

Thurston County Comprehensive Emergency Management Plan
ESF 15 Annex - Appendix A
Limited English Proficiency (LEP) Emergency Communications Plan

I. INTRODUCTION

A. Purpose

To ensure that sufficient assets are mobilized during emergencies or disasters to provide accurate, coordinated, and timely life safety information to impacted individuals with limited English proficiency (LEP).

B. Scope

This Plan is an attachment to the Thurston County Comprehensive Emergency Management Plan (CEMP), including but not limited to Emergency Support Function 2 (ESF-2), Communication, Information, and Warning Systems; ESF-6, Mass Care, Emergency Assistance, Housing and Human Services; ESF-8, Public Health and Medical Services; and ESF-15, External Affairs.

This Plan does not relieve local city, town and tribal emergency management organizations or other agencies of their responsibility to communicate and provide information on the emergency or disaster to their residents including LEP populations during times of emergency or disaster.

C. Legal Authority

This Plan meets requirements of Washington State Substitute Senate Bill (SSB) 5046, which passed the legislature in 2017 and was codified in chapter 38.52 RCW. This Plan will assist with addressing requirements of Title VI of the Civil Rights Act of 1964 concerning access to services for people with LEP, and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, which directs recipients of federal funding to take reasonable steps to ensure that people with LEP have meaningful access to their programs and activities.

D. Process to Develop Plan

This Plan was developed by Thurston County Emergency Management with assistance from a contractor and input from the Thurston County Emergency Management Council (EMC) and Disaster Assistance Council (DAC). Concepts within the plan, such as messaging strategies, were discussed with members of the Hispanic Roundtable of South Sound and the Washington State Coalition for Language Access (WASCLA), attendees of the 2018 Hispanic Roundtable Community Summit, and representatives of local faith communities.

II. POLICIES

A. General

It is the policy of Thurston County Emergency Management (TCEM) to provide timely meaningful access for LEP persons to all agency programs and activities. All personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. TCEM will inform members of the public that language assistance services are available free of charge to LEP persons and that the agency will provide these services to them.

B. LEP Communications

1. Emergency managers will keep life safety information simple, clear, and brief to promote ease and accuracy of translation.
2. When emergencies or disasters impact the entire county, TCEM will communicate life safety information in multiple languages, including languages spoken by significant population segments (defined in III.B.8). For non-countywide emergencies or disasters, emergency managers will apply a four-factor analysis (see III.B.9) to determine the obligation to provide language assistance services.
3. It is recommended – but not required – that any individual providing translation or interpretation services should be certified through either the Washington State Court Interpreter Program, the Washington Department of Social and Health Services or the American Translators Association. Certification provides a level of assurance about the quality of the work provided by the translator or interpreter.

C. ESF-2

1. ESF 2 coordinates establishment and maintenance of an effective communications and warning systems for use in a disaster. This ESF also monitors the overall status of the county's communications infrastructure and coordinates provision of redundant, temporary communication as required.
2. The County relies on the hazard warning capabilities of federal and state government, industry, and the media. Citizens are expected to be aware of a hazardous situation for which there is significant media attention, such as severe weather or flooding. When there is a demonstrated need, particularly if timeliness is crucial to protect life and property, the county may supplement existing warning systems. Supplemental measures will depend on the nature of the hazard, the quality and quantity of information available, resources available,

media attention, and other situational factors. Supplemental measures, including, but not limited to the use of ADA compliant technology will focus on enhancing or amplifying the information being provided through existing sources and, to the extent practicable, upon participatory systems activated at the neighborhood or community level.

3. In accordance with RCW 38.52.110 (1), in responding to a disaster, or the threat of a disaster, the Board of County Commissioners (BOCC) is directed to utilize the services, equipment, supplies, and facilities of existing departments, offices, and agencies of the state, political subdivisions, and all other municipal corporations thereof including but not limited to districts and quasi municipal corporations organized under the laws of the state of Washington to the maximum extent practicable, and the officers and personnel of all such departments, offices, and agencies are directed to cooperate with and extend such services and facilities upon request notwithstanding any other provision of law.
4. As assets and personnel may be overwhelmed, Thurston County can only endeavor to make every reasonable effort to respond to a hazardous event based on the situation, and on information and resources available at the time.

