CITY OF SEQUIM

Language Access Plan for Local Public Agencies

City of Sequim Public Works

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1. Introduction

City of Sequim is committed to providing meaningful access to its programs, services, and activities for all persons, regardless of race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964 and related federal nondiscrimination requirements applicable to recipients of Federal Highway Administration (FHWA) funding, which provides:

> No person in the United States, on the ground of race, color, or national origin, shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

This Language Access Plan establishes the City's process for serving individuals with Limited English Proficiency (LEP). LEP individuals are persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. According to 2024 American Community Survey data, approximately 98.4% of the City of Sequim population age 5 and over speaks English very well or speaks only English, while approximately 1.6% speaks English less than very well. Although the proportion of LEP individuals in the community is small, the City recognizes that some residents and members of the public may still require language assistance to meaningfully access federally funded or federally related transportation programs, public works activities, permitting processes, public meetings, and other City services.

Because the local LEP population is limited, the City has determined that routine written translation of vital documents into multiple languages is not currently required as a standard practice. However, the City will provide oral interpretation services when needed, and will take reasonable steps to ensure meaningful access for LEP individuals.

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2. Legal Authority

This Plan is adopted pursuant to the following authorities:

- Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.
- 49 CFR Part 21, U.S. Department of Transportation nondiscrimination regulations
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency
- U.S. Department of Transportation LEP Guidance
- Federal Highway Administration 23 CFR Part 200 (FHWA Title VI Program and Related Status – Implementation and Review Procedures) and FHWA Order 6640.23A, Title VI Program and Related Requirements, as specific FHWA authorities.

Under these authorities, the City must take reasonable steps to provide meaningful access to LEP individuals eligible to be served or likely to be affected by its programs and activities.

3. Needs Assessment

The City of Sequim identifies and assesses the language assistance needs of the communities it serves by reviewing demographic data for individuals with LEP. The City uses data from the American Community Survey (ACS), including the table "Language Spoken at Home for the Population 5 Years and Over," to evaluate the number and proportion of LEP individuals within the community.

Based on 2024 ACS data for the City of Sequim, the population age 5 years and over totals 7,930 persons. Of that total, 128 persons, or 1.6%, speak English less than "very well." This indicates that the overwhelming majority of the population is English proficient, while a small percentage may require language assistance to meaningfully access City services, programs, and activities.

The City reviewed the primary non-English languages spoken at home and the number of persons who speak English less than very well. That information is summarized below.

Table 1 - Language Spoken at Home for Population 5 Years and Over

Language	Speak English Very Well	Less than Very Well	Total Population	% of population
English Only	7,543	0	7,543	0.0%
Spanish	62	47	109	0.6%
German	74	48	122	0.6%
Russian	34	15	49	0.2%
Other Indo-European	71	0	71	0.0%
Tagalog	8	10	18	0.1%
Other Asian & Pacific Island	10	8	18	0.1%
Total	7,802	128	7,930	1.6%

This data indicates that Sequim has a relatively small LEP population. The largest language groups among individuals who speak English less than very well are German, Spanish, and Russian, with smaller numbers of Tagalog and other Asian and Pacific Island languages also present. The City recognizes that even where the overall LEP population is small, language assistance may still be needed in connection with important public services, public participation opportunities, complaints, public works activities, transportation-related projects, right-of-way matters, and safety-related communications.

Based on the City's review of demographic data, the limited proportion of LEP persons in the service area, the City's experience with infrequent LEP contact, and the absence of requests for translation services during the past five years, the City has determined that routine written translation of

documents into multiple languages is not currently required as a standard practice. The City will continue to provide oral interpretation services when needed and will evaluate project-specific or document-specific translation needs where the nature of the service, the importance of the communication, or the characteristics of the affected population indicate that additional written language assistance may be warranted.

4. Policy Statement:

It is the policy of the City of Sequim that no person shall be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any City program, service, or activity on the basis of race, color, or national origin.

The City will take reasonable steps to provide meaningful access for persons with LEP. In light of local demographics and the frequency of contact with LEP individuals, the City's primary language access strategy will be:

- provision of interpretation services upon request or when needed;
- use of state-contracted language service providers when appropriate;
- possible use of qualified bilingual staff, when available and appropriate; and
- periodic review of demographic and service data to determine whether additional translation measures become necessary.

5. Scope:

This Plan applies to all programs, services, and activities of the City department or agency that receive FHWA or other U.S.DOT financial assistance, including those administered through Public Works and transportation-related functions. The City may also apply the practices in this plan more broadly across general government operations where feasible.

6. Definitions:

Limited English Proficient (LEP) Person:
An individual who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English.

Interpretation:
The act of listening to something in one language and orally translating it into another language. This may include in-person, telephonic, or video remote interpretation.

Translation:
The written conversion of text from one language into another.

