

2020

Limited English Proficiency Accessibility Plan



Washington State Department
of Transportation

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Language assistance services

If you have difficulty understanding English, you may, free of charge, request language assistance services for this Department information by calling (360) 705-7090, or email us at: TitleVI@WSDOT.WA.GOV.

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Title VI, ADA, and Further Information

Title VI Notice to Public

It is the policy of the Washington State Department of Transportation (WSDOT) that no person shall, on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or be otherwise discriminated against under any of its Federally funded programs and activities. Any person who believes his/her Title VI protections have been violated may file a complaint with WSDOT's Office of Equal Opportunity (OEO). For additional information regarding Title VI complaint procedures and/or information regarding our non-discrimination obligations, please contact OEO's Title VI Coordinator at (360) 705-7090.

Americans with Disabilities Act (ADA) Information

This material can be made available in an alternate format by emailing the Office of Equal Opportunity at wsdotada@wsdot.wa.gov or by calling toll free, 855-362-4ADA(4232). Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

Notificación de Título VI al Público

Es la política del Departamento de Transporte del Estado de Washington (WSDOT) el asegurarse que ninguna persona, por razones de raza, color, o país de origen, como es provisto en el Título VI del Acta de Derechos Civiles de 1964, sea excluida de participar en, se le niegen los beneficios de, o sea discriminada en contra de, bajo cualquiera de sus programas y actividades financiadas con fondos federales. Cualquier persona que crea que su protección bajo el Título VI ha sido violada, puede presentar una queja con la Oficina de Igualdad de Oportunidades (OEO) de WSDOT (Departamento de Transporte del Estado de Washington). Para obtener información adicional sobre los procedimientos de queja bajo el Título VI y/o información sobre nuestras obligaciones antidiscriminatorias, favor de llamar al coordinador del Título VI en la Comisión Estadounidense de OEO (Oficina de Igualdad de Oportunidades de WSDOT) al tel 360-705-7090.

Información del Acta de Americanos con Discapaciades (Americans with Disabilities Act, o ADA por sus siglas en inglés)

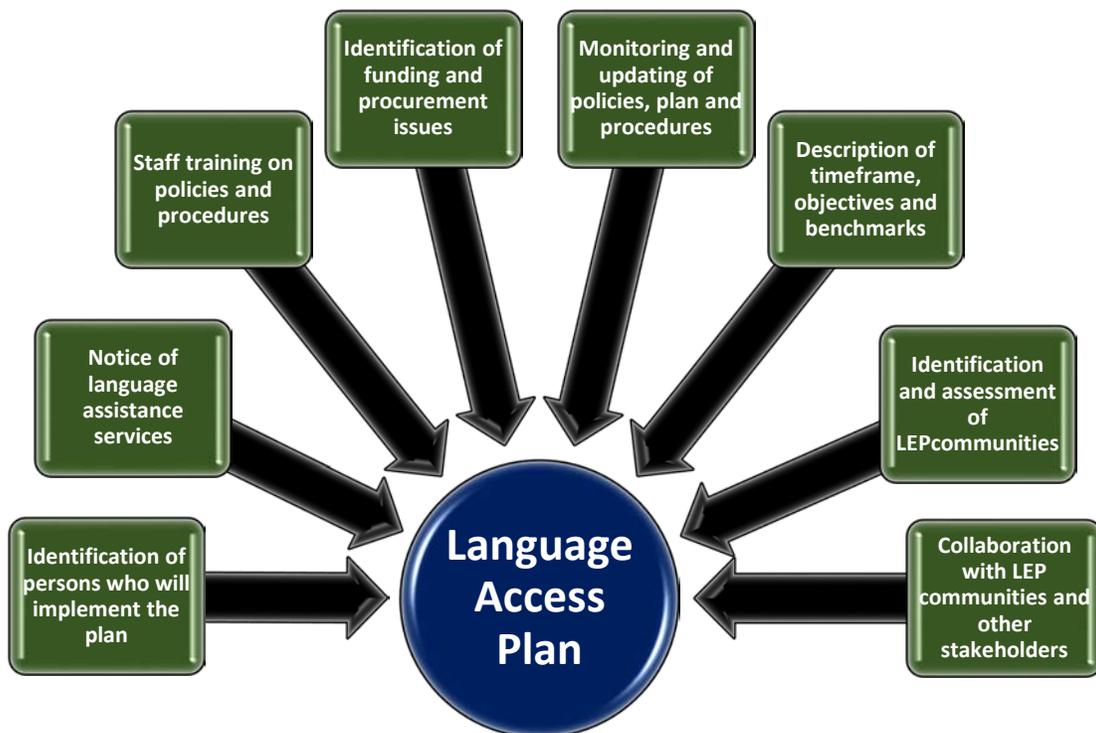
Este material está es disponible en un formato alternativo enviando un email/correo electrónico a la Oficina de Igualdad de Oportunidades a: wsdotada@wsdot.wa.gov o llamando gratis al 855-362-4ADA (4232). Personas sordas o con discapacidad auditiva pueden solicitarlo llamando a Washington State Relay al 711.

Purpose of the Language Access Plan

As a recipient of funding from the U. S. Department of Transportation (USDOT), WSDOT must provide USDOT with assurances that LEP individuals have meaningful access to WSDOT programs, services and activities; and that the programs, services and activities provided by Local Public Agencies receiving Federal funding through WSDOT (WSDOT subrecipients) are also accessible to LEP individuals. USDOT administrations, including the Federal Highway Administration (FHWA), the Federal Aviation Administration (FAA), and the Federal Transit Administration (FTA), require funding recipients to develop a Language Access Plan to provide meaningful access to LEP individuals in conformance with the prohibition against national origin discrimination under [Title VI](#) of the Civil Rights Act of 1964 and the Act's implementing regulations.

OEO has developed this Limited English Proficiency (LEP) plan to help WSDOT and its subrecipients better serve LEP individuals and their communities. OEO will assess the LEP programs of WSDOT divisions and regions, and of WSDOT subrecipients, pursuant to the guidance provided by this Plan.

Key components of a Language Access Plan



A Limited English Proficient (LEP) individual refers to someone whose primary language is not English, and who has limited ability to read, write, speak or understand English. The Washington State Department of Transportation (WSDOT) is committed to providing LEP individuals with meaningful access to the programs, services and activities provided by WSDOT and its subrecipients.

The purpose of this Limited English Proficiency (LEP) Plan is to identify the language access needs of LEP individuals and to develop and implement language services to meet those needs as required by the national origin nondiscrimination provisions in Title VI of the Civil Rights Act of 1964, Executive Order No. 13166, and Title VI implementing regulations.

The U.S. Department of Justice (USDOJ), in its [Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons](#) (2002), outlines four factors federal fund recipients should apply to assess language needs and determine what reasonable steps should be taken to ensure meaningful access for LEP individuals:

- (1) The number or proportion of LEP persons served or encountered in the eligible service population;
- (2) The frequency with which LEP individuals come in contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the program; and
- (4) The resources available to the recipient and costs.

In the first part of this document, the Office of Equal Opportunity (OEO), which is responsible for monitoring WSDOT's Title VI compliance program, will use the four factor analysis to identify the language access needs of LEP individuals in Washington State. In the second part, OEO will use USDOJ's [Language Assistance Self-Assessment and Planning Tool](#) to review the current language services WSDOT provides to LEP individuals, and outline a plan to improve those services.

Conclusions based on the Four Factor Analysis

Factor 1 – Demographics

- Over 7.7% of Washington State’s population is LEP, with an English proficiency level that could impede the ability to access services.
- A majority of LEP individuals are concentrated in the greater Seattle Metropolitan area.
- A majority of LEP individuals speak either Spanish, Russian, Vietnamese, Chinese, Korean, or Somali as their primary language.
- LEP individuals speaking Spanish are spread widely and in significant numbers throughout the state. LEP individuals speaking Russian are similarly wide spread, though fewer in number. LEP populations speaking languages other than Spanish or Russian are highly concentrated in King, Snohomish, and Pierce counties.

Factor 2 – Frequency of Contact

- Both the HCA and AOC data on LEP contact frequency show the highest accessibility service demand for four languages: Spanish, Russian, Vietnamese, and Korean.
- HCA data also shows Arabic in high demand, though this may be an anomaly. WSDOT should nevertheless consider Arabic as a high demand language when planning potential language accessibility services.
- Frequency of contact with LEP individuals speaking Spanish or Russian were wide spread throughout the entire state. WSDOT should therefore be prepared to provide Spanish and Russian accessibility services in all geographic areas.
- Frequency of contact with LEP individuals speaking other languages is highest in King, Snohomish and Pierce Counties. WSDOT should therefore be prepared to provide language accessibility services in multiple languages in the Seattle metropolitan area.

Factor 3 – Importance

- WSDOT needs to develop procedures to provide language assistance to LEP individuals as part of its standard business practices.
- To develop those procedures, WSDOT should reach out to community organizations that serve LEP individuals to determine the importance of each program, service or activity to the lives of LEP individuals.

Factor 4 – Resources

- WSDOT should, on a case by case basis, identify the most cost effective means of delivering timely, accurate and effective language services to LEP individuals.
- If language services to LEP individuals in any given instance are to be limited, WSDOT must be prepared to document the reason why WSDOT is not able to provide such services

Introduction

For LEP individuals, language can be a barrier to accessing important benefits and services, understanding important rights, complying with applicable responsibilities, or understanding vital information. The Washington State Department of Transportation (WSDOT) is committed to improving the accessibility of its programs, services, and activities to LEP individuals.

