



Fire Department Language Access Plan

Definitions

Back Translation: When a document is translated and a second, independent translator translated the document back to English to check that the appropriate meaning has been conveyed.

Call for Service: an incident that emergency services or public safety organizations (such as police, fire departments, and emergency medical services) are assigned to resolve, handle, or assist with.

Federal Financial Assistance: Includes funding for grants, training, use of equipment, donations of surplus property, and other assistance.

Four Factor Analysis: An individualized assessment of four factors designed to be a flexible and fact-dependent standard that balances the need to ensure meaningful access while not imposing undue burdens on small business, small local governments, or small nonprofit entities.

Interpretation: The act of listening to something in one language (source) and orally translating it into another (target). Interpretation is in person or via a telephone interpretation service ranging from on-site interpreters for critical services provided to a high volume of LEP persons through commercially available telephonic interpretation services.

Limited English Proficiency (LEP) Person: Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such person(s) may be entitled, at no cost to them, to language assistance with respect to a particular type of service, benefit or encounter.

Language Access Plan (LAP): An implementation plan developed after the four-factor analysis to decide what language assistance services are appropriate to address identified needs of the LEP populations served.

Timely: Language assistance should be provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services to the LEP person. *Note: there is no single definition that is applicable to all types of interactions at all times by all types of recipients.*

Translation: The replacement of a written text from one language (source) into an equivalent written text in the target language. Written translation can range from translation of an entire document to translation of a short description of the document.

Vital Document: Any document that contains information that is critical for obtaining or contain the services or benefits that are supported by Federal funds, or that are required by law. Such documents may include but are not limited to applications, consent forms, notices of participant rights and responsibilities, disciplinary notices, letters or notes that require a response from the participant or beneficiary, legal notices and notices advising LEP persons the availability of free language services.

Introduction

This Language Access Plan (LAP) addresses Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on national origin. In 1974, the U.S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities, with limited-English proficiency, to participate in a federally funded program violates Title VI regulations.

The City of Pasco Fire Department (Pasco Fire) recognizes that language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by our programs and activities and the programs and activities of our federally funded sub grantees. As a recipient of federal financial assistance, the Pasco Fire should work to follow the compliance standards set forth in this guidance document to ensure the programs and activities that are normally provided in English are accessible to LEP persons and thus do not discriminate on the aforementioned basis.

The Pasco Fire acknowledges the responsibility to reduce language barriers that can preclude meaningful access by LEP persons by pursuing a more comprehensive approach.

Assistance:

Pasco Fire shall respond to requests for language assistance in the manner described in this plan, which includes:

- A mechanism to provide ongoing assessment of needs, programs, and activities of target audiences, along with the organization's capacity to meet these needs using the LAP
- Translation of vital written materials in languages other than English where there is a significant number of percentage of persons with limited English proficiency.
- Oral language assistance to LEP persons for programs, where such assistance is requested an/or anticipated.
- Identified procedures and a designated representative from Pasco Fire responsible for implementing activities related to the LAP.
- Notification of the availability of free language services to those persons in the target audience, through oral and written notice in the relevant primary language assistance activities.
- Staff training on policies and procedures of the organization's language assistance activities.

Scope:

The LAP applies to individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English. For example, the scope of the plan would not extend to the following:

- Hearing or visual impairments requiring Sign language interpretation and Braille text are accommodations provided under the Americans with Disabilities Act.
- Illiteracy, generally - The inability to speak, read, or write English and conditions that may trigger language assistance under the Title VI are distinguished with a key factor. A LEP person cannot speak, read or write English and primarily speaks, read, or writes in a language other than English.

Extent of Obligation & Four-Factor Analysis:

The Four-Factor Analysis is a starting point for Pasco Fire to take reasonable steps to ensure meaningful access to programs and activities by LEP persons by looking at following:

- Factor 1 - The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- Factor 2 - The frequency with which LEP persons come in contact with the program;
- Factor 3 - The nature and importance of the program, activity, or service provided by the program to people's lives; and
- Factor 4 - The resources available to the grantee/recipient and costs.

