

An aerial photograph of the Seattle waterfront, showing a long pier extending into the water with several boats docked. In the background, there is a dense urban area with various buildings, including the iconic Space Needle tower on the right side. The sky is clear and blue.

LANGUAGE ACCESS GUIDANCE MANUAL

PREPARED BY THE OFFICE OF EQUITY, DIVERSITY, & INCLUSION

Using This Guide and Why It Matters

The Port of Seattle’s Language Access Guidance Manual was developed in partnership by the Office of Equity, Diversity, and Inclusion (OEDI), External Relations (ER), and the Language Access Cohort. The content for the guidance manual was created by gathering data from the Language Access Cohort and documenting Port-specific practices, in addition to researching national best practices.

This Guidance Manual is designed to support Port teams in providing timely and meaningful access to our facilities and services for Limited English Proficient (LEP) persons, as well as effective communication for individuals who are Deaf and speak American Sign Language (ASL). Port teams should strive to provide language assistance services to Limited English Proficient individuals whom they encounter or whenever a Limited English Proficient person requests language assistance services, as well as provide effective communication methods to individuals who are Deaf and speak American Sign Language (ASL).

This guidance manual is to be used in conjunction with the Department Language Access Plan Template. This template and guidance manual are designed to support each department in building a strong, intentional foundation for delivering effective language access services.

Quick Reference Guide

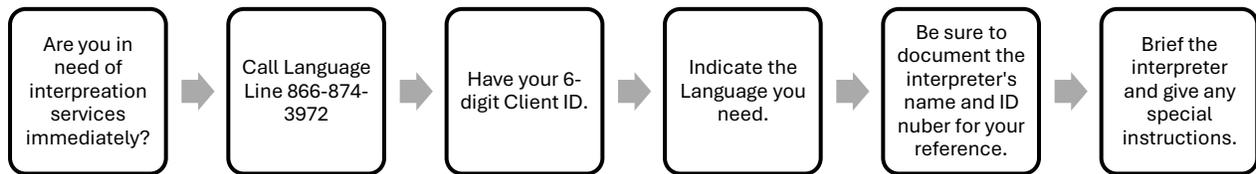
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Need Help?

Contact the Civil Rights Program Manager: blanco.l@portseattle.org | 206-867-1293

Request Now: Interpretation | Translation

How to request **on demand interpretation** (spoken word) services:



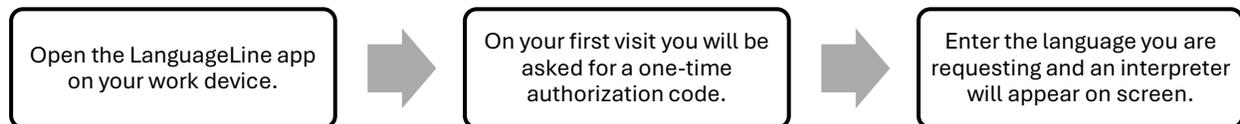
If you do not have a department client ID, please use:

Central Services Non-Emergency Client ID: 663666

Department	Client ID
AV Landside Operations – OPI <i>(Example: Parking services)</i>	652627
Central Procurement Office – OPI	659158
Central Procurement Office – VRI	659159
External Relations – OPI	710304
External Relations – VRI	710305
Legal Aid Attorneys – OPI	655158
Legal Aid Attorneys – VRI	655159
Legal Department – OPI	657517
Legal Department – VRI	657518
Port of Seattle Fire Dept - OPI	663827
Port of Seattle Fire Dept - VRI	663829
Port of Seattle Police Dept – OPI	143009
Sea Tac Intl Air – OPI <i>(Example: Customer service, Pathfinders, CBP)</i>	543400
Sea Tac Intl Air Insight – VRI <i>(Example: Customer service, Pathfinders, CBP)</i>	577717

VRI = Video Remote Interpretation OPI = Over the Phone Interpretation

How to request **video** (video remote interpretation) services:



How to request **scheduled interpretation** (spoken word) services:



How to request **translation** (written materials) services:



Links: [Interpretation | Translation Request Form](#) | [Interpretation | Translation Request Email Template](#)

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Key Contacts and Resource Directory

This directory provides staff and partners with a one-stop reference for the Port of Seattle’s Language Access Services. It should be reviewed and updated annually by the Office of Equity, Diversity, & Inclusion (OEDI) and department Language Access Leads.

Internal Contacts			
Area/Function	Contact Name & Title	Email / Phone	Responsibility / Support Provided
Language Access Coordinator / Civil Rights Program Manager	LeAnn Blanco, Civil Rights Program Manager	Blanco.l@portseattle.org	Language Access Anti-Human Trafficking Civil Rights (Title VI)
OEDI Manager Policy/Comms	Jay Doran, Manger Policy and Communications	Doran.J@portseattle.org	OEDI Policy and Communications
Contracted Language Access Vendors			
Service Type	Vendor / Provider	Access Method	Notes / Availability
Telephonic Interpretation	Language Line	Phone, Tablet, App, etc.	SEA, Customer Service, Available upon request
Video Remote Interpretation	Fluentalk	Tablet	SEA Volunteers Only
Document Translation Services	Universal Language	Contact OEDI – Fill out Request: Interpretation Translation Request Form	All Port of Seattle
Sign Language / Deaf and Hard of Hearing Services	Currently under procurement		
Braille	Pilot in Progress		
Community & Outreach Partners			
Organization	Language / Community Served	Contract Information	Role / Partnership Purpose
Washington State School for the Blind/Ogden Resource Center	Visually Impaired Community	N/A	Braille services
Emergency and Accessibility Resources			
Resource	Contact / Link	Purpose	Use Case
Emergency Interpretation Support	Interpretation and Language Services Port of Seattle	Interpretation Services	SEA
ADA Coordinator	Candace Field	Title II (ADA)	Accessibility
TTY / Relay Service (Washington Relay 711)	Dial 711	Telephone access for Deaf or hard-of-hearing customers.	

