



# Limited English Proficiency Plan

*A plan for improving access to Metro for  
persons with limited English proficiency*

September 2018

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**Project web site:** [oregonmetro.gov/civilrights](https://oregonmetro.gov/civilrights)

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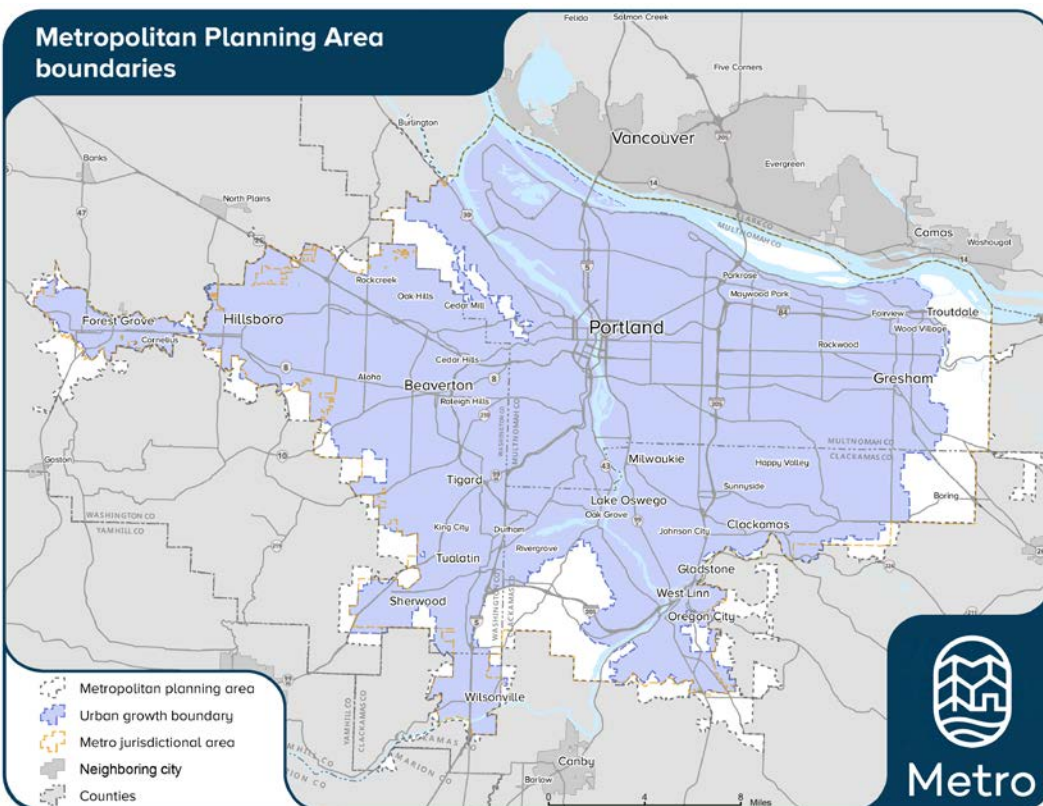
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## INTRODUCTION

A person with limited English proficiency is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English. This plan outlines Metro's responsibilities to persons with limited English proficiency and defines Metro's process for providing language access to its programs and services pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency.

Metro is a directly elected regional government serving 1.6 million people living in the urbanized areas of the greater Portland, Ore. metropolitan region, authorized by Congress and the State of Oregon to coordinate and plan investments in the transportation system. As the designated metropolitan planning organization, Metro works collaboratively with cities, counties and transportation agencies to decide how to invest federal highway and public transit funds within its service area. It creates a long-range transportation plan and leads efforts to expand the public transit system.

### Metro Council districts and jurisdiction boundary



Metro is the only regional government agency in the U.S. whose governing body is directly elected by the region's voters. Metro is governed by a council president elected region-wide and six councilors elected by district. The Metro Council provides leadership from a regional perspective, focusing on issues that cross local boundaries and require collaborative solutions. The council oversees the operation of Metro's programs, develops long range plans and fiscally-responsible annual budgets, and establishes fees and other revenue measures.

## PURPOSE AND PROCESS

The purpose of the Limited English Proficiency (LEP) Plan is to provide language assistance for LEP persons seeking meaningful access to programs as required by Executive Order 13166 and USDOT's policy guidance. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available and information for future plan updates. The jurisdictional boundaries addressed will focus on the tri-county urbanized area designated as the Metro metropolitan planning organization service area.

As a recipient of federal funding, Metro has taken steps to ensure meaningful access to the planning process, information and services it provides. The LEP Plan includes elements to ensure that LEP individuals have access to the planning process and published information. Metro will also work toward ensuring multilingual material and documents and interpretation at meetings and events when needed.

In developing the LEP Plan, Metro conducted the four-factor analysis set out by the U.S. Department of Justice, which considers the following:<sup>1</sup>

1. number or proportion of persons with limited English proficiency (LEP) eligible to be served or likely to be encountered by a program, project or service
2. frequency with which LEP individuals come in contact with the program, project or service
3. nature and importance of any proposed changes to people's lives
4. program, project or service resources available for language assistance and costs of language assistance.

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<sup>1</sup> U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41455, June 18, 2002, issued pursuant to Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, Aug. 11, 2000, incorporated by U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.



## SECTION I: LIMITED ENGLISH ACCESS NEEDS ASSESSMENT

### Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population

There were several key findings revealed in the analysis of the data:

- Approximately 304,100 persons age 5 and older, or 20 percent of the greater Portland region's population age 5 and older, speaks a language other than English at home.
- Approximately 129,400 persons age 5 and older speak a language other than English at home and speak English less than "very well." This population is 8.5 percent of the Metro region's population age 5 and older.
- Spanish is the most predominant language, second to English, spoken in the region.
- Sixteen language groups within Metro's service area have limited English proficient populations of 1,000 persons or more.
- Of all languages spoken in the region, Table 1 shows the languages with more than 1,000 persons with limited English proficiency; no languages meet the threshold 5 percent of the service area population.<sup>2</sup>

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<sup>2</sup> The 1000 persons or 5 percent of the population thresholds refer to what has become known as the Department of Justice's "safe harbor provision": "The following actions will be considered strong evidence of compliance with the recipient's written-translation obligations: (a) The DOJ recipient provides written translations of vital documents for each LEP language group that constitutes five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered..., " U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41464, June 18, 2002.

**Table 1: Languages in Metro3 with more than 1,000 LEP persons**

Language spoken at home	Population 5 and over speaking a language other than English at home	Population that is LEP, age 5 and over, by native language	Percent of total LEP population by native language	Percent of total Metro region population age 5 and over (1,473,411), LEP, by language
Spanish or Spanish Creole	140,500	61,500	47.5%	4.1%
Vietnamese	20,900	13,700	10.6%	0.9%
Chinese	21,400	11,100	8.6%	0.7%
Russian	13,900	6,400	4.9%	0.4%
Korean	8,000	4,000	3.1%	0.3%
<i>Somali *</i>	<i>no ACS data</i>	<i>2,700</i>	<i>2.1%</i>	<i>0.2%</i>
<i>Ukrainian *</i>	<i>no ACS data</i>	<i>2,500</i>	<i>1.9%</i>	<i>0.2%</i>
Arabic	5,600	2,200	1.7%	0.1%
Japanese	6,100	2,200	1.7%	0.1%
Tagalog	6,300	1,900	1.5%	0.1%
<i>Romanian *</i>	<i>no ACS data</i>	<i>1,900</i>	<i>1.5%</i>	<i>0.1%</i>
<i>Nepali *</i>	<i>no ACS data</i>	<i>1,600</i>	<i>1.2%</i>	<i>0.1%</i>
Mon-Khmer, Cambodian	2,900	1,600	1.2%	0.1%
<i>Chuukese</i>	<i>no ACS data</i>	<i>1,500</i>	<i>1.2%</i>	<i>0.1%</i>
Persian	3,100	1,200	0.9%	0.1%
<i>Karen*</i>	<i>no ACS data</i>	<i>1,200</i>	<i>0.9%</i>	<i>0.1%</i>
<b>Total, all non-English languages</b>	<b>304,100</b>	<b>129,400</b>	<b>100.0%</b>	<b>8.5%</b>

Data source: American Community Survey 2011-2015, 5 year estimate, Table B16001, Language spoken at home, except:

*\* Languages not in Census: estimates derived from Oregon Department of Education school language dataset for 2015-16.*

ACS and ODE-based estimates rounded to nearest 100 persons.

