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Language Access Assessment

Submitted by: Office of Equity, Diversity, and Inclusion

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Introduction

In April 2023, the Port of Seattle Commission adopted <u>Order 2023-5</u> to advance language access. The order directs the Port to development a language access policy and plan to ensure the inclusion of non or limited English speakers, including those who are hard of hearing or deaf, in the use of Port services and facilities; and the Port wide implementation of a plan directing divisions with public services to offer language assistance including translation and/or interpretation. The policy makes language access a permanent, ongoing commitment by the Port of Seattle in every department and every division.

The language access order set into motion the design and implementation of a Port-wide assessment of current practices (including a review of publicly facing documents, resources, signage, websites, social media sites, and forms); the development of a guidance manual for departments to create language access plans; and a proposal for budgeting resources necessary to effectively implement this policy.

This report is a summary of the above referenced assessment and includes quantitative data findings from the survey distributed to all Port departments and qualitative data collected by key stakeholder interviews, community survey findings, and cohort representatives' recommendations. Assessment findings mostly focus on areas of improvement, opportunity for interdepartmental learning and resource sharing, and team engagement and recognition. It is of note that there are current Port practices to be celebrated that ensure access for LEP¹, deaf, hard of hearing, and deaf-blind (D/HH/DB) individuals who interact with or use Port-related services and programs.

The Office of Equity, Diversity, and Inclusion (OEDI) with support from External Relations (ER) and Business Intelligence have contributed to this report. A special thanks to the Language Access Cohort who have contributed significantly to identifying challenges as well as practical and innovative recommendations.

The Language Access Order makes language access a permanent, ongoing commitment at the Port of Seattle.

Engagement Methodology

To fully understand the current state of the Port's language access strengths and weaknesses, a Portwide survey was conducted. A similar survey was conducted with local non-profit and community partners to help us understand the current community landscape.

To take a deeper dive at the department level, a new cohort of representatives from high usage departments was formed. The cohort has been instrumental to providing both quantitative and qualitative data and input on innovative and practical solutions.

¹ Limited English Proficient (LEP) is a term used to refer to people who do not speak English as a primary language and who have a limited ability to read, write, speak, or understand English.

STEP 1 Port-wide Survey (42 Departments - 100% participation)

Community nonprofit partners survey

STEP 2

Language Access Cohort (High Usage Departments) (60 Partners responded)

STEP 3

OEDI and External Relations developed a comprehensive Port-wide survey that was completed by all 42 departments, and because External Relations has a variety of interactions with community, their survey responses were captured separately from other departments for reporting and analysis purposes.

The main objective of the survey was to assess and measure the current language access services being provided and to ensure that we have a clear understanding of how language access is being addressed both organizationally and on a team-by-team basis. The survey provided insights from a port-wide perspective and on a departmental level, highlighting key successes and priority needs.

Step 1: Port-wide Survey (complete survey shared in Appendix A)

The Port-wide Survey was designed by OEDI and External Relations. Department leads were asked to identify the most appropriate individuals from their teams that could respond to the survey with accuracy based on experience and familiarity with LEP interactions within their department. The survey was distributed in August 2023 and all data was collected and analyzed by Business Intelligence in September 2023. The survey was comprised of 15 questions, many of which allowed for the selection of multiple responses as well as for the ability for team members to write in unique individual responses.

The objectives of the survey were to:

- Understand how and where departments interact with LEP individuals.
- Identify Port departments that interact most frequently with LEP communities.
- Identify language assistance services and tools used.
- Recognize the level of training staff is receiving on policies and procedures.
- Understand the frequency and practices of language assistance services.
- Monitor and documentation of language access procedures.

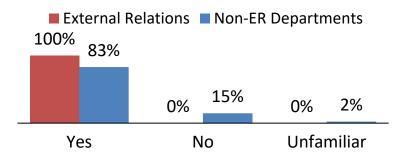
Key Findings

The top eight findings from the Port-wide Survey are noted below.