D. ESF-6 & ESF-8

1. Mass care, Housing and Human Services (ESF-6) will be provided to the whole community as needed during emergencies and disasters. The whole community includes individuals with disabilities and others with access and functional needs, including the limited English Proficiency. Pursuant to Title VI of the Americans with Disabilities Act, the Civil Rights Act, the Fair Housing Act, and SSB 5046, all agencies and organizations providing mass care, housing or human services will comply with state and federal laws.
2. Public Health and Medical Services (ESF-8) is committed to communicating with the Whole Community as needed during emergency response and disaster recovery operations.

E. ESF-15

Thurston County government recognizes the importance of providing vital health and safety information to affected populations. TCEM and BOCC will work to ensure that information is consistent, accurate, complete, and promptly delivered using communication methods, within County guidelines, to disseminate information to affected populations and the general public, including those with alternate communication needs.

F. Plan Updates

This Plan will be reviewed and updated with the Thurston County Comprehensive Emergency Management Plan. Thurston County Emergency Management staff, with input from the EMC, DAC, community-based organizations serving LEP individuals, and incident or exercise after-action reports, will update the plan as-needed to reflect current demographics, systems, methods, and resources.

III. SITUATION

A. Emergency/Disaster Conditions and Hazards

1. Reference the Hazard Mitigation Plan for the Thurston Region and local jurisdiction initiatives, CEMP, and Hazard Identification and Vulnerability Analysis (HIVA) for detailed information on the hazards with a potential to impact Thurston County.
2. People with access and functional needs may not be able to access (e.g. hearing or visual impairment) or understand (e.g. cognitive impairment or limited English speaking) conventional warning systems (e.g. sirens, emergency alert systems) advising them of the need to evacuate during a short-notice event such as a flash flood, wildfire, or hazardous materials spill

B. Planning Assumptions

1. All public information staff will endeavor to keep stakeholders adequately informed with clear, accurate, and complete reports of changing situations as soon as possible including connecting with those with alternate communication needs. (ESF-15)
2. Public messaging before, during, and after the incident will be in a variety of formats and languages and made accessible to those with alternate communication needs. (ESF-15)
3. Public messaging will include specific information as to what people with access and functional needs should do in an evacuation and/or sheltering situation that is different from the actions recommended to the general population. (ESF-15)
4. Public messaging for people with access and functional needs will also focus on community gathering points such as schools, local grocery stores, media outlets, churches, community centers, advocacy groups, and support agencies. (ESF-15)
5. In the event public instructions need to be interpreted or translated, the provision of interpreters or translators will be coordinated through the Thurston County Emergency Coordination Center (TCECC) and The Crisis Clinic. (ESF-2)

6. Evacuating displaced and other populations may include those with limited English proficiency. (ESF-6)
7. Preparedness, response, and recovery efforts must incorporate and address the unique needs and circumstances of vulnerable populations, including LEP individuals. Therefore, specific measures will be taken to ensure that these populations will have accessibility to information, health services, and other services. (ESF-6, ESF-8)
8. LEP Language Groups within Thurston County
 - a. RCW 38.52.070(3)(a)(ii) defines “significant population segment” as “each limited English proficiency language group that constitutes five percent or one thousand residents, whichever is less, of the population of persons eligible to be served or likely to be affected within a city, town, or county.” This provision further states that, “The office of financial management forecasting division's limited English proficiency population estimates are the demographic data set for determining eligible limited English proficiency language groups.”
 - b. According to Office of Financial Management (OFM) 2016 estimates, Thurston County has two LEP language groups considered significant population segments, **Spanish and Vietnamese**. Table 1 displays jurisdiction and significant language group populations.