Limited English proficiency defined as speaking another language at home and speaking English less than “very well.”

While Hmong was on the list of languages that met the guidelines for translation in Metro’s 2013 Title VI report, Hmong did not meet the safe harbor guidelines for translation of vital documents in the 2015 or 2018 analysis. In addition to the populations of Hmong speakers with limited English proficiency in the region slightly decreasing, a more precise methodology in the 2015 analysis shows that Hmong speakers with limited English proficiency is well below the safe harbor guidelines. Documents considered vital as of 2013 are available in Hmong on the Metro website.

<sup>3</sup> Defined as the 331 Census Tracts that intersect the Metro jurisdictional boundary.

While Laotian was on the was on the list of languages that met the guidelines for translation in Metro’s 2015 Title VI report, Laotian did not meet the safe harbor guidelines for translation of vital documents in the 2018 analysis. Documents considered vital as of 2015 are available in Laotian on the Metro website.

## **LEP population data sources**

Several data sources were used to conduct the Factor 1 analysis in Metro’s service area in order to understand the number or proportion of LEP persons eligible to be served by Metro or encountered by Metro programs or services. (For information on the development of Metro’s Factor 1 methodology, see Appendix A; for detail on the Factor 1 methodology, see Appendix C.)

The data sources used in the determination of populations with limited English proficiency, as recommended by the April 2007 USDOT/FTA guide,<sup>4</sup> include:

- 2011-2015 American Community Survey (ACS) 5-Year sample: census tract data
- 2011-2015 American Community Survey (ACS) 5-Year sample: county data
- Oregon Department of Education (ODE): 2015-2016 school year enrollment data for school districts in Clackamas, Multnomah and Washington counties.

## **LEP population analysis**

### 2011-2015 American Community Survey

Metro’s jurisdictional boundary area includes most of Clackamas, Multnomah and Washington counties. However, Metro’s jurisdictional boundary does not conform to the geographies of U.S. Census data. In order to estimate the LEP populations within the jurisdictional boundary area, Metro collected and analyzed census data from the tract level (ACS 2011-2015) – selecting all tracts that were either partly or completely within Metro’s service area boundary. As a result of this process, Metro identified 331 census tracts (Figure 1).

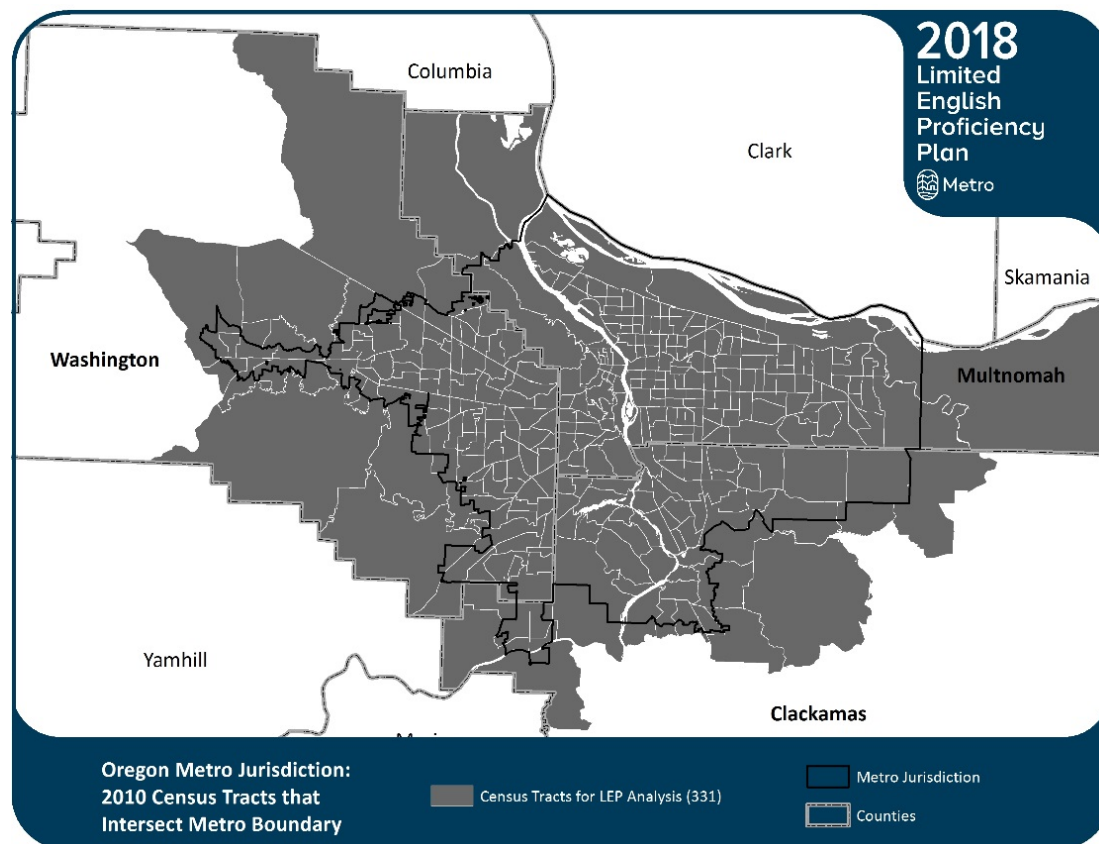
The estimated total counts of LEP population obtained from Table B16001 in the 2011-2015<sup>5</sup> ACS tract data were obtained by aggregating population estimates from 331 census tracts (which include Clackamas, Multnomah and Washington counties) of persons age 5 and older that “speak English less than very well.”

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<sup>4</sup> Federal Transit Administration Office of Civil Rights, Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, a Handbook for Public Transportation Providers, April 13, 2007.

<sup>5</sup> For economic and privacy reasons, Table B16001 has been discontinued for smaller geographies (including tracts) in the current 2012-2016 ACS release, which necessitated the use of the previous 2011-2015 release.

**Figure 1. Clackamas, Multnomah and Washington county census tracts included in Metro 2018 Factor 1 Analysis**



Sources: U.S. Census Bureau Cartographic Boundary Files; Oregon Metro RLIS network GIS data

In the 331 census tracts that intersect Metro’s jurisdictional boundary, the LEP population represents 8.5 percent of persons age 5 years and older (Table 2).

**Table 2: Aggregate estimates, 331 tracts in Metro’s jurisdictional boundary area**

Total population, persons age 5 and older	Persons age 5 and older, speak a language other than English at home	Persons age 5 and older, speak a language other than English at home, speak English less than very well (LEP)	Percent of estimated regional population age 5 and older that is LEP
1,517,300	304,100	129,400	8.5%

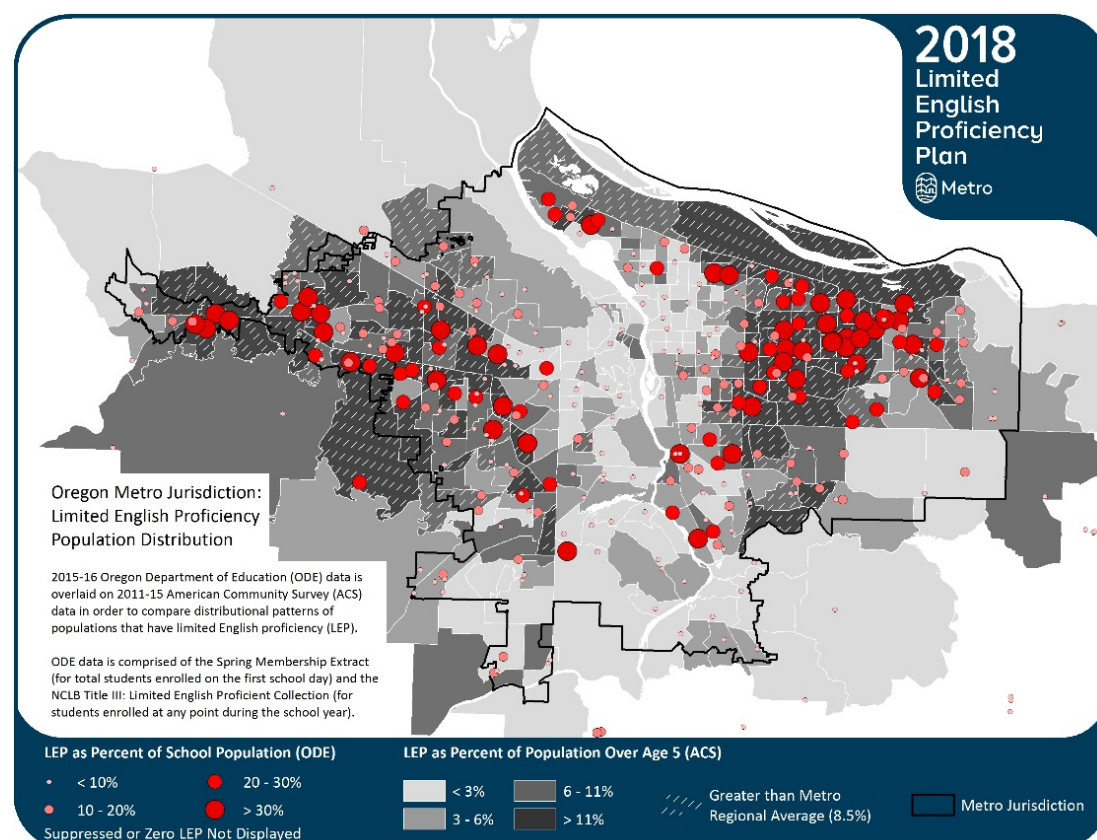
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

