



# 2022 Language Access Report: A Case for Somali and Russian

## About King County Elections

Led by Director Julie Wise, King County's Department of Elections (KCE) serves over 1.4 million registered voters by conducting accessible, secure, and accurate elections. KCE is a well-respected leader within the elections community for its programs, outreach and education, accessible voting advocacy and technological innovations.

Home to one-third of Washington State's voters, King County held the title for largest jurisdiction in the country to vote entirely by mail for many years.

With core values of integrity, transparency, teamwork, service, accuracy, and equity, the team at KCE is committed to ensuring all King County voters can get registered, cast their ballot, and make their voices heard.

KCE currently provides all ballots, voting materials, customer service, and correspondence in five languages: English, Chinese, Korean, Spanish, and Vietnamese.

## Summary

Every five years KCE reviews our language access services to ensure that we are actively fulfilling King County's mandates to serve all voters. In this review, we work to determine whether there are unmet translation needs in our community when it comes to accessing their right to vote.

We have collected data and solicited feedback from a variety of sources, including King County service providers, community partners, the 2019 American Community Survey (ACS), and King County demographic resources. After conducting a thorough assessment of both statistical data and community input, **we strongly recommend that King County Elections add Russian and Somali to the suite of full-service languages in order to meet the needs of our communities.**

## Regulatory Environment

Section 203 of the Voting Rights Act of 1975 (Section 203) provides that

*"Whenever any State or political subdivision [covered by the section] provides registration or voting notices, forms, instructions, assistance, or other materials or information relating to the electoral process, including ballots, it shall provide them in the language of the applicable minority group as well as in the English language."*<sup>1</sup>

This provision covers areas that have 10,000 limited English proficiency (LEP) speakers or LEP speakers make up at least 5% of the voting age population. The languages specified by Section 203 as historically excluded from the political process are "Spanish, Asian, Native American, and Alaskan Native." Thus, the languages mandated by Section 203 are limited to the above listed languages, excluding numerous languages such as European and African languages.

<sup>1</sup> The United States Department of Justice; <https://www.justice.gov/crt/language-minority-citizens>, accessed 10/30/2021.

To meet the standards set forth by Section 203, KCE added Chinese in 2002 and Vietnamese in 2012 as full-service languages. As of 2022, KCE is also required to provide Spanish under Section 203, however the department has been providing that language to the federal standard since 2016 per Ordinance 18086.

In 2015, the King County Council passed Ordinance 18086, which includes the requirement that King County Elections provide full services in Spanish and Korean. Furthermore, the ordinance required that starting in 2017, and at least every five years thereafter, KCE provide a report examining changes in the use of languages in the King County population. The 2017 Report (see Appendix C) recommended that KCE focus on voter education initiatives with marginalized communities. In the last five years, the Voter Education Fund (VEF), in partnership with the Seattle Foundation, has supported community-based organizations who work on voter education and voter registration with new voters and historically disenfranchised populations such as youth, LGBTQ+, those with a disability, those experiencing homelessness, Black communities, and immigrant communities. In addition to supporting voter education and voter registration work in King County communities, the VEF program has strengthened KCE's community relations and outreach.

This focus on voter outreach and education through the VEF program has strengthened our relationship with stakeholders, organizations, and community leaders within non-English speaking communities and opened lines of communication to ensure that we hear feedback regularly. We engage these partners monthly and actively work with them to identify and implement processes or programs that will reduce barriers to voting for their community. A key tenant of KCE's vision to be a leader in inclusive elections is being both proactive and responsive. We work year-round to address needs and get our voters what they need to cast their vote.

In 2017, the King County Council passed Ordinance 18665 which requires all King County agencies to develop plans to provide communications and vital documents in the top six non-English languages identified by the Office of Equity and Social Justice and the county demographer. At the time of writing, the top six languages identified by Office of Equity and Social Justice and the county demographer are Spanish, Chinese, Vietnamese, **Somali, Russian**, and Korean.

KCE currently provides full services in four of those six languages, but not Russian or Somali. Adding these additional two languages will ensure that access to KCE's services and communications are consistent with the rest of the County government and fulfill a vital need in our community.

## Language Services

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All KCE content is translated and/or proofed by KCE staff into the five currently-supported languages, including:

- Ballots;
- Voters' pamphlets;
- All letters and communications to voters;
- KCE website content;
- All voter services provided in person or over the phone; and
- Social media, advertising, and outreach material.

We recognize that some services that are managed at the state level, such as the Office of the Secretary of State’s (OSOS) online voter registration portal and the state voters’ pamphlet, will not include the number of languages that KCE provides. Currently, Korean is the only language not supported by the State. To fill that gap, KCE’s translation staff take on those services typically provided by the State. If Russian and Somali are included in KCE’s suite of fully supported languages, we would also need to provide support to the State for those languages.

## Methodology

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For this report, we reviewed applicable statistical sources and engaged with community partners and other King County departments that provide services in languages other than English. The 2020 Census data presented two challenges:

1. Section 203 does not include European and African languages, and
2. The ongoing COVID-19 pandemic has further exasperated the difficulty of data collection in ‘hard to count communities.’

Additionally, we gathered data from Seattle-King County Public Health, Office of the Superintendent of Public Instruction (OSPI), King County Court, WIC (Women, Infant, and Child), school districts, and the voter rolls on demand for services in non-English languages.

To augment and provide context to the statistical data, we surveyed several community members and King County departments that serve LEP populations, including the Office of Equity and Social Justice, Seattle-King County Public Health, and immigrant and refugee organizations such as the Refugee Women’s Alliance and Northwest Immigrant Rights Project. The information provided was evaluated by KCE and we have generalized our findings in this report.

## Findings based on statistical data

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According to the King County Office of Equity and Social Justice’s language tiers, the top six languages are Spanish, Chinese, Vietnamese, Somali, Russian, and Korean. These tiers are based on ACS data and the services requested in non-English languages as detailed in the table below.

King County Code requires that we provide services in “each single language that has ten thousand or more limited-English-proficient King County residents.” Based on the 2019 ACS data, only Spanish, Chinese, and Vietnamese will meet this threshold, while Korean is on the cusp of 10,000 LEP speakers. As noted above, we currently provide the full suite of services in each of these languages.

The next language that is close to the 10,000 LEP speaker threshold is Russian at 8,552. We expect to see that number to continue to grow over the next five years based on current trends.

<sup>2</sup>KCE Voter Education Fund, <https://kingcounty.gov/depts/elections/education-and-outreach/voter-education-fund.aspx>, accessed 10/30/2021

<sup>3</sup><https://kingcounty.gov/audience/employees/translation-interpretation.aspx>

<sup>4</sup>Washington Office of Financial Management, 2020 Hard to Count Areas: Washington State; <https://ofm.wa.gov/sites/default/files/public/databasearch/pop/census/2020/htcmmaps/c000trv01.html>, accessed 10/30/2021

**Table A1**  
**February 2021 Draft King County Top Languages - Data**

ACS PUMS 2019	OFM/OSPI: Limited English Proficiency Students 2016	KC District Courts: Cases Requesting Interpretation, 2019-20	WIC Interpreted Visits, 2019-20**	Public Health Clinic Visits 2019-20
Spanish 54200	Spanish 26300	Spanish 12600	Spanish 6100	Spanish 27600
Chinese 44500	Chinese 5800	Chinese 1200	Chinese 800	Somali 1900
Vietnamese 21700	Vietnamese 5600	Vietnamese 1000	Somali 700	Ukrainian 1600
Korean 9700	Somali 3800	Russian 900	Vietnamese 600	Dari 1600
Russian 8600	Russian 2500	Somali 500	Russian 500	Vietnamese 1300
Tagalog 7400	Ukrainian 1900	Punjabi 500	Amharic 500	Russian 900
Japanese 5400	Korean 1900	Korean 400	Arabic 400	Tigrinya 700
Amharic 5200	Tagalog 1700	Arabic 400	Ukrainian 400	Amharic 700
Somali 5100	Punjabi 1500	Marshallese 400	Dari 300	Arabic 400
Ukrainian 4800	Arabic 1400	Amharic 300	Tigrinya 300	Chinese* 400

