

# Limited English Proficiency and Access Plan

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OCTOBER 2020



PUGET SOUND  
Clean Air Agency







## Overview

The Puget Sound Clean Air Agency's (The Agency) vision is for everyone, everywhere to breathe clean, healthy air all the time. The Agency is committed to meeting this goal with inclusiveness and fairness rooted in our approach. The Agency's Limited English Proficiency Plan (LEP) is intended to meet the requirements of Title VI of the Civil Rights Act of 1964 and ensure meaningful access to the Agency's programs and activities for people with limited English proficiency. This plan shows our commitment to providing access to information to everyone and describes our translation, interpretation, and access approach.

## Four-Factor Analysis

The Agency conducts a four-factor analysis to guide the LEP and access plan implementation.

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’s programs, activities, and services.
3. The nature and importance of the program, activity or service provided by the Agency to people’s lives.
4. The resources available to the recipient and costs.

### FACTOR 1. THE NUMBER OR PROPORTION OF LEP INDIVIDUALS OUR AGENCY WOULD LIKELY SERVE OR ENCOUNTER.

The Agency’s service area is King, Kitsap, Pierce, and Snohomish County. The Agency used data for the most common languages other than English spoken at home by those identifying as LEP, by persons over 5 years of age:

#### Languages

	Spanish	Chinese	Vietnamese	Tagalog	Korean	Other	Total
King	53,440 2.8%	31,450 1.7%	20,232 1.1%	9,237 .05%	11,024 .06%	76,153 4.0%	201,536 10.8%
Kitsap	2,196 .09%	202 0.1%	407 0.2%	1,555 0.7%	287 0.1%	1,581 0.7%	6,228 2.6%
Pierce	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%
Snohomish	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.<sup>1</sup>

<sup>1</sup> Data from 2015



In addition to analyzing data, Agency Equity and Community Engagement staff work closely with focus communities throughout the four-county jurisdiction to better understand language needs and to identify specific languages for interpretation. In addition to using certified translation and interpretation service providers, the Agency also works with community-based organizations to ensure that translations are appropriate in context and tone for the focus audience.

## **FACTOR 2. THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME IN CONTACT WITH THE AGENCY'S PROGRAMS, ACTIVITIES, AND SERVICES.**

There is no current way to definitively identify every individual that identifies as having limited English proficiency, who comes into contact with our agency. We use the four factor analysis and other identifying factors to assess specific language needs for a specific program, activity, or service. For example, our inspection team provides frequent outreach to Spanish speaking people through our asbestos outreach program. Further, Agency staff that are fluent in Spanish manage the asbestos outreach program. In addition, we offer printed resources in Spanish for this program. We also know that many owners of dry cleaners and gas stations in the area are of Korean heritage so we catering materials in a culturally appropriate way. We also work with our community partners in our four environmental justice focus communities to identify language needs. These are few examples of how the Agency addresses individuals and industries with specific language needs.

### **FACTOR 3. THE NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY OR SERVICE PROVIDED BY THE AGENCY TO PEOPLE'S LIVES.**

The Agency's goal is to provide the greatest access to materials and information. The Agency considers which materials or information to translate or interpret based on 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 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 small businesses (<~5 employees)
  - violations of the Clean Air Act or Agency regulations
- **Information that describes the Agency**
  - General Agency brochures
  - Equity and environmental justice information
  - 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
  - Program specific information in focus communities



## **FACTOR 4. THE RESOURCES AVAILABLE TO A RECIPIENT AND COSTS.**

The Agency has numerous language assistance resources in place.

### **RFPs**

We post Requests for Proposals (RFP) on our website, the Daily Journal of Commerce, and identified local and 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 small businesses or community organizations may respond to, using the four factors described above.

### **Human Resources**

We post agency job announcements on our website, the Daily Journal of Commerce, and identified local and 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.

### **Printed Materials**

We translate agency brochures, handouts and promotional items into other languages considering the four factors above. General agency informational brochures are translated, printed, and made available in the top five languages (>0.5% population) identified by LEP speakers as language spoken in the home.

We also translate program-specific information in both print and digital formats in various languages depending on the focus audience. See Appendix A for examples of translated materials.