Figure 2 displays the percentage of all LEP speakers per census tract and schools in a quantile distribution. Also, Metro followed the recommendation in the 2007 FTA handbook to “identify specific census tracts where the proportion of LEP persons exceeds the proportion of LEP persons in the service area as a whole,”<sup>6</sup> by highlighting (white hashes in Figure 2) census tracts where the percentage of LEP persons is greater than the regional average of 8.5 percent. In Appendix B,

<sup>6</sup> *Ibid*, p. 16.

Figures B1-B16, illustrate the spatial concentration of LEP speakers for each of the 15 languages, in map form.

**Figure 2. Distribution of limited English proficient populations, all languages**



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 enrollment data

The ACS-based summary counts revealed 10 individual languages with LEP populations of more than 1,000 persons within the 331 tracts that intersect the Metro jurisdictional boundary, with seven of the 10 individual ACS languages having LEP populations exceeding 2000.<sup>7</sup> Additionally, six ACS language groups have populations of LEP speakers greater than 1,000.<sup>8</sup>

The margins of error in the ACS data at the tract level are significant, and aggregating large numbers of estimates to yield a single sum invalidates the error estimates, so Metro staff sought confirmation that these estimates were valid by performing a second analysis based on county-level ACS data.

#### 2011-2015 American Community Survey (ACS) county level data

<sup>7</sup> Individual ACS languages exceeding 2000 persons in the Metro region include Spanish or Spanish Creole (61,500), Vietnamese (13,700), Russian (6,400), Korean (4,000), Arabic (2,200), and Japanese (2,200). Individual ACS languages exceeding 1000 persons (but not exceeding 2000 persons) in the Metro region include Tagalog (1,900), Mon-Khmer or Cambodian (1,600), and Persian (1,200).

<sup>8</sup> ACS language groups exceeding 1000 persons in the Metro region include African (3,700), Other Asian (3,100), Other Slavic (2,700), Other Indo-European (2,400), Other Indic (2,200), and Other Pacific Island (2,100).

Metro analyzed Clackamas, Multnomah and Washington county census data from the 2011-2015 American Community Survey to confirm estimates, which are more reliable due to the increased sample population and decreased error margins of survey aggregations at larger geographic scales (i.e., counties provide more reliable estimates than tracts). Since the greater Portland region intersects only three counties, it is possible to aggregate margins of error, as compared with the inability to aggregate margins of error for the 331 census tracts that intersect the Metro jurisdictional boundary (see Appendix C for additional discussion of margins of error for aggregates of estimates). As compared with tract data, the distribution of the LEP populations of individual languages is similar with the county data, which increases Metro's confidence in the aggregated tract estimates of LEP speakers within the Metro jurisdictional boundary (see Appendix C, Table C2).

**Table 3. Aggregate estimates, three counties, including but not limited to Metro's jurisdictional boundary**

<b>Total population age 5 and older</b>	<b>Persons age 5 and older, speak a language other than English at home</b>	<b>Persons over 5, speak a language other than English at home, speak English less than very well (LEP)</b>	<b>Percent of estimated Tri-County region population that is LEP</b>
1,609,500	312,500	132,500	8.2%

Source: 20011-2015 American Community Survey, County level data, Table B16001

The margins of error constructed on the county data allow Metro to confirm that it is very likely that the ten unique populations (i.e., individual ACS languages) of LEP speakers within the 331 tracts making up Metro's service area identified in the first analysis have populations of greater than 1,000.

#### Further analysis: languages not routinely reported in the American Community Survey

Data from the U.S. Census Bureau aggregates 382 distinct languages into 39 categories in Table B16001 data used in this analysis. This table includes 29 unique languages and 10 groupings of multiple languages. Six of these ten language groupings contained LEP population of more than 1,000 in both the census tracts and county data sets for the greater Portland region. The language groups include:

- African
- other Asian
- other Slavic (one of five sub-groups within the Indo-European language family)
- other Indo-European (remaining languages in this family after four sub-groups and 15 individual languages are removed)
- other Indic
- other Pacific Island.

To determine if a single language population embedded within one of these group language categories has a population greater than 1,000, Metro collected and analyzed data from the Oregon Department of Education. Metro used ODE data in conjunction with the ACS 5-year releases to

determine rough estimates for populations age five and older that live within Metro's jurisdictional boundaries that are LEP within that specific language population.

#### Oregon Department of Education (ODE) 2011-2012 Enrollment data

FTA recommends using public school enrollment data to identify LEP populations and the types of languages spoken in Metro's jurisdictional boundary area. Every year, the Oregon Department of Education (ODE) collects student enrollment data from public school districts and state-accredited public charter schools. Each school reports on:

- non-native English speaking students
- LEP students (data includes native English LEP speakers, LEP totals are significantly different from those in the American Community Survey)
- socio-economic data; and race/ethnicity.

The data represent 100 percent counts rather than sample estimates. ODE collects native language and LEP status data on a rolling basis throughout the academic year in compliance with Title III of the federal No Child Left Behind Act. The schools data is highly detailed, with more than 200 individual languages represented and LEP data collected for native speakers of each language.

However, ODE cautions that the language classification is not highly validated. To protect student confidentiality, ODE suppresses data at the individual school level when six or fewer students are counted as speaking English less than very well. Metro has calculated an estimate for the number of students who are represented by a suppressed value in order to more precisely count total enrollment at the regional level. More than 400 schools are aggregated in this process, so confidentiality protections are preserved.

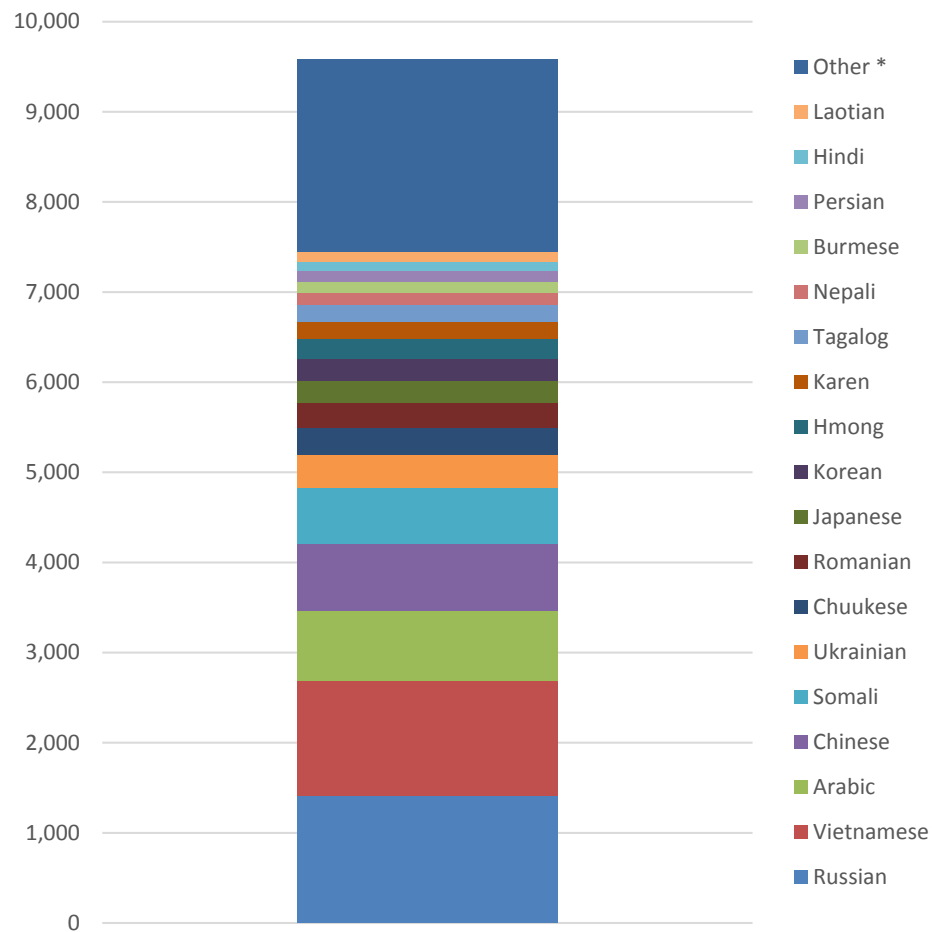
The Oregon Department of Education 2015-2016 data helped refine Metro's estimates of more than a dozen languages which have significant LEP populations in the schools but are not reported in the U.S. Census. Seven individual language populations that do not appear in the American Community Survey<sup>9</sup> have at least 100 LEP speakers in the ODE schools data, including Somali, Ukrainian, Chuukese, Romanian, Karen, Nepali and Burmese (see Appendix C, Table C4).