Most individuals living in the United States read, write, speak, and understand English. However, many individuals have a primary language that is not English. The 2010 census shows that the U.S. population age 5 years and older includes over 37 million people that speak Spanish and over 9 million people that speak an Asian or Pacific Island language at home. If these individuals have a limited ability to read, write, speak, or understand English, they are of Limited English Proficiency, or “LEP.” Of the 37 million U.S. Spanish speakers, 44.7% report that they speak English less than “very well.” Of the 9 million people who speak Asian or Pacific Island languages, 47.9% report that they speak English less than “very well.”

Authority

[Executive Order No. 13166](#), *Improving Access to Services for Persons with Limited English Proficiency* (August 16, 2000), clarifies the existing protections against national origin discrimination afforded to LEP individuals by [Title VI](#) of the Civil Rights Act of 1964 and the Act’s implementing regulations. Title VI protections require that LEP individuals have equal access to the programs, services and activities provided to individuals whose primary language is English.

The Four Factor Analysis for Determining LEP Accessibility Needs

USDOT requires reasonable steps be taken by Federal funding recipients to ensure meaningful access to the recipient’s programs, services, and activities by LEP individuals. USDOT published its [Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient \(LEP\) Persons](#) in 2005. This policy guidance applies to all USDOT funding recipients, and covers a recipient’s entire operations, even if only one of the recipient’s programs, services or activities receives Federal assistance. This USDOT LEP guidance, closely following USDOJ LEP guidance, outlines how Federal fund recipients should assess language needs and determine the reasonable steps that need to be taken to ensure meaningful access for LEP individuals. This first requires an individualized assessment of the LEP population in the service area that balances the following four factors:

1. **Demography** - the number or proportion of LEP persons eligible to be served or likely to be encountered or directly affected by a program, service or activity, and who would potentially be excluded from access to or not receive the benefits from that program, service or activity absent efforts to remove language barriers.
2. **Frequency of Contact** - the frequency with which LEP individuals come in contact with the program, service or activity. The more frequent contact recipients have or should have with LEP individuals from different language groups, the more likely enhanced language services will be needed. Frequency of contact with specific languages should also be analyzed.

3. **Importance** - the nature and importance of the program, service or activity to people’s lives. The more important the information, program, service or activity, or the greater the possible consequences of contact to the LEP community, the more likely accessible language services will be needed.
4. **Resources** - the resources available to the recipient and costs. While a recipient is required to take reasonable steps to remove language barriers, “reasonable steps” may cease to be reasonable if the resources available to the funding recipient are limited, and the costs of language barrier removal would substantially exceed the benefits.

An individualized assessment of these four (4) factors should provide Federal funding recipients with an understanding of the language accessibility needs of LEP individuals within their jurisdiction or “service area,” balanced against the resources available to the recipient and the costs required to meet those needs. Since OEO’s analysis considers the entirety of Washington State as its “service area,” OEO’s conclusions are broad and high-level. Each WSDOT division, region and subrecipient should apply the four factor analysis to its geographic service area to determine the specific needs of LEP speakers residing there. The “reasonableness” of a recipient’s or subrecipient’s efforts to remove language barriers must be weighed according to this four factor analysis.

Factor 1: Number or Proportion of LEP Individuals

WSDOT used 2013-2017 American Community Survey 5-Year Estimates data for Washington State to identify areas with high concentrations of LEP individuals. Not surprisingly, these areas fall primarily within the State’s larger urban centers. OEO analyzed data obtained at the county level, and estimates that 510,111 individuals, equal to 7.11% of the state’s total population, are LEP speakers. Washington has 39 counties, with the following 12 counties having populations exceeding 100,000¹:

County	Estimated population
King	2,118,119
Pierce	845,193
Snohomish	771,904
Spokane	490,764
Clark	457,474
Thurston	269,885
Kitsap	258,903
Yakima	248,279
Whatcom	212,738
Benton	190,529
Skagit	121,725
Cowlitz	103,590



¹ 2013-2017 American Community Survey 5-Year Estimates, TOTAL POPULATION, B01003

The 14 Counties in the table below, representing 72.1% of the state’s population, have the highest concentrations (over 5%) of people five years and older who report they speak English “less than very well.”² It must be emphasize that just because a county has less than 100,000 population does not mean that less importance should be placed on ensuring accessibility.

County	% of LEP Speakers
Adams	29.0%
Franklin	23.6%
Grant	17.3%
Yakima	16.0%
Douglas	12.7%
King	10.6%
Chelan	10.0%
Walla Walla	9.0%
Benton	8.2%
Okanogan	7.7%
Snohomish	7.6%
Skagit	7.3%
Clark	5.8%
Pierce	5.5%



Seven of the 12 counties with populations over 100,000 have estimated LEP populations of over five percent.

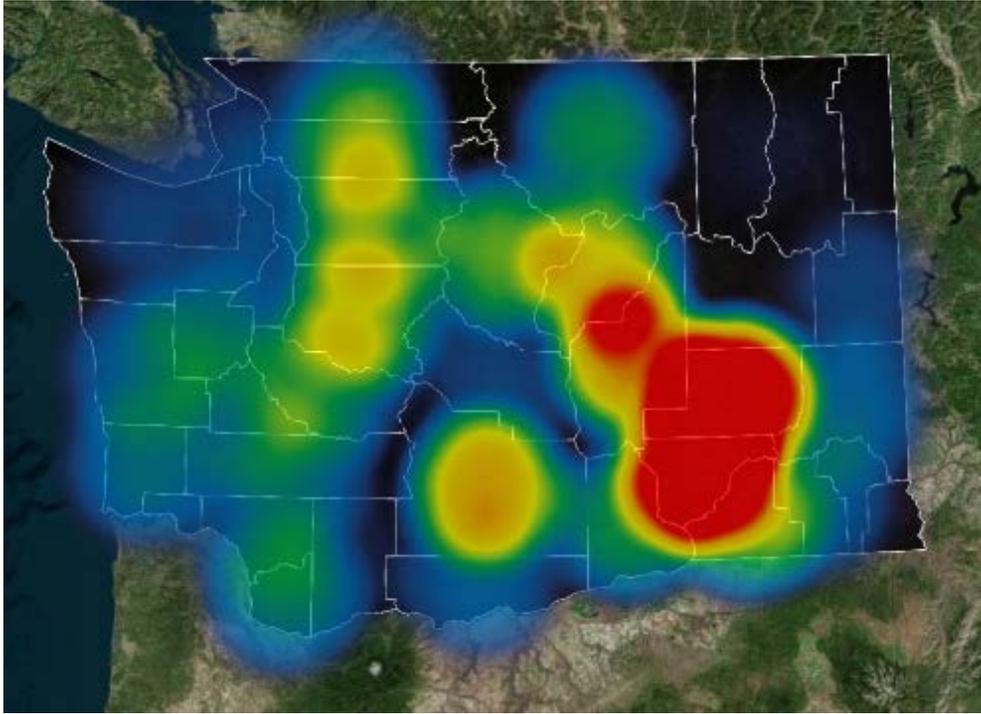
County	% of LEP Speakers
Yakima	16.0%
King	10.6%
Benton	8.2%
Snohomish	7.6%
Skagit	7.3%
Clark	5.8%
Pierce	5.5%



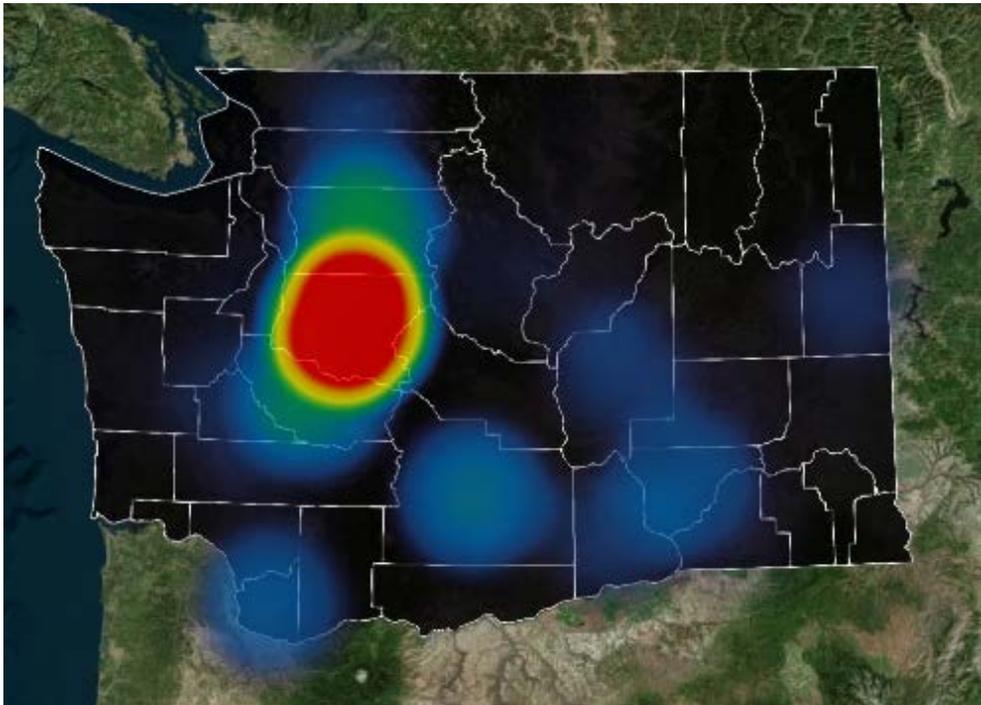
Based on American Community Survey 2013-2017 5-Year Estimates, 25 counties have LEP populations that are less than 5% of the total population.

² 2013-2017 American Community Survey 5-Year Estimates, SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES, DP02

The heat map below shows the highest proportion of LEP speakers as a percentage of total population. The counties with the highest proportion of LEP speakers (in red) are located east of the Cascades.