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Annual Department Language Access Plan & Evaluation Template

Every department must complete and submit an Annual Language Access Plan to the Office of Equity, Diversity, and Inclusion (OEDI). This plan documents goals, implementation activities, and performance indicators aligned with the Port’s enterprise-wide Language Access Program.

The purpose of the Language Access Plan is to establish measurable, annual goals that advance meaningful language access, and to monitor compliance, effectiveness, and equity outcomes across departments.

Instructions for Departments

Complete the Language Access Plan as part of your department’s annual business planning process. Submit to the Civil Rights Program Manager for review and compilation into the Port-wide Annual Language Access Report.

Section	Description / What to Include
Department Overview	Program description, primary public-facing services, contact for Language Access Lead/Liaison
LEP Population Summary	Top languages served, frequency of contact, data sources.
Annual Language Access Goals	3-5 SMARTIE goals (Specific, Measurable, Achievable, Relevant, Time-bound, Inclusive, Equitable)
Key Activities / Strategies	Planned actions: translation updates, staff training, signage, outreach partnerships
Monitoring and Evaluation Metrics	Quantitative and qualitative indicators: # of interpreters used, # of translated documents, customer feedback results.
Resource / Budget Needs	Funding, staffing, or technology required to achieve goals
Evaluation Summary (End of Year)	Actual outcomes vs. goals, lessons learned, recommendations for next cycle.

Language Access Plan Department Template: [Appendix D: Annual Language Access Plan, Goals, and Evaluation Template](#)

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Most Common Languages at The Port of Seattle

Across the Port, certain languages appear more frequently. At the same time, language needs vary by department and facility. This means each team should consider both the system-wide languages commonly encountered and the languages most relevant to their own customer-facing environment when determining translation and interpretation needs.

Port of Seattle – Languages Identified in Assessment (2024)

Tier 1	Spanish			
Tier 2	Vietnamese	Somali	Korean	Amharic
	Chinese	Japanese	American Sign Language	Tagalog

To view additional languages used throughout the Port, visit: [LanguageAccessAssesment_March-2024--1-](#)

Consistent with Title VI requirements, the Port has adopted a tiered translation framework (Tiers 1-3) to guide decisions about written translation. This framework is intended to help departments assess language needs and apply language services in a manner appropriate to their operational context.

Tier	What This Means in Practice	Common Signs	Type of Documents
1 – Translation Required	You see/hear this language often, and people who speak it regularly use your services.	<ul style="list-style-type: none"> This is one of the top languages used by our customers Staff frequently receive requests for interpretation in this language This language appears often in customer data, feedback, or complaints Lack of translation would clearly limit access or create risk 	Safety; rights, eligibility, legal notices, critical customer instructions
2 – Translation Recommended	You see/hear this language sometimes, or in specific situations, and translation would meaningfully improve access.	<ul style="list-style-type: none"> Requests for this language are regular but not constant Usage may be seasonal, location-specific, or program-specific Interpretation is often used instead of written translation Translation helps people understand services but is not always critical 	Program info, standard customer service materials; Travel alerts; Service changes; Accessibility info
3 – Translation Encouraged	You see/hear this language occasionally or rarely but offering translation can still be welcoming or inclusive.	<ul style="list-style-type: none"> Few documented requests for this language Contact is infrequent or one-time Language groups are small or emerging Translation improves inclusion but is not required for access 	Outreach or engagement materials

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Language Access Services

The Port of Seattle provides a variety of language assistance services to ensure equitable participation in Port activities and communications. These services are available to any member of the public who requests or appears to need assistance in a language other than English.

Language assistance is a shared responsibility: every department with public-facing programs must implement and maintain language assistance resources in accordance with this guidance and the Port’s enterprise-wide Language Access Order.

Service Type	Description	When to Use / Application	Examples / Common Tools
Onsite Interpretation (In-Person)	A qualified interpreter is physically present to facilitate real-time spoken communication between staff and LEP individual.	Complex, sensitive, or high-risk interactions Safety, enforcement, emergencies, or legal matters Public meetings, hearings, or community forums	Contracted in-person interpreters Certified interpreters (medical, legal, or conference) Sign language interpreters
Telephonic Interpretation	Interpretation provided by phone, allowing immediate access to an interpreter without physical presence.	Immediate or unscheduled needs Short interactions Call centers, customer service lines	Language Line
Video Remote Interpretation (VRI)	Interpretation delivered via video platform, allowing visual connection between interpreter and participants.	When in-person interpretation is not feasible Situations where visual cues improve accuracy Deaf or hard-of-hearing individuals using sign-language	VRI platform Tablets, iPad, or laptop with camera Secure video conferencing tools
Bilingual Staff Assistance	Staff who are assessed and authorized to provide language assistance as part of their job duties.	Routine, non-complex interactions Customer service or information-sharing Not for complex, legal, or high-risk communications unless formally qualified	Authorized bilingual staff lists
Documentation Translation	Conversion of written materials from English into another language to ensure equal access to information.	Vital documents	Professional translation vendors
Digital Communication (Web, Text, Email, Apps)	Digital Accessibility Library		

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Interpretation (Spoken or Signed)

The Port requires that all interpreters – whether staff or contracted – be qualified and competent to provide accurate, impartial, and confidential language services.

