members

The Clerk's Office recommends that the future Task Force consider and adhere to standard City protocols for language access, and consult language liaisons and OCEIA with any and all language accommodation concerns. OCEIA staff are experienced experts in the field of language access, and can provide recommendations and a dashboard with district-level language populations based on the census data, rather than anecdote.

The Clerk's Office also recommends that the number and length of meetings, and interpretation expectations be established early on in the process so that adequate interpreters can be arranged – especially if meetings are expected to extend into the AM hours. Technical terminology, subject matter, and key messaging should also be communicated to interpreters in advance, rather than during live hearings – this is not only for professional courtesy, but to ensure that OCEIA can provide accurate interpretation, and adequate communication and training to contract interpreters if extended meeting coverage is anticipated. Sufficient lead time for communication, coordination, and training in advance of scheduled meetings will alleviate any potential issues and improve the quality of interpretation services provided.

### **MEETINGS, FACILITIES, AND LOGISTICS**

At the inaugural meeting of the RDTF on September 17, 2021, the Clerk of the Board and staff provided Members with an orientation of meeting platforms, schedule, and format. The Mayor's 24th Supplement to the COVID-19 emergency declaration, issued July 31, 2020, required that the RDTF conduct all meetings by teleconference or other electronic means only without providing a physical meeting place.

The RDTF communicated that it was imperative for meetings to occur both in person and off site to engage the public. The Clerk's Office's Operations Division conducted extensive planning and logistics in anticipation of the potential need to resume in person meetings, vetting over 53 potential venues and locations across the 11 districts of San Francisco, taking into consideration the many requirements and feedback from members.

The Clerk's Office vetted all locations based on location, availability, timing, capacity, vendor status (for nonprofit and community-based organization venues), scheduling lead time, cost, technological accommodations (WiFi, ethernet, sound/PA, monitors/projector/visuals, etc.), custodial services, SFGovTV coverage, and other considerations requested by the Task Force. Additional considerations based on RDTF member requirements and feedback included, but were not limited to, proximity to public transit, food, walkability, vehicular parking, bicycle parking, and for requirements in the Americans Disability Act.

The extensive venue requirements, site and resource availability, evolving COVID-19 directives based on health data, varying technological infrastructure, lead times for technology procurement, and unknown timing for resumption of in-person meetings did pose some significant logistical challenges. However, through extensive coordination, planning, and proactive engagement with various facility managers and department partners, the Clerk's Office's Operations Division and IT unit strategically laid out a roadmap with numerous venue options, contingency plans, and presented ongoing updates to the RDTF in full preparation. The Clerk's Office fully recognizes that staff have gone above and beyond to accomplish this logistical feat, and was fully ready to facilitate in person, off-site, meetings in anticipation of updates to the Mayor's supplement.

On December 17, 2021, the Mayor issued the 41<sup>st</sup> Supplement to the COVID-19 emergency declaration, which *permitted* the RDTF to conduct meetings in person effective January 8, 2022, subject to certain conditions. The Clerk's Office presented this update to the RDTF for further direction on how to proceed with future meetings. The RDTF opted to continue meetings remotely, and held district focused meetings remotely beginning on 1/14/22.

On February 10, 2022, the Mayor issued the 45<sup>th</sup> Supplement to the COVID-19 emergency declaration, which then *required* that the RDTF conduct meetings in person effective March 7, 2022; members were required to conduct meetings in person, while members of the public may participate in person or remotely via a telephonic option to provide public comment. The Clerk's Office presented options to the RDTF for conducting in person meetings either offsite in districts or in City Hall. The RDTF opted to conduct all remaining meetings from March 7, 2022, forward to be held in City Hall. In total, the RDTF conducted 45 meetings, with five (5) of those being Saturday meetings.

While there were no direct cost for facilities incurred by the Clerk's Office, there are notable costs absorbed by other City agencies. Additional cost to the City to open City Hall for Saturday special meetings alone is estimated to be upwards of \$69,000 due to additional Sheriff's staff, Building Engineers, Custodians, Laborers, and SFGovTV staff. This was due to not only needing to open City facilities outside of regular business hours, but holding lengthy RDTF hearings without any defined end time to deliberations, which also required supplemental and overtime staffing. The duration of meetings were also highly variable. For example, the meeting held on April 2, 2022 lasted approximately 11+ hours accounting for setup time and takedown time, and the April 9, 2022 meeting lasted approximately 20+ hours.

For comparison, the 2011-2012 RDTF held 31 meetings for approximately 104 hours in total, while the 2021-2022 RDTF held 45 meetings for over 234 hours in total.

For future planning, the Clerk's Office recommends that discussions and expectations around meeting length be set upfront to allow for adequate resourcing, mitigation of overhead and overtime, and staffing/additional shifts.

### **DIGITAL ACCESSIBILITY**

In consideration of remote and hybrid meetings, Clerk's Office coordinated with the San Francisco Public Library to provide digital access to members of the public, providing Citywide public access to computers, RDTF information, mapping tools, and in person support.

The Clerk's Office IT Division also posted every agenda, minutes, flyers, draft maps, and various other forms of outreach, in language, to Twitter, and the DOE posted on Facebook. All communications and forms of outreach were also posted on the Redistricting Task Force website.

The Task Force tasked the Clerk's office to also conduct Outreach on NextDoor, however, after months of deliberation with Nextdoor Administrators, the Task Force was not granted an account.