The heat map below shows where the highest number of LEP speakers are concentrated. While Counties east of the Cascades have larger proportions of LEP speakers to total population, the majority of LEP speakers live in King, Snohomish, and Pierce Counties.

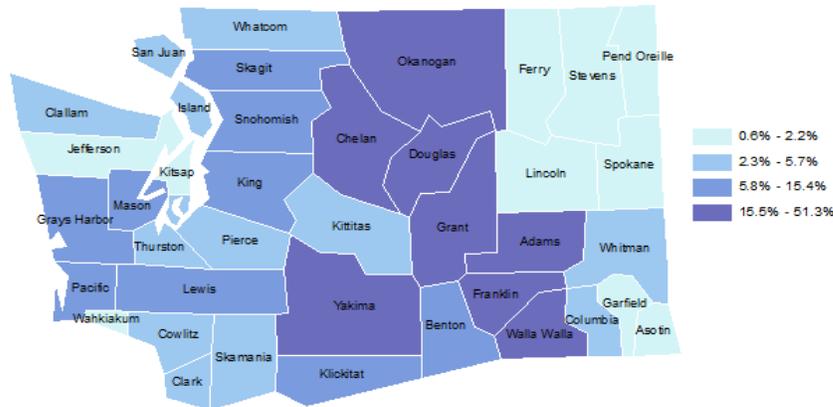


Concentrations of Specific Language Populations with Limited English Proficiency

The language spoken at home is most likely a household's primary (preferred) language with English as the second language of household members.

Percentage of households where Spanish is the primary language

Population Age 5 and Above, 2017

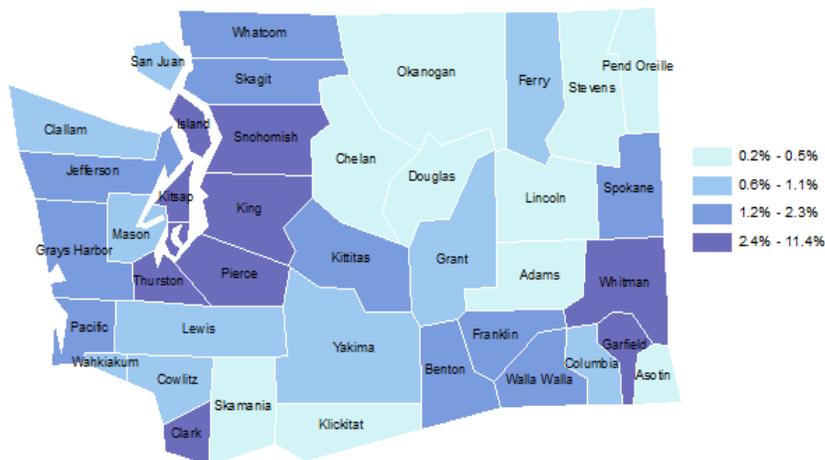


[OFM demographics map from 2017](#)

About 51% of households speak Spanish as their primary language in Adams County, which is the highest percentage of any county. Only 0.6% of households speak Spanish as their primary language in Garfield County, which is the lowest percentage of any county.

Percentage of households where an Asian or Pacific Island language is the primary language

Population Age 5 and Above, 2017

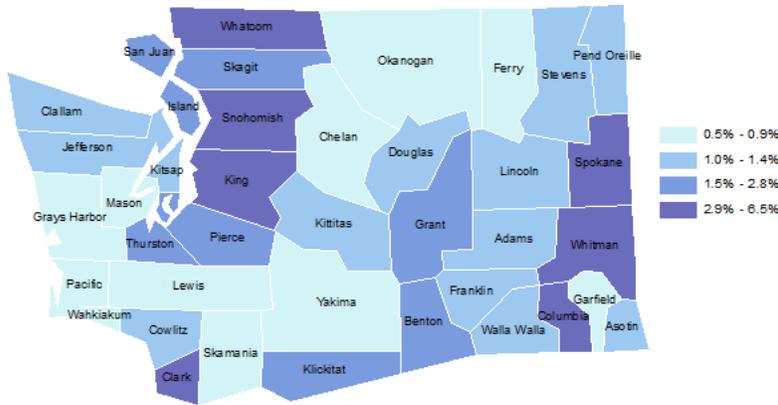


[OFM demographics map from 2017](#)

About 11.4% of people in King County live in households where an Asian or Pacific Island language is spoken as their primary language. Only 0.2% of people in Adams and Pend Oreille counties were in this category.

Percentage of households where an Indo-European language other than English or Spanish is the primary language

Population Age 5 and Above, 2017



OFM demographics map from 2017

About 6.5% of people in King County live in households where an Indo-European language other than English or Spanish is spoken as their primary language. By contrast, only 0.4% of people in Ferry, Garfield, Mason, Okanogan, Skamania and Yakima counties live in households where an Indo-European language other than English or Spanish is spoken as their primary language.

Spanish language speakers who speak English less than very well

Spanish speakers with limited English proficiency are more evenly distributed across the state than any other group of LEP individuals. Seven counties have more than 10,000 LEP individuals who speak Spanish as their primary language.

County	Estimated Population
King	54,315
Yakima	35,252
Franklin	17,719
Snohomish	17,526
Pierce	16,509
Grant	14,048
Benton	11,134
Clark	9,596
Chelan	6,756
Skagit	6,449



Asian and Pacific Island language speakers who speak English less than very well

Asian and Pacific Island language speakers who speak English less than very well are heavily concentrated in King, Snohomish, and Pierce counties. All other counties each have less than 10,000 Asian and Pacific Island language speakers.

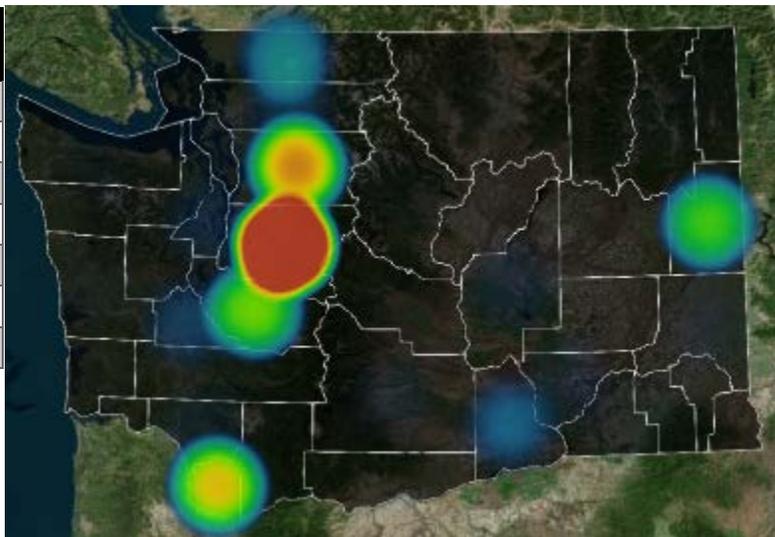
County	Estimated Population
King	102,566
Snohomish	23,293
Pierce	19,159
Clark	6,190
Thurston	5,465



Other Indo-European language speakers who speak English less than very well

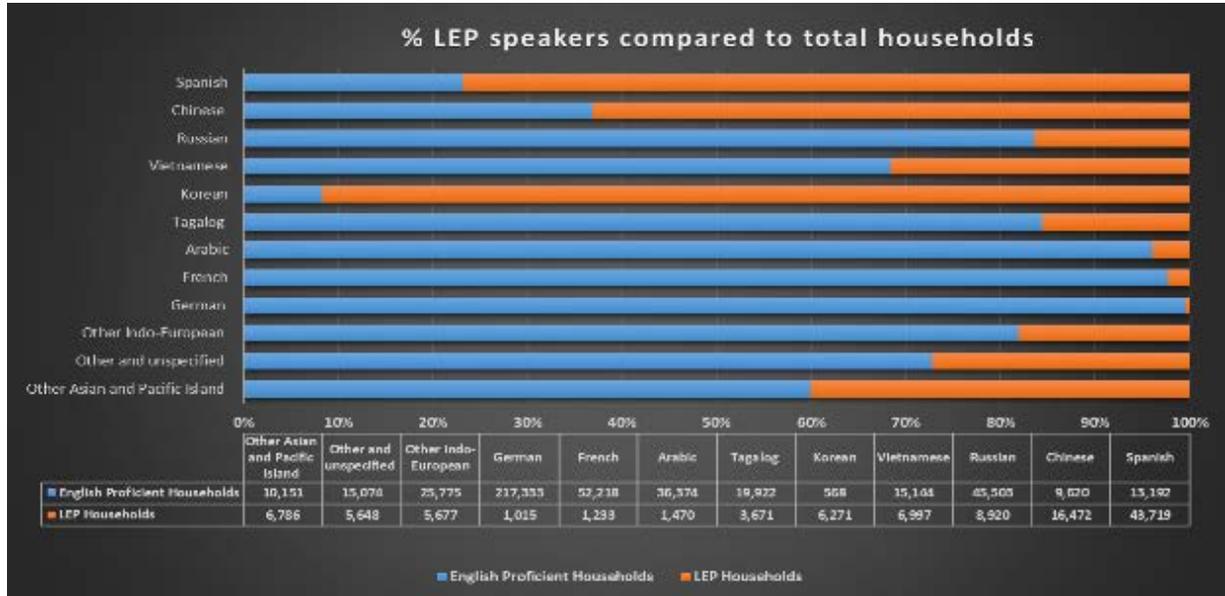
Other Indo-European language speakers who speak English less than very well are heavily concentrated in King, Snohomish, and Pierce counties. OEO estimates, however, that the number is far less than the number of LEP individuals who speak Spanish, Asian, or Pacific Island languages. Only King and Snohomish Counties have more than 10,000 LEP individuals speaking other Indo-European languages as their primary language, and only seven counties have more than 1,000.

