



LANGUAGE ACCESS PLAN

Washington State Department of Licensing



WASHINGTON STATE DEPARTMENT OF
LICENSING



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Message from the Director



I am excited to debut the Washington State Department of Licensing's (DOL's) updated Language Access Plan (LAP). Our state is rich in its diversity. Indeed, more than one million of our residents came to Washington from countries around the globe. Many of these individuals communicate in their native languages, and much like the more than 250,000 Washingtonians who experience hearing difficulties, they cannot rely exclusively on English or verbal information from our agency.

This LAP documents the agency's ongoing commitment to providing customers with limited-English proficiency (LEP) and who communicate through manual (sign) language meaningful access to our services. Importantly, the Language Access Plan is identified in the agency's [2023-2026 Strategic Plan](#). Our Equity and Inclusion priority states, "We believe the best way to serve all Washingtonians is by removing barriers to our services. We continually ask how we can improve accessibility for everyone." To that end, we have pledged to revise and modernize our LAP, to incorporate best practices throughout our business areas, and to advance our agency toward equitable service delivery regardless of language preference.

DOL's Language Access Plan was created in 2017. Originally combining the Language Access Plan, the Americans with Disabilities Act Transition Plan, and the Title VI Program Compliance Plan, this document now focuses on how the agency will provide equitable language access services. The LAP is a living document that will be continuously reviewed and updated as the data and demographics change.

You will find references in this document to Title VI of the Civil Rights Act and federal Executive Order 13166, with the understanding that these federal laws require recipients of federal funds to take reasonable steps to provide meaningful access to information and services for LEP persons and to develop a Language Access Plan.

I encourage you to read this plan and join us in continuing our work to help every Washington resident live, work, drive, and thrive!

Plan Purpose and Implementation

Purpose

This plan describes how DOL will provide meaningful limited-English proficiency (LEP) and manual (sign) language access to DOL's programs and services. DOL expects staff in all programs and offices to provide language access services and reasonable accommodation to all customers who may need them. These responsibilities align with the agency's commitment to excellent and equitable customer service.

DOL's [Policy 1.1.6](#) requires employees to deliver equitable service without discrimination. This means DOL provides customers access to its programs, services, and facilities regardless of race, color, national origin, sex, age, sexual orientation, genetic information, disability, income level, military or veteran status, or limited-English proficiency.

DOL will provide accurate, accessible, effective, timely language access services and protect our customers' privacy and data in compliance with the governor's [Executive Order 16-01](#).

Guiding Principles

DOL is united by its purpose and values statements. DOL's purpose statement is:
Helping every Washington resident live, work, drive, and thrive.

DOL's value statements are:

Growing a culture of belonging through our values:

- Respect – We treat each person with dignity and respect.
- Trust – We earn your trust through our actions.
- Diversity – Our differences are our strengths.
- Equity – We meet each person's unique needs.
- Inclusion – Your voice informs and influences.

The Department of Licensing's commitment to diversity, equity, and inclusion are evident throughout the [2023-2026 Strategic Plan](#) in the Equity and Inclusion strategic priority as well as other business objectives. One specific strategy is to "Improve culturally and linguistically appropriate services and communications." The first initiative under this strategy is to "Revise the agency's Language Access Plan and policy."

Statutory Authority

DOL commits to providing customers equitable access to our programs, services and facilities in a manner that complies with all state and federal nondiscrimination laws.

[Title VI of the Civil Rights Act of 1964](#) requires government entities that receive federal funds to provide meaningful access to services without discrimination based on limited-English proficiency. Title VI compliance includes a plan for providing language access services.

Federal [Executive Order 13166](#), “Improving Access to Services for Persons with Limited English Proficiency,” requires us to review our services and develop a system for customers with LEP to have meaningful access. The Executive Order also requires DOL to develop a Language Access Plan.

Plan Implementation

The Equity and Inclusion Office (EIO) manages the development and implementation of the LAP. The LAP outlines the agency’s strategy for improving program and service access for persons with limited-English proficiency or who communicate through manual (sign) language.

In addition to this plan, the EIO will work with the Legislative and Policy Office (LPO) to develop an agency policy for language access. The policy will include procedures for employees and contractors to provide language access services for our customers.

Monitoring and Updating the Plan

The EIO will monitor the LAP [Agency Goals](#) (below) by tracking strategic planning measures, meeting with division Assistant Directors, and providing consultation, guidance, and deliverables to support language access services. The LAP will be reviewed annually and updated as we achieve goals or discover new opportunities.

Collaboration and Outreach

DOL will continue to collaborate with and provide outreach to communities, key partners, and organizations that serve customers with LEP, such as schools, religious organizations, community groups, and groups working with new immigrants.

Four-Factor Analysis

Federal law provides guidance for government agencies to assess the services and programs provided for meaningful language access. Designed to be a flexible and fact-dependent standard, federal guidance recommends the four-factor analysis.