The Four-Factor Analysis may show that different language assistance measures are sufficient for the different types of programs or activities provided by the City of Pasco Fire Department and therefore reasonable steps to ensure meaningful access to LEP persons may vary.

FACTOR 1- the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.

The first part of the Pasco Fire's self-assessment involves data on the number of LEP persons eligible to be served, likely to be served, or likely to be encountered by Pasco Fire through programs, services or activities.

In order to determine the number and proportion of potential LEP persons, relevant demographic information was collected utilizing the U.S. Census Bureau, 2022 American Community Survey (ACS) 5-Year Estimates.

According to the ACS 5-Year Estimate, the population for the City of Pasco is around 77,108. (The Office of Financial Management estimates the population to be 81,280) Utilizing the information in Table A, it is determined that 47% of the population speak a language other than English at home. This portion of the population is represented by the following: Spanish 43%, Indo-European 3%, Asian/Pacific Island 1% and Other 0.4%.

Of the individuals that speak a language other than English, 47% speak less than "very well" and would be considered to have Limited English Proficiency. Spanish-speaking individuals make up 90% of persons that could potentially qualify as having a Limited English Proficiency and will be the target audience for materials and outreach.

Language		Spanish			Indo-European			Asian/Pacific			Other			TOTAL
Ability	Age	5-17	18-64	65+	5-17	18-64	65+	5-17	18-64	65+	5-17	18-64	65+	
Very Well		5748	11182	371	371	720	114	60	322	0	66	70	0	19024
Well		3085	3554	252	187	341	8	0	136	13	0	185	0	7761
Not Well		1101	4113	523	51	242	5	0	34	129	0	0	0	6198
Not at All		36	2302	551	0	131	29	0	48	139	0	0	0	3236
TOTAL		9970	21151	1697	609	1434	156	60	540	281	66	255	0	36219

Table A: Ability to speak English by language spoken at home other than English by age for the population 5 years and over.

FACTOR 2- The frequency with which LEP persons come in contact with programs

The second part of the Pasco Fire's self-assessment includes identifying which program or service an LEP individual may access on a daily basis as this will increase our duty to accommodate than if access to programs or services are unpredictable or infrequent.

Data that provides the frequency at which the Pasco Fire has contact with LEP individuals has not been collected in the past.

During a two-week observation period from Monday, February 25, 2024, to Friday, March 8, 2024, a survey, Table B, was conducted by the Pasco Fire staff while on various shifts. This method is an example of how Pasco Fire can measure frequency of LEP individuals contact with programs and services.

How many individuals with Limited English Proficiency were encountered?	What languages were encountered and the frequency?	Where did you encounter the LEP individual?	What documents or information were requested in a language other than English? and what language?
13	Spanish & Indo-European	Call for Service	Translation
19	Spanish	Call for Service	Translation
3	Spanish & Asian/Pacific	Call for Service	Translation
17	Spanish & Asian/Pacific	Call for Service	Translation & EMS/Medical Forms

Table B: Non- English customer contact during a two-week survey period performed by Pasco Fire staff.

FACTOR 3 - The nature and importance of programs, activities or services provided by City of Pasco Fire Department

The third part of the Pasco Fire's self-assessment requires a review of the importance of activities, information, services, or programs that are offered. Determining the need of language service can be compared to the possible consequences if it is not available. Identifying whether or not denial or delay of access have a serious or even life-threatening implications for the LEP individual will indicate a greater need for language services. A program's importance can also be analyzed by any forms, applications, hearings, or other activities required in order to participate.

Pasco Fire primarily engages with LEP individuals during Calls for Service. When responding to Calls for Service, Pasco Fire personnel engage in direct communication with individuals present at the scene. Pasco Fire is committed to ensuring effective communication with all individuals encountered during emergency responses.