Table 1 – 2016 Significant LEP Population Segments in Thurston County

Jurisdiction Name	Jurisdiction Population	Language Group	Language Group Pop.	% of Jurisdiction Pop.
Thurston	272,690	Spanish	4,191	1.5%
		Vietnamese	1,329	0.5%

Source: OFM Estimate of population with limited English proficiency (LEP) for the state and counties, 2016

9. Obligation to Provide Language Access – Four-Factor Analysis
 - a. Factor 1: Number or proportion of LEP persons eligible or likely to be served.
 - i. Emergency management serves the whole community, so we assume the proportion of LEP persons our emergency management organizations are likely to serve, encounter, or receive notifications of life safety information during an emergency to be the same proportion as LEP persons in the general population. See Table 1. **We assume Thurston County will serve 2.0%, or approximately 5,520, LEP persons.**
 - ii. The exact number notified of life safety information will vary depending upon the nature and scope of emergencies or disasters that occur. We will share preparedness information and general communications to the entire

population, including LEP persons, so we will be prepared to communicate to all significant population segments in an emergency or disaster. We will be prepared to serve or notify the language group populations listed in Table 1.

- b. Factor 2: Frequency with which LEP individuals encounter organization and programs.
 - i. The frequency with which LEP individuals encounter the emergency management organization and its programs, including notifications of life safety information during an emergency, varies. Thurston County emergency management programs have had **infrequent** direct interaction with LEP individuals. Police, fire, 9-1-1, public health departments, healthcare providers, schools, and other front-line public service agencies report more frequent encounters with LEP individuals in day-to-day operations.
 - ii. Since SSB 5046 went in effect, emergency management organizations have tracked impacts to LEP individuals in emergency and disaster after action reports. Data produced by these after-action reports will provide a more comprehensive understanding of the frequency with which LEP individuals are impacted by situations resulting in life safety emergency communications. This data will inform plan updates.
- c. Factor 3: The nature and importance of the program, activity, or service provided by the program.
 - i. Life safety information is of **vital** importance.
- d. Factor 4: Resources available to the agency and costs.
 - i. The resources listed in **V. Resource Requirements** are available to TCEM within the existing budget.

IV. CONCEPT OF OPERATIONS

A. General

While emergencies and disasters may vary in size and significance, the population and diversity, and multi-jurisdictional environment, and concentration of critical infrastructure in Thurston County can magnify their impacts. These emergencies and disasters take a “Whole Community” approach, with an effective decision making and resource management structure, along with coordination among health and medical service providers and supporting agencies which is critical to successfully addressing the consequences of emergencies and disasters. (ESF 6)

B. Communications (ESF-2)

1. *Coordination:* The TCECC may be activated to provide coordination, and technical and administrative support to the incident. The TCECC would coordinate as needed with Washington State Emergency Operations Center (SEOC). Coordination with both ESF-2 and ESF-15 will take place for both internal and external communications. This includes communications with LEP populations and in accordance with the OFM Forecasting Division.
2. *Multiple forms of communication:* Pursuant to the National Incident Management System (NIMS) operating principles and protocols, public information efforts should generally focus on incident specific information. Several forms of communications may be utilized. Public information, advisories, and warnings will be in a variety of formats and languages, and made accessible to those with alternate communication needs as defined in ESF 15.
3. *LEP consideration:* Provision of communication-related activities will take into account LEP populations and be planned for according to state and federal regulations and guidance.

C. LEP and ESF-6, Mass Care, Emergency Assistance, Housing & Human Services

1. Some members of our community, including but not limited to those with limited English proficiency, will be more vulnerable during and after a disaster.
2. ESF-6 primary and support agencies will work collaboratively with partners to:
 - a. Monitor disproportionate impacts to vulnerable populations
 - b. Develop strategies and operations that ensure equal access to human services.
 - c. Mitigate barriers that may be preventing access.
 - d. Address communication and medical, mental health and other human services needs of these most vulnerable residents.
 - e. Use ethnic and community media and coordinate with community-based organizations to communicate and gain situational awareness.
 - f. Develop and distribute language and graphic translations of shelter and human service needs.
 - g. Plan for unaccompanied minors and adults requiring care/supervision.
 - i. Work with appropriate law enforcement and legal authorities to develop a disaster protocol for temporary care of unaccompanied children/minors and adults requiring care.