Standards include:

- Demonstrated proficiency in English and the targeted language
- Knowledge of industry-specific terminology in one of the top nine Port languages
- Role must be public-facing, frontline customer service

Interpretation Coordination A Checklist for Port Departments Best Practices to Integrate Interpretation into Your Event Planning

1. Plan and staff your event with your intended audience in mind

- When preparing your event, plan the appropriate logistics and staffing that will be needed for interpretation to go as smoothly as possible.

Start by doing the following:

- Identify your Limited English Proficient (LEP) audience's points of participation and communication flow
- Identify how many interpreters are needed per language

2. Prepare in-language outreach materials

- Outreach materials should be translated in the target language(s) of your audience.
- Materials should include event and contact information, such as access information (virtual/remote) or address and location.

3. Create Interpreter Information Packet

- Send any relevant information to the interpreters as early as possible in advance of the event.

For example:

- Event details, including point of contact for interpreters, venue access, and check-in instructions.
- Agenda, program, and run of show
- Event materials, presentations, websites, scripts, or planned talking points
- Post-related language glossaries if available, for term consistency
- Copies of in-language outreach materials used to promote the event

4. Meet with interpreters before your event

IN PERSON EVENTS

- Schedule interpreters to arrive early to go over the program.
- Designate support staff for equipment distribution and collection.
- Test equipment for clear signals (Tablets, Phones, etc.)
- Coordinate with interpreters to ensure they are positioned where they can hear and will not interfere with each other
- Remind event participants to speak slowly to allow for the best interpretation possible

VIRTUAL EVENTS

- Schedule a virtual run-through to ensure smooth transitions.
- Test interpreters' connectivity, access, and signal clarity
- Establish lines of communication among interpreters, tech monitors, and event organizers/moderators
- Work with interpreters to coordinate:
 - In what order the interpreters will speak
 - How interpreters will signal transitions
- Remind event participations to speak slowly to allow or the best interpretation possible

5. Follow up after the event and discuss lessons

- Identify lessons learned from your event to support future planning.

For example:

- Take note of what worked well to establish future protocols
- If you host future events on the same subject matter, consider creatin a language or term glossary
- Provide space for feedback and suggestions on improving coordination

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Translation (Written)

Translation services provided by vendors or contractors should follow a two-step quality review process, consistent with recognized industry standards (such as ISO 17100). This includes translation by a qualified linguist and independent review by a second qualified linguist prior to delivery.

Vendors and contractors remain responsible for the accuracy, completeness, and appropriateness of translated materials provided to the Port.

Pre-Translation Quality Assurance Checklist

Review this checklist before you send your English-language document to be translated.

- Check that your document uses the **plainest language**¹ possible
 - **Clear & Simple**
 - Avoid puns, wordplay, or legal/industry jargon
 - **Purpose Is Obvious**
 - The reader can easily understand what this is, why it matters, and what they need to do.
 - **Final & Ready**
 - The content is complete and will not change after translation.

- Double check all key information, like phone numbers, links, dates and times.
 - Best practice: Use a month's name rather than a numeral to avoid confusion
 - Best practice: Make sure links lead to translated content
 - Best practice: If you choose to translate an agency name, consider also providing the English name or acronym so the audience can web search or ask for directions

- Include a context statement to the translator that describes the purpose of the document, the audience, and any other information that can help orient their work.
 - Remember the translator may be unfamiliar with your community and/or operations in your organization.

¹ [Order No. 2025-02](#)

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Interpretation | Translation Request Process

This process streamlines how departments request interpretation and/or translation services through the Port of Seattle's, Office of Equity, Diversity, and Inclusion (OEDI).

1. Fill out a request form either online or copy and paste the template below into an email.
 - a. [Interpretation | Translation Request Form](#)
2. Once submitted either online or via email, the Civil Rights Program Manager will commence the request with the vendor.
 - a. All parties will be cc'd on all communications with vendors for accountability and transparency.
3. Expected a 24-hour turnaround time for a response from the vendor. The response will include: Project Number, Word Count, and a Quote.
4. Once the quote is approved by the appropriate parties, the Civil Rights Program Manager will communicate the approval to proceed with the request.

Deliverables will be delivered in electronic format in the format in which the submission was received (Word, Pdf, etc.).

Interpretation | Translation Request Email Template

Project Name or Event Name: _____

Requestor Information (Name of person submitting): _____

Specify what language service is needed: Interpretation Translation Both

Purpose or Intended Use: Web Content Public Meeting Emergency Safety Other

Request Priority: Standard (10-15 Business Days) Expedited (5 Business Days)
 Emergency (24-48 hrs. – Manager Approval Required)

List Languages Requested:

Request Deadline (Date when deliverable is required): _____

Has this request received approval from the necessary parties? (supervisors, directors, legal, etc.) Yes No Not Applicable

Budget Allocation:

- Requestor Dept. has budgeted for this request.
 Need OEDI to provide funding for this request.