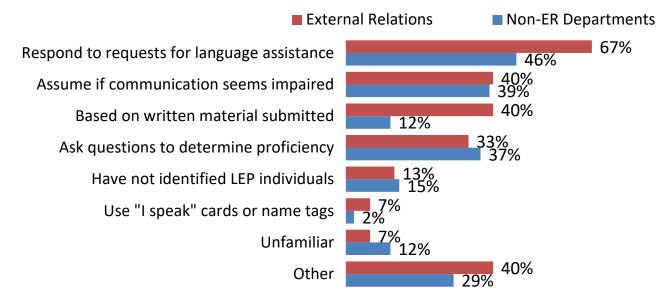
1. All External Relations (ER) teams (100%) and most other departments (83%) interact or

communicate with the public or LEP individuals. As expected, External Relations and Aviation departments reported the highest level of frequency and engagement with LEP individuals.

Port of Seattle interaction with LEP individuals



- **2.** Aviation Customer Service has the most frequent engagements and variety of interactions. co-led by Customer Service and Facilities & Infrastructure, which includes the SEA Access accessibility program, has several tools and resources that contribute to their strong customer service, including the Pathfinder program. In February 2024, SEA received the highest rating, level 3, through the ACI Accessibility Accreditation Enhancement program. This distinction reflects SEA's multi-faceted approach towards becoming one of the nation's most accessible airports.
- **3. Teams reported that the two most common interactions with LEP individuals occur from direct requests for language assistance.** The most common interaction is to request interpretation at the airport and when Port staff experience a communication challenge, such as travelers looking for services or needing directions. At SEA the Pathfinders, are easily recognizable in their lime green shirts, working hard to support travelers. Pathfinders work throughout the terminals doing anything from organizing security lines to directing travelers. These staff members are some of the most knowledgeable people at the airport. There are Currently 16 pathfinders, with 4 additional emergency hires seasonally to support busy travel periods like summer and winter holidays, all strategically positioned throughout the terminals to provide excellent customer service. the Pathfinder team uses the Language Line service (along with CBP) via their port-tablet. Language Line provides interpretation support for 200+ languages, including ASL. Additionally, it is worth noting that the Pathfinder team themselves speak a combined 20+ languages.



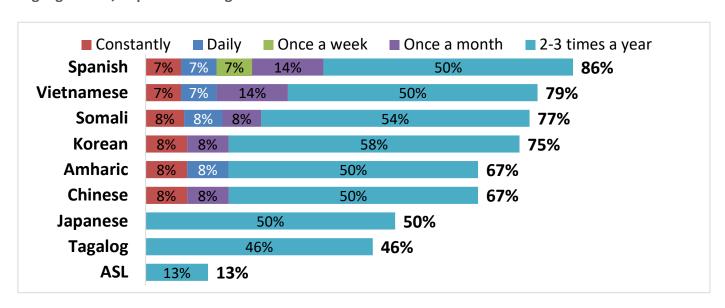
- **4. Formal processes surrounding language assistance services are uncommon.** Team members are providing quick solutions to solve problems and directing individuals to additional resources, as needed. Most challenges are being solved in a timely and responsive manner. It would be helpful to further understand the most common requests and provide teams with additional resources that could assist them with more culturally appropriate responses, heightened awareness of LEP individuals' needs, and training to learn common phrases or signing in ASL.
- **5.** Across all departments, trainings about language assistance services are rare. Most teams (other than Aviation) reported receiving very little formal training. Most interactions are informal and handled on a case-by-case basis. At SEA, when someone needs assistance, they can be directed to a Pathfinder, the communication challenge can be addressed through an app, or by requesting a colleague to help which saves time and quickly resolves the problem.
- 6. Survey responses suggest a desire for processes, standards, and supports to be established Portwide. Responses to the open-ended questions included written feedback such as:
 - "Additional policies, training and resources would be helpful."
 - "Yes, I would like for us to discuss/establish protocols and needs for when we recommend translating materials or offer interpretation. I am unaware of our division having established protocols at this time and would love to help implement it."
 - "We try to use resources available and lean on teams who have more experience communicate with these groups. If there's a more formal training or new process available, we'd be eager to take part."

These comments from Port staff indicate a desire for guidance and direction when addressing language access challenges.