Figures 3 and 4 illustrate all LEP students enrolled in Oregon public and private schools; figure 4 compares those who that speak Spanish and all other languages besides Spanish.

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<sup>9</sup> These noteworthy individual language populations in the ODE are included within group language categories in the ACS and thus do not have available ACS estimates.

**Figure 3. LEP students enrolled in public and private schools within the greater Portland region**

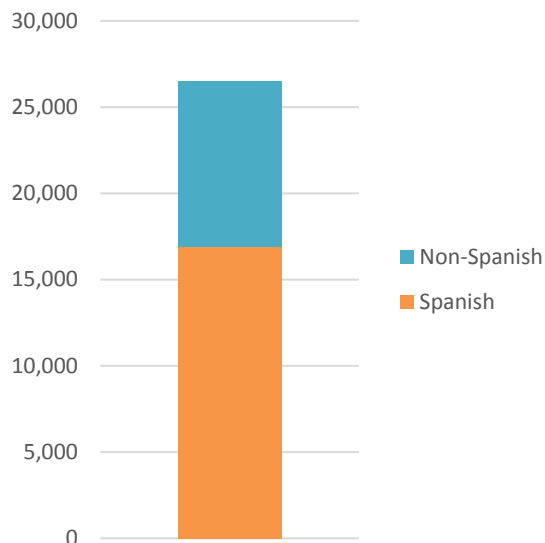


\* Other category includes languages classified as “other” as well as languages with less than 100 LEP students.

Source: Oregon Department of Education, 2013-2014



**Figure 4. LEP students enrolled in Oregon public and private schools that speak Spanish compared to all other languages**



Source: Oregon Department of Education, 2013-2014

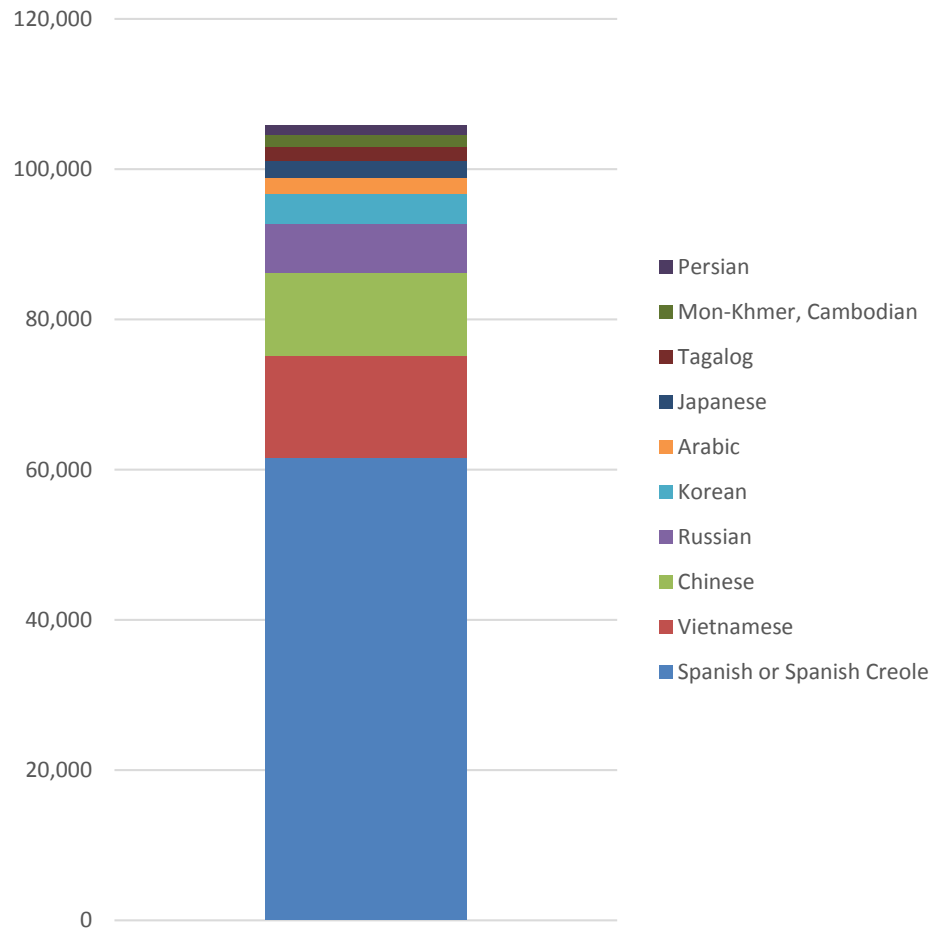
The primary method of interpolation for languages not represented individually in the ACS – but instead are hidden within larger language groupings (e.g., Ukrainian falls within Other Slavic in the ACS) – involved using the ratios of individual languages in the ODE data to inform the degree to which individual ODE languages comprise their respective ACS language groups.

### Results summary

The analysis of the three data sources included in this report identified 16 specific languages in Metro’s jurisdictional area with more than 1,000 individuals with limited English proficiency.

LEP populations for 10 of 16 languages could be determined from ACS data alone (Figure 5), whereas ODE data was needed to interpolate the populations of Somali, Ukrainian, Romanian, Nepali, Chuukese and Karen from within their parent ACS language groupings – African, Other Slavic, Other Indo-European, Other Indic, Other Pacific Island and Other Asian languages respectively (Figure 6). Of the LEP populations, approximately one-half speak Spanish as their first language, and approximately one-quarter speak Vietnamese, Chinese (Mandarin and Cantonese) or Russian.

