

Language Access Plan

This Language Access Planning document is required by Ordinance 18665 for each department/agency division.

From Ordinance 18665: King County agencies and offices shall develop language assistance plans that identify which of its vital documents and public communication materials need to be translated into languages for use by limited-English-proficient persons. The plans should also include identification of agency or office plans for providing translation of webpages, automated telephonic greetings, automated telephonic voice messages and informational signage. The threshold for the translation of vital documents and public communication materials shall be based on the top six languages identified by the tier map of limited-English-proficient persons maintained by the office of equity and social justice and the county demographer. The executive shall submit the language assistance plans required in section 6 of this ordinance and a motion that accepts the plans to the county council by September 30, 2018.

Background Definitions:

"Public Communication Materials" are materials that are intended for broad distribution to inform or educate people served by King County. For the purpose of translation, Public Communication Materials refers only to printed media such as:

- Brochures
- Posters
- Booklets
- Pamphlets
- Billboards
- Advertisements in printed publications.

"Vital documents" are materials that provide essential information for accessing basic county services and benefits and for which serious consequences would result if the information were not provided. Departments will define their vital documents. Examples of vital documents include:

- Emergency messages and alerts
- Application forms
- Consent forms
- Complaint forms
- Notices of eligibility criteria, rights, denial, loss, or decreases in benefits or services
- Notices of availability of free language assistance
- Summary explanations of department's direct services

Translation: The conversion of **written** communication from one language to another in a written format. The materials translated include: Multilingual Signage (e.g. language signs at reception areas), Vital Documents, web pages, written outreach materials, and educational and informational materials.

Interpretation: The **oral** conversion of communication of a spoken message from one language to another. Interpretation needs include: Community Meetings/Sessions, One-One Constituent Meetings/Appointments, Language Line, Vonage or other live-interpreter service,

In-Language Community Outreach include Ethnic Media Ad Buys, Contracting with Community Based Organizations (CBOS) to do in-language outreach, and community education and information.

Section 1: Context and Current State

1. Division/agency mission and purpose:

The Legislative Branch includes the County Council, the Clerk of the Council, the County Auditor, the Office of Citizen Complaints, the Board of Tax Appeals and Equalization, King County Television, the Office of the Hearing Examiner, and the Office of Law Enforcement Oversight.¹

- **King County Council**: sets policies, enacts laws, and adopts budgets that guide an array of services, including:
 - The criminal justice system of prosecutors and public defenders, District and Superior Courts, juvenile detention, and adult jails;
 - The King County Sheriff's Office, which directly serves residents of unincorporated areas and contracts with many cities to provide police protection;
 - Public health and human services;
 - Metro Transit bus service, Water Taxi, King County International Airport (Boeing Field), and county roads;
 - Wastewater treatment and solid waste management;
 - Regional parks, open space, and trails; and
 - Elections, records, and licensing.Each of the nine members of the King County Council represents a geographical district of about 239,000 residents.
- **Clerk of the Council**: the official repository for all Council proceedings and legislation. They are responsible for the uniform and efficient flow of legislation, the thorough and accurate processing of records, and control over their location, identification and retrieval. King County Council Clerk's office mission is to ensure adherence to legislative and legal processes and create and maintain accurate and required records to facilitate more effective government and provide consistent quality responsiveness to citizens.
- **King County Auditor's Office**: an independent agency within the legislative branch of King County. In 1969, the County Auditor was established as an appointed position under Section 250 of the County Charter. The County Auditor is appointed to a four-year term by the Metropolitan King County Council. Their mission is to promote improved performance, accountability, and transparency in King County government through objective and independent audits and studies.
- **Office of Citizen Complaints**: (See Office of the Ombuds below.)
- **King County Tax Advisor Office**: (See Office of the Ombuds below.)
- **King County Television**: produces original programming on county issues and services and provides transparency into the proceedings of the Metropolitan King County Council and the regional committees that advise the Council, as well as the regional boards on which members sit such as Sound Transit and the King County Board of Health. King County TV is a government access channel granted to the County under franchise agreements regulated under federal law. It is an agency within the legislative branch of county government. It is overseen by the County Council, with guidance provided by the Citizens Advisory Committee and the King County TV Working Group.
- **King County Hearing Examiner**: committed public servants holding fair hearings. The King County Hearing Examiner's Office works to inspire public confidence in King County government through accessible process, impartial consideration, and reasoned decisions.