County	Estimated Population
King	35,632
Snohomish	10,614
Clark	8,812
Pierce	6,492
Spokane	5,540
Whatcom	2,115
Benton	1,372



Quantity of Limited English Speakers in Specific Languages

The ACS tracks eight specific languages in Washington State. The chart below shows the percentage of English proficient (non-LEP) households who speak a specific language as their primary language compared to LEP households who speak the same language:



The ACS³ estimated LEP households for the most populous counties in Washington State. Of the eight languages tracked by the ACS, only five had a total number of LEP households greater than 5,000.

County	Spanish	Russian	Chinese	Vietnamese	Korean	Total County LEP Households
King	12,943	3,460	12,610	3,982	2,936	35,931
Snohomish	1,995	1,881	1,281	840	969	6,966
Pierce	2,378	1,126	785	864	1,134	6,287
Clark	1,939	1,088	281	235	274	3,817
Spokane	715	910	336	140	273	2,374
Thurston	454	75	345	368	191	1,433
Kitsap	214	0	195	56	276	741
Total LEP Households	20,638	8,540	15,833	6,485	6,053	57,549

The ACS data shows that LEP individuals speaking one of these five languages reside primarily in King County, and over 50% of Spanish, Chinese, and Vietnamese LEP households reside in King County. Russian and Korean LEP households are more evenly distributed across these seven counties, and less than 50% of Russian and Korean LEP households reside in King County.

³ 2013-2017 American Community Survey 5-Year Estimates, LIMITED ENGLISH SPEAKING HOUSEHOLDS, S1602

To supplement the ACS data, OEO used data from the Washington State Office of the Superintendent of Public Instruction (OSPI). All languages with 100 or more students speaking that language are shown in the table below.

Spoken Language	No. of Students	Spoken Language	No. of Students	Spoken Language	No. of Students	Spoken Language	No. of Students
Spanish	85,655	Samoan	951	Farsi	367	Hmong	170
Russian	5,377	Japanese	869	Mixteco	366	Pashto	166
Vietnamese	3,983	Hindi	744	Tamil	364	Ilokano	164
Chinese	3,497	Telugu	701	Karen	317	Bosnian	161
Somali	3,300	Tigrinya	539	Burmese	307	Toishanese	154
Arabic	2,852	Swahili	530	Thai	301	Hebrew, Modern	141
Ukrainian	2,410	Chuuk	507	Dari	296	Kurdish	135
Marshallese	1,669	French	467	Turkish	293	Kosraean	133
Tagalog	1,550	Rumanian	447	Lao	290	Soninke	129
Korean	1,454	Oromo	405	Pilipino/ Filipino	200	Malayalam	125
Punjabi	1,254	Nepali	402	Mam	199	Mongolian	123
Amharic	1,048	Urdu	393	German	195	Marathi	123
Cambodian	980	Portuguese	383	Kanjobal	179	Khmer	111
						Tongan	100

It is reasonable to assume that at least one of each student's parents speak the same language. The total number of speakers of each language, therefore, could be at least double the number of students speaking that language.

The Washington State Office of Financial Management (OFM)⁴, using data from both the census and OSPI, estimated the LEP population by county in 2016.

County	Language	No. of Students	Household Size used in estimation	Estimated Number of LEP Speakers by language
Adams		2,676	4.25	11,373
	Spanish	2,676	4.25	11,373
Benton		5,622	3.73	20,970
	Spanish	5,622	3.73	20,970
Chelan		4,661	4.01	18,691
	Spanish	4,661	4.01	18,691
Clark		11,638	2.77	35,992
	Spanish	6,830	3.50	23,905
	Russian	2,894	2.37	6,859
	Vietnamese	610	3.39	2,068

⁴ Estimate of population with limited English proficiency (LEP) for the state and counties, Office of Financial Management, accessed 9/30/19 at <https://www.ofm.wa.gov/washington-data-research/population-demographics/population-estimates/special-subject-estimates>

County	Language	No. of Students	Household Size used in estimation	Estimated Number of LEP Speakers by language
	Ukrainian	708	2.37	1,678
	Rumanian	317	2.37	751
	Chinese-Mandarin	279	2.62	731
Cowlitz		1,268	3.62	4,590
	Spanish	1,268	3.62	4,590
Douglas		2,462	4.19	10,316
	Spanish	2,462	4.19	10,316
Franklin		9,774	4.20	41,051
	Spanish	9,774	4.20	41,051
Grant		7,732	4.14	32,010
	Spanish	7,732	4.14	32,010
Grays Harbor		1,250	3.18	4,371
	Spanish	988	3.73	3,685
	Sinhalese	262	2.62	686
King		63,642	2.88	190,502
	Spanish	26,260	3.25	85,345
	Vietnamese	5,575	3.39	18,899
	Somali	3,786	2.57	9,730
	Chinese-Mandarin	3,551	2.62	9,304
	Russian	2,543	2.37	6,027
	Chinese-Cantonese	2,263	2.62	5,929
	Tagalog	1,700	3.08	5,236
	Korean	1,868	2.59	4,838
	Ukrainian	1,902	2.37	4,508
	Punjabi	1,507	2.92	4,400
	Arabic	1,416	2.57	3,639
	Hindi	1,040	2.92	3,037
	Amharic	1,130	2.57	2,904
	Cambodian	764	3.76	2,873
	Telugu	768	2.92	2,243
	Japanese	978	2.08	2,034
	Samoan	500	3.76	1,880
	Urdu	473	3.50	1,656
	Marshallese	434	3.76	1,632
	Tigrinya	604	2.57	1,552
	Tamil	528	2.92	1,542
	Farsi	390	3.50	1,365
	Lao	381	3.53	1,345
	Nepali	374	3.15	1,178
	French	496	2.37	1,176
	Oromo	449	2.57	1,154
Rumanian	456	2.37	1,081	
Burmese	245	3.83	938	

County	Language	No. of Students	Household Size used in estimation	Estimated Number of LEP Speakers by language
	Swahili	343	2.57	882
	Portuguese	319	2.37	756
	Turkish	306	2.37	725
	Hebrew, Modern	293	2.37	694
Kitsap		946	3.05	2,865
	Spanish	691	3.01	2,080
	Tagalog	255	3.08	785
Kittitas		534	3.09	1,650
	Spanish	534	3.09	1,650
Klickitat		376	3.87	1,455
	Spanish	376	3.87	1,455
Lewis		1,130	3.73	4,215
	Spanish	1,130	3.73	4,215
Mason		810	4.03	3,264
	Spanish	810	4.03	3,264
Okanogan		1,562	3.79	5,920
	Spanish	1,562	3.79	5,920
Pacific		365	3.64	1,329
	Spanish	365	3.64	1,329
Pierce		13,254	3.09	43,464
	Spanish	8,565	3.40	29,121
	Vietnamese	1,020	3.39	3,458
	Cambodian	692	3.76	2,602
	Russian	960	2.37	2,275
	Samoan	541	3.76	2,034
	Korean	602	2.59	1,559
	Tagalog	483	3.08	1,488
	Ukrainian	391	2.37	927
San Juan		148	2.80	414
	Spanish	148	2.80	414
Skagit		3,820	4.11	15,700
	Spanish	3,820	4.11	15,700
Skamania		53	3.44	182
	Spanish	53	3.44	182
Snohomish		18,492	2.89	60,189
	Spanish	10,817	3.60	38,941
	Vietnamese	1,586	3.39	5,377
	Russian	1,405	2.37	3,330
	Ukrainian	1,100	2.37	2,607
	Korean	962	2.59	2,492
	Arabic	792	2.57	2,035
	Tagalog	424	3.08	1,306
Chinese-Mandarin	490	2.62	1,284	

County	Language	No. of Students	Household Size used in estimation	Estimated Number of LEP Speakers by language
	Punjabi	364	2.92	1,063
	Cambodian	282	3.76	1,060
	Amharic	270	2.57	694
Spokane		2,882	2.90	8,267
	Russian	1,087	2.37	2,576
	Spanish	882	2.89	2,549
	Marshallese	668	3.76	2,512
	Arabic	245	2.57	630
Thurston		1,744	3.25	5,520
	Spanish	1,352	3.10	4,191
	Vietnamese	392	3.39	1,329
Wahkiakum		27	2.37	64
	Russian	27	2.37	64
Walla Walla		2,107	3.75	7,901
	Spanish	2,107	3.75	7,901
Whatcom		2,731	2.89	8,671
	Spanish	1,980	3.39	6,712
	Russian	426	2.37	1,010
	Punjabi	325	2.92	949
Yakima		22,229	4.08	90,694
	Spanish	22,229	4.08	90,694
Grand Total		183,935	3.09	631,630

OEO estimates that 6,000 people or more speak one of the twelve languages listed in the table below.

Language	Estimated number of LEP speakers
Spanish	468,254
Vietnamese	31,131
Russian	22,141
Chinese (Mandarin or Cantonese)	11,319
Somali	9,730
Ukrainian	9,720
Korean	8,889
Tagalog	8,815
Cambodian	6,535
Punjabi	6,412
Arabic	6,304

Factor 2: Frequency of Contact with LEP Speakers

OEO’s Factor 2 analysis seeks to measure the potential frequency of WSDOT contact with LEP individuals based on their location and primary language. For WSDOT’s purposes, frequency of contact should consider that nearly everyone residing in Washington who access our transportation systems. The traveling public has a need for information about the roadways that they are traveling (mountain pass information, detours, roadways blocked due to collisions), the ferries they are riding, the services available at rest areas, park and ride lots, and projects that could change the way they live/travel. Frequency of contact is more than coming face-to-face with someone.