DOL will use and analyze these four factors in determining reasonable efforts for providing language access services:

1. **Demographics:** The number or proportion of persons who experience limited-English proficiency who are eligible for or provided DOL services.
2. **Frequency:** The frequency with which LEP individuals use the service.
3. **Importance:** The nature and importance of the program, activity, or service provided by DOL to its customers.
4. **Resources:** The resources available to DOL and their costs.

Guidance for Translations

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required

Source: [B16001: Language Spoken at Home by Ability to Speak English for Population 5 Years and Over](#)

Sample four-factor analysis in three key service areas in Washington

Four-Factor Sample Analysis for Three Washington Counties									
Factor	Benton County			King County			Spokane County		
Demographics: The number or proportions of LEP persons eligible to be served or likely to use the program/service	Total population: 193,899			Total population: 2,132,657			Total population: 508,098		
	Language	Count	%	Language	Count	%	Language	Count	%
	Spanish	31,660	16	Vietnamese	37,835	1.85	Arabic	2,238	<1%
Frequency: The frequency with which LEP individuals use the service	14,450 15-19-year-olds (potential new drivers) 16% (2,312) 15-19-year-olds would likely be Spanish speakers.			123,282 15-99-year-olds (potential new drivers) 1.85% (2,280) 15-19-year-olds would likely be Vietnamese speakers.			13,093 15-19-year-olds (potential new drivers) <1% (<130) 15-19-year-olds would likely be Arabic speakers.		
Importance: The nature and importance of the program, activity, or service provided by DOL to its customers	Parental Authorization Affidavit (required for anyone under 18 getting their first driver's license or permit)			Parental Authorization Affidavit (required for anyone under 18 getting their first driver's license or permit)			Parental Authorization Affidavit (required for anyone under 18 getting their first driver's license or permit)		
Resources: The resources available to DOL and their costs	The population and frequency of service means that translating this document would be a priority for resource allocation.			The population and frequency of service means that translating this document would be a priority for resource allocation.			The population (fewer than 1,000 and less than 5%) and frequency of service do not meet the threshold for prioritizing written translation of this form.		

Source: [C16001: Language Spoken at Home for the Population 5 Years and Over](#)

Language Services

The Department of Licensing provides language services to customers in person, by phone, written correspondence, forms, and other media. State-contracted vendors provide interpreters and written translation services. The DOL also has certified dual-language speaking employees who provide interpretation services in their offices or program areas.

Vital Documents

DOL is in the process of developing a prioritization tool for translating vital written documents to provide consistency, efficiency, and meaningful language access to our customers. A vital document is written communication (in most cases, a form) that is critical for obtaining DOL services and benefits or is required by law.

The Equity and Inclusion Office (EIO) works with the business divisions to determine which documents meet the U.S. Department of Transportation criteria for a “vital document.” This, in combination with the four-factor analysis, will inform the order in which vital documents are translated into identified languages given adequate resources to do so.

The EIO will work with key business partners to make vital documents available to the public. Individual requests for translated documents may be met through one of the following ways:

- A document that has already been translated is provided.
- A newly translated document will be provided if four-factor analysis demonstrates a need and resources are available.
- Oral interpretation of a written form’s content is provided.

DOL has previously undertaken a multi-year audit of forms and documents, updating vital document inventory, and procuring translations of many vital documents into the top 11 languages identified. That effort was funded through an end-of-biennium surplus of funding earmarked for language access. Remaining translations into the previously identified languages or new requests for document translations are funded through divisional budgets. DOL is pursuing potential funding streams to minimize budgetary barriers to translated documents.

Contracted Interpreters

DOL offers in-person and telephone interpreters through statewide vendor contracts. We provide interpreter services at no cost to customers in our offices and through our call center on-demand and through pre-scheduled interpreter appointments.

DOL does not generally rely on the use of a LEP customer’s friends, family members, or other customer-provided interpreters, and is not allowed under state law in the following circumstances:

- During any testing
- During an Enhanced Driver’s License (EDL) or Enhanced Identicard (EID) interview
- During an administrative hearing or legal proceeding

DOL is currently developing an internal agency policy and standardized procedures instructing employees how to provide customer service in the customer's language. This applies to both LEP and manual language services such as American Sign Language (ASL).

Certain DOL programs and services are guided by federal or state laws that prohibit language interpretation (e.g., the program or service has an "English proficiency" requirement). The Assistant Directors of these program areas are responsible for seeking legal consultation from the Attorney General's Office regarding these requirements and to direct the work for the division staff accordingly.

Agency Goals

DOL has identified opportunities for continually improving our delivery of language access services. Our strategic plan identifies language access as a priority. Our Pro-Equity, Anti-Racism (PEAR) team, formed in response to the governor's [Executive Order 22-04](#), chose language access as one of its 2024 investment areas, and the DOL convened a cross-agency team dedicated to improving and expanding language access for our customers.