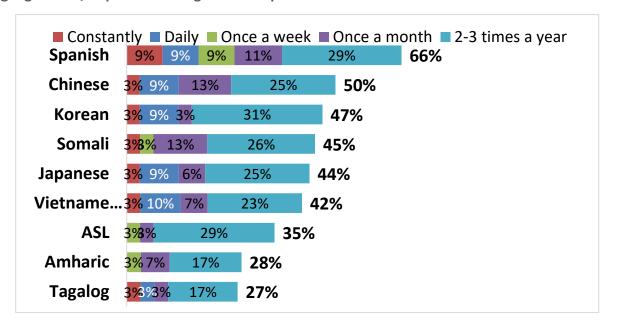
7. Highest usage departments were identified (more information on page 13). The survey findings helped identify Port departments with the most interactions and highest frequency of engagement with LEP individuals. This created the starting point for the formation of a Port Language Access Cohort.

8. Most common languages encountered by Port team members in their LEP interactions were identified. For both External Relations and all other departments, Spanish is clearly the most prevalent of the non-English languages identified. Eight other languages are clustered and ranked in accordance, including ASL. The findings from both surveys correlate similarly to King County's official statistical language data.

Languages used/requested through External Relations:



Languages used/requested through other Departments:



Most common languages in King County:

King Couty's language tiers reflect the needs of LEP populations in King County, and their guidelines for document translation. Five different sources were used to identify the 20 most common language needs in King County. These languages are ranked into three tiers. Spanish is alone in Tier 1, as it is clearly the most prevalent of the non-English languages spoken in King County. Eight other languages are clustered and ranked in Tier 2 and are the next most frequently spoken languages. Eleven additional languages make up Tier 3. The survey conducted by the Port also identified Tier 1 as Spanish, in Tier 2 the Port and King County had similarities in Vietnamese, Somali, Chinese, Korean, and Amharic. The Port also identified Japanese and ASL as Tier 2.

	Language	Avg Rank	Tier
First Tier: Materials Shall be Translated	Spanish	1	1
Second Tier:	Vietnamese	2	2
Second Her.	Russian	4	2
-			_
Translation	Somali	4	2
	Chinese	4	2
Recommended	Korean	6	2
	Ukrainian	7	2
	Amharic	8	2
	Punjabi	9	2
	Tagalog	10+	3
Third Tier:	Cambodian	10+	3
	Laotian	10+	3
Translation	Japanese	10+	3
	Hindi	10+	3
	Arabic	10+	3
Encouraged	Farsi	10+	3
	Tigrinya	10+	3
	Oromo	10+	3
	French	10+	3
	Samoan	10+	3

Step 2 – Community Survey (complete survey shared in Appendix B)

OEDI, External Relations, and Business Intelligence jointly designed a community language access survey. The purpose of the survey was to assess the needs and preferences of LEP communities who interact with the Port of Seattle. The Survey was emailed to 150 leaders/community organizations in South King County who have interacted with the Port of Seattle. A total of 66 people/organizations participated, resulting in a 44% response rate.

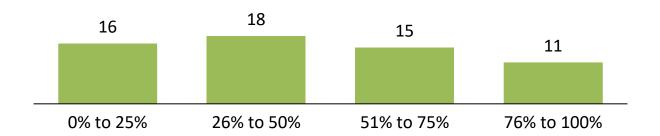
Key Findings

1. The need for language access services is varied and depends on the community. Some

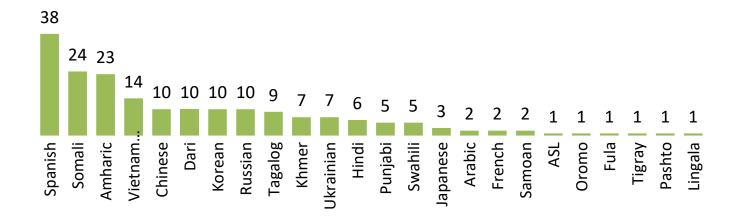
organizations serve individuals who know little to no English. Other organizations serve populations that have a higher degree of English proficiency and are comfortable communicating in English, but it is not their primary language. The most prevalent languages used in communities were also identified.