**Figure 5. All persons age 5 and older, speak English less than “very well,” based on American Community Survey data**

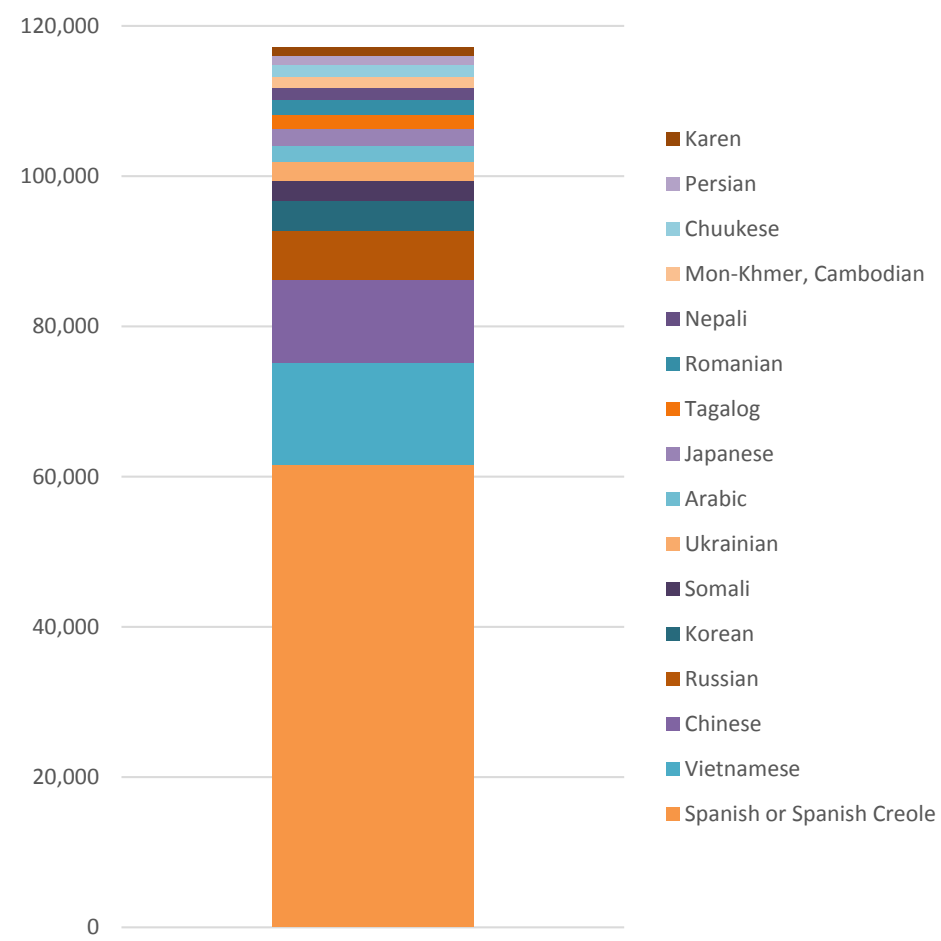


Source: American Community Survey, 2009-2013

Metro has determined that translation of vital documents should be performed for 16 languages, including vital documents found on Metro’s website: [oregonmetro.gov/languagehub](http://oregonmetro.gov/languagehub). Upon request and subject to available resources, Metro will provide translation of other documents pertaining to programs and services into relevant languages.

Figure 6 and Table 4 show the 16 languages, including the estimated population sizes based on supplemental data for the four languages which are not reported in ACS Table B16001.

**Figure 6. All persons age 5 and older, speak English less than “very well,” based on American Community Survey and Oregon Department of Education data**



Sources: American Community Survey, 2009-2013; Oregon Department of Education, 2013-2014

**Table 4. Languages eligible or potentially eligible for safe harbor provisions in Metro-wide services**

	1) Persons age 5 and older, language at home is not English	2) LEP persons age 5 and older, language at home is not English	3) LEP persons age 5 and older, language at home is not English	4) LEP persons age 5 and older, language at home is not English	5) Percentage of total regional population (tracts), by language spoken at home and LEP
DATA SOURCE	ACS 2011-2015	ACS 2011-2015	ACS 2011-2015	ODE 2015-16 ACS 2011-2015	
GEOGRAPHY	Tracts	Tracts	Counties	Schools attendance boundaries, tracts	
All languages	304,100	129,400	132,500	<i>not estimated</i>	8.5%
Spanish	140,500	61,500	63,900		4.1%
Vietnamese	20,900	13,700	13,900		0.9%
Chinese	21,400	11,100	11,100		0.7%
Russian	13,900	6,400	6,700		0.4%
Korean	8,000	4,000	4,100		0.3%
Somali	<i>no data</i>	<i>no data</i>	no data	2,700	0.2%
Ukrainian	<i>no data</i>	<i>no data</i>	no data	2,500	0.2%
Arabic	5,600	2,200	2,200		0.1%
Japanese	6,100	2,200	2,200		0.1%
Tagalog	6,300	1,900	1,900		0.1%
Romanian	<i>no data</i>	<i>no data</i>	no data	1,900	0.1%
Nepali	<i>no data</i>	<i>no data</i>	no data	1,600	0.1%
Mon-khmer	2,900	1,600	1,600		0.1%
Chuukese	<i>no data</i>	<i>no data</i>	no data	1,500	0.1%
Persian	3,100	1,200	1,200		0.1%
Karen	<i>no data</i>	<i>no data</i>	no data	1,200	0.1%
Thai	1,700	900	900		0.1%
French	6,700	800	900		0.1%
Hindi	4,600	800	800		0.1%
Laotian	1,600	800	800		0.1%
Serbo-Croatian	1,800	700	700		0.0%
Hmong	1,500	600	700		0.0%
German	6,600	600	600		0.0%

Source: American Community Survey, 2011-2015; Oregon Department of Education, 2015-2016

## **Factor 2: The frequency with which individuals with limited English proficiency come into contact with programs, activities and services**

The U.S. Department of Transportation has published the following guidance on Factor 2:

Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily. Recipients should also consider the frequency of different types of language contacts, as frequent contacts with Spanish-speaking people who are LEP may require certain assistance in Spanish, while less frequent contact with different language groups may suggest a different and/or less intensified solution. If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual's program or activity contact is unpredictable or infrequent. However, even recipients that serve LEP persons on an unpredictable or infrequent basis should use this balancing analysis to determine what to do if an LEP individual seeks services under the program in question. This plan need not be intricate. It may be as simple as being prepared to use a commercial telephonic interpretation service to obtain immediate interpreter services. Additionally, in applying this standard, recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups.<sup>10</sup>

In its role as metropolitan planning organization for the greater Portland region, Metro is not a provider of public transit service and is almost never a provider of direct services to the public. The agency does not manage construction of transportation infrastructure, nor does it buy or operate vehicles. Mainly, Metro and other metropolitan planning organizations act as planner, banker and facilitator of the investment of federal transportation funds in the metropolitan area. In this way, Metro is a wholesaler, rather than a retailer, of services.

For its Factor 2 analysis, Metro took guidance from the steps enumerated in the FTA handbook, Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, April 13, 2007.

### **Review of relevant programs, activities and services provided**

Metro reviewed its contact with LEP populations for its relevant metropolitan planning organization's programs, activities and services:

1. Regional Transportation Plan (long-range regional transportation plan)
2. Metropolitan Transportation Improvement Plan (schedule of investment of federal transportation funds)
3. corridor planning (potential New Starts and Small Starts projects)

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<sup>10</sup> U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, Section V, 70 FR 74087, Dec. 14, 2005.

4. regional flexible funding allocation (allocation of the Surface Transportation Block Grant program and Congestion Mitigation and Air Quality Improvement program)
5. Regional Travel Options (marketing of and grant programs related to carpooling, biking and transit use).

While there are some programs that are very important to the metropolitan planning organization function, Metro's role as the convener of conversations across local jurisdictional lines is often its crucial role. Also, some stages of longer processes could be more important than others, whereas even these may be built upon city and county processes with their own outreach – including outreach to LEP populations – requirements and practices. For example, in the three- to four-year process it takes to develop a Regional Transportation Plan (RTP), the process of developing lists of local transportation project to include in the plan is often viewed as the most important because of the opportunity to directly affect whether a project is eligible for federal funds – and thus increasing the chance for implementation – in the near future, but these lists are developed through city- and county-level transportation system plans and further refined through county coordinating committees before refinement at the regional table.

Metro's metropolitan planning organization programs involve long-term policy decision-making, such as the RTP, which guides investments and corridor planning over a 25-year time horizon. The goals, objectives and high-level policy questions contained in the RTP can be challenging, even to local elected officials and English-speaking stakeholders. Even new high capacity transit corridors, which could have direct impacts to property and provide new transit benefits, could take a decade or longer to plan before construction might start.

Most metropolitan planning organization activities are geographically expansive, such as the RTP and Metropolitan Transportation Improvement Program, which plan for and consider the transportation system – and include transportation projects – across the entire greater Portland region. Some functions address smaller, yet still significant, geographies, such as the planning of high capacity transit and related investments in a corridor that links two or three adjacent cities within one or two counties. Historically, Metro has had little success in engaging LEP populations these planning efforts, but with recent planning efforts that are exploring innovative tools (such as interactive posters with multiple languages) and new community partnerships, contact may increase.<sup>11</sup>

Metro's process for distributing its Surface Transportation Block Grant program (STBG) and Congestion Mitigation and Air Quality Improvement Program (CMAQ) relies on soliciting project proposals from local jurisdictions. Because the proposals must be weighed against goals, objectives and policies of the RTP and other long-range plans, there is relatively little regional interest by even English-speaking stakeholders to deeply engage and provide input. Though Metro's most recent allocation process garnered intense interest at the local level in advocating for or against funding of specific project proposals, multilingual outreach and tools for engaging in the process garnered little participation from LEP persons. Further, these proposals are developed

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<sup>11</sup> See, for example: Public engagement reports for the Powell-Division Transit and Development Project, [oregonmetro.gov/powelldivision](http://oregonmetro.gov/powelldivision).

from, and resulting projects are further developed through, city and county processes with their own outreach requirements and practices – including outreach to LEP populations – that may allow for more direct and meaningful public influence.