Geographic areas have a responsibility to meet the accessibility needs of their respective LEP populations. WSDOT must analyze the localized demographic data from each geographic area where it has operations. Frequency of contact with LEP individuals may vary from expectations based solely on a Factor 1 analysis. Localized geographic areas may have a higher number of LEP individuals than expected, while other regions, communities, or neighborhoods may have no significant LEP populations, even if within the counties or geographic areas listed above.

The language spoken by the majority of LEP individuals in a specific geographic area must also be considered when determining what assistance is required. Language accessibility services for multiple languages may be required in high-density urban areas.

Estimates of WSDOT Contact Frequency with LEP Speakers

ACS data⁵ on commuter methods provides some insight into how LEP speakers access services provided by WSDOT and its subrecipients. OEO estimates assume that the number of LEP speakers using these commuter options roughly equates to the proportion of LEP speakers in each county.

Counties where LEP commuters number more than 5,000 are indicated in the table below:

County	LEP Mass Transit Commuters	LEP Carpool Commuters	LEP Single Occupant Car Commuters
King	1,867	13,631	128,594
Snohomish	255	4,727	41,100
Pierce	132	3,144	34,178
Yakima	10	3,265	29,956
Clark	32	1,763	19,594
Franklin	10	2,053	14,879
Benton	15	1,220	11,619
Grant	3	1,748	11,349
Spokane	20	965	10,057
Thurston	13	719	8,560

⁵ 2013-2017 American Community Survey 5-Year Estimates, MEANS OF TRANSPORTATION TO WORK BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH, B08113

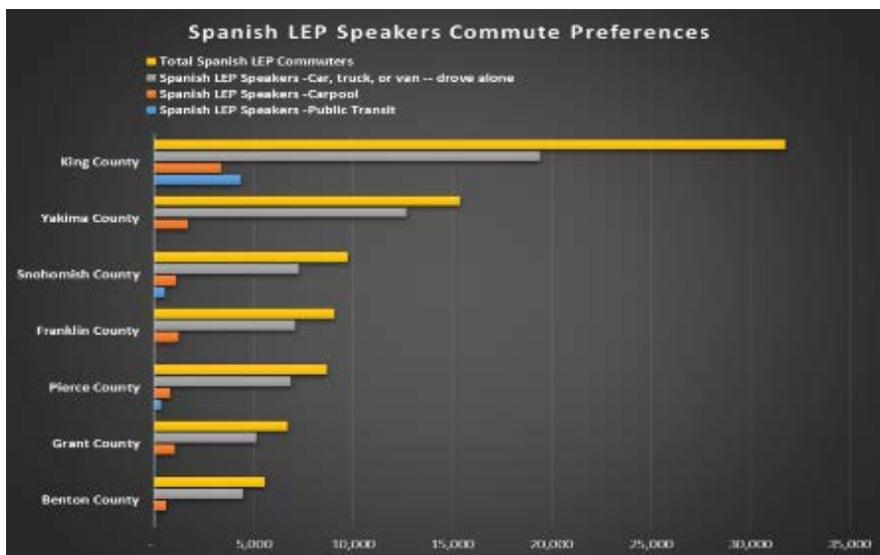
County	LEP Mass Transit Commuters	LEP Carpool Commuters	LEP Single Occupant Car Commuters
Whatcom	10	580	6,742
Skagit	4	689	6,435
Chelan	6	436	5,249

Large numbers of LEP speakers access public transportation systems in King, Snohomish, Pierce, Yakima, and Clark Counties due to the large number of LEP speakers who reside in those counties. Counties with smaller populations, like Franklin, Benton, and Grant Counties, have relatively large numbers of LEP commuters due to the high proportion of LEP speakers in those counties.

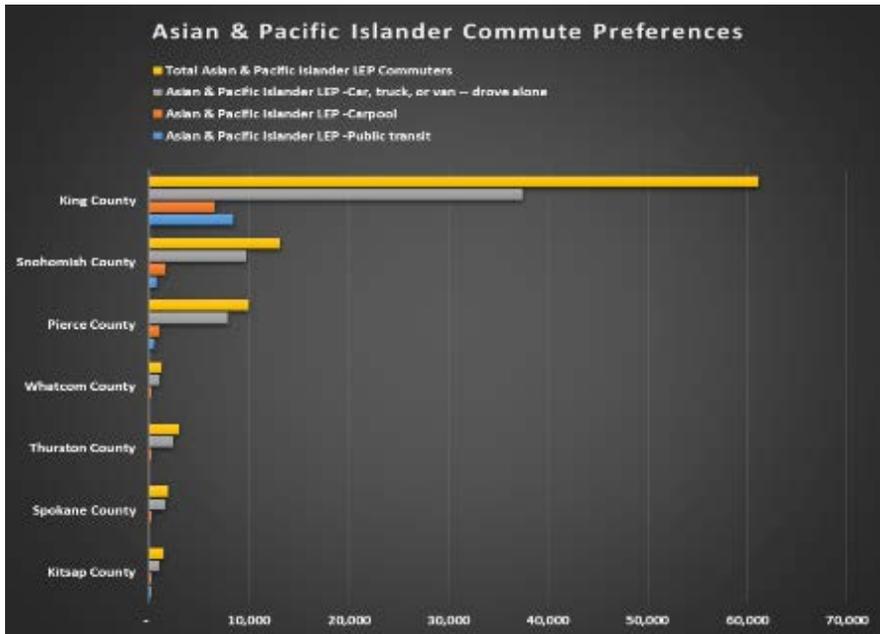
Commuter Preferences of Specific Language Populations with Limited English Proficiency

The ACS data on commuter preferences for mode of transportation is limited in that its language categories are general rather than specific, making it hard to determine the languages LEP individuals are speaking if the language is other than Spanish.

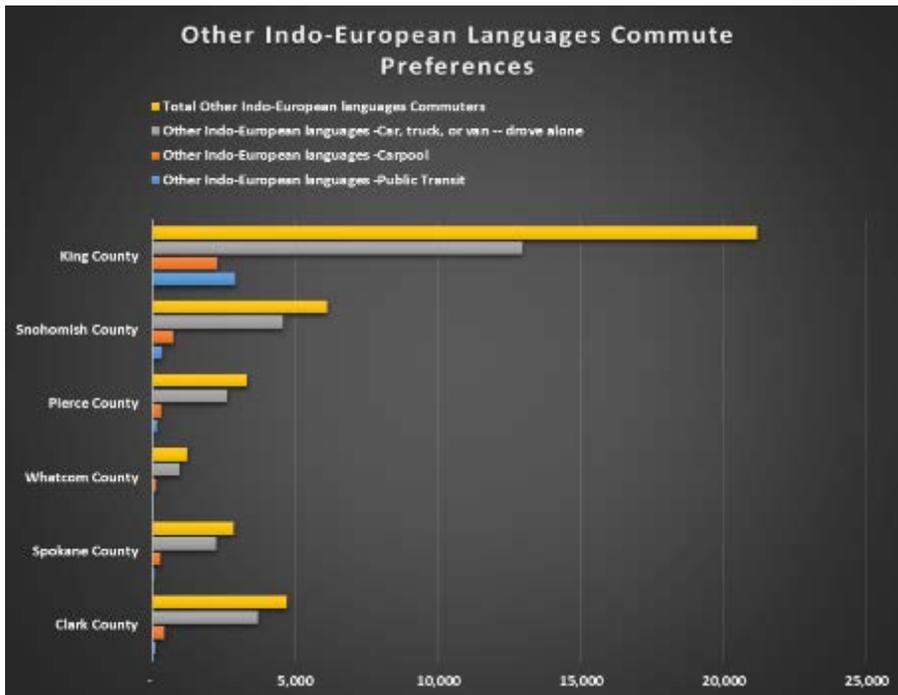
Spanish language speakers who speak English less than very well