Pasco Fire's recognizes the importance and benefit of outreach and communication with LEP individuals during planning, monitoring and implementation of projects, programs, and plans. Within the range of offerings, some are more important than others. While it is the Pasco Fire's intent to provide meaningful access to all participants and eligible persons, the availability of resources may limit the provision of language services in some instances. Information about and an understanding of all high priority offerings should be effectively communicated to all persons affected.

Oral interpretation at public meetings, events and other activities shall continue at no charge provided that the need is identified by the participant(s) at least forty-eight (48) hours prior. Written communication advertising such events shall provide instructions for requesting interpretation services.

All legal notices and publications intended to inform the public of meetings involving Pasco Fire, the availability of documents, or opportunities for public comment shall be published in English with a notice in Spanish notifying them to contact the City for interpretation. In addition to the legal notices associated with Pasco Fire published in an official newspaper, notices and public service announcements shall offer translation services.

FACTOR 4 - the resources available to the recipient and costs

The fourth and final part of the Pasco Fire's self-assessment looks at the steps that should be taken and how resources and costs impact the level of language service available to be provided.

Technological advances, sharing language assistance materials and services, advocacy groups, federal grant agencies and reasonable business practices can help to reduce issues encountered related to limited resources and high costs. Pasco Fire's recognizes the responsibility to carefully explore the most cost-effective means of delivering language services before limiting them due to resource limitations.

Language services can be provided through oral interpretation (interpretation) in person or via telephone service or through written translation (translation). Pasco Fire's recognizes the value of having interpretation and translation services and will evaluate when services should be made available on an expedited basis. Hiring of bilingual staff has allowed oral interpreters to be available immediately.

Data collected shall be specific enough to inform staff as to the variety of language groups for whom interpretation and translation services are needed. Pasco Fire's should provide language services to LEP persons by a variety of methods based upon the relative numbers of such person and the frequency of contacts or anticipated contacts. Reasonable steps should be taken to accomplish this; at a point at which costs approach or exceed the benefits, alternative methods of delivery of language services shall be evaluated and appropriate changes made. There will be times that the cost is indeterminable until the specific project or program is identified.

Resources	Cost	Application
Translation and Interpretation Services	\$0 - \$75/page \$0.25/word \$50 - \$75/hour <i>*estimate</i>	Spanish translation for City of Pasco official forms, documents, contracts, etc. In-house bilingual staff members can provide basic translation
Social Media	Indeterminable	When issuing notices through social media related to Pasco Fire, LEP persons will have the option to have the post translate through the social media platform.
Website Portal	Indeterminable	City of Pasco website www.pasco-wa.gov has translation capabilities available
Notice	\$50extra/notice <i>*minimum estimate</i>	Notification of the availability of free language services to LEP persons can be included within meeting notices advertised in the local newspaper. Materials on the website and on appropriate materials developed for meetings, events and public hearing can include notice of available interpretation/translation services
"I Speak" Cards	Manufacturing Costs <i>Variable</i>	"I Speak" language cards can be made available to Pasco Fire staff who speak languages other than English to have on hand for customers to easily identify them.

Phone System	\$0.98/minute	Language series can include a contract with a language service or equivalent service provider for on-call translation services
Bilingual Staff	Indeterminable	Staff are available for interpretation/translation services.
Previously translated material	Indeterminable	Public documents, fliers, brochures, etc. have been made available on the City's website for LEP individuals. Valuable papers can be reviewed to ensure bilingual copies are available.

Oral Language Services:

1. Competence of Interpreters

Pasco Fire recognizes the responsibility to ensure competency of the language service provider no matter the strategy being utilized. It shall be ensured that interpreters:

- Demonstrate proficiency in and ability to communicate information accurately in both English and in the other language and identify and employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation).
- Have knowledge in both languages of any specialized terms or concepts peculiar to the entity's program or activity and of any particularized vocabulary and phraseology used by the LEP individual(s).
- Understand and follow confidentiality and impartiality rules to the same extent that staff for whom they are interpreting and/or to the extent their position requires; and
- Understand and adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles (particularly in court, administrative hearings, or law enforcement contexts).