In the below graph the Top Row reflects the number of organizations (60 total) that completed the survey, the bottom row is the range of % of services needed. For example, 16 Organizations reported that 0-25% of the individuals in the communities they serve, require language access services.

% of communities needing language access services



The chart below confirms that Spanish is the most used non-English language in King County, followed by Somali and Amharic. Other frequently used languages include Chinese, Vietnamese, Korean, Dari and Russian.



- **2.** Many communities identified difficulties accessing Port information. Communities shared they had difficulty navigating the Port website and accessing job opportunities. Sixty-one percent (61%) reported their community having difficulty accessing Port information. Difficulties were related to:
 - · Accessing job opportunities
 - Website primarily in English; navigating is difficult
 - Forms for grants/funds
 - · Physical signage in English
 - Limited and poor-quality translations

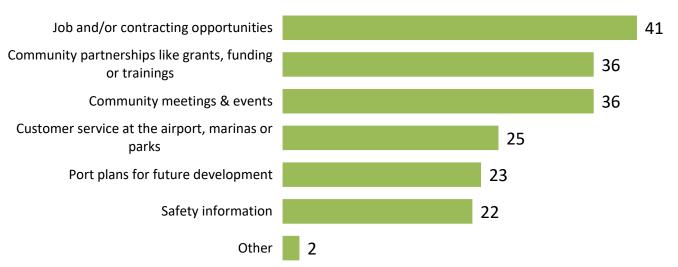
Reported Barriers

Difficulty navigating website and finding the right resources and right person to speak to Poor quality translations. Not enough details

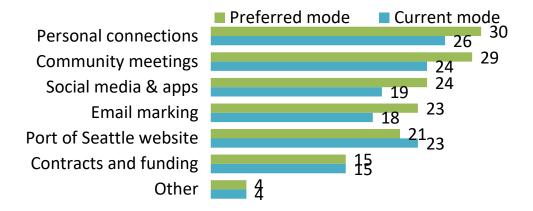
Documents are complicated and difficult to understand

Even if a flyer or communication is translated, the link or place where they are sent to is not

3. Information about jobs and contracting opportunities were most important to have available in other languages. The top areas identified by community members for language access needs were the following:



4. Interpersonal modes of information dissemination, such as personal connections and community meetings, were most preferred. Below are the most preferred modes of communication and information dissemination for the communities that completed the survey. The most preferred modes of information access are interpersonal: *personal connections* and *community meetings*.



5. Computer-generated translation tools are not always accurate. While they are seen as *useful* by most, they often lack accuracy and contribute to confusion and an inability to properly access services and information.

Step 3 — Language Access Learning Cohort

From the data collected in the Port-wide Survey, we gained a better understanding about which departments experience the highest degree of interactions and engagement with LEPs. With support from Business Intelligence, we developed criteria to identify the teams most impacted and to better understand their interactions, their strengths, and where they need support.

Criteria to Identify High Usage Departments

Diverse Interactions	High Frequency	Bilingual Staff	Support Personnel	Community outreach	Media Used
3 or more forms of interactions: In-Person Telephonically Email Website Correspondence Braile/ASL Interpretation	1 or more 3 or more for ER) Non-English language encounters at least once per week	Have bilingual staff assist with language assistance	Using contracted interpreters/translators for language assistance service	Translates marketing specific programs into non-English languages	Informs in one or more ways: Multilingual staff Posters "I Speak" IDs Website Email Social media

Based on these findings, department directors identified representatives from their teams to participate in the Language Access Learning Cohort, the departments that comprise the Language Access Learning Cohort are:

High Usage Departments		
AV 911 dispatch	AV Police Department	
AV Capital Program Management + FI	AV Public records Request	
AV Commercial Management	AV Security	
AV Customer Experience	Boating, Ops + Security	
AV Environment & Sustainability	Central Procurement Office	
AV Fire Dept	Diversity in Contracting	
Marine Maintenance	Port Construction Services	
Ground Transportation	Cruise Operations	
AV Facilities + Infrastructure	External Relations	

Building the Language Access Cohort

The individuals identified for the cohort either experience interactions with LEP individuals or are familiar and a part of a larger team that interacts with LEP individuals. Approximately 20 team members representing 18 departments were identified. Cohort members can be found in the appendix.