Asian and Pacific Island language speakers who speak English less than very well



Other Indo-European languages who speak English less than very well

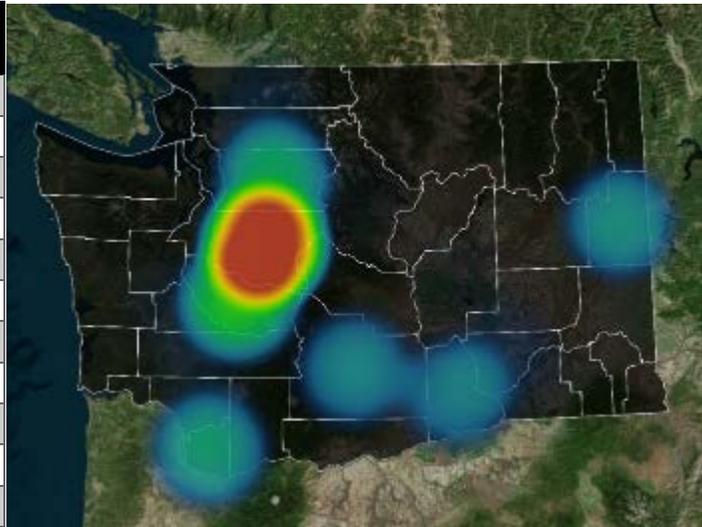


Using Health Care Authority Data to Estimate LEP Frequency

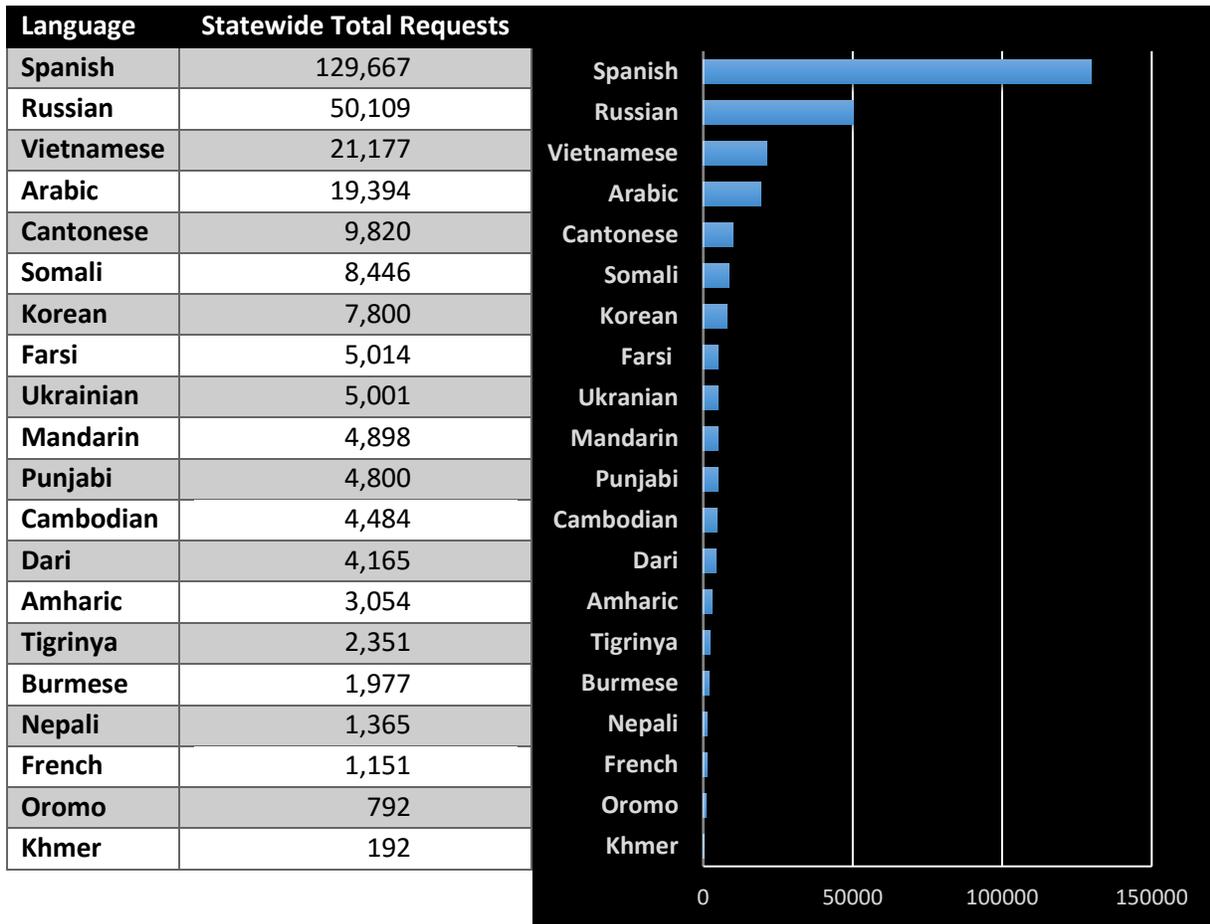
WSDOT has limited information on its own frequency of contact with LEP speakers. WSDOT will need to prioritize creating procedures that involve the collection of LEP contact frequency. In the interim, data from other agencies can be used as an approximation of LEP contact frequency. For example, the Washington State Health Care Authority (HCA) collects data on interpreter requests for access to its services. From the HCA data, it is possible to estimate frequency of contact with LEP individuals. HCA collects information on the number of language interpreter requests it receives and organizes the data by location and language in the [HCA Interpreter Services dashboard](#).

According to HCA data, the majority of interpreter requests came from King County, representing about 43% of the total interpreter requests the HCA received. Six additional counties had interpreter requests that each exceeded 15,000. The remaining 32 counties received less than 5,000 requests combined, while 17 counties received no requests at all.

County	No. of requests for Interpreter services
King	123,027
Pierce	39,251
Snohomish	26,694
Clark	23,330
Spokane	20,307
Yakima	17,757
Benton	15,736
Franklin	4,112
Thurston	2,534
Skagit	2,511
Whatcom	2,262
Lewis	1,660
Cowlitz	1,526
Chelan	1,320
Grant	1,214
Kitsap	304
Okanogan	243
Walla Walla	236
Grays Harbor	181
Mason	181
Kittitas	140
Island	105



HCA also organizes interpreter request data by language as shown in the table and chart below.



The number of interpreter requests by both location (county) and language is shown in the table below.

County	Language	Total Number of interpreter requests (HCA data)
Benton	Total County Requests:	13,533
	Spanish	12,057
	Russian	1,222
	Vietnamese	116
	Ukrainian	76
Chelan	Total County Requests:	3,409
	Arabic	2,092
Clark	Total County Requests:	23,145
	Russian	11,298
	Spanish	9,437
	Vietnamese	1,111
	Amharic	373

County	Language	Total Number of interpreter requests (HCA data)
	Cambodian	227
	Korean	219
	Mandarin	200
	Cantonese	134
	Ukrainian	95
	Punjabi	51
Cowlitz	Total County Requests:	1,470
	Spanish	1,470
Franklin	Total County Requests:	3,821
	Spanish	3,189
	Russian	632
Grant	Total County Requests:	1,419
	Spanish	1,096
	Arabic	214
	Russian	109
Grays Harbor	Total County Requests:	178
	Spanish	178
Island	Total County Requests:	93
	Spanish	93
King	Total County Requests:	115,259
	Spanish	39,435
	Russian	14,147
	Vietnamese	12,127
	Cantonese	9,288
	Somali	8,144
	Dari	3,929
	Punjabi	3,815
	Farsi	3,572
	Mandarin	3,534
	Korean	3,117
	Ukrainian	2,935
	Amharic	2,696
	Tigrinya	2,094
	Cambodian	2,037
	Burmese	1,759
	Nepali	945
	French	769
Oromo	766	
Khmer	150	

County	Language	Total Number of interpreter requests (HCA data)
Kitsap	Total County Requests:	8,046
	Arabic	7,768
	Spanish	278
Kittitas	Total County Requests:	136
	Spanish	136
Lewis	Total County Requests:	1,658
	Spanish	1,658
Okanogan	Total County Requests:	243
	Spanish	243
Pierce	Total County Requests:	37,770
	Spanish	18,077
	Russian	8,811
	Vietnamese	4,264
	Korean	3,108
	Cambodian	1,604
	Ukrainian	477
	Punjabi	392
	Farsi	255
	French	239
	Mandarin	223
	Amharic	127
	Somali	102
Cantonese	91	
Skagit	Total County Requests:	3,842
	Spanish	2,297
	Arabic	1,370
	Russian	175
Snohomish	Total County Requests:	22,442
	Spanish	11,578
	Russian	4,159
	Vietnamese	2,038
	Korean	1,158
	Ukrainian	723
	Farsi	596
	Mandarin	581
	Cambodian	401
	Punjabi	391
	Cantonese	226
	Amharic	188
Tigrinya	154	

County	Language	Total Number of interpreter requests (HCA data)
	French	75
	Nepali	63
	Somali	57
	Dari	54
Spokane	Total County Requests:	21,144
	Russian	8,660
	Spanish	5,070
	Arabic	4,224
	Vietnamese	1,168
	Ukrainian	637
	Farsi	403
	Nepali	333
	Mandarin	179
	Dari	143
	Burmese	136
	Tigrinya	79
	French	57
	Korean	55
Thurston	Total County Requests:	5,713
	Arabic	3,277
	Spanish	2,089
	Vietnamese	191
	Korean	98
	Cambodian	58
Walla Walla	Total County Requests:	233
	Spanish	233
Whatcom	Total County Requests:	2,195
	Spanish	1,270
	Russian	739
	Mandarin	96
	Punjabi	90
Yakima	Total County Requests:	17,737
	Spanish	17,737
Grand Total		283,486

Estimates of WSDOT LEP Contact Frequency Washington Courts Interpreter Service Requests

Interpreter credentialing records maintained by the Administrative Office of the Courts (AOC), and court records reflecting interpreter requests, are another source of data for measuring contact frequency with LEP individuals. AOC credentialed interpreters as either certified or registered in over 100 languages:

Languages (Certified Interpreter)	Languages (Registered Interpreter)	Languages (Registered Interpreter)
Arabic (Egyptian or Levantine)	Afrikaans	Kinyarwanda
Bosnian/Croatian/Serbian	Akan-Twi	Kirundi
Cantonese	Albanian	Krio
French	Algerian	Kurdish
Khmer (Cambodian)	Amharic	Latvian
Korean	Armenian	Lingala
Laotian	Azerbaijani	Lithuanian
Mandarin	Baluchi	Macedonian
Portuguese	Bambara	Malay
Russian	Bengali	Malayalam
Spanish	Bulgarian	Mandingo-Bambara
Tagalog	Burmese	Mongolian
Vietnamese	Cebuano	Navajo
	Chavacano	Nepali
	Chechen	Norwegian
	Czech	Oromo
	Danish	Pashto
	Dari	Persian Farsi
	Dutch	Polish
	Ewe	Portuguese
	Finnish	Punjabi
	Fulfulde (Fulani)	Romanian
	Ga	Samoan
	Georgian	Sindhi
	German	Sinhalese
	Greek	Slovak
	Gujarati	Somali
	Haitian Creole	Swahili
	Hausa	Swedish
	Hebrew	Tajik
	Hiligaynon	Tamil
	Hindi	Tausug
	Hmong	Telugu
	Hopi	Thai
	Hungarian	Tibetan
	Igbo	Tigrinya
	Ilocano	Turkish
	Indonesian	Turkmen

Languages (Certified Interpreter)	Languages (Registered Interpreter)	Languages (Registered Interpreter)
	Italian	Uighur
	Jamaican Patois	Ukrainian
	Japanese	Urdu
	Javanese	Uzbek
	Kashmiri	Wolof
	Kazakh	Wu
	Kikongo-Kongo	Yoruba

Language	Hours
Spanish	28,831
Russian	2,778
Vietnamese	2,098
Chinese	1,348

Washington Courts reported using interpreters for 96 different languages in Fiscal Year (FY) 2016. Different courts may have varying interpreter needs, ranging from one language (Spanish for some eastern Washington courts) to 56 languages (Seattle Municipal Court). Court interpreters are usually paid at an hourly rate for in-person interpreting. The languages courts require for the most number of interpreter hours are reflected in the table.