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Language Access Training

Language access is not just a compliance obligation; it is a core competency that advances the Port’s mission of equitable service delivery. Training and professional development are therefore essential to embedding language accessibility as a standard part of customer service, community engagement, and civil rights compliance across all departments.

Following foundational Lunch-and-Learns, micro-learnings will provide short, targeted learning opportunities that build awareness, reinforce key concepts, and support practical application of the Language Access Guidance Manual across Port departments.

Roles and Responsibilities for Training Oversight

Role	Responsibility
Office of Equity, Diversity & Inclusion (OEDI)	Develops standardized training content; monitors compliance; analyzes completion data; reports annually
Directors / Managers	Ensure staff complete required training within required timelines.
Language Access Leads	Coordinate department-level training needs; support tracking and follow-up
Human Resources / Learning & Development	Maintains LMS records and supports reporting.

Language Access Training Details

Training Topic	Audience	Learning Objectives	Intended Outcome	Title VI / Compliance Alignment
Introduction to Language Access Guidance Manual	All employees	Understand why language access matters and how it supports equitable service delivery	Shared baseline awareness of language access purpose and scope	Establish baseline understanding of nondiscrimination obligations for LEP individuals
Who Needs Language Access Services	Customer-facing roles	Identify LEP populations and when language assistance is needed	Improved identification of language assistance needs	Reinforces obligation to provide meaningful access to LEP individuals
Vital vs. Non-Vital Communication	All Employees creating public-facing content	Distinguish between vital and non-vital information	Reduced risk of Title VI violations	Prioritizes translation of critical information impacting access to services
Interpretation Options & Tools	Customer-facing staff	Understand interpretation modalities and appropriate use	Increased effective communication with LEP customers	Supports timely access to oral language assistance
Requesting Language Services	All employees	Learn how to request translation and interpretation services	Faster and more accurate service requests	Supports consistent implementation of language access procedures

All training will be accessible through our Learning Management System.

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Public Communication and Outreach

The Port will ensure that the public, particularly limited English proficient (LEP) community members, receive timely, accurate, and accessible information about Port programs, services, and opportunities.

Port Statement on Language Services

Language assistance services – interpretation, translation, and communication access – are provided free of charge to any member of the public. At no time shall a person be denied, delayed, or charged for services because of language or communication barriers. All Staff must communicate this guarantee clearly and respectfully to ensure trust and equitable access.

Required Public Notices

Language Access Statement: Include the following statement in all public-facing materials, websites, and signage: “Free language assistance services are available. Please ask any Port staff member for help.”

Posting Locations: Display multilingual notices at customer-service counters, ferry/cruise terminals, meeting venues, public hearings, and Port websites.

Translation of Key Notices: Translation of vital information, such as safety alerts, meeting announcements, complaint rights, and major service changes, into priority languages identified through the Port Language Access Assessment² (Four-Factor Analysis).

Digital Accessibility: Ensure that online materials meet ADA Title II.

Community Engagement and Partnerships

Collaborate with community-based organizations (CBOs) serving LEP and immigrant/refugee populations for message distribution, interpretation at outreach events, and feedback collection.

- Conduct listening sessions or focus groups at least once every two years to gather input on language-access effectiveness.
- Work with Port Communications and OEDI to develop multi-lingual communication plans for major capital projects or policy initiatives.

Messaging Standards

- Use plain language and culturally responsive visuals.
- Avoid acronyms or technical jargon when possible.
- Validate translations for accuracy and tone with trusted community reviewers before publication.

² [LanguageAccessAssesment_March 2024.pdf](#)

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Complaint and Feedback Process

This process is to ensure that all members, including individuals with limited English proficiency (LEP), can easily provide feedback or file complaints regarding language access, and that each concern is addressed promptly, respectfully and in compliance with federal and Port policies. The following will provide clear guidance for the public and staff to raise concerns about:

- Delay of interpreter or translation services
- Lack of accessible information in preferred languages
- General feedback on the quality or effectiveness of language access services across the Port

How to Submit a Complaint or Feedback

Method	Instruction
By Phone	Title VI Coordinator (206) 787-4156
By Email or Online Form	TitleSixCoordinator@PortSeattle.org Printable form: TitleVI-Complaint-form_012024.pdf Online Form: Title VI Coordinator's Office Complaint Form Port of Seattle
By Mail	OEDI Title VI Coordinator P.O. Box 1209 Seattle, WA 98111

Complaint Resolution Process

Step	Action	Responsible Party	Timeline
Intake & Acknowledgement	Complaint or feedback is received, logged, and acknowledged (in the complainant's language when feasible)	Title VI Coordinator Manger EDI Policy & Comms Civil Rights Program Manager	Acknowledge within 5-10 business days
Review & Investigation	Review complaint details, interview involved staff if needed and determine whether a Title VI or policy violation occurred.	OEDI + Department Lead + EEO + Professional Standards + Legal if applicable	Initial Review: 10-15 days Investigation: 30-60 days
Response & Resolution	Provide written response outlining findings and corrective actions. Offer translated summary if requested.	Title VI Coordinator Manger EDI Policy & Comms Civil Rights Program Manager EEO Professional Standards	Resolution: 60-90 days
Follow-Up & Tracking	Log outcome and identify trends for improvement.	OEDI	