**Table A2**  
**February 2021 Draft King County Top Languages - Rankings**

Top 10	Language	Avg Rank	Overall Rank / Tier
1	Spanish	1	1
2	Chinese	3.6	2
3	Vietnamese	3.6	2
4	Somali	4.6	2
5	Russian	5	2
6	Korean	6	2
7	Ukrainian	6.8	2
8	Tagalog	7	2
9	Amharic	8	2
10	Arabic	8.5	2

**Table B**  
**2019 5-year ACS PUMS Data for King County:**

Language	Speakers	LEP Speakers	Sp. Rank	LEP Rank	% of Speakers LEP
Spanish	138,885	54,171	1	1	39.00%
Chinese	87,931	44,517	2	2	50.63%
Vietnamese	37,434	21,660	3	3	57.86%
Korean	21,409	9,711	6	4	45.36%
Russian	21,414	8,552	5	5	39.94%
Tagalog	20,751	7,372	7	6	35.53%
Japanese	15,452	5,372	8	7	34.77%
Amharic	10,366	5,199	12	8	50.15%
Somali	11,681	5,123	10	9	43.86%
Ukrainian	11,431	4,817	11	10	42.14%

While the 2019 ACS data shows that Somali has fewer LEP speakers than Tagalog, Japanese, and Amharic (see Table B), there could be various reasons why Somali does not rank highly in the ACS data. For example, translation is not provided during ACS data collection and because ACS data uses the household unit to reach individuals, the heads of households may not give a full account of who resides in the family in order to comply with housing occupancy rules.

However, we recommend prioritizing the addition of Somali over other languages because:

- 1) ***Somali is the fourth most requested language by those seeking translation and interpretation services in King County (see Table A).*** In ranking the King County language tiers, King County demographers consider requests for translation and interpretation by those seeking services.

Somali is one of the top five frequently requested languages in all four service categories, while Japanese, Amharic, and Tagalog are not consistently featured in rankings of the top ten most-requested languages.

- 2) ***Immigration trends have shifted in recent years.*** Between 2004 and 2017, 4,000 to 10,000 Somali refugees were admitted to the US annually. This does not include other immigration paths such as student and family reunification.

This recent wave of immigration is the successor to the Ethiopian and Eritrean immigration waves that were seen about ten years ago. With many new arrivals our region, the Somali community is more likely to have a larger proportion of LEP speakers and newly naturalized citizens who are eligible to vote for the first time.

- 3) *Our conversations with community partners and service providers highlighted the need for Somali translation to ensure that all voters can exercise their right to vote.* We will cover this in depth in the next section.

Finally, we examined what language voters requested when registering to vote (see Table C). While these numbers are not part of the criterion set by the Ordinance, they do provide a sense of what the voters have been requesting in our interactions.

**Table C**  
**Voter Registrations in King County by Language**

Language	Active Reg	Inactive Reg
Chinese	2,869	67
Vietnamese	2,154	52
Spanish	936	68
Korean	794	37
Russian	107	5
Somali	48	5
Punjabi	19	1
Cambodian	18	0
Ukrainian	16	0
Laotian	14	0

The number of voters requesting a non-English language drops dramatically in the languages that KCE does not support, even when the number of LEP speakers is fairly the same (see Table B). That could be attributed to many not knowing that they can make that request. We expect that if the King County voters had an option of opting for additional languages other than English, they would welcome the opportunity.

## Findings based on community conversations

Our goal in the conversations with community service providers (see Appendix A for a list of respondents) was to get a sense of the trends they are observing and experiencing in their respective communities. This is not a comprehensive, qualitative study, as such a study would be outside the scope of work for the Elections outreach team. However, the insights from the community service providers enrich our understanding of the statistical data and provide a fuller picture of the barriers that our voters experience. We asked the community service providers we spoke with the following questions:

1. In your conversations with the community around King County, what languages do you notice being used? Anything new?
2. Is there any information in the data sets that you work with that would be relevant for us to consider?
3. What trends do you see in immigration/migration patterns?
4. What communities are currently not being served?
5. Who else should we talk to?

One of the main takeaways from our community conversations was the lack of an East African language, which includes Somali, Amharic, Eritrean, and Oromo. Of these, Somali was the most-cited language that needs translation and interpretation support. The other common sentiment from the service providers we spoke with was a hope that the 2020 census data could provide additional clarity for their work.

Conversations with the community also highlighted several other insights that have impacted our recommendations and inform the way we will look to implement the addition of new languages:

- The ACS census takers ask which household residents five years or older speak English less than 'very well,' and it is up to the individual responding to decide what 'very well' means. The idea of what would be considered 'very well' can be influenced by one's educational and economic status, as well as community and culture. It could mean the ability to succeed in a service sector job or to complete a college-level course.
- We have found that the level of English proficiency needed to feel comfortable enough to fully participate in the electoral process is higher than the level needed for casual, daily communication skills.
- We should consider literacy levels when considering the addition of a language. While at Elections we provide translated materials in writing, we have heard that many Somali speakers may not necessarily be fluent readers and writers in Somali. Thus, interpretation and disseminating information through video and audio may be more applicable. This is true for several populations who may not have received a 'traditional' education before settling in the US. However, since voting in KC is done through mail-in ballots, we need to incorporate interpretation with translation, which means additional staffing and support. Education and outreach to the community in preferred mediums is necessary to ensure they can navigate the voting process and make their voices heard.
- There are a number of other languages that are not receiving translation support—or very limited language support in King County, such as indigenous languages from Latin America and Indo-Pacific regions. Some of the community partners have identified an increase in requests for support in these languages across county services.

## Languages for further consideration

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Though we are not currently recommending Tagalog as full-service language, we do acknowledge that there is a significant population that would benefit from the addition of the language. While Tagalog ranks higher than Somali for the number LEP speakers, we heard from some community partners that the level of English language proficiency within the Tagalog-speaking community is higher than other LEP speakers they work with.

When considering the number of requests for interpretation within King County, Tagalog does not rank in the top six. This supports the argument that Tagalog speakers have a greater level of proficiency.

Likewise, the ACS data for Amharic and Japanese is very similar to Somali. However, when considering the King County language tiers, Somali ranks much higher than Amharic, and Japanese is not ranked in the top ten. With unlimited resources, we would enthusiastically provide service in each of the top ten languages.

**However, with limited resources and capacity, we believe Russian and Somali should be prioritized at this moment.**



## Cost

While adding a language to our services undeniably represents a sizeable cost, the value of providing every voter the opportunity to make their voice heard is immeasurable.

Based on our 2021 expenses, the addition of one language will cost \$230,770 annually. Below, Table D shows the proposed budget breakdown.

**Table D**  
**Cost to add one language include:**

Item	Cost	Comments
One Language Services FTE (salary + benefits)	\$90,000	This member of the KCE Language Services and Community Engagement team would be responsible for providing all services in the new language, including translating ballots, all voting and outreach materials, providing customer service in-language, coordinating with community partners, and working with community media.
Voter Services Assistance	\$90,000	In addition to the full-time staff on the Language Services and Community Engagement team, KCE also employs a back-up translator on the Voters Services team. In addition to providing regular customer service, this staff person fills-in when the primary translator is out, provides proofing support throughout the year, and joins the translation team during peak translation periods.
STTs (wages + benefits)	\$11,101	For elections with large voters' pamphlets (e.g. local year Primary and General Elections with more than 600 candidates statements) KCE brings on short-term temporary staff to assist with proofing and translation.
Overtime	\$9,653	During peak translation periods, KCE translators often work evenings and weekends to ensure everything gets done ahead of the statutory deadlines.
Other Labor (Duty Assignment, Pay Diff Premium)	\$12,066	KCE is a department that utilizes agile work and special duty assignments to ensure that all work is completed ahead of the statutory deadlines. This cost accounts for projected agile and special duty needs.
Technology Support	\$7,500	In addition to a regular IT set-up for each new employee, KCE's professional translators require a variety of technical programs including Trados and InDesign to perform their work.
Advertising	\$2,250	A critical piece of our voter education and outreach programs is paid advertising in community media and online, targeted at voters who speak our supported languages. This reflects the minimum recommended in paid advertising for each language.
Printing, Binding, & Postage	\$9,700	While English voters' pamphlets are mailed general delivery (meaning they are delivered to every household in the County), language voters are mailed their voters' pamphlet individually. This accounts for the increase in those mailings for the new language.
Other Non Labor	\$6,000	Translation services through third party vendors.
<b>Total</b>	<b>\$238,270</b>	



For KCE to add another two languages, the department will require an additional administrator or program manager to help manage the process of translation for six total languages. This new position will also be a direct contact with community, media, and organizations to inform voters about the services we provide in these languages and the opportunity to opt-in. We expect this position to cost around \$90,000 annually (based on the cost of Administrative Specialist III at \$88,794).