Vital Document:

A document that contains information critical for obtaining services or benefits, participating in a program or activity, understanding rights or responsibilities, or complying with legal requirements. For purposes of this Plan, vital documents may include, as applicable:

- the City's Title VI complaint form and complaint procedure;
- nondiscrimination notices;
- interpreter request notices, taglines, or language assistance notices;
- notices of public hearings, meetings, or comment opportunities for major federally funded transportation or public works projects;
- right-of-way, acquisition, relocation, or access-related notices, if applicable; and
- detour, closure, or safety notices for major federally funded work, where applicable.

Whether a particular document is vital will depend on the importance of the program, service, activity, or communication and the consequences to the individual if the information is not understood.

Meaningful Access:
Language assistance that is sufficient to provide an LEP person with an adequate opportunity to participate in and benefit from the City's services, programs, or activities.

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7. Four-Factor Analysis:

Consistent with federal LEP guidance, the City assesses language needs using the four-factor analysis.

Factor 1: Number or Proportion of LEP Persons Served or Encountered

As described in Section 3,128 persons, or 1.6% of the population age 5 years and over, speak English less than very well. Based on this information, the proportion of residents likely to require language assistance is relatively small.

The City nonetheless acknowledges that even a small LEP population may require assistance, particularly in connection with public meetings, project outreach, complaints, right-of-way matters, service requests, safety information, or other interactions involving important rights or public participation.

Factor 2: Frequency of Contact with LEP Persons

The City expects contact with LEP individuals to occur infrequently, but it may arise in public-facing operations such as:

- public meetings and hearings;
- permit and application processes;
- public works and transportation projects;
- code or compliance interactions;

- utility or service inquiries; and
- emergency or safety-related communications coordinated with other agencies.

City experience indicates that requests for language assistance have been infrequent. The City has received no requests for translation services during the past five years. Although the City has not identified a pattern of recurring requests that would support routine written translation at this time, the City recognizes that LEP needs may arise unpredictably. For that reason, the City will maintain access to on-demand interpretation resources and will evaluate specific requests for translation or other language assistance on a case-by-case basis.

Factor 3: Nature and Importance of the Program, Activity, or Service

Some City services are of significant importance to the public, including transportation and infrastructure planning, public safety-related notices, rights-of-way and access changes, opportunities for public comment, complaint procedures, and access to federally funded benefits or services.

For these important interactions, the City will prioritize meaningful oral interpretation when needed so that LEP individuals can understand and participate.

Factor 4: Resources Available and Costs

As a smaller local government, the City must balance language access obligations with available resources. Based on the small proportion of LEP residents and infrequent contact, the City has determined that maintaining as-needed interpretation services through pre-negotiated State contracts is a reasonable and cost-effective method for providing meaningful access.

The City may also use qualified bilingual staff, when available, and when doing so is appropriate for the communication involved. The City does not currently provide broad routine written translation of documents because available data does not indicate that such a measure is required at this time.

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8. Language Assistance Services

8.1 General Standard

The City will take reasonable steps to provide language assistance to LEP persons who seek to access City services, programs, or activities.

8.2 Interpretation Services

The City will provide interpretation services as needed, which may include: telephonic interpretation, video remote interpretation, where available, in-person interpretation, when appropriate for the nature of the communication, scheduling interpreters in advance for public meetings or appointments when requested.

Interpretation services will be obtained primarily through State of Washington pre-negotiated contracts or other properly procured service arrangements available to the City.

8.3 Use of Bilingual Staff

The City may use bilingual staff to assist LEP individuals when:

- the staff member is sufficiently proficient in both languages;
- the communication is within the employee's work role and competency;
- use of staff is appropriate to the complexity and sensitivity of the matter; and
- the arrangement does not compromise accuracy, confidentiality, or timeliness.

Bilingual staff should only be used when the City is confident the employee can communicate accurately and effectively about the subject matter involved.

Bilingual staff should not be treated as the City's sole language access method unless the City has determined they are qualified for the specific communication task.

8.4 No Charge to the Public

Language assistance provided under this Plan will be made available at no cost to the LEP individual.

8.5 Family Members, Friends, and Minor Children

The City will not require an LEP person to provide their own interpreter. Family members or friends may accompany an LEP person, but the City should use a qualified interpreter when accuracy, confidentiality, impartiality, or effective communication is important.

Minor children should not be used as interpreters except in urgent or emergency situations where no other option is immediately available.

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9. Written Translation

Based on current demographic data showing that approximately 98.4% of Sequim residents are English proficient and based on the City's current experience regarding frequency of LEP contact, the City has determined that routine translation of documents into multiple languages is not presently required.

However, the City will review whether written translation is needed when one or more of the following occur:

- a particular language group is repeatedly encountered;
- a vital document is frequently requested in another language;
- a major federally funded project is expected to affect an LEP population;
- demographic trends indicate growth in a non-English language group;
- a funding agency, oversight agency, or applicable guidance indicates additional translation is necessary.

If needed, the City may translate vital documents or prepare translated summaries, notices, taglines, or other language access materials for specific projects or services.

Records related to language assistance requests and implementation of this Plan will be retained in accordance with the City's record retention requirements and applicable federal program documentation requirements.

The City will give priority consideration to translation of vital documents when a specific LEP population is affected by a major project, when a document concerns access to rights or complaint procedures, when safety information must be communicated, or when repeated requests indicate that translated written materials are needed to provide meaningful access.