Factor 3: Nature and Importance of Programs, Services and Activities

WSDOT must also analyze the nature of its programs, services and activities, and their importance in LEP people's lives. This analysis must be balanced with the analysis of LEP population demographics (Factor 1); the frequency of contact with LEP speakers (Factor 2); and the availability of resources (Factor 4, to be discussed below).

WSDOT programs, services and activities that affect a broad sector of the state's population will increase the need to provide language accessibility services to LEP individuals. Information such as road/bridge closures, detours, public communications via variable message signs, 511 traveler information line, WSDOT's right-of-way process, maintenance operations, rest area information, size & weight permits, et al, are all important to Washington residents/travelers. Denial or delay of access to services or information could also have serious implications. If WSDOT or any of WSDOT's subrecipients are responsible for providing emergency evacuation instructions (as on ferries, for example) or public safety information, failure of LEP individuals to understand such information could have life threatening consequences. The inability of a LEP individual to effectively use public transportation because of a language barrier may adversely affect their ability to obtain health care, education, or access to employment.

WSDOT operations (and the operations of its subrecipients) range from roadway planning and improvement projects, to public transportation and public safety programs. Each operation must be assessed to determine how it affects LEP populations and how important it is to the lives of LEP individuals.

Factor 4: Available Resources and Cost

Pursuant to the USDOT's Policy Guidance Concerning [Recipients' Responsibilities to Limited English Proficient \(LEP\) Persons](#), and the USDOJ's [Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons](#) (2002), recipients of Federal assistance are required to take reasonable steps to ensure meaningful access to their programs, services, and activities by LEP persons. "Reasonable steps" might cease to be reasonable where available resources and the costs imposed substantially exceed the benefits. Small municipalities and rural counties with limited budgets and staff are not expected to provide the same level of language services as state government agencies, like WSDOT, with larger budgets and staff.

WSDOT's resources, however, are not unlimited. WSDOT should, on a case by case basis, identify the most cost effective means of delivering timely, accurate and effective language services to LEP individuals.

There are two main ways to provide language services to LEP individuals: 1) oral interpretation; or 2) written translation. The choice of oral interpretation or written translation should be based on the nature of the program, service or activity and its importance to the LEP population, balanced with the resources available and costs imposed by providing the service.

Oral interpretation can range from in-person interpreters to telephonic interpretation services. Written translation can range from translation of an entire document to a short summary of the document written in the requested language. In some cases, WSDOT may need to provide language services on an expedited basis. On less urgent matters, WSDOT may wish to refer LEP individuals to another WSDOT office for language assistance.

WSDOT must use certified interpreters when the importance of the information is high and there is need for accuracy. Using a telephone language line is a less expensive alternative than hiring an in-person interpreter.

Identifying vital documents

WSDOT must make any vital document accessible to LEP individuals. Vital documents are paper and electronic documents and communications deemed vital to a LEP person's access to WSDOT programs, services and activities, or that are required by law. To determine that a document is vital, it must be reviewed in light of the importance of the program, service, activity or information involved, and the consequences to a LEP individual if the information is not provided accurately or in a timely manner.

The federal government's LEP.gov⁶ website defines vital documents as:

A document will be considered vital if it contains information that is ***critical for obtaining federal services and/or benefits, or is required by law.*** (Emphasis) Vital documents include, for example: applications, consent and complaint forms; notices of rights and disciplinary action;

⁶ Commonly Asked Questions and Answers Regarding Limited English Proficient (LEP) Individuals, LEP.gov, Accessed October 1, 2019 at <https://www.lep.gov/faqs/faqs.html#OneQ9>

notices advising LEP persons of the availability of free language assistance; prison rulebooks; written tests that do not assess English language competency, but rather competency for a particular license, job, or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client. For instance, if a complaint form is necessary in order to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services. Advertisements of federal agency tours and copies of testimony presented to Congress that are available for information purposes would be considered non-vital information.

From [LEP.gov's](#) definition we can conclude that vital documents may include, but are not limited to:

- Documents that must be provided by law (e.g. right-of-way, size & weight permits, etc.);
- Notices regarding the availability of free language access services for LEP individuals;
- Outreach or informational material the lack of which may effectively deny a LEP individual meaningful access to a WSDOT program, service or activity;
- Traveler information such as rest area signs and the 511 traveler information line,
- Notice of denial, loss or decrease in benefits or services; and
- Forms, notices or written material related to an individual's rights, requirements or responsibilities regarding WSDOT services, such as filing a discrimination complaint against WSDOT, or protesting an agency decision.

LEP.gov goes on to provide guidance on distinguishing vital documents from non-vital documents.

It may sometimes be difficult to draw a distinction between vital and non-vital documents, particularly when considering outreach or other documents designed to raise awareness of rights or services. Though meaningful access to a program requires an awareness of the program's existence, we recognize that it would be impossible, from a practical and cost-based perspective, to translate every piece of outreach material into every language. Title VI does not require this of recipients of federal financial assistance, and EO 13166 does not require it of federal agencies. Nevertheless, because in some circumstances lack of awareness of the existence of a particular program may effectively deny LEP individuals meaningful access, it is important for federal agencies to continually survey/assess the needs of eligible service populations in order to determine whether certain critical outreach materials should be translated into other languages.

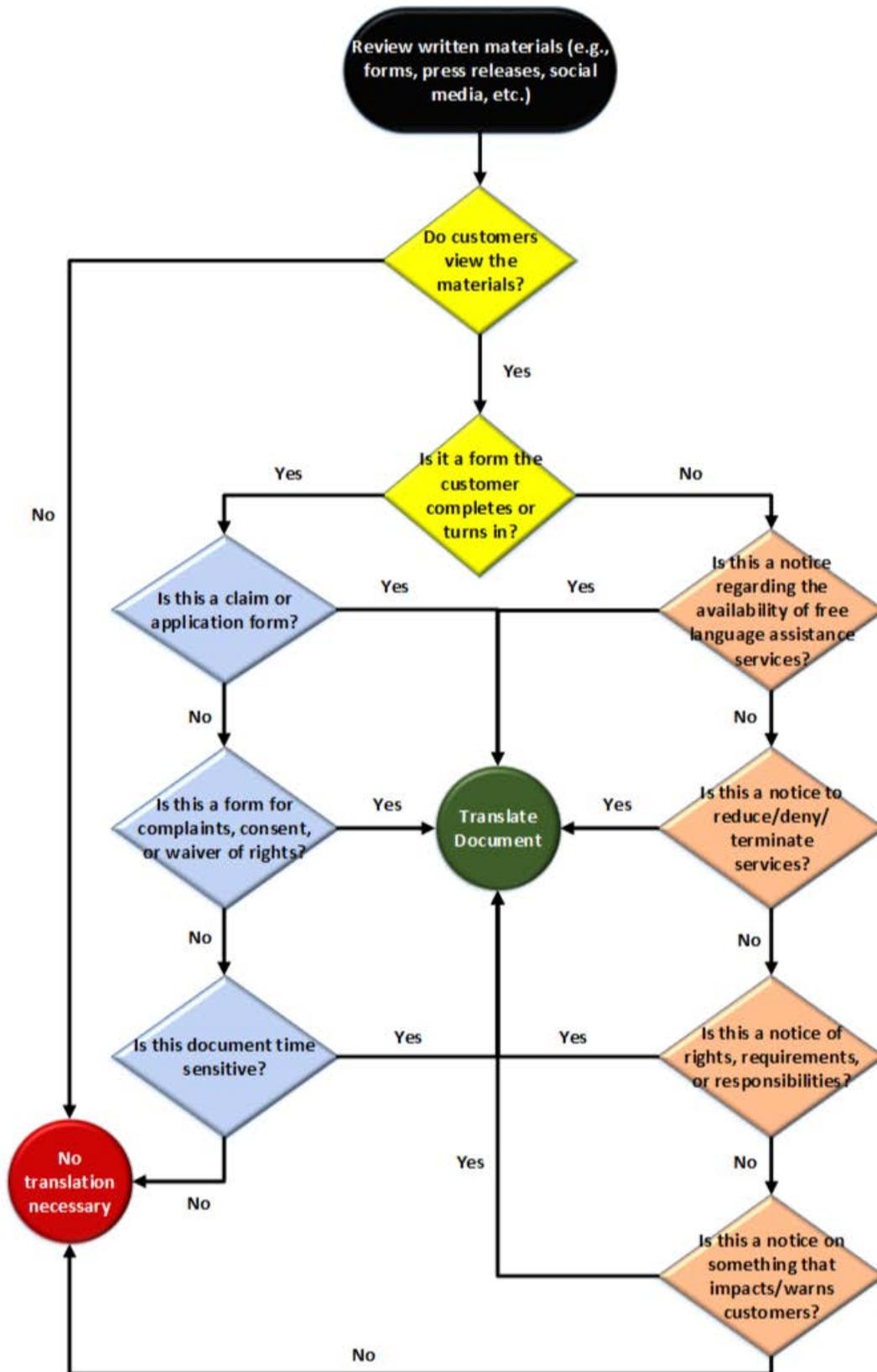
The key take away is that determining vital from non-vital documents is about balancing the need for LEP accessibility with available resources. WSDOT must be able to substantiate its resource concerns if language services to LEP individuals are to be limited.