Unlike most metropolitan planning organizations, Metro uses STPBG and CMAQ funds to pay for and, in some cases, manage marketing and grant programs that encourage use of carpooling, public transit, bicycling and walking to reduce auto dependence and provide cleaner, more efficient transportation options. This is called the Regional Travel Options program, and it has produced maps and outreach projects that show residents safe biking and walking routes in neighborhoods across the region. Unlike the Regional Transportation Plan and other planning programs which use public outreach as a tool for informing planning and policy decision-making, the program generates public outreach materials (such as maps) and activities (such as information tables at community events) as a main outcome of the program. Historically, the Regional Travel Options program has had limited interaction with LEP individuals, but with recent programs targeted to diverse populations, contact may increase.

### Staff questionnaire

A staff questionnaire was conducted in September 2018 to determine the frequency of contact with residents with limited English proficiency. The survey was sent to 62 employees, including planning, administrative and communication staff who could come direct contact with the public via phone and public outreach events as well as planning staff who are the subject matter experts for the metropolitan planning organization's programs and land use planning programs.<sup>12</sup> 30 of the 62 staff responded.

The staff questionnaire asked the following questions:

1. *Have you received a request from a community member for a language interpreter to be provided at a meeting related to a Metro program or project in the last year (July 1, 2017 - June 1, 2018)?*

Three respondents said they had received translation requests: by TriMet for the Division Transit Project,<sup>13</sup> by community partners for the affordable housing measure prior to referral and by participants of a Regional Travel Options communications research project.

2. *Have you received an information request from a community member (either by phone or in person) who had a hard time speaking English and needed an interpreter to understand information about a program or project in the last year (July 1, 2017 - June 1, 2018)?*

Three respondents had received translation requests: a resident for the Division Transit Project that was referred to TriMet, by community partners for the affordable housing

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<sup>12</sup> This questionnaire focused on staff connected to Metro's metropolitan planning organization function. Additional outreach and services in multiple languages are also performed by Metro's garbage and recycling and its parks and natural areas programs.

<sup>13</sup> The Division Transit Project is the Environmental Assessment phase, led by TriMet; Metro continues to support TriMet in its engagement efforts as Metro began the project as the Powell-Division transit and development strategy.

measure prior to referral and by a participant of a Regional Travel Options communications research project.

*Have you received a request from a community member (either by phone or in person) to provide a translated version of a Metro document to better understand a Metro program or project in the last year (July 1, 2017 - June 1, 2018)?*

Three respondents had received translation requests: by community partners for the affordable housing measure prior to referral, by a resident regarding the Southwest Equitable Development Strategy and by a participant of a Regional Travel Options communications research project.

3. *Have you conducted community outreach (e.g., open house, table at a community event, etc.) targeted to people who don't speak English well, to obtain input or spread awareness of a Metro program or project in the last year (July 1, 2017 - June 1, 2018)?*

Spanish translators were part of the Southwest Equitable Development Strategy outreach during two open houses, one public hearing and at a multilingual event, about 40 LEP Spanish speakers attended the multilingual event (no LEP Spanish speakers were part of the other events). The Southwest Corridor Plan conducted event tabling with both Spanish- and Vietnamese-speaking staff to reach out to those communities. The Regional Travel Options communications research project also conducted surveys, focus groups and tabling at public events in Spanish.

4. *Have you translated a document, sign or notice to help people understand something about a Metro program or project in the last year (July 1, 2017 - June 1, 2018)?*

Nine respondents had participated in proactive translation to engage residents who speak languages other than English: the Southwest Corridor Plan noticed and advertised in multiple languages and translated its initial route proposal factsheet in Arabic, Somali and Spanish and its newsletter and executive summary in Spanish. The regional flexible funds allocation was noticed, and engagement tool provided, in multiple languages; the Metropolitan Transportation Improvement Program noticed in multiple languages, including a "need help?" notice during amendment comment periods; and the Regional Transportation Plan was noticed in multiple languages.

In addition to what is mentioned above, Metro is currently research best practices for marketing affordable housing to non-English speakers as part of the Equitable Housing Initiative; the Community Placemaking grant program has supported multilingual projects; and subjects of storytelling efforts on Metro News have been chosen as English language learners; and consultants for the Regional Travel Options communications research project were requested to have a multi-lingual outreach staff.

These results indicate that a small portion of staff have direct interaction with people who don't speak English well, with the majority of these connections as part of focused outreach to include multi-lingual participants. As targeted outreach to LEP communities continues, it is anticipated that translation and interpretation requests will increase.



The questionnaire also asked what tools or resources, including prepared translated materials, could help staff better identify, communicate with and engage with LEP individuals and populations. Many of these recommendations have been incorporated in the preparation of language resources for the agency.

### **Review of information obtained from community organizations**

Metro convened a discussion group of community based organizations that serve LEP populations from across the agency's tri-county service area on April 16, 2012. Fourteen organizations were invited to send a representative to the meeting, where lunch was provided by Metro and four attended. Though this discussion group was held in 2012, Metro's subsequent engagement efforts – including efforts to engage people with limited English proficiency – and language assistance program have not shown a conflict with what was communicated by these participants. It is anticipated that Metro will again convene a similar LEP-focused discussion group prior to its next LEP Plan.

- Roberto Varona, Virginia Garcia Memorial Health Clinic, said that many of the clients he transports, as part of the clinic's van service, are from Mexico or Guatemala. A large portion of the community he works with is migrant workers who travel to Oregon from California or Washington during the harvest season. He said that the migrant workers are often a bit more familiar with the area and how the roads and transit service might work, but many don't have a car or a license, so they often have a difficult time travelling in the greater Portland region. Mr. Varona said his clients often speak only Spanish as a second language, their first language being native/Indian dialects, so they may not be able to read signs that are translated into Spanish. He explained that his agency often uses family members or professional services to interpret signs and directions, even when they are written in Spanish.
- Viktor Bereznay, Human Solutions, serves the Slavic community in the Portland area. He explained that the Slavic population he serves can speak Russian, but there are as many as 15 other languages spoken in the community as well. He emphasized that Russian is often used as a common language to communicate to his clients. He also indicated that understanding how to use transit service is key for his clients, especially in their early years in the area. Mr. Bereznay also said that his clients can often read Russian.
- Pei-ru Wang, Immigrant and Refugee Community Organization (IRCO), works with a variety of different populations. She explained that staff at IRCO speak a total of 60 to 70 languages, and their client populations speak many more. Ms. Wang suggested Metro use the Coalition of Communities of Color report on languages spoken in the Portland region to see where the communities are that may need language assistance. Ms. Wang said that often times the smaller populations are more cohesive and supportive of each other as a group, and that the larger, more established populations may be more dispersed. She emphasized the importance of learning the most effective way to communicate with each population, which may be more than printing or translating materials.
- Hector Osuna, OPAL Environmental Justice Oregon, said Spanish is the only foreign language his organization addresses. He suggested that Metro has outreach programs in place, is

familiar with community organizations and knows what resources are needed, but needs to take the next step of implementing those resources.

These recommendations from community based organizations emphasized additional considerations for serving and outreach to LEP populations, such as non-English multilingualism (e.g., LEP Slavic individuals may speak Serbo-Croatian or Ukrainian at home but may be served or engaged in Russian) and literacy rates.

### **Review of consultation with LEP persons**

To learn more about the needs and interests of community members with limited English proficiency, Metro partnered with and provided funding to community organizations that serve LEP populations to organize, recruit, facilitate and capture comments at language discussion groups in June 2013. (For the language group survey and discussion questions, see Appendix D).