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10. Notice to the Public

The City will inform the public that interpretation assistance is available. Notice will be provided through reasonable methods such as:

- a statement on the City website;
- notices at City Hall and public service counters;
- public meeting notices, when appropriate;
- Title VI notices or nondiscrimination statements;
- direct communication by staff when language needs are identified.

A sample notice follows:

The City of Sequim provides language assistance services, including interpretation, at no cost to persons who need them to access City services, programs, or activities. To request language assistance, please contact Amy Dougherty, Title VI Coordinator, Public Works, Phone: 360-582-2471, email: adougherty@sequimwa.gov.

The City may also use short multilingual notices or "I Speak" resources to help identify language needs.

Information about the City's Title VI nondiscrimination policy, complaint procedure, and complaint form will be made available on the City's website and through the City's Title VI program materials.

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11. Procedures for Providing Language Assistance

11.1 Identification of Language Needs

Staff who interact with the public should take reasonable steps to determine whether a person needs language assistance. Methods may include:

- observing communication difficulty,
- asking simple questions,
- using "I Speak" cards or similar language identification tools,
- reviewing prior requests or appointment notes.

11.2 Accessing Interpretation

When a language need is identified, staff should:

1. determine the preferred language, if possible;
2. contact the approved interpretation service provider under the applicable State contract or City process;
3. document the request and assistance provided, as appropriate;
4. notify Amy Dougherty, Title VI Coordinator, or a supervisor if the matter involves a significant public process, complaint, hearing, or legal/technical issue.

11.3 Public Meetings and Hearings

For public meetings, hearings, and major project outreach:

- the City will provide interpretation upon request when reasonable advance notice is given;
- notices for significant public meetings may include information on how to request an interpreter;
- for projects with anticipated LEP impact, the City will evaluate whether additional outreach or translated materials are warranted.

11.4 Emergencies or Time-Sensitive Matters

When urgent communication is necessary, staff should use the quickest available qualified interpretation method, including telephonic services if needed.

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12. Staff Training

The City will provide periodic training or guidance to relevant staff on this Plan. Training may include:

- the City's obligations under Title VI and LEP requirements;
- how to recognize language assistance needs;
- how to access contracted interpretation services;
- when bilingual staff may or may not be used;
- documentation expectations;
- handling public meetings, complaints, and vital communications involving LEP individuals.

Training should be provided to employees in departments most likely to interact with the public, including reception, public works, engineering, permitting, administration, and project management staff, as appropriate.

13. Monitoring and Recordkeeping

The City will monitor implementation of this Plan and maintain reasonable records, which may include:

- number of interpretation requests received;
- date of request;
- languages requested;
- departments or programs involved;
- type of service provided;
- whether the matter involved a vital document or public meeting;
- any issues, delays, or complaints related to language access.

This information will support FHWA/WSDOT Title VI reporting and compliance review and will help the City determine whether current measures remain sufficient or whether additional translation or outreach is needed.

14. Complaint Process

Any person who believes they have been denied meaningful access to City services, programs, or activities because of language barriers or national origin discrimination may file a Title VI complaint with the City.

Complaints should be submitted to:

Amy Dougherty, Title VI Coordinator
Public Works
City of Sequim
152 W Cedar St, Sequim WA 98382
Phone: 360-582-2471
email: adougherty@sequimwa.gov

The City will process complaints in accordance with its adopted Title VI complaint procedures. The City's Title VI complaint procedure and complaint form are available on the City's website and may also be provided upon request.

15. Plan Review and Updates

This Plan will be reviewed at least every two years, and sooner if:

- demographic conditions change,

- the City experiences increased contact with LEP populations,
- new federally funded programs are added,
- a complaint or compliance review indicates a need for revision,
- federal or state requirements change.

Amy Dougherty, as Title VI Coordinator in Public Works, will be responsible for coordinating plan review and recommended updates.

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16. Roles and Responsibilities

Title VI Coordinator

The Title VI Coordinator, Amy Dougherty, Public Works, is responsible for:

- overseeing implementation of this Plan;
- coordinating updates and periodic review;
- supporting staff with language access issues;
- tracking complaints and compliance concerns;
- coordinating with departments using federally funded programs.

Department Directors and Supervisors

Department leadership is responsible for:

- ensuring staff understand how to access language assistance resources;
- supporting compliance in day-to-day operations;
- notifying the Title VI Coordinator of recurring language access needs.

Staff

City staff who interact with the public are responsible for:

- responding appropriately when language assistance is needed;
- using approved interpretation resources;
- not denying or delaying access because of language barriers;
- informing supervisors of recurring or significant needs.

17. Plan Availability

This Plan will be maintained by Amy Dougherty, Title VI Coordinator, Public Works, and will be made available upon request. The City will publish this Plan, or a summary of its language access commitments, on the City's website and will retain a copy with its Title VI program records. Information about the City's Title VI complaint procedure and complaint form will also be available on the City's website. The Plan and related Title VI material will be posted online and made available in alternative formats and languages upon request, as appropriate.