As stated by LEP.gov, once documents have identified as vital they must:

Be translated when a significant number or percentage of the population eligible to be served, or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively. For many larger documents, translation of vital information contained within the document will suffice and the documents need not be translated in their entirety.

Failure to provide timely, accurate and effective language services to LEP individuals may subject WSDOT to complaints, and possible regulatory scrutiny or legal jeopardy. It is sound business practice to make every reasonable attempt to provide timely, accurate and effective language services to LEP individuals, to ensure that LEP individuals have meaningful access to WSDOT's programs, services and activities.

The flowchart below shows the steps involved in identifying vital documents:



Under safe harbor provisions outlined in USDOJ’s guidance document, for service areas with 1,000 or more non-English speakers, or where non-English speakers make up at least 5% of the total population, vital documents must be translated. Vital documents should be translated at a fourth (4th) grade literacy level to ensure the targeted audience can understand the information. Community based organizations or focus groups can assist with testing translations for accuracy and literacy level appropriateness. Planned Agency Efforts to Increase Access for LEP Individuals

Reccomendations to Ensure LEP Accessibility

WSDOT conducted a self-assessment of current services offered to LEP individuals based on the [Language Access Assessment and Planning Tool](#) provided by USDOJ. Based on the self-assessment, WSDOT identified six areas that would benefit from further attention:

1. Develop a language access policy.
2. Develop procedures to provide language access services.
3. Develop an ongoing public outreach effort to assess the effectiveness of the language access plan and the language accessibility services provided to the community.
4. Use the Four Factor Analysis to identify and assess LEP communities, and understand how LEP individuals interact with the agency; and update the analysis, as required.
5. Provide notice to the community that language access services are available for free.
6. Train staff to provide language accessibility services and assess the needs of the LEP community.

Based on the results of this self-assessment, WSDOT will seek to improve language accessibility for LEP individuals through the following actions:

Policy, Procedures, and Outreach	
Develop a language access policy	<ul style="list-style-type: none"> • Define goals and expectations of the agency • Enact policies outlined in the statewide LEP plan • Determine the legal basis or administrative authority for program • Create a statewide workgroup to obtain input from people who provide or need access to the information, including employees from all levels, individuals in the community that speak other languages, and community organizations • Establish standards for data collection and recording, provision of services to the public, and training • Define division and staff responsibilities • Outline performance measurements
Develop procedures to provide language access services, gather data, and deliver services to non-English speakers including guidelines for how staff:	<ul style="list-style-type: none"> • Respond to telephone calls from non-English speakers • Track and record preferred language information • Inform individuals about available language assistance services • Identify the language needs of individuals. • respond to correspondence not in English (letters and email)

Policy, Procedures, and Outreach	
	<ul style="list-style-type: none"> • Can get in-person interpreter services • Can get telephone or video interpreter services • Can to get translations of documents • Are to process language access complaints and how language access complaints are filed
Public outreach on availability of language assistance services	<ul style="list-style-type: none"> • Multilingual signs or posters in offices and jobsites announcing the availability of language assistance services • Including non-English information that would be easily accessible to LEP individuals on the agency website • Social networking websites (e.g. Facebook, Twitter) • Emails to individuals and community groups • Translated program outreach materials • Notice to current applicants or recipients of WSDOT services about the availability of language assistance services • Ongoing effort to obtain feedback from LEP individuals and community groups on the effectiveness of WSDOT's language access program and the language assistance services provided by the Agency

Specific Actions	
How WSDOT staff can identify LEP individuals	<ul style="list-style-type: none"> • "I Speak" language identification cards or posters • Self-identification by the non-English speaker or LEP individual • Written material submitted to the agency (e.g. complaints) • Ask open-ended questions to determine language proficiency on the telephone or in person • Requests for language assistance services • Assume limited English proficiency if the ability to speak or write English seems impaired
Create internal data collection processes to determine:	<ul style="list-style-type: none"> • The number of LEP individuals in a service area • The number and prevalence of languages spoken by LEP individuals in a service area
Develop and update LEP demographics, frequency of contact data, and nature and importance of services by using Four Factor Analysis of WSDOT operations in relevant service areas	<ul style="list-style-type: none"> • Update as required; at minimum, every two years
For demographic analysis, use data from a variety of sources	<ul style="list-style-type: none"> • Census • Washington State Office of the Superintendent of Public Instruction • Washington State Office of Financial Management

Specific Actions	
	<ul style="list-style-type: none"> • Administration Office of the Courts • Washington State Healthcare Authority • Internal agency data
Track language assistance services provided to LEP individuals	<ul style="list-style-type: none"> • Log for each interaction with LEP individuals the type of language assistance services provided, including: <ul style="list-style-type: none"> ➢ Primary language of persons encountered or served ➢ Use of language assistance services (interpreters, translators), including cost ➢ WSDOT funds and staff time spent providing language assistance services
Provide the following resources where applicable	<ul style="list-style-type: none"> • Bilingual staff • Contracted interpreters with required certifications • Contracted translators with required certifications • Telephone interpretation services • Language bank or dedicated pool of interpreters or translators • Volunteer interpreters or translators
Improve and Expand language access services	<ul style="list-style-type: none"> • Enact policies outlined in the statewide LEP plan • Translate signs or posters announcing the availability of language assistance services • For internal use, provide staff with a written list of available certified interpreters and translators, languages they speak, and contact information • Contract with interpreter and translator referral services
Identify and translate vital written documents into high demand languages, including:	<ul style="list-style-type: none"> • Documents that must be provided by law • Notices regarding the availability of free language access services for LEP individuals • Outreach or informational material the lack of which may effectively deny a LEP individual meaningful access to a WSDOT program, service or activity • Notice of denial, loss or decrease in benefits or services • Forms, notices or written material related to an individual's rights, requirements or responsibilities regarding WSDOT services, such as filing a discrimination complaint against WSDOT, or protesting an agency decision
Provide training on language assistance services to WSDOT staff	<ul style="list-style-type: none"> • Agency staff will receive mandatory initial and periodic training on how to access and provide language assistance services to LEP individuals • Include a section on language access services to LEP individuals in the HR Manual

Specific Actions	
	<ul style="list-style-type: none"> • Staff members who serve as interpreters will receive regular training on proper interpreting techniques, ethics, specialized terminology, and other topics
Update language access policies, procedures and plans	<ul style="list-style-type: none"> • Update as required; at minimum, every two years

The OEO will appoint a Language Access Coordinator to implement the elements of WSDOT’s Language Access Plan as outlined in the tables above. OEO’s Language Access Coordinator will be responsible for:

- Development of WSDOT’s Language Access Plan and monitoring its implementation, including setting timelines and goals
- Assessment and analysis of current programs
- Providing support to WSDOT leadership on language access services
- Collection of LEP demographic data as required
- Development of reporting tools and systems to capture data
- Development and distribution of materials to inform WSDOT staff, Local Public Agencies, and the general public of language access programs, policies and procedures
- Producing an annual report on WSDOT’s progress implementing the Language Access Plan and WSDOT’s compliance with Executive Order 13166

Guidance to WSDOT Divisions, Regions and Subrecipients

[Federal Executive Order 13166](#) directs all organizations that receive Federal financial assistance to take reasonable steps to provide non-English speakers with meaningful access to their programs, services and activities.

Each WSDOT Division, Region or subrecipient that receives Federal funds must determine how to best provide meaningful access to LEP individuals in their service area. Each WSDOT Division or LPA must perform a self-assessment similar to that done by the OEO and, based on that self-assessment:

1. Develop a language access policy.
2. Develop procedures to provide language access services.
3. Develop an ongoing public outreach effort to assess the effectiveness of the language access program and the language accessibility services provided to the community.
4. Use the Four Factor Analysis to identify and assess LEP communities, and understand how LEP individuals interact with the agency; and update the analysis, as required.
5. Provide notice to the community that language access services are available for free.
6. Train staff to provide language accessibility services and assess the needs of the LEP community.

WSDOT Divisions and LPAs will find guidance for developing their own Language Access Plan in the sections above.

Compliance and Enforcement

WSDOT directors, program managers, Region and Area managers, and Title VI Program Liaisons are responsible for ensuring that LEP individuals are provided meaningful access to programs, services and activities in their respective service areas. Additionally, Title VI Program Liaisons will be required to provide annual reports to OEO's Title VI Program staff on accomplishments and upcoming goals for language accessibility services within the Title VI Program Liaison's respective service area.

OEO's Title VI Program staff will: assess whether WSDOT Divisions and LPAs have developed adequate procedures to allow LEP individuals meaningful access to programs, services and activities; review the use of methods outlined in this document by WSDOT Divisions and LPAs; and determine whether more needs to be done by the WSDOT Division or LPA to comply with LEP requirements based on their analysis and documentation.

Technical Assistance

The WSDOT OEO Title VI Program will provide WSDOT divisions, regions, and WSDOT subrecipients with technical assistance in developing their own Language Access Plan.

Resources

[42 U.S.C. §2000d et seq.](#) (Title VI).

[Exec. Order No. 13166](#), *Improving Access To Services For Persons With Limited English Proficiency*, 65 Fed. Reg. 50121 (August 11, 2000).

U.S. Department of Justice, [Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons](#), 67 Fed. Reg. 41455 (June 18, 2002)

U.S. Department of Justice, [Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance](#).

U.S. Department of Transportation, [Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency \(LEP\) Persons](#), 70 Fed. Reg. 74087 (December 14, 2005)

[Limited English Proficiency \(LEP\) - A Federal Interagency Website](#) (resources and information, including [FAQs](#), samples of Language Access Plans, and Tutorials)