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Internal Review and Escalation

To ensure accountability and continuous improvement within Port operations, this structured process will allow staff and leadership to review, analyze, and correct issues related to language access implementation, whether discovered through:

Step	Action	Responsible Party	Timeframe
Issue Identification	A potential language-access issue identified (e.g., repeated complaints, missing translations, noncompliance by vendor)	Staff, Language Access Lead/Liaison, or OEDI	As needed
Preliminary Review	The Language Access Lead/Liaison confirms facts, gathers documentation, and reports the issue to the Department Director and OEDI.	Department Language Access Lead/Liaison	Within 5 business days
Formal Escalation	If the issue involves a potential Title VI violation, failure to provide services, or resource gap affecting multiple customers, it is formally escalated to the OEDI Director and Legal Department.	OEDI + Legal	Within 10 business days
Corrective Action Plan	OEDI and Department Leadership develop a written plan outlining root cause, corrective steps, timeline, and responsible persons	OEDI + Department Director	Within 30 business days
Monitoring & Closure	Progress is tracked quarterly until resolved; lessons learned shared with Language Access Workgroup	OEDI	Ongoing

Continuous Improvement, Monitoring, & Evaluation

In alignment with [Commission Order 2023-05](#), the Port of Seattle recognizes language access as a continuous practice that requires regular monitoring, evaluation, and refinement. By reviewing data, training outcomes, service usage, and community feedback, the Port will identify gaps, strengthen practices, and adapt to changing needs. This commitment to continuous improvement ensures sustained compliance with Title VI while advancing equitable, inclusive, and accessible services for all communities.

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Appendices & Implementation Tools

Appendix A: Key Definitions and Acronyms

Word	Definition
ADA Title II (Effective Communication)	Requires state and local governments to ensure effective communication with individuals with disabilities, including those who are Deaf, hard of hearing or have speech impairments.
Bilingual Staff / Designated Bilingual Position	An employee officially approved and qualified to use another language as part of their regular job duties to assist LEP customers. Proficiency should be verified and documented through assessment.
CBO (Community-Based Organization)	A nonprofit or grassroots group that represents and provides services to a specific linguistic, cultural, or geographic community; often engaged as partners for outreach or feedback.
Complaint	A formal expression of dissatisfaction alleging that an individual or group was denied language access or discriminated against based on national origin, in violation of Title VI or Port policy.
Cultural Competence	The ability of staff, systems, and organizations to understand, respect, and effectively respond to the cultural and linguistic needs of diverse populations. It includes awareness of one's own biases and commitment to continuous learning.
Cultural Responsiveness	The active practice adapting services, communication, and engagement strategies so they align with the cultural values, communication styles, and expectations of the people being served.
DOT (Department of Transportation)	Federal agency that provides Title VI and LEP compliance oversight for transportation entities, including ports and airports.
Equity	Fair treatment, access, opportunities, and advancement for all people while striving to identify and eliminate barriers that have prevented the full participation of historically oppressed communities. Improving equity involves increasing justice and fairness within institutions and systems and ensuring fair and intentional distribution of resources.
Essential Public Information / Vital Documents	As per the executive Order, "Essential Public Information" is any information developed or used by the department and deemed vital for purposes of public safety, public health and economic development. This term is used interchangeably with the term "vital documents".
Executive Order	
Four-Factor Analysis	The Title VI-required assessment process used to determine language-access obligations by examining: Number/proportion of LEP people served or likely to be encountered. Frequency of contact Nature and importance of the service; and Available resources and costs.
Interpretation	The oral rendering of speech from one language to another in real time (e.g., in-person, telephonic, or video-remote interpretation). Interpretation = spoken.
Language Access	The provision of oral and written communication assistance, such as interpretation and translation, enables LEP individuals to have meaningful access to a program, service, or activity.
Language Access Coordinator	A senior staff member who will be responsible for policy compliance and implementation of the language access plan.
Language Access Lead / Liaison	A department-level contact is responsible for implementing language-access practices, completing annual plans, liaising with OEDI, and monitoring compliance within their department.
Language Access Plan	A written plan outlines how a department or program will provide language assistance, monitor effectiveness, and achieve annual goals for meaningful access.
LEP (Limited English Proficient Individual)	A person who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. (Title VI and Executive Order)
LEP Threshold	The quantitative benchmark that determines when translation or interpretation is required for a given language group. (e.g., 5 % or 1,000 individuals, whichever is less, of the eligible service population).