This puts the total cost of adding two languages at \$566,540.00 annually.

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Russian	\$238,270
Somali	\$238,270
Translation Lead	\$90,000
<b>Total</b>	<b>\$566,540</b>

## New Language Roll-out

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One of the most important lessons KCE has learned since initially providing Chinese ballot translation in 2002 is that simply translating materials is not enough. For a language access program to be successful it requires proactive and ongoing voter outreach and education to make voters aware of the options available to them.

Based on previous efforts and best practices, the roll-out of Somali and Russian languages would ideally include:

- **Targeted Mailing.** Based on recent census data and working in collaboration with our GIS team, KCE would send out targeted mailers to households and organizations in areas that have a concentration of Somali and Russian speakers to promote awareness that ballots are available in-language and encourage opt-ins to indicate language preference.
- **Digital Advertising.** Using our in-house digital and social media advertising expertise, KCE would similarly target click-through ads for delivery in areas with a concentration of Somali and Russian speakers, as well as specific demographic groups most likely to be interested in receiving their ballot in Russian or Somali, in order to drive opt-ins.
- **Promotion in Community Media.** Community media is often one of the most trusted sources for information for many King County residents. A community media campaign would include advertising in print media, video channels, radio, and social media posting. It is key to utilize a wide variety of outlets and sources because different communities use different media outlets.
- **Partnership with Community Organizations and Ambassadors.** KCE will work with current Voter Education Fund partners and other organizations serving the Russian and Somali speakers to ensure broad awareness of the new resources available.

## Conclusion

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Democracy is strongest when all can make their voices heard in our elections, regardless of the voter's level of English proficiency or ability to navigate often complex electoral and governmental systems.

Through a robust review and following extensive conversations with community partners and stakeholders, the need for translation and support in both Somali and Russian is clear.

While federal, state, and local law do not require these additions, they are critical to bringing KCE more fully in line with the language access services provided by the King County government and to fulfill our duty to our voters and constituents in ensuring that every eligible person has meaningful access to their right to vote.

**KCE strongly recommends the addition of Somali and Russian to our suite of full-service languages required in King County Code.**

## Appendix A: list of respondents

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King County Demographer

King County Office of Equity & Social Justice

King County Public Health

King County COVID Response

King County Immigrant and Refugee Commission

Refugee Women's Alliance

City of Seattle Office of Immigrant and Refugee Affairs

City of Seattle Department of Neighborhoods

Seattle Public Libraries, High Point Branch

Northwest Immigration Rights Project

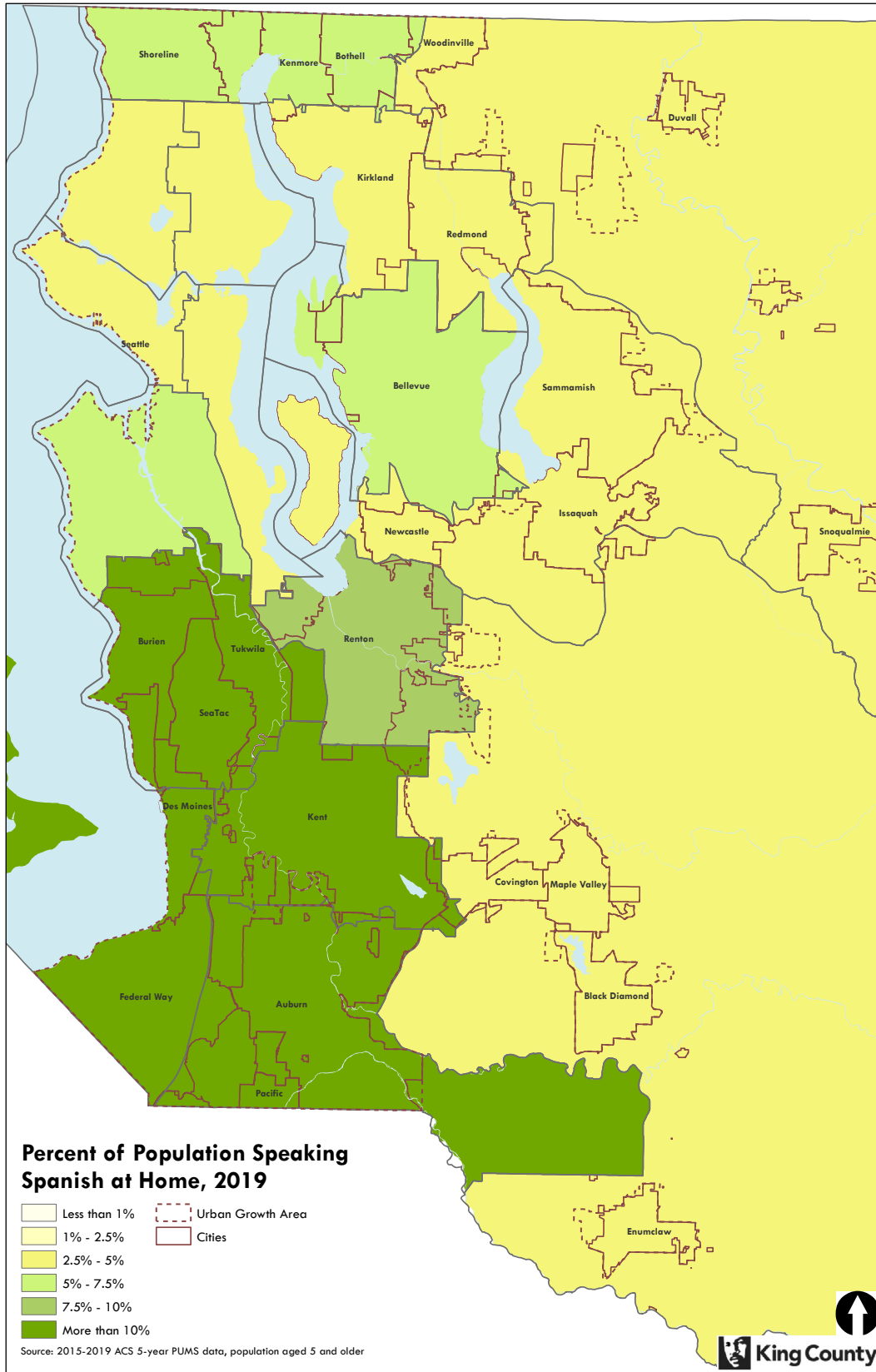
University of Washington Center for Demography and Ecology