When no formal certification assessments currently exist for a language, other qualifications to consider are qualified by a state or federal court, level of experience and participation in professional trainings and activities, demonstrated knowledge of interpreter ethics, etc.

2. Hiring Bilingual Staff and Staff Interpreters

Having bilingual persons on staff offers one of the best, and often most economical, options. It is important to keep in mind that being bilingual does not automatically mean that a person has the ability to interpret. Also, there may be times when the role of the bilingual employee may conflict with the role of an interpreter. Management strategies that include appropriate adjustments in assignments and protocols for using bilingual staff can ensure that proper utilization of bilingual staff.

3. Interpreters: Hiring/Contracting

Where there is a frequent need for interpreting services it may be necessary and reasonable to provide on-site interpreters. Depending on the facts, this may be the most helpful to provide accurate and meaningful communication with LEP individuals.

Contracting may be a more cost-effective approach when there is no regular need for a particular language skill. It can be cost-effective to contract with community-based organizations and mutual assistance associations that provide interpretation services to certain languages already.

4. Telephone Interpreter Line

When the mode of communicating with a LEP individual is over the phone, telephone interpreter service lines can offer speedy interpreting assistance in many different languages. Although useful in many situations, it is important to ensure the competency of the interpreter regarding technical or legal terms that may be important parts of the conversation. Video teleconferencing can help resolve the issue of lost nuances and non-verbal communication where necessary. When using telephonic interpreters be sure to provide adequate opportunity to review any documents that will be discussed and any logistical problems that should be addressed.

5. Community Volunteers

Under appropriate circumstances, providing supplemental language assistance through coordinated community volunteers may be cost-effective. It is best to use volunteers trained in the information or services of the program that have been identified as competent in the skill of interpreting and are knowledgeable about applicable confidentiality and impartiality rules. Developing a formal arrangement with a community-based organizations can help ensure services are more regularly available.

6. Family Members/Friends as Interpreters

An LEP individual may feel more comfortable when a family or friend acts as an interpreter although the Pasco Fire does not plan to rely on informal interpreters to provide meaningful access to important programs and activities. Where desired, a LEP individual will be permitted to use, at their own expense, an interpreter of their own choosing in place of or as a supplement to the free language services expressly offered. With proper planning and implementation, Pasco Fire should be able to avoid most exigent circumstances that would necessitate temporary use of interpreters not identified by Pasco Fire. In many cases family members (especially children) or friends are not competent to provide

quality and accurate interpretations. Confidentiality, privacy or conflict-of-interests (disclosed or undisclosed) may arise if a LEP individual is uncomfortable revealing or describing personal information. If it is determined that language services are not necessary and a LEP individual uses their own informal interpreter, Pasco Fire should consider whether a record of that choice of assistance is appropriate to document. Extra caution should always be used when the LEP individual chooses to use a minor by ensuring that the choice is voluntary, the LEP individual is aware of the possible problems and that the LEP individual knows that Pasco Fire could provide a competent interpreter at no cost to the LEP person.

Written Language Service:

Pasco Fire recognizes that many LEP individuals may not be able to read their native language and that the availability of oral interpretation is always advantageous.

1. Documents that Should be Translated

Pasco Fire can apply the four-factor analysis to determine if an effective LAP for particular programs or projects include the translation of vital or generic widely used written materials. Where appropriate, it can be beneficial to create a plan for consistently determining, over time and across various activities, what documents are vital to the meaningful access of the LEP populations Pasco Fire is serving. Regular review can help determine whether certain critical outreach materials should be translated. Translation of materials can be more effective when done in tandem with other outreach methods such as ethnic media, schools, grassroots, faith-based and community organizations. If a document sent out to the general public includes both vital and non-vital information, providing guidance in the appropriate language where a LEP individual might obtain an interpretation or translation of the document is important.