Public Website (dol.wa.gov)

In alignment with agency-wide efforts to continually improve language access, our web content management team is working to:

- Simplify all web content for translation into additional languages.
- Provide clear instructions about how to get language access support.
- Implement an accessible website translation tool.
- Identify and implement digital solutions that improve accessibility for customers who are blind or have low vision, those who communicate using manual (sign) languages or captioning, and those who use assistive technologies when using websites.

Statewide Vendor Contracts

The EIO is working closely with the state-contracted vendors to improve communications and get commitments to retain certified and authorized interpreters and translators. EIO staff are immediately contacting vendors when they receive notification that interpreters cancel appointments, drop calls, or provide poor service. The EIO is working with division staff to track concerns with interpreter services and work has begun to hold contractors accountable based on not meeting the needs of our customers.

DOL Service Contractors

DOL contracts with county auditors and private businesses to provide licensing and testing services, such as vehicle and vessel licensing, driver knowledge and skills testing, and professional licensing testing. Although statutory authority and jurisdiction are not exclusive to DOL, we are committed to collaborating across all business lines and with business partners to improve and expand language access wherever our customers seek our services.

Standardized Processes and Training

The Equity and Inclusion Office will develop a new internal Language Access Policy. In the past, language access was embedded in the Title VI nondiscrimination policy. A Language Access policy and accompanying procedures will provide enhanced guidance, specialized training, and clear procedures for employees, volunteers, and contractors.

Manual (Sign) Languages

DOL provides manual (sign) language interpretation to customers who request sign language services. Sign languages are visual languages that use hand, facial, and body movements to communicate. There are over 135 different sign languages all around the world, and DOL has served customers who needed two interpreters – one to translate from their language’s sign language to American Sign Language (ASL) – to be able to communicate with our employees. In addition, there are too few sign language interpreters within our state, which creates barriers to receiving our services. DOL is partnering with the Office of Deaf and Hard of Hearing to improve access for DOL customers who are deaf or hard of hearing.

DOL’s commitment to provide equally effective communication extends beyond providing sign language interpreter services. Providing communication in alternate formats and other auxiliary aids and services are addressed in the DOL ADA Transition Plan.

Notices and Taglines

DOL currently provides a notice regarding our language access services on our website and on our Know Your Rights posters at all DOL licensing offices. Existing taglines are under revision to align with the governor’s [Executive Order 23-02](#) regarding plain language and as part of the DOL 2023-2026 Strategic Plan. Printable versions of the Know Your Rights posters will be provided on the website once they are revised.

Defining Limited-English Proficiency in Other Languages

A person with limited-English proficiency (LEP) is defined as a person who does not speak English as their primary language and has a limited ability to read, write, speak, or understand English. A person with LEP may request language access in a spoken or written language other than English. DOL is committed to identifying culturally appropriate non-English equivalent terms for “persons with limited-English proficiency” for translation and interpretation purposes.

Dual Language Certification and Employee Compensation

DOL is committed to providing all Washington residents equitable access to its services, which may require services in a language other than English. The Customer Relations Division and Human Resources Division, in partnership with the Equity and Inclusion Office, are finalizing an internal agency policy to compensate certified bilingual employees in designated [areas](#). The agency is testing a pilot of the dual language compensation program and exploring additional resources to expand that program.

DOL complies with all federal, state, and agency requirements regarding nondiscrimination and equitable access to programs, services, and facilities. We are an organization of people deeply committed to our values and the pursuit of diversity, equity, access, and inclusion.

For questions regarding this LAP or any language access matters, please contact [Lani Fowlkes](#).

LAP Milestones and Deliverables

Proposed date	Milestone or Deliverable
2024 – Q2	Draft enterprise-wide Language Access Policy and procedure.
2024 – Q2	Develop vital documents rubric to prioritize documents, forms, letters, web content, and publications for translation.
2024 – Q2	Write RFI and funding request for AI-supported technology solutions for LEP customers.
2024 – Q2	Develop a ranking index to identify languages for translation and interpretation.
2024 – Q3	Develop tagline documentation for all autogenerated letters
2024 – Q3	Draft Dual Language Certification and Assignment Pay Policy and procedure.
2024 – Q3	Begin contract renegotiation of language interpretation and translation services.
2024 – Q4	Clarify jurisdiction in preparation for process maps of translation and interpretation in each division.
2024 – Q4	Review existing processes and develop process maps of existing processes to get documents translated and how to receive interpretation.
2024 – Q4	Increase vendor options for additional language translation and interpreter services.
2025 – Q2	Seek funding for translation of documents – including FTE, technology, and process fees.
2025 – Q4	Streamline and establish processes across the agency by division and unit as needed.
2026 - Q4	Incorporate Plain Talk principles into agency documents.
2026 – Q4	Develop Language Access training for all DOL employees.