The purpose of the cohort was to:

Gain a deeper understanding about the frequency and types of interactions With LEP community members.

- Researching and collecting existing data that can inform the future work
- Collaboratively develop department Language Access Plans
- Support the development of the 2025 budget to implement the Language Access Plans
- Generate recommendations for Port-wide language access improvements.
- Use of employees for interpretation
- Vital documents identification for translation
- Ways to improve engagement and communication (media buy-in, website, social media, newsletters, etc.)
- Determining budgets and resources necessary

Key findings from the Language Access Cohort

- **1. Less than one in 10 of interactions with LEPs are known in advance**. The vast majority of LEP individual communication needs are addressed without advance notice and preparation. Not surprisingly, staff members rely upon these three most common practices:
- A) Bilingual coworkers who can assist in offering language access
 Cohort members confirm that, while they are dependent on the assistance of bi- and multilingual staff members, it is often a very informal process and there is no master list of these staff members. Cohort participants note that it would be helpful to have the following:
 - Adopt a policy to support the use of Port staff when appropriate.
 - Create a master list of staff who are interested and available.
 - Offer training for this staff.
- B) A phone app, like Google Translate, that quickly provides a solution. Airport teams report that frequently LEP travelers will already have an app open on their phone, where the question is presented in English to Port staff. Some staff are familiar with language apps, and this proves to be a quick solution. For those unfamiliar with language apps, they may reach out for a Pathfinder to

provide assistance, often using the Language Line as a tool for assistance.

- Resources available for on-the-spot interpretation and translation
- Guidance on the use of personal phones during critical situations.

C) The Language Line which can provide immediate assistance for interpretation needs. Most departments had little to no knowledge of the Language Line, nor do they have access to it.

The Language Line is contracted service that is used by Pathfinders, the Police and Fire Departments, and Customer Engagement as well as the primary service used for all international arrivals and passport control support with U.S. Customs and Border Protection from international flights. The cost is determined by the number of calls and minutes used for services. Since there a cost associated with the service, distribution is closely tracked, and access and training for the software is limited. Below is a table that outlines the number of calls in a particular language and the number of Language Line minutes used. One of the recommendations is for the Language Line to be made available to other high usage teams.

Language Line Usage 2021 and 2022 across the entire organization (two-year totals)

Language	Calls	Minutes
SPANISH	6996	195813
KOREAN	2338	57455
MANDARIN	1860	30183
JAPANESE	1260	27102
VIETNAMESE	921	7755
UKRAINIAN	443	4144
RUSSIAN	363	5644
ARABIC	352	6230
THAI	339	11316
FRENCH	332	5101

For situations where advance notice is provided, an interpreter is often used. Most interactions occur at or near SEA. Other high frequency interactions occur onsite at maritime facilities, construction sites, and for community events.

2. There are unclear, nonuniform practices and policies across the organization.

We identified a common need for clarification on the differences between interpretation and translation. An easy way to identify the difference is that interpretation is spoken or signed, translation is written. Most interpretation is performed by bilingual employees, often on the spot. For situations and events requiring an interpreter, for example a community event or virtual training, contracted

interpreters are used.

Few departments have contracts in place with interpretation or translation providers. In situations where there is a need to hire an interpreter or have documents translated, it can be a challenge to find the necessary contact and the required process for securing their services. In cases where an IDIQ (open to various departments) contract for translation/interpretation is in place, teams often don't know the contract exists. One notable concern is that the department that manages the IDIQ contract is then responsible for ensuring the department adheres to the agreement and has adequate budget for their request. With additional requests, contract capacity becomes a concern.

Department representatives participating in the Language Access Cohort were engaged and supportive in sharing what they understand as formal and informal policies and procedures. Department staff are striving to serve LEP individuals with the resources they have, however departmental leadership is not consistently aware of the frequency of interactions, the number of employees using their bilingual talents, and the quality and impact of the interactions.

