

City of Issaquah

# Title VI Limited English Proficiency (LEP) Plan

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Title VI Coordinator

Stephanie Johnson, Human Resources Director

[TitleVI@issaquahwa.gov](mailto:TitleVI@issaquahwa.gov)

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## Introduction

As a recipient of Federal funds, the City of Issaquah is required to follow certain federal regulations. Consequently, the City of Issaquah has laid out this Limited English Proficiency (“LEP”) plan to ensure compliance with both Title VI of the Civil Rights Act of 1964, regarding access to services for people with limited English proficiency, and Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, which directs recipients of federal funding to take reasonable steps to ensure that people with limited English proficiency have meaningful access to their programs and services.

This LEP Plan consists of two primary components, 1) a federally mandated Four-Factor Analysis, and 2) an implementation plan. The Four-Factor Analysis consists of the following four considerations:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people’s lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The implementation plan consists of the specific steps the City of Issaquah will take in order to provide services to LEP individuals, including access to language assistance services, outreach regarding those services, staff training, and complaint procedures.

## Part I: Results of the Four-Factor Analysis

### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.**

To determine the number of LEP individuals in the City of Issaquah, the City relies on data provided by King County to identify persons who have another primary language other than English. Specifically, the City utilized the [Top Languages by City](#) data provided as part of [King County’s Language Access Program](#). The City also used the United States Census Bureau’s July 1, 2023 population estimate for the City of Issaquah to determine language speakers as a percent of total population. Other than English, the most common languages spoken within the City of Issaquah are:

Rank	Language	Number of People	Percent of Population
1	Chinese (incl. Mandarin, Cantonese)	2578	6.6%
2	Spanish	1210	3.1%
3	Hindi	824	2.1%
4	Korean	521	1.3%
5	Russian	422	1.1%

In regards to written translation of vital documents, many federal agencies have specified a ‘safe harbor’ in determining compliance. The ‘safe harbor’ is typically that a language is spoken by 1,000 people or 5% or more of the population, whichever figure is less. Applying this standard to the City of Issaquah yields that Chinese (incl. Mandarin, Cantonese) and Spanish are the two languages above the ‘safe harbor’ threshold.

**Factor 2: The frequency with which LEP persons come into contact with the program.**

The City of Issaquah does not currently possess information specifically relating to the frequency of interactions between LEP individuals and City staff or programs. However, the City has begun analyzing requests for translation and interpretation services to determine which languages are requested most frequently. The City will expect to update on this particular metric in subsequent updates to the LEP Plan.

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

The City of Issaquah provides a number of services that are important to LEP individuals. These include Municipal Court services; provision of drinking water; police, dispatch, and jail services; emergency housing and mental health referral services; and so on. The City prioritizes language access in programs related to law enforcement, Court, and access to basic services.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

The City contracts with several different providers for language access services. For simultaneous in-person interpretation, the City uses an interpreter agency called Intercom, has contracts with some individual interpreters for common languages, and uses Dynamic Language Services for harder to find languages. For phone-based interpretation, Language Line is used. For translation of written documents, the City uses Dynamic Language Services and technological services like Omega Solutions that has built-in interpretation for Court forms. In addition to these resources, the City sometimes utilizes qualified staff to translate some documents or to converse directly with residents/program participants in their preferred language. To encourage this, the City has implemented Bilingual Pay, including a language skills testing process, in some positions with high public contact (e.g.. Police Officer). Lastly, the City also utilizes an embedded Google translate tool to make its website accessible in different languages.

## **Part II: Implementation Plan**

### **Identifying LEP Individuals and Languages Served**

The data assembled in the above Four-Factor Analysis indicates that Chinese (including Mandarin, Cantonese) and Spanish are by far the most prevalent non-English languages spoken in Issaquah. The data further indicates that Hindi, Korean, and Russian are prominent additional languages in Issaquah.

In addition to the data from King County, the City will continue to explore ways to gather additional data regarding languages spoken by customers, and will continue to explore other sources of data

that may serve to confirm or expand the assumptions in this plan (e.g. data from the Issaquah School District).

### **Language Assistance Measures**

Currently, the City offers five main language assistance measures to customers:

1. In-person interpretation
2. Telephonic interpretation
3. Translation of vital information
4. Translation of non-vital information
5. Fulfilling reasonable modification requests for translation or interpretation, particularly for critical services (e.g. Police and Court).

### **Staff Training**

Currently, key staff responsible for the implementation of Title VI programs are trained on understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities. The City has previously used training materials provided by the Washington State Department of Transportation to accomplish these baseline trainings with the Title VI Coordinator and others likely to come into contact with Title VI programming (e.g. Human Resources and Transportation staff).

The City has also recently purchased a Learning Management System (“LMS”) that includes a training titled ‘Title VI of the 1964 Civil Rights Act for Municipalities’. The City is currently evaluating the staff list who should receive this training on a regular interval, and will be better able to track training compliance in the new LMS.

Additionally, within the LMS, the City has the ability to deploy tailored trainings to staff regarding providing language assistance services. For example, the City recently deployed a short training regarding how to use Language Line services. That training was provided to employees in customer-facing positions and others likely to interact with customers who may need telephonic interpretation services.

### **Notifying Customers**

The City provides notice to LEP individuals of the availability of language services in the following ways:

1. Stating in outreach documents that language services are available.
2. Providing “I Speak” language identification flashcards to front desk and other primarily public facing staff.
3. Providing a complaint form and procedure for any complainant who believes they may have been discriminated against in a City program or service.

The City is looking to expand notice to LEP individuals by starting to do some of the following:

1. Signs and notices that free language assistance is available with advance notice.
2. Working with community-based organizations and other partners to inform LEP individuals of the language assistance services the City provides.

3. Providing information as to the availability of translation services (free of charge) when advertising for public meetings and hearings.

### **Monitoring, Evaluating, and Updating the LEP Plan**

The City of Issaquah will periodically assess the effectiveness of this LEP Plan and update it as appropriate. The assessment will include reviewing the use of language assistance measures, reviewing population and other data regarding languages spoken in Issaquah, and speaking with staff members who interact with people who do not speak English or prefer to interact in a language other than English on process improvements and best practices.

## Appendix A: Resources

### Federal Government Resources:

[Title VI of the Civil Rights Act of 1964](#)

[Regulations Implementing Title VI of the Civil Rights Act of 1964](#)

[Executive Order 13166, \*Improving Access to Services for Persons with Limited English Proficiency\*](#)

[Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons](#)

[Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs](#)

[LEP.gov](#)

[U.S. Department of Labor, LEP Toolkit](#)

### State and Local Government Resources:

[WSDOT Title VI Basics for Local Public Agencies](#)

[King County Language Access for Limited English-Speaking Populations](#)

[Top Languages by City](#)

### City of Issaquah Resources:

[Title VI Website](#)

[Title VI Assurances](#)

[Title VI Complaint Form](#)