

# Limited English Proficiency (LEP) Plan

In order to meet our mission “Clean healthy air for everyone, everywhere, all the time”, it is important for the Puget Sound Clean Air Agency to make reasonable efforts to accommodate those individuals in the jurisdiction that self-identify as having Limited English Proficiency (LEP). As an agency that receives federal funding, we are obligated to provide a Limited English Proficiency Plan to outline our efforts to ensure meaningful access for LEP persons to the agency’s programs and activities. This Plan describes our translation and interpretation strategy.

To accomplish this, the agency should: (1) conduct the four-factor assessment; (2) develop a language access plan (LAP); and (3) provide appropriate language assistance.

Limited English Proficiency (LEP) individuals self-identify their ability to speak English as “not very well”

In evaluating any potential translation or interpretation need, we consider the following four factors:

1. The number or proportion of LEP individuals our agency would likely serve or encounter.
2. The frequency with which LEP individuals come in contact with the agency
3. The nature and importance of the program, activity or service provided by the agency to people’s lives
4. Costs and resources available

## 1. The number or proportion of LEP individuals our agency would likely serve or encounter

Language spoken at home by those identifying as LEP, by persons over 5 years of age:

	Spanish	Chinese	Vietnamese	Tagalog	Korean	Other	Total
<b>King</b>	53,440 2.8%	31,450 1.7%	20,232 1.1%	9,237 0.5%	11,024 0.6%	76,153 4.0%	201,536 10.7%
<b>Kitsap</b>	2,196 0.9%	202 0.1%	407 0.2%	1,555 0.7%	287 0.1%	1,581 0.7%	6,228 2.6%
<b>Pierce</b>	16,761 2.2%	1,079 0.1%	3,986 0.5%	2,024 0.3%	6,075 0.8%	13,660 1.8%	43,585 5.8%
<b>Snohomish</b>	17,998 2.6%	4,442 0.6%	5,606 0.8%	2,938 0.4%	6,065 0.9%	18,545 2.7%	55,594 8.1%

Top five (>0.5% of population in our jurisdiction) speaks Spanish, Chinese, Korean, Tagalog and Vietnamese. As a general matter these are the languages we consider translation to, absent specific linguistic information about the audience of a particular material.

Although many more people speak these languages in our region, in these early days of our LEP efforts, we are primarily focused on serving those who “speak English less than well,” as compared to serving those that also speak English well. In some instances we offer Spanish services due to the large number of native Spanish speakers in our region (even though most speak English well).

## **2. The frequency with which LEP individuals come in contact with the agency**

There is no current way to definitively identify every individual that identifies as having limited English proficiency, who comes into contact with our agency. Anecdotally, we know that our inspection team has frequent encounters with Spanish speaking day-laborers through our asbestos outreach program. We also know that many of the owners of dry cleaners and gas stations in the area are of Korean heritage.

Our Customer Service Specialist reports that there are very few calls to the Agency from people needing interpretation. Spanish is the most requested, followed by Korean and Vietnamese. We offer real-time interpretation to a number of languages to anyone that requests it. With regard to translation, we consider frequency of contact along with the other three factors herein.

## **3. The nature and importance of the program, activity or service provided by the agency to people’s lives.**

What is a vital document for someone interacting with PSCAA? When considering which materials or information to translate or interpret, we consider the following criteria:

- Information affecting people’s health, e.g. information that:
  - helps people avoid asbestos exposure
  - helps people minimize wood smoke
  - helps people reduce their exposure to near-road pollution
- Information that helps individuals and very small businesses comply with the law, e.g. information about:
  - burn bans & indoor burning (e.g. No Other Adequate Source of Heat exemption)
  - outdoor burning
  - registration program information relevant to very small businesses (<~5 employees)
  - violations of the Clean Air Act or Agency regulations
  - targeted at “highly impacted communities” either with >0.5% LEP or for which we don’t know the LEP %
- Information that very generally describes the agency

Some specific examples:

- Permit applications if would be used by very small businesses
- Notice of Construction
- Asbestos related notifications
- Asbestos information
- Burn ban notices
- Notices of Violation
- Notices of Civil Penalties
- No Other Adequate Source of Heat application & exemption
- Correspondence related to owed civic penalties
- Settlement agreements where the other party is LEP

#### **4. Cost and resources available**

While the above three criteria are operative, generally we anticipate spending about \$ 10,000 per year on the services described in this Plan. An application of the above criteria that took us well outside that resource range might require us to consider resource level as a constraint.

Following are some specific examples of how we apply the above factors.

##### **RFPs**

We post Requests for Proposals (RFP) on our website, the Daily Journal of Commerce, and identified local ethnic media outlets. The Communications & Public Engagement Liaison will work with the Contracts Liaison to identify appropriate media outlets at least 1X/year. We consider translating RFPs that very small businesses may respond to, using the four factors described above, however it is rare that we translate RFPs because the successful contractor will usually have to be English proficient to work for us in any event.

##### **Human Resources**

We post agency job announcements on our website, the Daily Journal of Commerce, and identified local ethnic media outlets. We are increasing the number of outlets we use. Since the media landscape is fairly dynamic, the Communications & Public Engagement Liaison will work with the Education & Training Liaison to identify appropriate media outlets at least 1X/year.

##### **Collateral**

We translate agency brochures, handouts and promotional items into other language considering the four factors above. Agency general informational brochures will be translated, printed and made

available in the top five languages (>0.5% population) identified by LEP speakers as language spoken in the home.

### **Videos**

Communication via video is a great way to reach a wide audience. Applying the four factors, we generally make our videos available in English and Spanish. We translate videos that target a specific audience (like Korean dry cleaners) into other appropriate language(s) and make them available on our website and YouTube channel.

### **Press Releases**

Our press releases contain the Title VI short form language. We send English versions to appropriate ethnic media representatives, and we translate them case-by-case considering the four factors.

### **Website**

The Agency website employs a user-friendly format and navigation. Those seeking translation can readily access Google Translate from the site home page. Google Translate provides over 100 languages. We professionally-translate key information, as described in the third factor above, on a case-by-case basis.

### **Legal documents/Civil Penalties /Notices of Violation/others**

When an appellant, penalty recipient, or other entity interacts with our Compliance Division and it becomes clear that interpretation services are needed, we provide an interpreter for telephone and in-person meetings. If requested, documents or correspondence will also be translated. When there has been an appeal of an Agency order or penalty filed before the Pollution Control Hearings Board (PCHB) and the agency becomes aware that interpretation and/or translation services are needed, the Agency notifies the PCHB so language support services can be provided. In addition, in 2015 the Agency had the PCHB's guide to the appeals process entitled "Your Right to Be Heard" translated into Spanish. In 2015, the Agency also rewrote and redesigned its civil penalty document and enclosed materials to be more readable and accessible to readers with limited English proficiency. The Agency also includes information about its free on-demand interpretation services when sending out civil penalties.

### **TTY**

The availability of texting, email, messaging and the FCC's 711 service has significantly eliminated the use of TTY services by deaf customers. We do not provide TTY services.

### **"Real Time" Interpretation the field and in office**

We use a real time interpretation service that is available for any/all staff to use whether in the field or in the office. All staff members receive a step by step guide (see below) on how to access the real-time

interpretations service, schedule an on-site interpreter for a meeting or hearing, or arrange for document translation.

LEP individuals wishing to contact us via phone can choose one of six languages when calling the agency main number. This enables real time phone interpretation between the individual and the agency.