Metro selected six organizations to conduct a series of seven language discussion groups. Three discussions were held with Spanish speaking community members, by far the largest regional LEP population. Metro held a Spanish language discussion group in Clackamas, Multnomah and Washington counties. Two discussion groups were held in Chinese to accommodate the spoken language difference between Cantonese and Mandarin. One discussion group each was held with the Russian and Vietnamese communities. Though this discussion groups were held in 2013, Metro's subsequent engagement efforts – including efforts to engage people with limited English proficiency – have not shown a conflict with what was communicated by these participants. It is anticipated that Metro will again convene a similar set of LEP-focused discussion groups prior to its next LEP Plan.

**Table 5. Community organizations contracted for language discussion groups**

<b>Community organization</b>	<b>Population served</b>
Adelante Mujeres	Low-income Latina women and their families, primarily in Washington County
Asian Health and Services Center	Cantonese, Mandarin and Vietnamese clients with a focus on being the bridge between Asian and American culture, building a harmonious community, reducing health inequity and improving healthcare quality for all Asians.
Immigrant Refugee Community Organization (IRCO)	Large variety of immigrants, refugees and the community at large
Asian Pacific American Network of Oregon (APANO)	Asian and Pacific Islander population
Latino Network	Latino population, primarily in Multnomah County
Los Niños Cuentan	Latina population, primarily in Clackamas County

### **Common themes**

Each language discussion group had varying levels of awareness of or interest in Metro's programs or services, yet several themes were common across all language discussion groups.

In order to better engage communities that have a limited ability to speak English, participants recommend Metro:

- build relationships and trust with communities that have a limited ability to speak English through partnerships with community based organizations
- speak the language or find a trusted community leader to speak on Metro's behalf
- translate materials – but use limited text and culturally specific images to help convey the message.

### Key findings

The language discussion groups identified Metro programs or services relevant or of interest to Spanish, Chinese, Russian or Vietnamese speaking communities. This input has been and continues to be used to prioritize translation of existing Metro materials or web content and inform LEP engagement efforts.

*(Spanish)* Metro services or programs of interest to the Spanish-speaking participants included:

- information about low-cost or free family activities at Oregon Zoo, Portland's Centers for the Arts or parks
- help finding ways to connect with nature or locating places to hike on trails
- information on cemeteries
- information on Metro Paint
- help finding a recycler, garbage hauler or places to take household hazardous waste
- information on Metro projects that discuss new MAX lines, bike routes, sidewalks and roads.

*(Spanish)* To engage the Spanish-speaking community, Metro can:

- advertise on Spanish language television, radio, billboards or public transportation
- build partnerships with faith-based or community-based organizations and community health organizations
- offer activities for families and children
- attend community events
- provide printed Spanish materials about programs and services
- host workshops/neighborhood forums about projects in Spanish and provide free childcare
- provide bilingual staff at events.

*(Chinese)* Metro services or programs of interest to Chinese-speaking participants included:

- Bike There and Walk There program
- tips and resources to help reduce the use of toxic products
- help finding a recycler, garbage hauler or places to take household hazardous waste

- information on which public transportation to take in order to attend Metro events.

*(Chinese)* To engage the Chinese-speaking community, Metro can:

- provide information about programs and services in Chinese along with illustrations/pictures
- post information at libraries, Asian supermarkets or organizations (i.e. Chinese Consolidated Benevolent Association, Chinese American Citizens Alliance and Bing Kong Associations)
- advertise in Chinese newspapers (i.e., Portland Chinese Times, China Media, China Press)
- host community fairs/workshops in Chinese.

*(Russian)* Metro services or programs of interest to Russian-speaking participants included:

- low-cost or free activities for families/children at parks or Oregon Zoo
- help finding a recycler, garbage hauler or places to take household hazardous waste
- information on Metro Paint
- maps and locations of parks/natural areas
- employment information.

*(Russian)* To engage the Russian-speaking community, Metro can:

- develop brochures/flyers in Russian about programs and services
- advertise on Russian radio stations
- advertise in Russian community newspaper
- build partnerships with faith-based or community-based organizations

*(Vietnamese)* Metro services or programs of interest to Vietnamese-speaking participants included:

- help finding a recycler, garbage hauler or places to take household hazardous waste
- information on Metro Paint
- information on Metro projects that discuss new MAX lines, bike routes, sidewalks and road improvements.

*(Vietnamese)* To engage the Vietnamese-speaking community, Metro can:

- collaborate with elderly community or find Vietnamese community leaders to help convey information to community members
- attend Vietnamese community events, gatherings and provide bilingual staff to answer questions about Metro's programs or services
- advertising or articles in Vietnamese newspapers
- provide written information about Metro's programs and services in Vietnamese.

### Barriers to participation

Participants were asked various questions about barriers to participation in public meetings and Metro's decision-making processes. Metro staff identified common themes to across all language groups that pertain to limited participation.

When engaging LEP populations, it is important to consider the following barriers and potential mitigations.

- Limited access to Internet: Provide alternative methods to reach communities (e.g., word of mouth, partner with community organizations or reach parents through schools).
- Limited financial means: Provide low-cost or free options for events.
- Language barriers: Provide interpreter or staff who speak the language.
- Low literacy: Provide written information in clear, easy to understand language (consider developing content at fifth grade reading level or lower).
- Limited time: Participants indicated that time is a limiting factor in participating in decision-making opportunities, as some work multiple jobs or have family obligations that take priority.

### **Results summary**

Metro's metropolitan planning organization programs have limited contact with the general public and very little contact with LEP populations unless the contact is specifically sought through outreach efforts by Metro's planning and community relations staff. It is anticipated that as Metro's engagement efforts and language assistance program expand, including outreach efforts to LEP populations, the frequency of contact with LEP individuals will increase. Additionally, as the size of the LEP population increases, so will the probability of future contact with LEP individuals. Metro will continue to monitor requests for language assistance, to build relationships with community based organizations and leaders in these communities, and to evaluate the effectiveness of outreach to these populations and determine where additional language tools and resources may be warranted.

The information gathered from conversations with community based organizations and the discussion groups helped staff in determining best practices to engage the Spanish-, Russian-, Vietnamese- and Chinese-speaking audiences and helped to determine which documents and materials that would be most relevant (i.e., web pages, documents, brochures) to translate.

### **Factor 3: The nature and importance of the program, activity or service provided by the program**

The U.S. Department of Transportation has put forth this guidance on Factor 3:

The more important the activity, information, service or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual. Decisions by a Federal, state or local entity to make an activity compulsory, such as requiring a driver to have a license, can serve as strong evidence of the importance of the program or activity.<sup>14</sup>

In addition, FTA suggests a two-step process for Factor 3 analysis:

#### **Step 1: Identify your agency's most critical services**

Your agency should identify what programs or activities would have serious consequences to individuals if language barriers prevent a person from benefiting from the activity. Your agency should also determine the impact on actual and potential beneficiaries of delays in the provision of LEP services.

For example, your agency may provide emergency evacuation instructions in its stations and vehicles or may provide information to the public on security awareness or emergency preparedness. If this information is not accessible to people with limited English proficiency, or if language services in these areas are delayed, the consequences to these individuals could be life threatening.

#### **Step 2: Review input from community organizations and LEP persons**

Your agency's contact with community organizations that serve LEP persons, as well as contact with LEP persons themselves, should provide information on the importance of the modes or types of service you provide to LEP populations. Depending on the results of your fieldwork, you may conclude that some particular routes or modes of transportation are of particular importance to the LEP population.<sup>15</sup>

Metro's metropolitan planning organization function addresses both long-range planning (Regional Transportation Plan; transportation corridor alternatives analysis, Environmental Assessment and Environmental Impact Statement processes) and the shorter-term impact of federal transportation funding disbursement (Metropolitan Transportation Improvement Program and regional flexible funding allocation). Metro does not provide any direct service or program involving vital, immediate or emergency assistance such as medical treatment or services for basic needs (like food or shelter). Further, although Metro works closely with other agencies and

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<sup>14</sup> U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.

<sup>15</sup> Federal Transit Administration Office of Civil Rights, Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, a Handbook for Public Transportation Providers, p. 20, April 13, 2007.

jurisdictions in planning for high capacity transit service, Metro is not a provider of public transit service.<sup>16</sup>

Metropolitan planning organizations are governed by policy boards comprised of elected officials and leaders of regionally significant transportation agencies. In the greater Portland region, the policy board responsibility is shared by the Metro Council and the Joint Policy Advisory Committee on Transportation (JPACT). Comprised of 17 local elected and state agency officials, JPACT is charged with coordinating the development of plans for regional transportation projects, developing a consensus of governments on the prioritization of required improvements, and promoting and facilitating the implementation of identified priorities. The Metro Council can accept or remand JPACT decisions, but cannot amend them.