2. Languages to Translate Documents to

Utilizing the four-factor analysis, Pasco Fire shall determine on a case-by-case basis which documents will be translated by looking at the totality of the circumstances. Translation is a one-time expense that must be weighed against the estimated lifespan of the document. It is unrealistic to translate all written materials as such an undertaking would incur unreasonable costs and require substantial resources. Identifying languages that are frequently encountered and those less commonly encountered can help Pasco Fire determine which vital documents should be translated into which language.

3. Competence of Translators

The skill of translating is very different from the skill of interpreting and Pasco Fire shall seek competent translators of written documents. Where certification or accreditation is not possible or necessary, a particular level of membership in a professional translation association can provide an indicator of professionalism. Translation can be checked by having a second independent translator check the work or have them back translate. Understanding the expected reading level of the audience while also having fundamental knowledge about vocabulary and phraseology is imperative because sometimes a translator will need to provide appropriate alternatives if there is not a direct translation. For vocabulary and phraseology that does not have a direct translation, Pasco Fire can work to develop a consistent and appropriate set of descriptions for future use. Consistency will help with the effectiveness and cost of translating terms of art, legal or other technical concepts. This can include partnering with agencies and organizations to ensure common vocabulary and phraseology. Written translations tend to be permanent, and Pasco Fire recognizes the responsibility to seek quality and accuracy in translations for meaningful access by LEP individuals.

Notification of Language Assistance Services:

Pasco fire will make every effort to ensure LEP individuals are aware of the language assistance that is available.

Service	Language assistance	Notifications
Call for Service	Interpretation	Pasco Fire staff will present "I speak" cards when necessary for easy identification. In the absence of a bilingual staff member, on-call translation services will be utilized. Pasco Fire will also detail available interpretation services during call for services on their webpage.
Call for Service	Translation	Pasco Fire will maintain necessary documents on hand in Spanish during calls for service. Additionally, information regarding document availability will be provided on their webpage.
Community Events	Interpretation	Prior to hosting community events, Pasco Fire will issue a notice and furnish contact details for individuals requiring interpretation services.

Training for Staff Persons:

Pasco Fire should provide training to its staff regarding its LAP, see Exhibit A. A determination of the frequency of staff encounters with LEP individuals should dictate the level of detail of this training. All employees who are likely to have contact with LEP individuals should be trained to assure that they know the LAP, that they work effectively with in- person and telephone interpreters, and they understand the dynamics of interpretation among LEP providers and interpreters. Staff having the greatest contact should be trained first to ensure effectiveness of the LAP. Those staff having the least amount of contact with LEP individuals should, at a minimum, be trained to be fully aware of the LAP so that they may reinforce its importance and effectively support implementation of the LAP by other staff.

LEP training should be part of the orientation for all new employees who work with LEP individuals. Pasco Fire shall document training and orientations on the LAP for new employees with the level of detail appropriate to their assigned job responsibilities. On-going employees shall receive a one-time orientation on the LAP which shall be documented.

Monitoring Compliance, Assessing Performance and Revisions:

Pasco Fire should monitor implementation of the LAP on an ongoing basis, making revisions to policies and procedures as may be required periodically. An effective plan has clear goals, makes management accountable and provides opportunity for community input and planning throughout the process. At a minimum, Pasco Fire shall review the overall effectiveness of its LAP. Considerations of the following information as well as any other factors that may become appropriate may be included during a review:

- Changes in demographics including new language groups and changes in the proportion of existing language groups, types of services and other needs.
- Frequency of encounters with LEP individuals.
- Nature and importance of activities to LEP individuals.
- Availability of resources and costs imposed.
- Adequacy of current plan meeting needs of LEP individuals.
- Understanding by the staff of the LAP and how to implement it.
- Availability and viability of identified sources.

Language Access Coordinator:

The Language Access Coordinator (LAC) helps to ensure that Pasco Fire adheres to its LAP, policy directives and procedures to provide meaningful access to LEP individuals. Responsibilities include coordinating and facilitating delivery of related services, staff training on the plan's policies and procedures and ongoing monitoring and assessment of the plan's effectiveness. The City of Pasco designates the City Manager's Office as the LAC's responsible for oversight and implementation of the LAP.