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Meaningful Access	Access is accurate, timely, and effective in enabling LEP persons to fully participate in or benefit from Port services, activities, or information. Meaningful access is the compliance standard under Title VI.
Monitoring and Evaluation	The ongoing process of collecting, analyzing, and reporting data on language-access implementation to ensure continuous improvement and compliance with federal and Port policies.
No-Cost Guarantee	A Port commitment that interpretation and translation services are provided free of charge to LEP or Deaf/hard-of-hearing individuals.
OEDI (Office of Equity, Diversity, and Inclusion)	The Port office responsible for overseeing implementation of equity and language-access initiatives, training, monitoring, and compliance reporting.
Qualified Interpreter	An individual who demonstrates proficiency in both English and the target language, understands industry-specific terminology, and adheres to confidentiality and professional-ethics standards. Family members, friends, or minors must not be used except in emergencies.
Target Audience	The specific group(s) of community members or stakeholders for whom information, communication, or outreach is intended, defined by language, geography, or service use.
Title VI of the Civil Rights Act of 1964	Federal law prohibiting discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance. (42 U.S.C. § 2000d et seq.)
Translation	The written conversation of text from one language into another while preserving meaning, accuracy, and cultural appropriateness. Translation = written.
Vital vs. Non-Vital Communication	Vital: Information that is critical for an individual to safety, effectively, or legally access, use, or participate in a program, service, facility, or activity. Non-Vital: Information or promotional materials that enhance understanding but are not critical to access or participation.
Vital Documents	A specific type of vital communication. Vital documents are any written materials that contain information critical to obtaining meaningful access to a program, service, activity, or facility. Example of Vital Documents <ul style="list-style-type: none"> • Consent forms • Complaint forms or Title VI/Title II notices • Applications for services or permits • Safety instructions and wayfinding • Eligibility criteria or program rules • Notices of rights, responsibilities, or deadlines • Instructions for accessing or navigating port services • Multilingual signage that directs behavior or ensures safety

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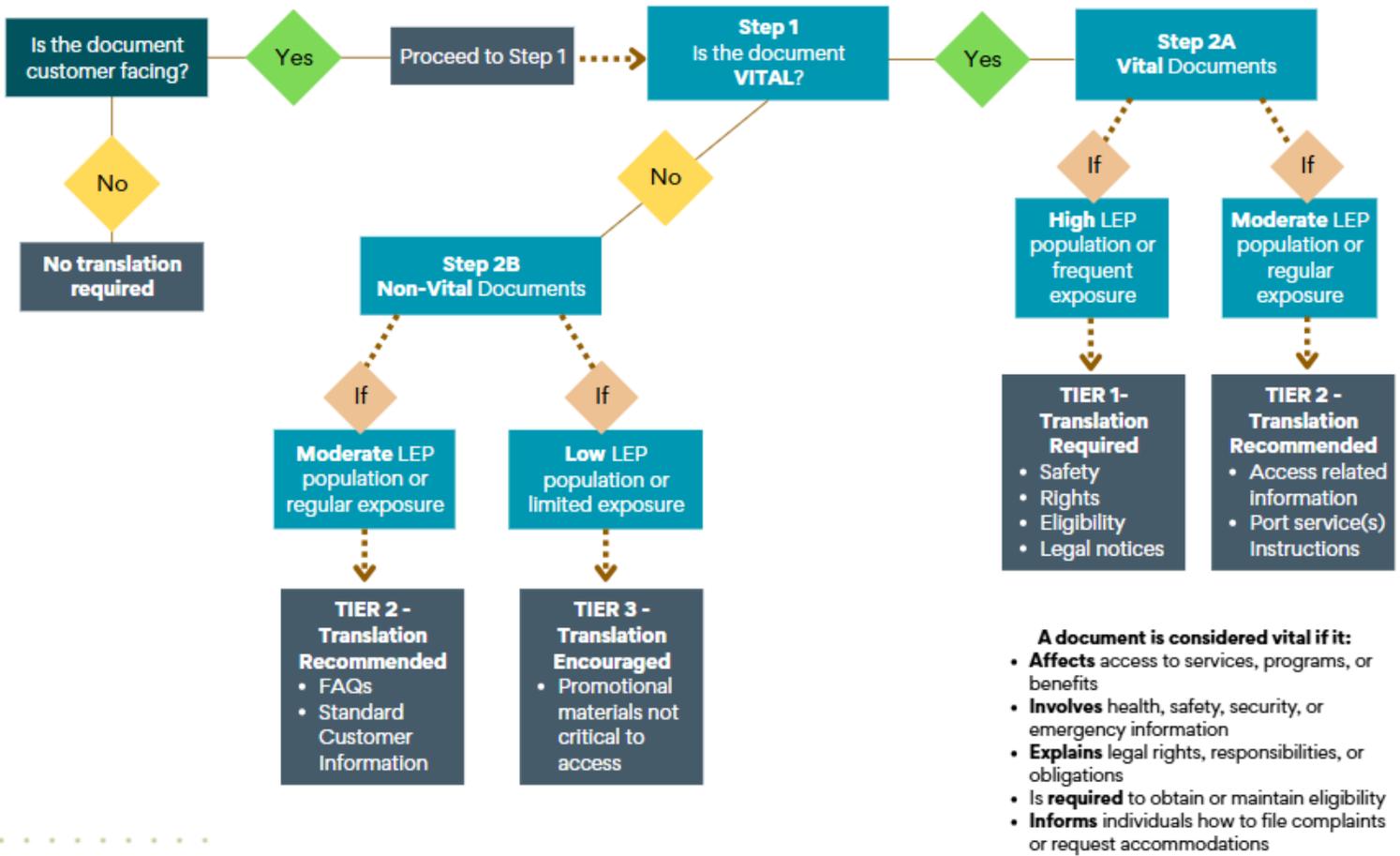
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Appendix B: Vital vs. Non-Vital Documents