¹ <https://www.kingcounty.gov/council/clerk/pdr.aspx>

- **Office of the Ombuds:** authorized, by King County Code (KCC) 2.52, to investigate complaints regarding administrative conduct by King County agencies, and to publish recommendations for change based on the results of investigations. In addition, the Ombuds office investigates possible violations of the King County Employee Code of Ethics (KCC 3.04), and reports of improper governmental action and retaliation under the Whistleblower Protection Code (KCC 3.42). The mission is to promote public confidence in King County government by responding to citizen complaints in an impartial, efficient and timely manner, and to contribute to the improved operation of County government by making recommendations based upon the results of complaint investigations.
- **Office of Law Enforcement Oversight:** The Office of Law Enforcement Oversight (OLEO) represents the interests of the public in its efforts to hold the King County Sheriff's Office accountable for providing fair and just police services. Through its independent review, OLEO seeks to instill confidence and public trust in the integrity of Sheriff's Office operations and in the effectiveness and professionalism of its employees. OLEO conducts outreach to the communities the Sheriff's Office serves and provides oversight and recommendations through reviews and investigations of misconduct complaints and systemic issues. OLEO issues public reports and makes recommendations on policies and practices to the Sheriff's Office.

2. Geographic reach of primary services/facilities/programs:

All of King County.

3. Demographics of current user population:

See Attachment 1.²

4. Demographics of intended or priority populations:

In 2018 there were an estimated 2.2 million people in King County. In 2010 47% of children in the county were kids-of-color. In South King County, 55% of the population under age 18 are kids of color. More than a quarter of King County residents speak a language other than English at home and about half of those report that they do not speak English well, or at all. King County residents speak 170+ different languages, with top languages being Spanish, Chinese, Vietnamese, Somali, Amharic, Tagalog, and Korean.

5. People who are not fluent speakers or writers of English are considered Limited English Speaking (LES). Do you assess LES data in your division? Yes No

² Please note that these numbers are a general reflection of the demographics in King County and may include some errors. While the specific numbers may not be accurate, the general ranking is correct. Note that this shows "Limited English Proficiency" (so someone who speaks both Spanish and proficient English is not counted). For the purposes of this attachment, Chinese, Cantonese, and Mandarin are grouped together into one "Chinese" category, which in several cases results in a higher ranking for Chinese. Finally, this shows *magnitude* by district, but the raw numbers should not be quoted literally because: (1) detailed language data is no longer collected in units small enough to match to Council districts; (2) this uses Public Use Microdata Areas (PUMA), which overlap districts; (3) in areas where the majority of the PUMA was within a district, it was assigned 1-to-1 to that district; (4) in densely populated areas where the PUMA was split across two districts, the whole PUMA was assigned to BOTH districts (e.g.: counted in both D5 and D8). This was recommended by the County demographer who expressed concern that that trying to split the PUMAs, without knowing where pockets of languages might exist within the PUMA, might lead to undercounting for some districts.

6. What tools (census maps, school data, subcontractor data, community meeting data, etc.) are you using to gather information about the LES communities that your Division/agency serves?

For the purposes of this plan, we used Public Use Microdata Areas (PUMA).

7. Existing language access policies, service levels, tracking methods:

No existing policies or tracking methods. When interpretation or translation is requested, the legislative branch does its best to be responsive.

8. Current state of translated materials and interpretation service levels. Please note: Current Executive order mandates King County to translate all documents into Spanish and recommends translation into: Vietnamese, Somali, Russian, Chinese, Korean, Amharic, Arabic, and Ukrainian. The below chart allows for each department to report and plan for the populations served.

Currently interpretation and translation is ad hoc and not standardized. The goal for 2019 is to pilot our language access work through several high profile issues for communities that do not speak English or are limited English proficient. Through these pilots we intend to track best practices for the constituents we serve and begin developing policies that would be responsive to their needs, as well as understanding in real time what documents should be accessible and in which languages. Given the different needs of districts and individual agencies, and the anticipated response from communities who do not generally fall into the top tiers of languages spoken in the County, the hope is that this process of working with the constituent will allow us to be more flexible and responsive.

In addition, the Legislative Branch Equity and Social Justice (ESJ) team has created a Language Access subcommittee, with the intent of meeting regularly to execute and explore the following ideas (including but not limited to):

- a) Work with the communications team to identify a list of public-facing documents that should be translated according to the policy proposed for 2019-2020:
 - *In the first two years of its language access work, the Legislative branch will identify public-facing documents that are county-wide in scope and translate to Chinese (simplified and traditional), Vietnamese and Spanish. With additional assessment, each district office or independent agency has the right to add languages for translation of documents specific to their needs. Further, each district office and independent agency may also decide on an additional separate, individual language access strategy as needed.*
- b) Examine possible technology alternatives for community members who attend meetings in Chambers and need interpretation. This may include using interpretation headsets.
- c) Explore additional open contracts with language line and other large party vendors for staff to have access to quality interpretation and translation in a timely manner. Also explore contracting with local community based organizations for third party review and contextual review of translations. In addition, create a list of trusted language vendors for staff use.
- d) Within pre-identified issue areas, work to identify interpretation and translation strategies with the ESJ and Communications teams. Track top languages requested and develop ethnic media strategies for the Council. Work with agencies within the legislative branch to ensure consistency and coordination. i.e. If the issue is expected to also come before the Hearing

Examiner's office, make sure that the documents available use the same common terms and qualified court experienced translators.