International Community Health Services

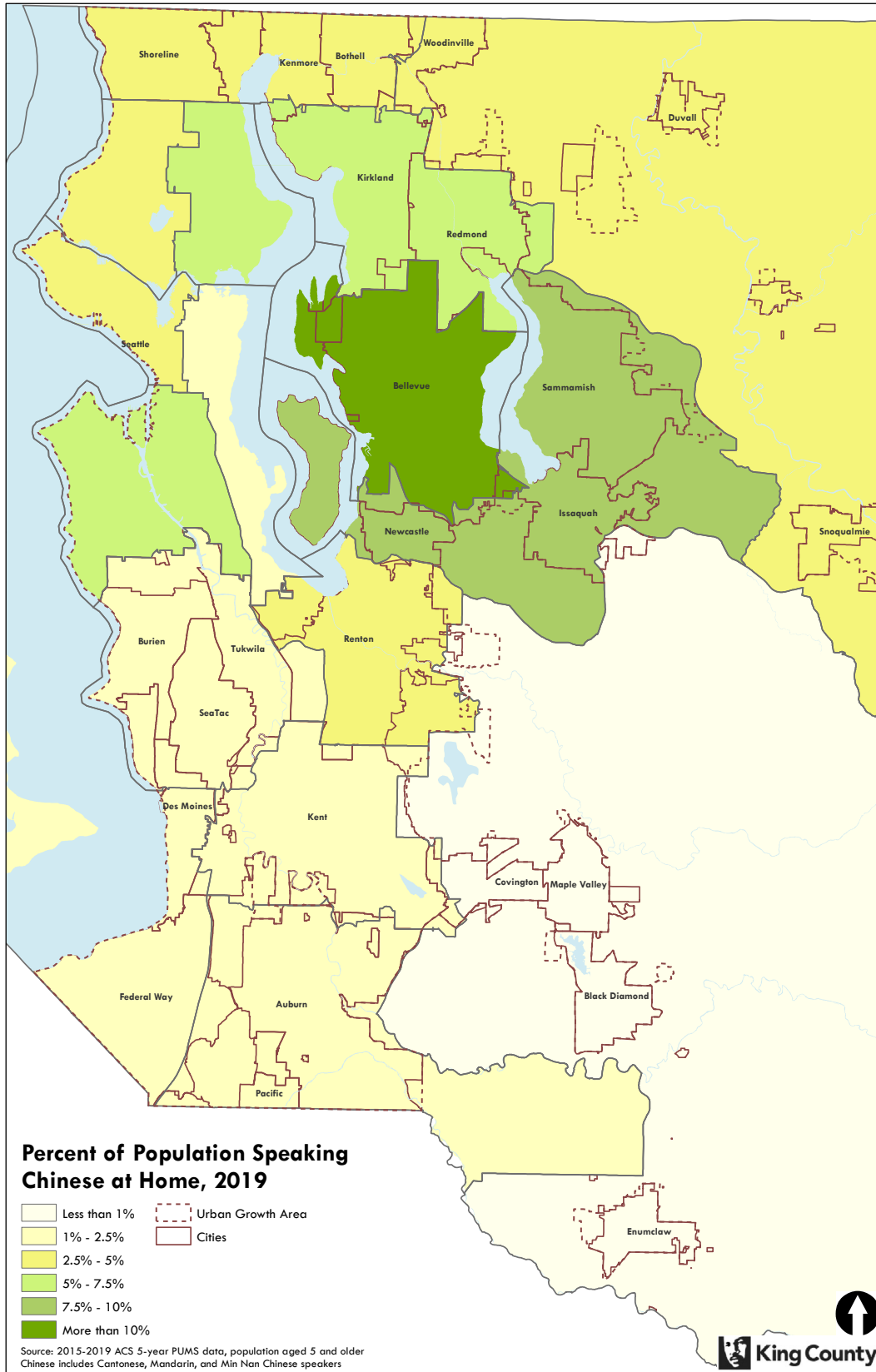
International Rescue Committee (no response received)

Port of Seattle (no response received)