- h. Plan for access to reunification tools such as the Red Cross Safe and Well website.

D. LEP and ESF-15, Public Affairs

1. Public information may need to be translated for LEP populations to include American Sign Language (ASL). Interpreters and translation services will be coordinated through the TCECC utilizing available resources through Thurston County departments, TCOMM 911 (language line), and local organizations (i.e., community groups, faith communities, schools, etc.) providing such services. If local resources are not available, the TCECC will request translation services from the SEOC.
2. Local cities, towns and tribal governments within Thurston County are responsible for providing their residents with information on the emergency or disaster including the whole community and limited English proficient (LEP) populations.

E. Communicating Life Safety Information to LEP Individuals

1. Strategies for **oral notification** include using:
 - a. Contracted certified interpreters (fee involved).
 - i. In-person interpretation services (state master contract):
<https://fortress.wa.gov/ga/apps/ContractSearch/ContractSummary.aspx?c=03514>
 - ii. Telephone-based interpretations (state master contract):
<https://fortress.wa.gov/ga/apps/ContractSearch/ContractSummary.aspx?c=05614>
 - iii. American Sign Language interpreters (state master contract):
<https://fortress.wa.gov/es/apps/ContractSearch/ContractSummary.aspx?c=08114>
 - iv. Department of Social and Health Services Certified/Authorized:
<https://fortress.wa.gov/dshs/dshsltc/FindInterpreter>
 - v. Washington State Courts Interpreter Program:
http://www.courts.wa.gov/programs_orgs/pos_interpret
 - vi. Washington State Coalition for Language Access:
<http://www.wascla.org/directory>
 - b. Qualified bilingual staff or volunteers.
 - c. Ethnic media.
 - d. Recordings. Emergency managers may record interpreted messages for transmission across multiple platforms. This may include broadcasting recorded messages on public address systems, on social media, and playing recordings for LEP individuals encountered during door-to-door notifications.

2. Strategies for **written notification** include using:
 - a. Contracted certified translators (fee involved).
 - i. Written translation services – see Category 6 or Category 9 (24-hour emergency service) (state master contract):
<https://fortress.wa.gov/ga/apps/ContractSearch/ContractSummary.aspx?c=04312>
 - ii. Department of Social and Health Services Certified/Authorized:
<https://fortress.wa.gov/dshs/dshsltc/FindInterpreter>
 - iii. Washington State Coalition for Language Access:
<http://www.wascla.org/directory>
 - b. Qualified bilingual staff or volunteers.
 - c. Translation of vital documents in advance. "Vital documents" are generally documents that affect access to, retention in, or termination or exclusion from a recipient's program services or benefits.
 - d. On-demand / real-time translation.
 - e. Pre-translated templates. Emergency managers may use pre-translated templates generated by government agencies or community-based organizations that allow the emergency manager to enter dates, times, locations, and other incident-specific details.
 - f. Machine translation. Emergency managers will seek review of machine-translated messages by certified translators or bilingual persons prior to dissemination.
 - g. Translated materials. As applicable to the situation, translated written notifications may be shared through wireless alerts, websites, ethnic and other news media, social media, partner organizations, email lists, reader boards, and trap lines. Print and electronic media, news releases, bulletin and sandwich boards, posting of signs can provide an effective method of disseminating emergency information. Electronic media can be helpful in issuing bulleting to inform the public or emergency conditions with or without formal activation of the EAS.
3. Methods for **disseminating** life safety information include:
 - a. Emergency Alert System:
 - i. KAYO Radio, Olympia, 96.9 FM
 - ii. KXXO Radio, Olympia, 96.1 FM
 - iii. KAOS at The Evergreen State College, Olympia, 89.3 FM
 - iv. COMCAST, Olympia