Translation Decision Tree

Vital vs Non-Vital Documents

TIERED TRANSLATION RECOMMENDATIONS



A document is considered vital if it:

- **Affects** access to services, programs, or benefits
- **Involves** health, safety, security, or emergency information
- **Explains** legal rights, responsibilities, or obligations
- Is **required** to obtain or maintain eligibility
- **Informs** individuals how to file complaints or request accommodations

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Appendix C: Title VI and LEP Legal References

Federal Statutes		
Law/Regulation	Citation	Description / Relevance
Title VI of the Civil Rights Act of 1964	42 U.S.C. § 2000d et seq.	Prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance. Language barriers that exclude or delay access for LEP persons constitute national-origin discrimination.
Section 504 of the Rehabilitation Act of 1973	29 U.S.C. § 794	Prohibits discrimination based on disability in federally assisted programs and activities. Includes communication accessibility obligations that complement language-access duties.
American with Disabilities Act (ADA) – Title II	42 U.S.C. § 12131 et seq. and 28 C.F.R. Part 35	Requires state and local government entities to ensure effective communication for people with disabilities (e.g. Deaf/hard of hearing, speech impairments). Often referenced alongside language-access requirements.
Civil Rights Restoration Act of 1987	Pub. L. No. 100-259	Clarifies that Title VI covers all operations of a recipient organization, not only the federally funded program.
Federal Implementing Regulations and Guidance		
Agency / Document	Citation / Year	Purpose / Relevance
U.S Department of Transportation (DOT) – Title VI Regulations	49 C.F.R Part 21	Implements Title VI within DOT and all funding recipients (includes ports, airports, and transportation programs).
DOT – Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons	70 Fed. Reg. 74087 (Dec. 14, 2005)	Defines the Four-Factor Analysis and best practices for providing meaningful access for LEP individuals.
Federal Aviation Administration (FAA) – Nondiscrimination Compliance Program	FAA Order 1400.11 (2017)	Directs airports / aviation recipients to implement title VI, Section 504, and LEP requirements, including annual certification and complaint procedures.
U.S Department of Justice – Title VI Legal Manual, Section IX: Limited English Proficiency	Updated 2023	DOJ’s authoritative interpretation of Title VI as it applies to LEP populations; includes examples of complaint and non-compliant practices.
Washington State and Local Authorities		
Authority	Citation / Reference	Relevance
Washington State Law Against Discrimination (WLAD)	RCW 49.60	Prohibits discrimination in employment, housing, and public accommodations; reinforces Title VI standards at the state level.
Office Financial Management (OFM) State Language Access Directive	OFM Directive 22-01 (2022)	Establishes statewide expectations for language access and translation in executive agencies.
Port of Seattle Commission Order 2023-05 – Removing Barriers Through Language Access	Adopted April 2023	Formally commits the Port of Seattle to enterprise-wide language access, including annual department plans and equity-centered implementation.

Need Help?

Contact the Civil Rights Program Manager: blanco.l@portseattle.org | 206-867-1293

Appendix D: Non-Verbal Communication Card Samples

(For more information contact: Candace Fields, AV F&I Accessibility Program Manager)

Communication Card

Communication

The best way to communicate with me is...

? TSA PSS

Gesture Lip Reading Writing

Documents

Which document would you like me to present?

Passport Boarding Pass Drivers License ID Card

mm dd yyyy

1	2	3
7	8	9
4	5	6
0	00	000

Screening

My preferred screening method is...

No Metal Detector No A.I.T. No Facial Recognition

Metal Detector A.I.T.

Pat Down Private Screening

Yes No

Communication Card

Communication

The best way to communicate with me is...

?

Gesture Lip Reading Writing Translation

Yes No

Where is...?

I would like a map.

Baggage Claim Ground Transportation Light Rail

Retail Restaurants Vending Alline Customer Desk

Nursing Suite Service Animal Relief Area Water Station Restrooms Sensory Room Prayer Room

A B C D N S

CUSTOMER SERVICE FRONT

TSA

CUSTOMER SERVICE FRONT

SEA Access

Yes No

The best way to communicate with me is...

Gesture Lip Reading Writing Translation

Personal medical information

EpiPen Medication Pacemaker

PAIN LEVEL

1 2 3 4 5 6 7 8 9 10

Where does it hurt?

FRONT BACK

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Appendix E: Annual Language Access Plan, Goals, and Evaluation Template

Port of Seattle - Language Access Plan for Departments

Purpose: This Language Access Planning document is required for each of the 18 high usage departments. This form should be filled out in collaboration with the department’s Language Access Cohort representative, your department lead/Director, and input from team members on annual activities planned. This document will be used to guide each Port of Seattle department in setting annual language access goals, monitoring implementation, and evaluating progress toward Title VI and equity compliance.

Instructions: Complete this plan annually by January 31 and submit it to the OEDI Civil Rights Program Manager. Attach any supporting documentation, including but not limited to: Four-Factor Analysis worksheet, LEP statistics, or community feedback. OEDI will compile results for the Port-wide Annual Language Access Report.