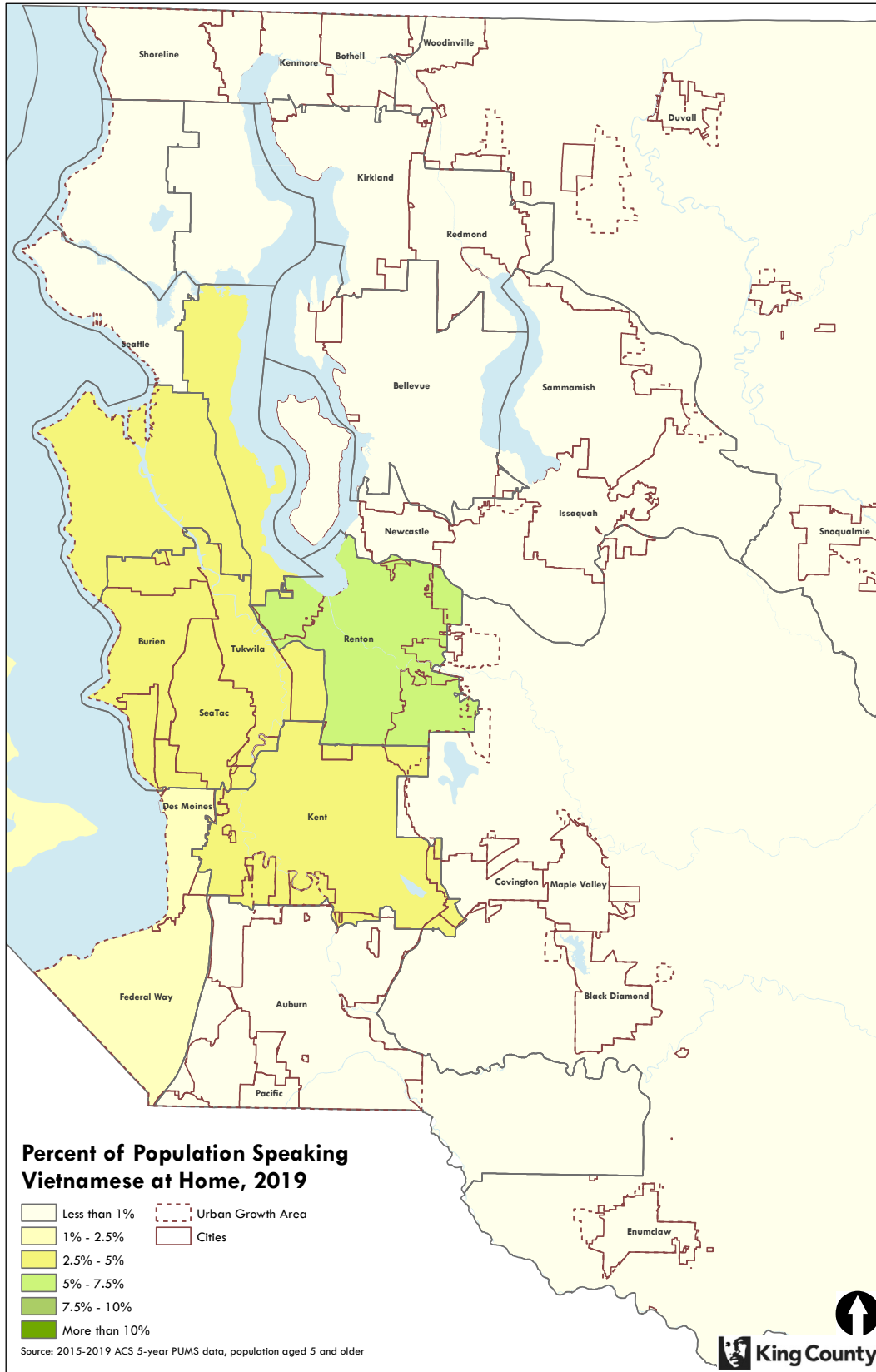
# Appendix B: Maps



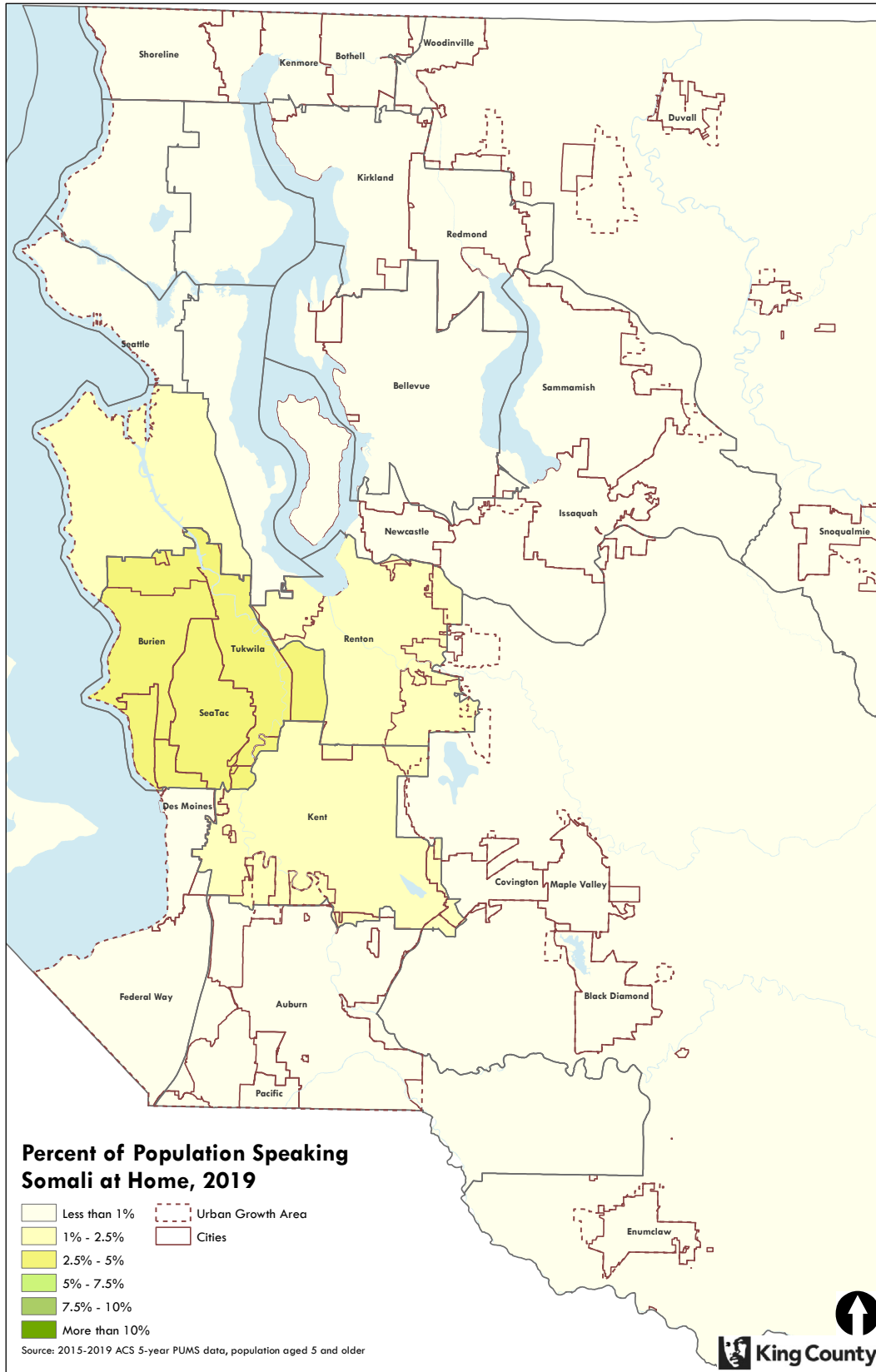
# Appendix B: Maps



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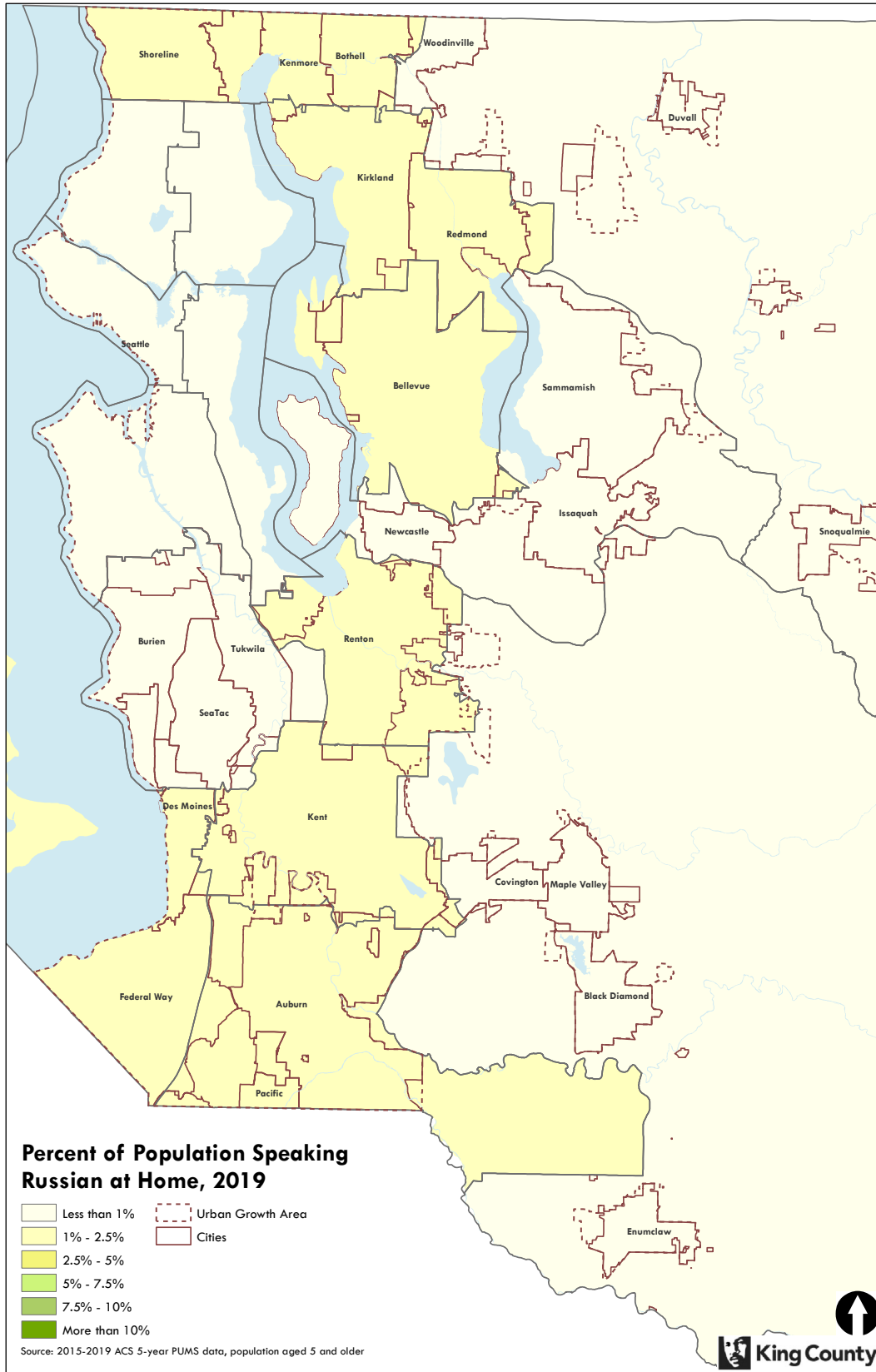