- b. Thurston Community Alert
- c. Social Media Platforms:
 - i. Facebook: ThurstonEM
 - ii. Twitter: ThurstonEM
 - iii. Nextdoor: ThurstonEM
- d. News Media:
 - i. El Mundo Newspaper, <http://www.elmundous.com> (Spanish, print and online)
 - i. KDDS La Grande Radio, 99.3 FM, <https://kdds.lagranderradio.com> (Spanish)
 - ii. KLDY La Estacion de Familia Radio, 1280 AM, <https://laestaciondelafamilia.org> (Spanish)
 - iii. KLSY La Estacion de Familia Radio, 93.7 FM, <https://laestaciondelafamilia>. (Spanish)
- e. Door-to-Door Notifications:
 - i. Depending on the nature of the incident, law enforcement, fire, other partner agencies, and/or volunteer resources may conduct door-to-door notifications through neighborhoods, farms, orchards, production facilities, parks, hotels, etc. Care would be taken to keep unprotected workers from entering hazardous areas to disseminate warning.
 - ii. Those providing door-to-door notifications will access telephonic interpretation services, recorded oral messages, pictographic messages, and/or translated written messages as needed to communicate effectively. When possible, bilingual persons will provide notifications in neighborhoods known to have LEP populations.
- f. Public Address Systems:
 - i. Fire District and Law Enforcement apparatus can provide warnings along specific routes using public address systems and sirens. These would be effective as an alternative to door-to-door notification.
- g. Organizations that may assist with LEP communications include but are not limited to:
 - i. Disaster Assistance Council (DAC) participants, including but not limited to The Crisis Clinic of Thurston and Mason Counties, United Way of Thurston County, Medical Reserve Corp, The Salvation Army, American Red Cross, TCEM, Thurston County Food Bank, Tenino Food Bank, South Sound 211, Chehalis Tribe, and Senior Services for South Sound (multiple languages)
 - ii. Rochester Organization of Families (ROOF) (Spanish)

- iii. Hispanic Roundtable of South Sound (Spanish)
 - iv. CIELO (Spanish)
 - v. Saint Michael Parish (Spanish, Vietnamese, and other languages)
 - vi. Thurston County Public Health and Social Services
 - vii. Local schools
 - viii. Local churches and other places of worship
- h. Trap Lines, or pre-selected locations where emergency communications will be posted on a bulletin board, may include:
- i. Fire stations
 - ii. Schools
 - iii. Grocery stores
 - iv. Community centers
 - v. Churches and other places of worship
 - vi. Food Banks

V. RESOURCE REQUIREMENTS

- A. Thurston County Emergency Management has the following resources available to provide life safety notifications in languages understood by local LEP language groups:
1. Thurston Community Alert is Thurston County's emergency notification system and houses the Integrated Public Alert and Warning System (IPAWS). The system, which also houses the EAS, can be activated by TCOMM911, TCEM, and select fire and law enforcement officials. TICALERT is capable of translating messages into 40 languages, including Spanish and Vietnamese.
 2. Access to at least one bilingual county staff member or volunteer trained in emergency management.
 3. Access to telephonic or other certified interpretation/translation services.
 4. News media contacts, including local Spanish-language radio stations.
 5. Social media platforms such as Facebook, Twitter, and Next Door.
 6. Local organizations, such as the Disaster Assistance Council (DAC), Rochester Organization of Families (ROOF), Saint Michael Parish, CIELO, and Hispanic Roundtable of South Sound, that may assist with developing and/or disseminating information to LEP individuals. DAC participating agencies include but are not limited to: United Way of Thurston County, The Crisis Clinic of Thurston and Mason Counties, Medical Reserve Corp, The Salvation Army, American Red Cross, TCEM, Thurston County Food Bank, Tenino Food Bank, South Sound 211, Chehalis Tribe and Senior Services for South Sound.

