

ORDER 2023-05
AN ORDER OF THE PORT OF SEATTLE COMMISSION

... To develop a language access policy and plan that ensures 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 portwide implementation of a plan directing divisions with publicly facing public services to offer language assistance services including translation and/or interpretation.

ADOPTED
APRIL 18, 2023

TEXT OF THE ORDER

The Port Commission hereby directs the Executive to develop a Portwide policy on language access. At a minimum, this language access policy shall include an assessment of current practices (including a review of publicly facing documents, resources, signage, websites, social media sites, and forms); development of a guidance manual for divisions to create language access plans; and a proposal for budgeting resources necessary to implement this policy. The Office of Equity, Diversity, and Inclusion (OEDI) and External Relations (ER) shall deliver a report to the Commission and Executive Director by February 29, 2024 on the findings of any language access assessments and the development and implementation of language access policy across the Port. The findings of this report may then be used to inform additional Executive Director and/or Commission action.

The following shall be considered a guide to the implementation of this order:

1. OEDI shall conduct an assessment of every department, except External Relations, across the organization to determine the following: the most critical materials that need translation, the need for interpreters, and the level of training and implementation necessary to meet Safe Harbor guidance by the U.S. Department of Justice and/or the Four Factor LEP Analysis framework from Federal agencies as part of the Title VI plans for the Port of Seattle and SEA. These assessments will be conducted with support from the Change Team and shall be completed by February 29th, 2024.
2. External Relations shall conduct a prioritized assessment of its most critical internal and external facing communications and determine the level of resources needed to implement language access in the department's materials and programming. External Relations shall share these findings with OEDI by September 2023 and propose a multi-year, prioritized language access implementation plan for ER starting in the 2024 budget. External Relations shall also collaborate with OEDI in assessing the Aviation Division.
3. By September 2023, OEDI and ER shall start to collaborate to develop a Language Access guidance manual. This Language Access guidance manual must include, but is not limited to, guidance for when targeted, culturally and linguistically responsive public communications must be translated, how to establish and meet interpretation requests as they relate to services

offered by the Port of Seattle, how to select quality, certified translators and interpreters when needed, when to consider alternative forms of language access when translation or interpretation may not be the most effective methods, and post-translation and interpretation quality assurance review. This guidance manual shall be completed and available for department and division use by February 29th, 2024.

4. Based on the assessments in Sections 1 and 2, by February 29th, 2024 the Office of Equity, Diversity, and Inclusion and External Relations shall begin to provide departments and divisions technical assistance for establishing and/or updating annual language access plans. Departments prioritized for support will be departments and divisions with external facing and/or customer facing operations. This technical support shall include budget planning for departments to resource language access strategies and implementation.
5. Departments and divisions shall establish and/or update their language access plans on an annual basis starting no later than 2025.
6. Any language access assessments or annual language access plans shall consider the needs of people who communicate using American Sign Language.
7. 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.
8. OEDI shall collaborate with King County to access King County's data related to first, second, and third tier languages and make this data available through the equity index and by sharing with other departments throughout the organization.
9. The Office of Equity, Diversity, and Inclusion is designated co-lead to provide technical support, oversight, and program management duties in fulfillment of this order.
10. External Relations is designated co-lead to provide technical support for departments to execute language access plan strategies related to the Port's external facing operations and outreach activities in fulfillment of this order.
11. By February 29, 2024, OEDI and External Relations shall provide a report to the Executive Director and the Commission on lessons learned and future considerations related to this order to establish language access plans and tools across the Port.

STATEMENT IN SUPPORT OF THE ORDER

The Port of Seattle strives to be inclusive in providing access to services and to provide a welcoming environment for customers, employees and the general public. We welcome citizens, neighbors, and visitors from throughout the world regardless of race, color or national origin and strive to exceed the values expressed in Title VI of the Civil Rights Act of 1964, which requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities accessible by eligible persons with limited English proficiency. The Port is committed to access to services, especially historically and currently overburdened communities and populations, including those with limited English proficiency, to promote the general health, safety, and economic prosperity of our region.