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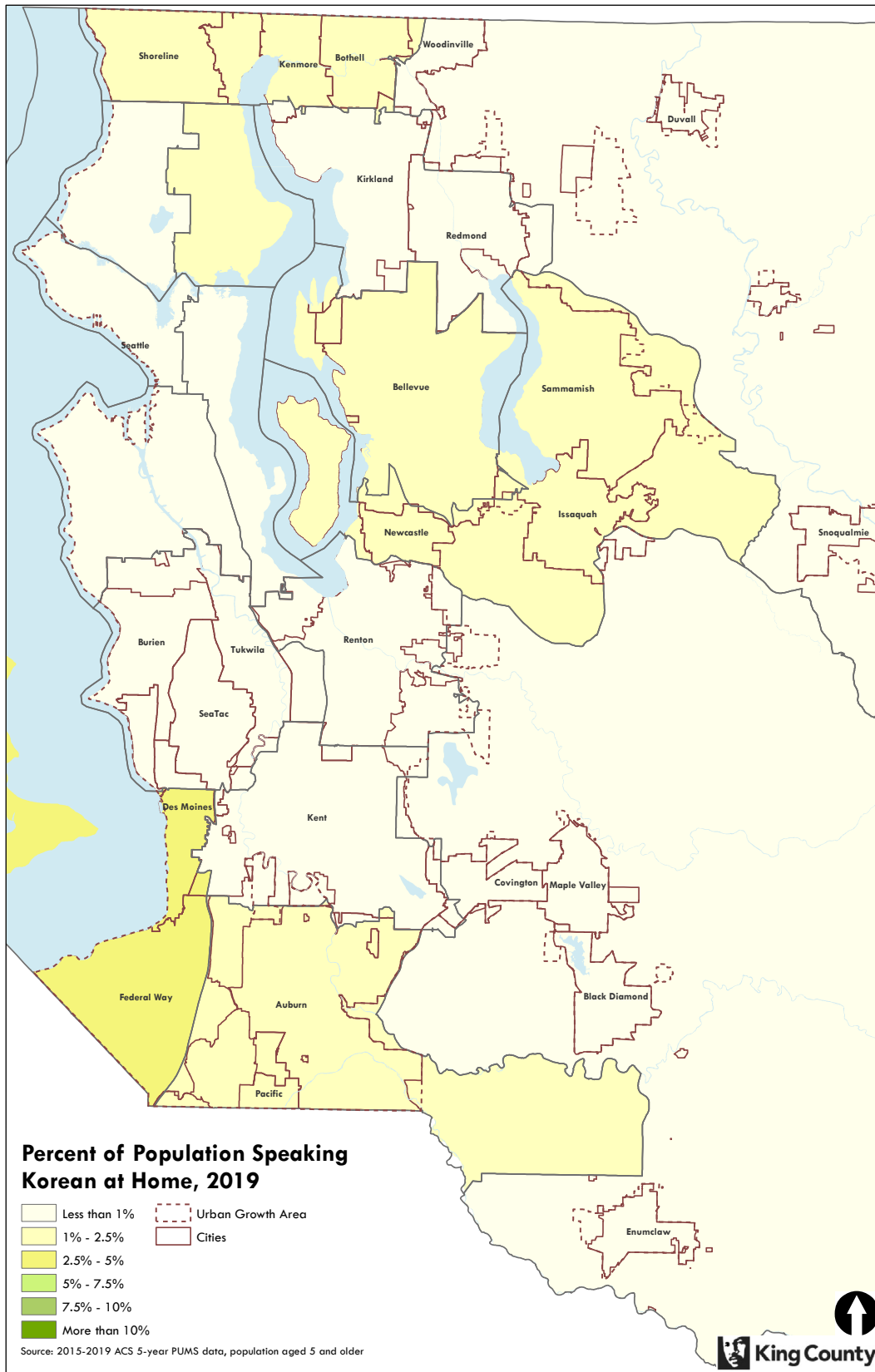




# Appendix B: Maps



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# Appendix C: Report on Translation Thresholds, King County Elections

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## Report on Translation Thresholds King County Elections



# Appendix C: Report on Translation Thresholds, King County Elections

## Introduction

One of King County Election's three core priorities is to "actively identify and work to remove barriers at both the individual and community level." In a County that is becoming increasingly diverse - one in five residents speaks a language other than English at home - supporting language access in voting is more important than ever. The recently released King County Equity and Social Justice Strategic Plan lays out an entire goal area focused on "Communication and Education," with a specific focus on language access that aligns with current populations, needs and demographic changes.

This report reviews data and information relevant to the translation of voting materials and makes a recommendation on whether or not additional languages should be added to the Department's service.

*Actively identify and work to remove barriers at both the individual and community level.*

## Regulatory environment

### Federal Voting Rights Act

Congress amended the Voting Rights Act in 1975 to include Section 203 which prescribes that certain jurisdictions must provide language assistance during elections for groups of citizens who are unable to speak or understand English adequately enough to participate in the electoral process. Section 203 only covers Spanish, Asian, Native American, and Alaskan Native languages.

In December 2016, King County Elections officially received notice of Section 203 Determinations from the U.S. Census. The determinations for Washington State have not changed and King County continues to be required to provide minority language materials in Chinese (including Taiwanese) and Vietnamese.

### King County Legislation

Seeking to set a more inclusive bar, in 2015 the King County Council passed Ordinance 18086, which required all election materials to also be translated into Spanish and Korean. The ordinance required active outreach and engagement with these communities and a report from the Director of Elections regarding the addition of languages going forward.

## Adding a language: services and cost

Below are the services King County Elections provides for translated languages:

- ▶ **Translated election materials:** voter registration form and materials, ballot and ballot packet materials, voters' pamphlet - both local and state, voter registration cards, all voter correspondence (for example, signature challenge and returned-too-late letters), educational materials, community outreach toolkits and materials.

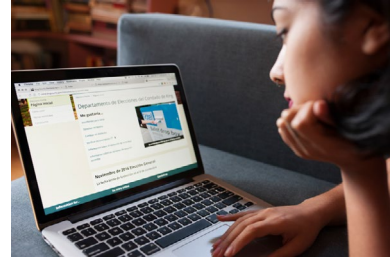


Chinese voting materials

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- ▶ **Translated audio ballots:** as well as audio voters' pamphlets if they are requested.
- ▶ **On-going bilingual customer support:** voter services and customer support in person; dedicated language phone line; bilingual staffing (including temporary staff) at Accessible Voting Centers, translated signs and ballot drop box materials.
- ▶ **Website with translated information:** each language has its own website with translated information.
- ▶ **Ethnic media and bilingual social media advertising:** this is both for upfront outreach to get the word out about a new language, as well as on-going reminders about key voting information and deadlines.
- ▶ **Technical assistance to other election departments and jurisdictions:** because King County is leading the state in many of these community outreach and translation efforts, our staff is often called upon to assist other jurisdictions and the Office of the Secretary of State (OSOS) with translation and community outreach.



*Voter using Elections website in Spanish*

Adding a language is not inexpensive. There are both initial start-up and on-going costs. Based on the experience of adding Spanish and Korean in 2016, King County Elections estimates that it costs around \$75,000 upfront and around \$125,000 in annual on-going costs to add a language.

Also important to consider is what resources the Office of the Secretary of State does or does not provide when adding languages. Currently, the OSOS only provides a state Voters' Pamphlet and web resources, like MyVote for online voter registration, for Section 203 mandated languages. That means that Korean-language speaking voters can't currently access MyVote, the State's online voter registration system, or any other online resources in their preferred language (Spanish is available because it is a mandated language for other Washington State counties). It also means that King County Elections produces – and will continue to produce – a State Voters' Pamphlet in Korean and partially in Spanish to ensure that voters have all of the information needed to vote. The same would be true for any additional languages the County chooses to add.

## Available data & information

Ordinance 18086 specifically requests the Director of Elections to determine, in consultation with community leaders of limited-English-proficient populations and the Office of Performance, Strategy and Budget, each single language that has 10,000 or more limited-English-proficient King County residents. The ordinance notes that this should be done by “referring to the best available data from the United States Census Bureau or other source the director considers relevant and reliable.” The following is a summary of data and sources consulted for this report.

### Census and American Community Survey Data

Section 203 determinations are made using [statistical models](#) based on the most recent decennial census and most recent American Community Survey (ACS) data. The exact methodology is not released, however ACS and PUMS (Public Use Microdata Sample) is readily available and has been analyzed at length by both the Office of Performance, Strategy and Budget and the Office of Equity and Social Justice.

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# Appendix C: Report on Translation Thresholds, King County Elections

The table below lays out the top 13 languages with populations who speak English “less than very well” based on a rolling average of ACS data. Based on the 10,000 individual threshold, King County Elections would translate all four currently provided languages (Spanish, Chinese, Vietnamese and Korean). According to this data, Tagalog and Russian are the next most appropriate languages with 8,500 and 7,000 respectively.

Census ACS PUMS, English “less than very well” 2010-2014		
Spanish 52,300	Russian 7,000	Mon-Khmer 4,400
Chinese 31,700	Cushite 6,300	Punjabi 4,200
Vietnamese 20,700	Amharic 6,000	Arabic 2,800
Korean 10,612	Ukrainian 5,300	
Tagalog 8,500	Japanese 4,700	

## King County Language Tiers

In 2010, King County Executive Dow Constantine issued an Executive Order on Translation that laid out a standard process for translation as well as created language tiers to guide county priorities for translation. The tiers are intended to capture not only demand, but also community need for language access services. Updated in 2016, the Tier 1 and Tier 2 languages are listed to the right in priority order.