Department Information

Department	
Dept. Lead	
Language Access Lead / Liaison	
Reporting Year	
Date Submitted	
Reviewer (OEDI)	

Section A – Department Overview

Describe your department’s primary programs, services, or public contact points: (e.g., airport terminal operations, maritime customer service, community outreach, job postings, permitting, public meetings)

--

Section B – Limited English Proficient (LEP) Population Summary

Data Point	Information
Top 3 Languages Served	
Data Sources Used (e.g., customer logs, surveys, etc.)	
Estimated % or # of LEP Customers	
Frequency of LEP Contact (Daily / Weekly / Monthly / Seasonal)	
Identified Community Partners Serving LEP Populations	

Section C – Annual Language Access Goals

List 3-5 SMARTIE goals (Specific, Measurable, Achievable, Relevant, Time-bound, Inclusive, Equitable) that reflect department needs and Port-wide priorities.

Goal #	Goal Statement	Baseline Data	Target Metric / Outcome	Lead Responsible	Target Completion Date

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Section D – Key Activities / Strategies

Planned Activity or Initiative	Description / Deliverable	Staff Responsible	Status (Planned/In Progress/Completed)	Timeline
e.g., Update multilingual signage at cruise terminals	Translate wayfinding signs into top 5 languages identified in Four-Factor Analysis	Facilities Team	In Progress	Q2 2026

Section E – Monitoring and Evaluation Metrics

Indicator / Metric	Data Source or Collection Method	Reporting Frequency	Responsible Person / Team	Notes / Comments
e.g., # of interpreter requests per quarter	Language Access Service Log	Quarterly	Dept. Lead	

Section F – Resources and Budget Needs

Resource Type	Estimated Cost / Support Needed	Funding Source / Request	Justification / Notes
e.g., Interpreter services contract, translation software license. Staff training hours allocation			

Section G – End-Of-Year Evaluation Summary

Provide a summary of key outcomes, challenges, and recommendations for next year.

Questions	Response
Which goals were fully or partially met?	
What barriers or gaps impacted implementation?	
What community or staff feedback informed your evaluation?	
What are next year’s priority actions?	

Sign-Off

Name/Title	Signature	Date
Dept. Lead		
Language Access Lead/Liaison		
OEDI Reviewer		

Need Help?

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Appendix F: Complaint Form and Flow Chart



**Port of Seattle
Title VI Coordinator's Office
Complaint Form**

Section I

Any person who believes he or she has been subjected to discrimination on the basis of race, creed, color, gender, or national origin in any program or activity administered by the Port of Seattle has the right to file a complaint with the Port of Seattle. Complaints must be filed within one hundred eighty (180) days following the date of the alleged discriminatory occurrence, must be filed using this form, and must be delivered to the Office of Equity, Diversity, and Inclusion, Title VI Coordinator, P.O. Box 1209, Seattle, WA 98111 or via email at TitleSixCoordinator@PortSeattle.org. If a complaint is initially made by phone, it must be supplemented with this Complaint Form within 180 days after the discriminatory event. This is not intended to deny or limit the right of a complainant to file a complaint with an outside agency, such as the U.S. Department of Transportation nor Federal Aviation Administration (FAA), or to seek private legal counsel regarding discrimination.

Please fill in your information below.

Basis for complaint

Race Color Sex Creed National Origin

Complainant

Name:

Address:

Telephone Numbers:
(Home) (Work)

E-Mail Address:

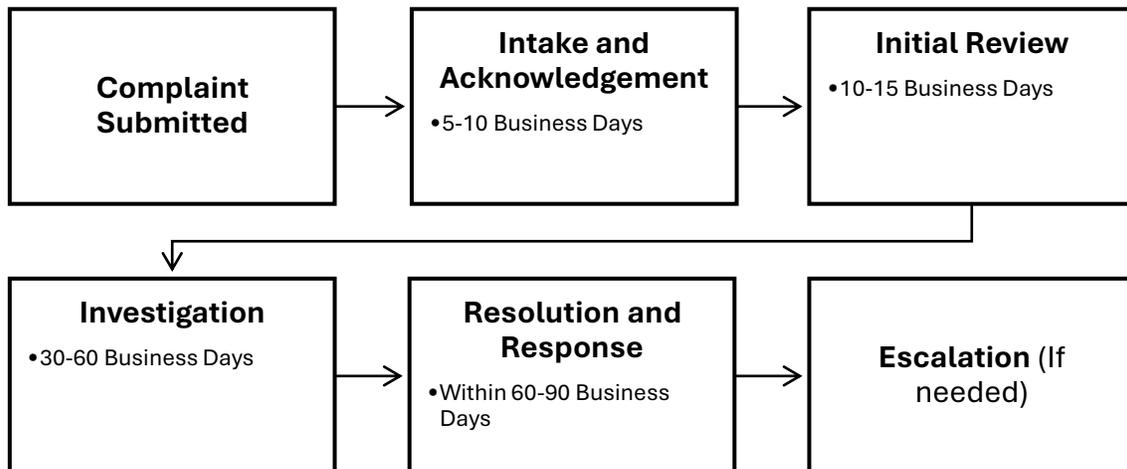
Section II

Are you filing this complaint on your own behalf?
Yes No

If you answered "yes" to this question, go to Section III.

If you answered "no", please provide the name and relationship of the person for whom you are filing.

Did you have obtained the permission to file this complaint from the person for whom you are filing?
Yes No



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