### **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 into other appropriate language(s) and make them available on our website, social media, and YouTube channel. For example, the Agency translated a drayage truck video training series in six different languages that were the most appropriate for the focus audience (Oromo, Punjabi, Russian, Somali, and Spanish).<sup>2</sup>

<sup>2</sup> Clean Diesel Truck Video Training Series. [www.pscleanair.gov/TruckTraining](http://www.pscleanair.gov/TruckTraining)

### **Press Releases**

Our press releases contain the abbreviated Title VI notice. We send English versions to appropriate ethnic media representatives, and we translate them case-by-case considering the four factors. For risk communication information (i.e. wildfire smoke preparedness messages) the Agency has template language translated in 10 different languages because often that type of information needs to be disseminated in a timely manner.

### **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 recognize that Google Translate services has limitations and we do not solely rely on that tool in order to make our information accessible. 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 accessible to readers with limited English proficiency. The Agency also includes information about its free, on-demand interpretation services when sending out civil penalties.



### **Blind and Visually Impaired, and Deaf and Hard-of-Hearing Access**

The Agency utilizes the WA Department of Social and Health Service (DSHS) Telecommunication Relay Service (TRS) Text Teletype (TTY) and Telebraille (TB) services.

We provide Sign Language Interpreter services upon request on all our public meetings and events.

We can provide accommodations for deaf, blind, or other alternate abled persons for the Agency's various services, programs, and activities through the "request for accommodations" form on our website. See Appendix B.

### **"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 interpretation 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 (Spanish, Chinese, Vietnamese, Korean, Tagalog, Russian) when calling the agency main number. This enables real time phone interpretation between the individual and the agency.



## Appendix A

PUGET SOUND CLEAN AIR AGENCY



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## APPENDIX A



대비하십시오

**산불 연기 대비 요령**


pscleanair.gov에서 대기 오염 예보를  
정기적으로 확인하십시오



Chuẩn Bị Sẵn Sàng

**Gợi Ý Để Chuẩn Bị Sẵn Sàng Cho Khói Cháy Rừng**


Khí không khí nhìn có vẻ vô và có mùi khói, đây không phải là thời điểm thích hợp cho các hoạt động ngoài trời.



Esté preparado

**COMO PROTEGERSE CONTRA EL HUMO DE LOS INCENDIOS FORESTALES**


Si es posible, adquiera un purificador de aire de alta eficiencia.



대비하십시오

**산불 연기 대비 요령**

야외 활동을 제한하기 위해 식품이나 약품 등의 필수 생활품들을 구비해두십시오.



Diyaargarow

**TALADA SIIN DIYAARGAROWGA DABKA KAYNTA**

La sameeso qorshe dhakhtarkaaga ama xirfadlaha caafimaadka.



## APPENDIX B



**PUGET SOUND  
Clean Air Agency**

1904 3rd Ave #105, Seattle, WA 98101

206-343-8800

[pscleanair.gov](http://pscleanair.gov)

The Puget Sound Clean Air Agency (the Agency) provides reasonable accommodations to persons with disabilities. If you need an accommodation for your disability, please fill out this form and return it to the Agency twenty (20) days prior to your activity date, if possible. There will be no cost to the person requesting an accommodation.

### Reasonable Accommodation Request Form

To request a accommodation, please fill out this form.

FIRST NAME: \_\_\_\_\_ LAST NAME: \_\_\_\_\_

EMAIL: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP CODE: \_\_\_\_\_

TYPE OF ACCOMMODATION:

VISION IMPAIRED ☐      HEARING IMPAIRED ☐      LANGUAGE ☐      OTHER ☐

DESCRIPTION OF REQUEST:

EVENT/MEETING DETAILS:

DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

LOCATION: \_\_\_\_\_





## **PLEASE CONTACT US**

**for questions, concerns,  
and suggestions.**

**Title VI Coordinator**

**206-343-8800**

**[ej@pscleanair.gov](mailto:ej@pscleanair.gov)**





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**WEBSITE**  
[pscleanair.gov](http://pscleanair.gov)

**MAILING**  
1904 3rd Ave #105  
Seattle, WA 98101