When employees are assisting individuals in need, there can emotional and stressful. For example, if a passenger leaves a passport on the plane and then can't communicate effectively to figure out how to retrieve it. Front line staff demonstrate high levels of problem-solving skills, quick and decisive thinking, and compassion.

In general, cohort representatives believe there is lack of clarity among departments regarding the following:

- Process and procedure for using interpretation and translation services.
- Available tools and resources and why some teams have more resources than others.
- Departmental systems for tracking costs associated with language access services.
- Systems for departmental translation of signs or posters.
- Lack of familiarity with Port website translation processes and procedures.
- Limited or no training of departmental staff members on how to access and provide language access services.
- Tracking and recording participant language preference information.
- Informing LEP individuals or persons with disabilities about available language assistance services.
- Identifying the language needs of LEP individuals.
- Parameters for multilingual staff to assist LEP individuals.
- Clarity on the process for documenting language access complaints.

3. There are many barriers to accessing interpretation and translation services.

Aviation Customer Service currently manages an American Sign Language for the Airport with Customer Service and a contract with the Language Line. External Relations also holds two contracts for Interpretation and translation services, to support Human Resources and multiple other departments as well as needs within External Relations. The current process for securing translation or interpretation

needs includes notifying the project manager with a request and confirming that this request meets guidelines (ie, submitted in enough time, covers what is included in the scope of work, confirmation that the department has a budget for the requested service, and verification of sufficient budget remaining in the contract. The manager may ask the team member to review the scope of work and level of effort).

Additionally, when other departments and teams are interested in accessing these services, this puts added pressure on the contract manager to accommodate the requests. The current demand is light to moderate, so this should not be a pressing issue, however as the Port grows its language access policy, a more comprehensive infrastructure could be designed to better meet teams' needs and ensure one team's capacity is not being exhausted.

Additionally, language access expenses vary from department to department; a few departments have allocated funds in their 2024 budget others do not have language access factored into their budgets. Because many departments have not allocated funds towards language access, they may face the dilemma of where to find funds within their budget to address their language access needs. A practical solution is to have departments submit an annual language access plan, the goals on that plan would be reflected in their EDI goals requirement and included as a line item in their budgets for language access. OEDI has drafted a 2-page language plan template for departments, so they do not need to create one.

Recommendations

The below set of recommendations was created through an inclusive process and is representative of feedback from both internal departments and external partners. The recommendations consider the current and ongoing implementation of certain practices and both short-term and long-term goals.

Recommendations were based on data collected from surveys, extensive research of best practices used by similar governmental agencies, input from front-line staff, and input from the Language Access Cohort. Some recommendations are already in progress, indicating that they have been deemed feasible and necessary.

The below set of recommendations was created through an inclusive process and is representative of feedback from both internal departments and external partners. The recommendations consider the current and ongoing implementation of certain practices and both short-term and long-term goals. Some recommendations are already in progress, indicating that they have been deemed feasible and necessary.

Recommendations are grouped into six themes captured in the assessment. Below each are specific actions that can be taken to improve current practices, invest in improvements, and further our commitment to LEP individuals and Port teams.

1. Prioritize Language Access Systemically Across the Organization

- Every Team across the organization develop Language Access Plans as mandated by the Commission order. OEDI has developed a 2-page plan template that departments can use or modify (see appendix). The process and timeline for identifying language access will mirror the existing process for the Port's annual EDI goal setting process that members of the Change Team support.
- Continue convening the Language Access Cohort to lead the implementation of these recommendations and develop budget proposals for 2025.
- Offer webinars and trainings for all departments to understand the mandates of language access.