King County Elections is already providing four of the top six languages in Tiers 1 and 2. This suggests that if the County wanted to add additional translated election material requirements, Somali and Russian might be good options to consider.

What’s more, the tiers are also helpful in determining which languages “evergreen” materials (publications that rarely change) should be translated. Election’s “Guide to Voting in King County” has been translated into all 22 Tier 1, 2 and 3 languages and there is likely additional opportunity to translate other educational materials.

Tier 1	Rank*
Spanish	1
Tier 2	
Vietnamese	2.8
Somali	4.0
Russian	4.6
Chinese	6.0
Korean	8.0
Amharic	8.0
Arabic	8.8
Ukrainian	10

*\*Rank is compiled based on multiple data sources including ACS PUMS data, data from the Office of the Superintendent of Public Instruction, District Court Case data, WIC program participation and Public Health clinic data.*

## Feedback from Community Partners

In 2016, King County Elections partnered with the Seattle Foundation to fund 22 organizations to do community outreach and education. These organizations focused on getting the word out about Chinese, Spanish, Korean and Vietnamese translation, as well as making connections and removing barriers in other limited-English speaking communities for whom we don’t provide translation.



*Kick-off event for Community-Based Organization Partnerships Program*

One of the most important components of the pilot project was regularly soliciting feedback from community partners on what’s working, what’s not and other barriers that need to be

## Appendix C: Report on Translation Thresholds, King County Elections

addressed. In the culminating debrief the Department held in December, representatives from the community-based organizations shared that access to translated materials is not necessarily the biggest barrier to participation. Many communities would rather see resources and effort spent on basic education – including how voting works in King County, who is eligible, how you become a citizen and register, etc.

### Other Sources

King County Elections also reached out to several governmental partners for help in assessing the current need for language translation. In collaboration with the Office of Performance, Strategy and Budget, the Department of Public Health assisted with analysis aimed at more accurately estimating the number of limited-English speaking residents who are eligible to vote, or soon will be (citizens over the age of 16). That analysis estimated the following populations:

- ▶ 16,691 Chinese-speaking LES voting eligible King County residents;
- ▶ 13,957 Vietnamese-speaking LES voting eligible King County residents;
- ▶ 10,504 Spanish-speaking LES voting eligible King County residents; and,
- ▶ 6,475 Korean-speaking LES voting eligible King County residents

The next most prominent language community based on that analysis is Tagalog with 4,890.

King County Elections also reached out to the King County Office of Equity and Social Justice and the Office of Immigrant and Refugee Affairs (OIRA) with the City of Seattle. Both of those offices underscored that language access is much more than just translation and that education, outreach and connection are just as important. Based on anecdotal evidence, OIRA also confirmed that of the many language translations they provide, Spanish, Korean, Chinese and Vietnamese are by far the most used and requested.

Finally, data on who is coming to Washington State may also be of interest. Since 2003 Washington has welcomed nearly 33,000 refugees, which is 8th most in the country and represents 4.3% of the total number of refugees entering the United States. Between 2000 and 2010, King County gained more than 200,000 new residents, half of which are foreign-born, according to data from King County's Immigrant and Refugee Task Force. OIRA estimates that 74,982 foreign-born individuals in King County are eligible to become naturalized citizens. Longer established refugee populations, who are primarily from Asia and Spanish-speaking countries, are more likely to be eligible to become citizens, as it's a five year process. New refugees to the County primarily speak Arabic, Farsi and African languages. Thus, it is important to keep in mind that language needs will evolve overtime as immigrant populations become eligible for citizenship.

### What other jurisdictions are doing

Nearly 250 jurisdictions across the country have voter language requirements other than English. The vast majority of them only provide what is required by Section 203, the notable exception being Los Angeles County which provides election services in English, Spanish, Chinese, Hindi, Japanese, Khmer, Korean, Tagalog, Thai, and Vietnamese.



## Conclusions & next steps

### 10,000 person threshold and additional languages

After reviewing available data, King County Elections does not see a compelling reason to deviate from the 10,000 limited-English speaking threshold for adding new languages and would not recommend adding any new languages at this time. The four currently translated languages are consistent with a variety of both qualitative and quantitative data sources. Adding a language is a significant commitment because of the upfront and on-going investment required and the clear need to continue service once it's started.

The Department would also recommend monitoring Somali and Russian as potential next languages, consistent with the County's translation tiers and policy.

### Focus on alternative methods for access

Consistent with conversations with community and government partners, King County Elections will also focus on alternative methods to create language access. This means continuing to focus on voter education through the community-based organization and ambassador partnership programs; it means translating "evergreen" materials into more languages, especially with respect to educational tools and resources; and, it means partnering with organizations like the Office of Immigrant and Refugee Affairs, the Offices of the Secretary of State and school districts to reach limited-English speaking voters. Finally, the Department is also committed to exploring options to make voting more accessible in English, which is often a barrier even before you get to translation.



**KING COUNTY**

1200 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104

**Signature Report**

**July 21, 2015**

**Ordinance 18086**

**Proposed No. 2015-0214.2**

**Sponsors Dembowski**

1 AN ORDINANCE related to elections; promoting access to  
2 elections for historically underrepresented citizens; and  
3 adding new sections to K.C.C. chapter 2.16.

4 **STATEMENT OF FACTS:**

- 5 1. More than one hundred seventy different languages are spoken in King  
6 County and a quarter of the county's population speaks a language other  
7 than English in the home.
- 8 2. Washington is among the states with the highest growth rates of limited  
9 English proficient populations; much of that growth is concentrated in and  
10 around King County. More than half of the county's recent population  
11 growth is from immigration.
- 12 3. The King County Strategic Plan 2010-2014 includes the objective to  
13 empower people to play an active role in shaping their future, via the  
14 strategy of providing accurate, secure and accessible elections.
- 15 4. Research suggests that civic engagement is a significant predictor of  
16 economic opportunity across states.
- 17 5. The United States Congress found in Section 203 of the Voting Rights  
18 Act of 1965, P.L. 94-73, 42 U.S.C. 1973aa-1a, that, "through the use of  
19 various practices and procedures, citizens of language minorities have

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20           been effectively excluded from participation in the electoral process." The  
21           law requires covered states or political subdivisions to make all elections  
22           information available in English also available in the language of the  
23           applicable minority group, and specifies these language minority groups as  
24           persons of American Indian, Asian American, Alaskan Native or Spanish  
25           heritage. Jurisdictions are covered under Section 203 of the Voting Rights  
26           Act of 1965 based on numbers or percentage of voting age citizens in the  
27           language group and rates of English literacy for the language group that  
28           are lower than the national average, as measured by the United States  
29           Census Bureau.

30           6. Research shows that targeted minority language voting materials and  
31           related outreach can improve voter turnout. According to a report by the  
32           Asian American Legal Defense and Education Fund, after coverage  
33           provided under Section 203 of the Voting Rights Act of 1965 was  
34           expanded in 1992, the number of Asian Americans registered to vote  
35           increased dramatically. As cited in the journal Legislation and Public  
36           Policy vol. 10:195 2006, "in covered areas where the Department of  
37           Justice brought section 203 enforcement actions, participation not only in  
38           voting but in running for political office increased dramatically."

39           7. All citizens with limited English proficiency, like all other citizens,  
40           should be encouraged to vote. They include, but are not limited to, those  
41           language minority groups specified in the Section 203 of the Voting

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42 Rights Act of 1965, as King County's population includes significant  
43 language groups with recent growth that are not represented in that act.

44 8. Therefore, appropriate efforts should be made to minimize obstacles  
45 and improve pathways to voting by citizens whose limited English  
46 proficiency results in practical barriers to full participation in our  
47 democracy.

48 9. Some state and local jurisdictions around the United States have taken  
49 steps to expand translation of voting materials and voter assistance beyond  
50 the requirements of Section 203 of the Voting Rights Act of 1965. For  
51 example: Maine law allows voters to request ballot instructions in French;  
52 California law requires language accommodations for limited English  
53 proficient citizens of voting age at a lower percentage threshold than  
54 federal law; and Massachusetts law provides that bilingual ballots in  
55 Chinese and Vietnamese must be provided for elections in Boston,  
56 although those languages are not required for Boston under the Voting  
57 Rights Act of 1965.