7. The Emergency Alert System (EAS) operates through local radio and cable TV stations and is intended to provide local officials with the means to disseminate prompt, reliable emergency information, instructions, and warnings in the event of an emergency or disaster.
 - i. KAYO Radio, Olympia, 96.9 FM
 - ii. KXXO Radio, Olympia, 96.1 FM
 - iii. KAOS at The Evergreen State College, Olympia, 89.3 FM
 - iv. COMCAST, Olympia

VI. REFERENCES

The content and format of this Plan was informed by LEP planning tools and guidelines from the Washington State Military Department Emergency Management Division (WA EMD), U.S. General Services Administration (GSA) and Departments of Homeland Security (DHS) and Justice (DOJ), including:

DOJ. (2004). Limited English proficiency resource document: Tips and tools from the field. Retrieved from: https://www.lep.gov/resources/tips_and_tools-9-21-04.htm

DOJ. (2016). Tips and tools for reaching limited English proficient communities in emergency preparedness, response, and recovery. Retrieved from: <https://www.justice.gov/crt/file/885391/download>

GSA. (2016). Foreign language services ordering guide. Retrieved from: https://www.gsa.gov/cdnstatic/Foreign_Language_Services.pdf

“Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Notice; final policy guidance,” 76 Federal Register 74 (18 April 2011), pp. 21755-21768.

WA EMD. (2017). Limited English proficiency communication resources.

WA EMD. (2018). LEP communications planning framework, draft 4.1

VII. TERMS AND DEFINITIONS

BOCC – Board of County Commissioners

CEMP – Comprehensive Emergency Management Plan

Communication Plan – A section in a local comprehensive emergency management plan that addresses emergency notification of life safety information. RCW 38.52.010(1)

DAC – Disaster Assistance Council

DHS – United States Department of Homeland Security

DOJ – United States Department of Justice

EAS – Emergency Alert System

EMC – Thurston County Emergency Management Council

ESF – Emergency Support Function

HIVA – Hazard Identification and Vulnerability Analysis

Interpretation – Interpretation is the act of listening to something in one language (source language) and orally translating it into another language (target language).

IPAWS – Integrated Public Alert and Warning System

LEP – A limited English proficient (LEP) individual is one who does not speak English as his/her primary language and who has a limited ability to read, write, speak or understand English. Not all individuals whose primary language is not English should be considered as having limited English proficiency.

Life Safety Information – Information provided to people during a response to a life-threatening emergency or disaster informing them of actions they can take to preserve their safety. Such information may include, but is not limited to, information regarding evacuation, sheltering, sheltering-in-place, facility lockdown, and where to obtain food and water. RCW 38.52.010(13)

NIMS – National Incident Management Systems

OFM – Washington State Office of Financial Management

Qualified Interpreter – For an individual with limited English proficiency, means an interpreter who via a remote interpreting service or an on-site appearance: (i) Adheres to generally accepted interpreter ethics principles, including client confidentiality; (ii) has demonstrated proficiency in speaking and understanding both spoken English and at least one other spoken language; and (iii) is able to interpret effectively, accurately, and impartially, both receptively and expressly, to and from such language(s) and English, using any necessary specialized vocabulary, terminology and phraseology.

Qualified Translator – A translator who: (i) Adheres to generally accepted translator ethics principles, including client confidentiality; (ii) has demonstrated proficiency in writing and understanding both written English and at least one other written non-English language; and (iii) is able to translate effectively, accurately, and impartially to and from such language(s) and English, using any necessary specialized vocabulary, terminology and phraseology.

ROOF – Rochester Organization of Families

SEOC – Washington State Emergency Operations Center

Significant Population Segment – each limited English proficiency language group that constitutes five percent or one thousand residents, whichever is less, of the population of persons eligible to be served or likely to be affected within a city, town, or county. RCW 38.52.070(3)(a)(ii)

SSB – Substitute Senate Bill

TCALERT – Thurston Community Alert

TCOMM911 – Thurston 911 Communications

TCECC – Thurston County Emergency Coordination Center

TCEM – Thurston County Emergency Management

Translation – Translation is the replacement of a written text from one language (source language) into an equivalent written text in another language (target language).

Vital Documents - Documents that affect access to, retention in, or termination or exclusion from a recipient's program services or benefits.

WA EMD – Washington State Military Department Emergency Management Division

WASCLA – Washington State Coalition for Language Access