2. Invest in Tools, Resources, and Partnerships

- Prioritize funding, contracts, RFP announcement opportunities as well as Port events, newsletters and social media for translation in 2024 and 2025.
- Optimize the Port's website to provide clear and streamlined access to translated information.
- Leverage existing cell phone applications that support our business and look for opportunities to incorporate language assistance components.
- All materials for frontline staff should be available in a central location that is easily accessible to staff, including resources for on-the-spot interpretation and translation.
- Ensure that language accessibility is incorporated into recorded Commission meetings.
- Institute quality control methods across the organization to ensure consistency in terminology and translation. We could leverage our relationships with community organizations for language expertise, engaging communities for quality control on translated documents. This could also be practiced with signage and translated materials at SEA.
- Create videos and communication materials that features some of the most important information about SEA in different languages and how to access SEA language resources, such as Pathfinders, Customer Care Connect, or Language Line.
- Develop more robust partnerships with language access agencies and 2-3 contracts for translation and interpretation service agreements managed by central staff who make these available to all departments and teams through translation and interpretation service agreements.

3. The use of employees for interpretation and translations

- The Port's Human Resources department is in the process of developing a policy per the
 order which reads: "Per the 2022 Salary and Benefits Resolution, Human Resources shall
 propose a policy and compensation model for Port employees who are tasked with
 translation services outside of their regular job duties prior to the 2025 budget
 development process."
- Employees can be a great resource available for on-the-spot interpretation and translation with policies in place.

4. Education and awareness for employees

- All LAP materials for frontline staff should be available in a central location that is easily accessible to staff.
- Develop training videos that teach Port staff how, when and where to access interpretation_ (including ASL) and translation support.
- Complete the Language Access Manual so that frontline staff can use when interacting with LEP individuals. This protocol document should walk staff members through the steps to obtain interpretation, translation, and language access support for LEP customers.
- Orientation materials for new Port employees should include language access training, processes and protocols.
- Trainings could be provided that incorporate best practices in interactions with LEP speakers of commonly encountered languages, and American Sign Language speakers. The trainings could be a combination of stories about the experiences of LEP travelers or community members and could incorporate scenarios and role playing, as well as practical advice.
- Enhance social media outreach by integrating multilingual text within multimedia posts; consider utilizing paid social media for comprehensive service announcements, and sharing relatable stories from diverse travelers, visitors.

5. Graphics and signage

- Incorporate an ASL welcome at checkpoints on TV screens.
- Have tabletop signage at SEA information desks that share language resources.
- Bigger and more prevalent signage at SEA and all other Port of Seattle locations to inform community members of their rights to request an interpreter.

6. Outreach and effective partnerships with Immigrant communities

- Use the Duwamish River Multi-Cultural Working Waterfront Tour as a model for other Port facility tours aimed at specific immigrant communities, providing narration in those languages.
- Develop a standard practice of translating Port outreach materials (program fact sheets, flyers) in the in the top tier languages spoken in near-Port communities.
- Enhance the SKCCIF Community Liaison program to reach and engage additional immigrant populations on specific Port programs and opportunities.
- Create a pilot program with a culturally connected community-based organization to develop Port-trained "language ambassadors" that can represent opportunities to engage with the Port on internships, workforce development and small business initiatives.

APPENDIX

- A. Port wide departments survey
- B. Community survey
- C. Cohort participants
- D. Departmental Language Access Plan template
- E. Glossary

Relevant readings and Background Articles:

Articles:

- 1. "Language Access in Government Services: Strategies and Best Practices" by John Doe, Government Executive Magazine
 - This article explores strategies and best practices for implementing language access policies in government services, with a focus on practical solutions for overcoming challenges and promoting inclusivity.
- "Building Language Access Programs at the Local Level: Lessons Learned from City Initiatives" by Jane Smith, City Journal
 - This article examines successful language access initiatives implemented by various cities, highlighting lessons learned and key considerations for local governments seeking to improve language access for residents.

Books:

- 1. "Language Access and the Law: Leading Lawyers on Understanding the Importance of Language Access and the Best Strategies for Achieving It" by Aspatore Books Staff
 - This book provides a comprehensive overview of the legal framework surrounding language access, with a focus on strategies for achieving compliance and effective implementation. It's a valuable resource for anyone working in government or legal fields.
- 2. "Language Access: Issues and Strategies" edited by Guadalupe Valdés, Jennifer K. Nelson, and Daniel P. Reed
 - This collection of articles covers a wide range of topics related to language access, including policy issues, best practices, and case studies from various sectors, including government and local city levels.