58 10. King County has historically worked to address barriers to inclusion  
59 through legislative and executive strategies, including Ordinance 16948,  
60 which is the King County equity and social justice ordinance, which in  
61 2010 created a framework to implement the fair and just principle of the  
62 countywide Strategic Plan. Also in 2010, to address the specific barriers  
63 of limited English proficient populations, Executive Order INF 14-2  
64 (AEO) set directives for translation of county written materials. The order

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65 identified the most common language needs in King County based on  
66 average rank across five different sources, including records of  
67 interpretation requests from King County departments and students with  
68 limited English proficiency in schools within King County, as well as  
69 United States Census Bureau data.

70 11. As of 2015, section 203 of the Voting Rights Act of 1965 requires  
71 King County to provide elections materials in only two of the nine  
72 highest-need languages identified in in the 2010 executive order.

73 12. Spanish and Korean are the languages spoken at home by the largest  
74 number of limited-English-proficient King County residents over five  
75 years old not covered by section 203 of the Voting Rights Act of 1965,  
76 according to the five-year averages, 2009-2013, of the American  
77 Community Survey of the United States Census Bureau.

78 13. The National Voter Registration Act of 1993, P.L. 103-31, requires  
79 state public assistance agencies to offer voter registration with every initial  
80 and renewal application for public benefits, every recertification, and  
81 every address change. Careful implementation of that provision has been  
82 shown to increase voter registration among typically underrepresented  
83 populations. King County has some offices that are open to the public,  
84 such as King County public health clinics, that could also increase voter  
85 registration for typically underrepresented populations by providing voter  
86 registration materials in English and other languages.

87 BE IT ORDAINED BY THE COUNCIL OF KING COUNTY:



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88           SECTION 1. Section 2 of this ordinance applies to voting materials for the  
89 general election of 2016 and every election thereafter.

90           NEW SECTION. SECTION 2. There is hereby added to K.C.C. chapter 2.16 a  
91 new section to read as follows:

92           A.1. For all elections administered by the department of elections, the director of  
93 elections shall prepare voting materials, to the extent not already provided by the office  
94 of the Washington state Secretary of State, in languages determined through the process  
95 described in subsection B. of this section, in addition to those languages required by  
96 Section 203 of the Voting Rights Act of 1965, P.L. 94-73, 42 U.S.C. 1973aa-1a. The  
97 director of elections shall make the voting materials available to any resident of King  
98 County upon request of that person, and in addition shall make the voter registration  
99 materials required by this section broadly available, including to King County offices  
100 required to make them available under section 3 of this ordinance. The director of  
101 elections shall record the numbers of ballot and voter pamphlet requests in each language  
102 other than English, and include this information in the report required in subsection C. of  
103 this section.

104           2. For the purposes of this section, "voting materials" include, but are not  
105 limited to:

106           a. voter registration notices, voter registration forms and voter registration  
107 instructions, to the extent not already provided by the office of the Washington state  
108 Secretary of State;

109           b. ballots and ballot instructions; and

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110 c. local voters' pamphlets, in conformity with K.C.C. chapter 1.10 and chapter  
111 29A.32 RCW.

112 B. In 2016 and at least every five years thereafter, the director of elections shall  
113 review data on limited-English-proficient populations in King County and shall  
114 determine, in consultation with community leaders of limited-English-proficient  
115 populations and the office of performance, strategy and budget, each single language that  
116 has ten thousand or more limited-English-proficient King County residents. The director  
117 of elections shall make this determination by referring to the best available data from the  
118 United States Census Bureau or other source the director considers relevant and reliable.  
119 The director of elections shall file a report of this determination, including a list of all  
120 languages that meet the threshold of ten thousand or more limited-English-proficient  
121 residents, and the supporting analysis by January 30, 2017, and at least every five years  
122 after the first report is filed. The director of elections shall file the report in the form of a  
123 paper original and an electronic copy with the clerk of the council, who shall retain the  
124 original and provide an electronic copy to all councilmembers, the council chief of staff,  
125 the policy director and the director of elections.

126 C.1. Beginning for the first general election after the director files a report  
127 required by subsection B. of this section, the director shall provide translated voting  
128 materials, in addition to the languages required under section 203 of the Voting Rights  
129 Act of 1965, P.L. 94-73, 42 U.S.C. 1973aa-1a, in all languages determined by the director  
130 under subsection B. of this section, unless within forty-five days of the filing of the  
131 determination report, an ordinance is enacted that adopts a different list. If a different list



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132 is enacted by ordinance, the director shall provide materials in all languages included in  
133 that list.

134           2. Until forty-five days have elapsed from the filing of the first report required  
135 by subsection B. of this section, the director of elections shall prepare and make available  
136 to the public at the same time as voting materials in English at least Spanish and Korean  
137 language voting materials.

138           D. The director of elections shall also ensure the provision of targeted outreach to  
139 all language communities identified under subsections B. and C. of this section to  
140 promote awareness of and requests for translated voting materials. The outreach may  
141 include, but not be limited to, engagement of community leaders from and outreach to  
142 community organizations serving limited-English-proficient populations, minority  
143 language media purchases, such as advertising, attendance and materials distribution at  
144 large limited-English-proficient community events, and recruitment of bilingual election  
145 workers. The director of elections shall maintain and make available to the public at least  
146 one hundred twenty days before each primary and general election a list of the languages  
147 other than English in which the department will provide translated material and  
148 assistance, and the specific form of that assistance.

149           E. The cost of providing the materials and services described in subsections A.,  
150 C. and D. of this section shall be considered a cost of elections, of which a pro rata share  
151 shall be recovered from constituent jurisdictions and the state.

152           NEW SECTION. SECTION 3. There is hereby added to K.C.C. chapter 2.16 a  
153 new section to read as follows:

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154           A. All King County offices open to the public shall, to all customers or applicants  
155 for services:

156           1. Offer voter registration notices, voter registration forms, and voter  
157 registration instructions, in all languages made available by the office of the Washington  
158 secretary of state and by the department of elections under section 2 of this ordinance,  
159 and

160           2. Provide the same degree of assistance to all customers and applicants without  
161 regard to the customer or applicant's choice of whether or not the customer or applicant  
162 accepts or declines voter registration materials.

163           B. The executive, in consultation with the director of elections, as soon as  
164 possible and in no event later than for the general election of 2016 and for every election  
165 thereafter, shall determine the specific county offices required to offer the materials  
166 described in subsection A. of this section and shall establish procedures to provide the  
167 materials required under subsection A. of this section in appropriate languages, as made  
168 available by the office of the Washington state Secretary of State and by the department  
169 of elections under section 2 of this ordinance, to individuals that they serve.

170           SECTION 4. This ordinance shall not be construed as creating any duty on the  
171 part of King County to any particular person or class of persons and the performance or  
172 non-performance of the duties specified herein shall not affect the validity of any  
173 election.

174           SECTION 5. Severability. If any provision of this ordinance or its  
175 application to any person or circumstance is held invalid, the remainder of the

# Appendix D: Ordinance 18086

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176 ordinance or the application of the provision to other persons or circumstances is  
177 not affected.  
178

Ordinance 18086 was introduced on 6/1/2015 and passed by the Metropolitan King County Council on 7/20/2015, by the following vote:

Yes: 9 - Mr. Phillips, Mr. von Reichbauer, Mr. Gossett, Ms. Hague,  
Ms. Lambert, Mr. Dunn, Mr. McDermott, Mr. Dembowski and Mr.  
Upthegrove  
No: 0  
Excused: 0

KING COUNTY COUNCIL  
KING COUNTY, WASHINGTON

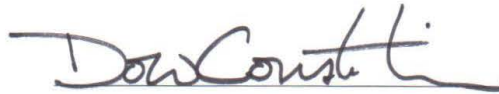
  
Larry Phillips, Chair

ATTEST:



Anne Noris, Clerk of the Council

APPROVED this 30 day of JULY, 2015.



Dow Constantine, County Executive

Attachments: None

RECEIVED  
2015 JUL 30 PM 3:50  
KING COUNTY CLERK  
KING COUNTY COUNCIL