- e) Create a shared database for feedback from staff and constituents about quality of interpretation/translation when using a vendor.
- f) Explore possibilities for telephonic greetings.
- g) Work with KCTV to craft emergency messages in advance for the station in case of emergency.

Vital Documents/Public Communication Materials Inventory

Please see the response to question 8. This is in the work plan for 2019.

DRAFT

Section 2: Analysis/prioritization of future needs

1. Have you identified Key gaps existing language access policies, service levels, tracking methods?

The Legislative Branch ESJ Team's Language Access subcommittee intends to pilot several issue areas in 2019 to identify these gaps and propose solutions to them by the beginning of 2020.

2. Have you identified amount / type of vital documents and public communication material translation materials that need to be completed and do you have a backlog of these? Please create an inventory of these needs for 2019

The Legislative Branch ESJ Team's Language Access subcommittee intends to develop this list with the legislative branch communications team and vet with the Legislative Branch ESJ team.

3. What communities have you not been able to serve effectively because of insufficient translation and interpretation resources?

Councilmember staff have indicated that it is challenging to meet the needs of constituents who do not fall into the top tiers, or who come from very small populations.

4. Do you have a plan and existing funds to work towards some of your translation and interpretation goals for the remainder of 2018 and through 2019? Yes No Please describe these:

Please see the response to question 8, Section 1.

Section 3: Work plan

The legislative branch intends to complete Section 3 as part of its 2019 work plan, in anticipation of implementation in 2020.

Section 4: Ensuring Quality & Continuous Improvement

The purpose of this section is to measure and ensure high quality language access services.

It is encouraged that all translations go through a third-party quality assurance review. If you have your translation completed by a translation vendor, this is an additional layer of review since vendors already provide a reviewer for all translations. There are three ways you can choose to have this third-party quality assurance review completed.

- a) Translation Vendor. You may choose another vendor from your department's approved list of translation vendors to complete the quality assurance review.*
- b) Certified Translator. You may have your material(s) reviewed by internal staff who are certified in the target language.*
- c) Target Audience. Another option is to have your material reviewed by someone from your target audience. If you have relationships established with local community-based organizations that serve your target population, you can ask them to review your translated materials for cultural relevancy and quality assurance.*

Service	Do you have a system to measure quality of services? Please answer Yes or No for each service listed.	
Translation	<input type="checkbox"/> Yes <i>Please describe how you measure quality:</i>	<input checked="" type="checkbox"/> No <i>Do you need technical assistance?</i>
Interpretation	<input type="checkbox"/> Yes <i>Please describe how you measure quality:</i>	<input checked="" type="checkbox"/> No <i>Do you need technical assistance?</i>
In-Language Outreach	<input type="checkbox"/> Yes <i>Please describe how you measure quality:</i>	<input checked="" type="checkbox"/> No <i>Do you need technical assistance?</i>

1. Please describe how priority populations / populations of concern will be consulted on the effectiveness of language access effort:

Once the issue areas have been identified, we can work with several key stakeholders and request spot reviews of our process and/or work. Our Language Access subcommittee recommends compensating them for their time, and working with Council staff to identify the appropriate individuals/communities. We can also create a small advisory group for the ESJ team – possibly with a mix of staff and community members, and send out periodic updates via email about our process and request feedback. The second approach would be more respectful to their time and not expect a lot of work from communities who have engagement fatigue. Either approach would be implemented with input from the community members who will be participating.

2. Measures of success that will inform the degree that language access innovations are helping advance toward agency and program objectives:

Below are some suggested indicators of success for this proposed process:

1. A list of at least 5-10 public facing documents that have been translated into multiple languages.
2. A public portal for feedback and/or complaints on our language access work.
3. A language access policy for the department including:
 - a. A clear process for how to access an interpreter in 5 minutes, 5 hours, 5 days
 - b. A clear process for translation and third party review
4. A work plan for 2020 that provides next steps to standardize language access and a process for continued translation of vital documents.
5. Identified language access liaisons for the legislative branch.

<i>Complaints</i>	<i>Do you have a system to handle language-access related complaints? Please answer Yes or No for each type of complaint.</i>		
We provide information to LES individuals advising them of the right to file a complaint if they did not get the information or service they sought due to language barriers.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Other
We display information on how to file a complaint.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Other

Please describe how your division handles complaints regarding the provision of language access services.

There are currently no complaints fielded by the front desk for language access issues. If one were to be received, they would be forwarded to the Legislative Branch Director of Operations.

Section 5: Total Department Budget for Language Access

Please fill out the following using the total from each division's plan. Refer to "Part Five: Implementation" for each Division

As noted above, the Legislative branch commits to working on several pilots through 2020 to create its language access plan and provide interpretation/translation services to the general public impacted by these pilot issues. Through these pilots, we will be able to determine the appropriate budget to allocate and how much more budget we may need in the future for our language access goals. Regardless, we have committed to funding the interpretation/translation needs of these pilots in 2019-2020.

Thank you for your attention to making the King County a model county in language access.

Signatory 1

Date

Signatory 2

Date