Overseeing the LAC's will be the City Manager's Office:

City of Pasco
City Manager's Office
525 N 3rd Ave
Pasco, WA 99301
pashona@pasco-wa.gov
Phone: 509-544-3060
Fax: 509-545-3403

Complaints:

For persons included in a regularly encountered LEP group, written notification of the opportunity to file a discrimination complaint in accordance with federal regulations will be provided on the Fire Departments Webpage. For infrequently encountered groups, LEP persons may be advised orally of the opportunity to file a discrimination complaint pursuant to federal regulations.

Complaints should be directed to the Language Access Coordinator.

**City of Pasco
Fire Department
Language Access Plan Training**

Objective: To ensure all Pasco Fire Department staff understand and implement the Language Access Plan (LAP) effectively to provide meaningful access to Limited English Proficiency (LEP) individuals.

I. Introduction:

The City of Pasco has a population of 77,108, it is determined that 47% of the population speak a language other than English at home. Of the individuals that speak a language other than English, 47% speak less than “very well” and would be considered to have Limited English Proficiency.

The Language Access Plan (LAP) is vital to complying with Title VI of the Civil Rights Act of 1964, prohibiting discrimination based on national origin. Pasco Fire Department recognizes its duty to reduce language barriers for LEP persons, ensuring equitable access to programs and services.

The LAP applies to individuals with limited English proficiency (LEP). Exclusions include accommodations under the Americans with Disabilities Act and general illiteracy.

Pasco Fire Department shall respond to language assistance requests through ongoing assessment, translation of vital materials, oral language assistance, designated representatives, and staff training.

II. Training:

A. Language Services:

a. Oral Language Services:

Interpreters must demonstrate proficiency, confidentiality, and impartiality. Bilingual staff should be appropriately utilized, and interpreters contracted when necessary.

i. Bilingual Staff and Staff Interpreters

1. Proper utilization of bilingual staff is the best and most economical option.
2. It is important to keep in mind that being bilingual does not automatically mean that a person has the ability to interpret.

ii. Telephone Interpreter Line:

1. It is imperative that any staff that have contact with LEP persons understand and are able to navigate the telephone interpreter line that the Fire Department utilizes.

iii. Other options:

1. Family members/Friends: An LEP individual may feel more comfortable when a family or friend acts as an interpreter although the Pasco Fire does not plan to rely on informal interpreters to provide meaningful access to important programs and activities.

2. Community Volunteers: Under appropriate circumstances, providing supplemental language assistance through coordinated community volunteers may be cost-effective.
 3. Contracted Interpreters: Where there is a frequent need for interpreting services it may be necessary and reasonable to provide on-site interpreters.
- b. Written Language Service:
Translations should consider document vitalness, target languages, and translator competence. Regular reviews ensure effectiveness and cost-efficiency.
- B. Notification of Language Assistance Services:
- a. Calls for Services:
 - i. Interpretation: Pasco Fire staff will present wear "I speak" cards, when necessary, pins for easy identification. In the absence of a bilingual staff member, on-call translation services will be utilized.
 - ii. Translation: Pasco Fire will maintain necessary documents on hand in Spanish during calls for service. Additionally, information regarding document availability will be provided on their webpage.
 - b. Community Events: Prior to hosting community events, Pasco Fire will issue a notice and furnish contact details for individuals requiring interpretation services.
- C. Language Access Coordinator and complaints:
- a. The Language Access Coordinator (LAC) helps to ensure that Pasco Fire adheres to its LAP, policy directives and procedures to provide meaningful access to LEP individuals.
 - b. The LAC will receive all discrimination complaints pursuant to federal regulations.

By signing this document, I certify that I have read and understood the provided training and will adhere to the City of Pasco Fire Departments Language Access Plan.

Name: _____

Signature: _____ Date: _____