The Metro Council and JPACT rely on public engagement activities and direct input from residents on the region's transportation plans and programs. They also receive advice from the metropolitan planning organization's technical advisory committee, the Transportation Policy Alternatives Committee, comprised of 15 professional transportation staff appointed by area cities, counties and government agencies and six at-large community representative members.

Inclusive public participation is a priority in all of Metro's plans, programs and activities. Metro may lead, coordinate or offer guidance on the public engagement process and reports. When led (solely or collaboratively) by state, local or transportation agencies, public engagement follows the policies of each agency to ensure inclusiveness, including policies to encourage participation by persons with limited English proficiency.

To aid in Metro's Factor 3 analysis, contextualize the work of Metro's transportation programs, activities and services and help prioritize language assistance and outreach efforts, Metro has created a spectrum of importance to LEP persons using the guidance provided by the U.S. Department of Transportation and FTA (see next page). The guidance offers as examples "if language services in these areas are delayed, the consequences to these individuals could be life threatening" and that actions that make the activities compulsory "can serve as strong evidence of the importance of the program or activity." Taking these into account, Metro's LEP importance spectrum considers the potential consequences that could follow from a lack of language access, where life threatening implications would be rated highest (a "10") with compulsory activities immediately following (a "9"). This spectrum also takes into account levels of urgency, importance of impact to health and property, and potential effect that public input may have on the decision-making of the Metro Council and regional policymakers. Metro's metropolitan planning organization functions range from a "1" to a "6."

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<sup>16</sup> Metro works with Federal Transit Administration (FTA), Tri-County Metropolitan Transportation District of Oregon (TriMet), Oregon Department of Transportation (ODOT) and affected cities and counties in planning transportation corridor improvements, including high capacity transit service.

### **Spectrum of importance to persons with Limited English Proficiency: Metro activities in context with other government and public transit activities**

Metro has determined that though these activities are important in planning for the region, and thus to both English proficient and LEP residents, those ranked levels 6 through 10 are those with potentially **serious** implications if there is a lack of language assistance services. Those ranked Levels 3, 4 or 5 would have only **moderate** implications, and those ranked 1 or 2 would have **limited** implications.

**Level 10 Urgent needs:** Lack of language assistance may have a health impact; example: emergency evacuation instructions

**Level 9 Compulsory activities:** government action taken to require; example: required driver's license.

**Level 8 Urgent effects:** Lack of language assistance may impact understanding of direct property impacts; example: construction impacts such as acquisitions, displacements, noise, vibration, and visual quality and aesthetics.

**Level 7 Important effects:** Lack of language assistance may frustrate input that could affect final decision on activities that will take less than a year to implement and that could impact access to work and social services; example: Ability to provide input on a transit agency cutting a bus line that serves a high concentration of residents with limited English proficiency.

**Level 6 Planning that could lead to urgent or important effects:** Lack of language assistance may frustrate input that could affect final decision on activities that will take five to 10 years to implement and that could lead to property impacts or access to work and social services property access to work and social services; example: Ability to provide input on an Environmental Impact Statement for a light rail project that could have impacts to properties in areas with a high concentration of residents with limited English proficiency.

**Level 5 Services aimed at improving individual health and safety:** Lack of language assistance may postpone behavioral change that would lead to safer transportation access; example: a walking map providing information on safer routes and access to work and social services.

**Level 4 Funding allocation for projects aimed at improving recreation and workplace access:** Lack of language assistance may frustrate input that could affect an allocation decision on projects that will take three to five years to complete; example: Ability to provide input on flexible funds allocation (Congestion Mitigation and Air Quality Improvement [CMAQ] Program and Surface Transportation Program [STP]).

**Level 3 Planning that could lead to strategies for community investment and development:** Lack of language assistance may frustrate input that could affect identification of the scope, goals, objectives, needs, challenges and community vision; example: Ability to provide input on corridor refinement plans that identify transportation and other investments that advance economic and community development.

**Level 2 Long-range planning and strategy development aimed at improving regional access and mobility, assuming no direct impact on construction in the next five years:** Lack of language assistance may frustrate input that could affect policy and project selections and identification of regional goals, objectives, needs, challenges and community vision; example: Ability to provide input on Regional Transportation Plan, the Portland metropolitan area's 25-year blueprint for a multi-modal transportation system.

**Level 1 Approval of project lists for funding, after local jurisdictions conduct general public, environmental justice and Title VI and LEP outreach as part of project submission process:** Lack of language assistance would not frustrate meaningful input opportunity because there is less ability to affect the list on the day it is scheduled for adoption; example: Metropolitan Transportation Improvement Program project list final approval by Metro Council.



Metro reviewed each of its five most critical metropolitan planning organization programs, applying FTA's two-step analysis. The programs are described in order of importance on the agency's spectrum of importance to LEP persons.

**Transportation corridor Environmental Assessment and Environmental Impact Statement processes (importance level: 6)<sup>17</sup>**

Metro follows the National Environmental Policy Act (NEPA) process for transportation corridor Environmental Assessments and Environmental Impact Statements, which overlap with the Federal Transit Administration alternatives analysis process.

- *Identify your agency's most critical services.* Though typically rendering long-term results, this planning process leads to tangible, on the ground improvements, often with elements of short- to mid-term implementation. Because of the direct community implications, these plans could have serious implications for individuals if language barriers prevent a person from participating in or benefiting from the planning process and results.
- *Review input from community organizations and LEP persons.* Because of the community-level focus (as opposed to regionwide focus) in corridor planning, the agency and organization discussion group indicated a higher importance to populations with limited English proficiency. These plans could lead to direct impacts to property, community resources, mobility and/or access to community services. It is important for those with limited English proficiency to not only understand those potential impacts but also to have a say in the decision-making process. Similar sentiments were expressed by Spanish-language discussion group participants, who said this planning is important in its potential effects on their communities, though they recommended only moderate effort in translating documents, translating information on the website and language-specific outreach.

Each corridor level plan will include an LEP four-factor analysis and an outreach plan as part its Title VI and environmental justice outreach plan, focused on the corridor or project area. Such plans will build on Metro's broader contact with LEP persons and community organizations that serve them and provide information on the scope, alternatives and environmental impacts. Under NEPA guidance, this limited English proficiency analysis and outreach will be targeted toward potentially affected populations, using the four-factor analysis on a corridor or project area level.

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<sup>17</sup> Transportation corridor-focused planning that that could lead to strategies for community investment and development may in turn lead to planning for a major public investment in transit or roadway expansion and require an Environmental Assessment or Environmental Impact Statement. Such project evolution is often not identified as two separate project phases, more often seen as a growth in planning and public involvement efforts through project development. Metro recognizes that there is not a distinct boundary between the level "2," planning that that could lead to strategies for community investment and development, and the level "6," planning that could lead to urgent or important effects (transportation corridor Environmental Assessment and Environmental Impact Statement processes). Rather, there is a steady increase in importance that must be mirrored by a related increase in outreach and language-services as part of that outreach.

### **Regional Travel Options (importance level: 5)**

The Regional Travel Options program improves air quality and reduces congestion by working with businesses, local organizations and public agencies to offer residents ways to get around without a car. The program is made up of a marketing effort to reach key audiences; an employer outreach program; a regional rideshare (carpooling) program; and a grant program that funds projects that improve air quality, address community health issues, reduce auto traffic and create more opportunities for walking and biking.

- *Identify your agency's most critical services.* The Regional Travel Options program focuses on providing information to offer choices to people in how they get around. The goal of the program is behavior change through education and resources to make non-driving-alone travel more convenient, easier and safer. Resources include a rideshare program that connects carpoolers, transit route planning assistance, and bike and walking maps highlighting safe routes. A lack of language service could have moderate implications for individuals as it may postpone behavior change that would lead to safer transportation access.
- *Review input from community organizations and LEP persons.* Because of the immediate utility of maps and transit route planning assistance, the agency and organization discussion group indicated that the Regional Travel Options could be of high importance to populations with limited English proficiency, again highlighting the difficulty that many of these residents have in meeting immediate transportation needs. The Spanish-language discussion group emphasized the transit dependency of many in their communities, stating that anything that helped with transit access is important to them. They recommended a moderate effort in translating information on the website and language-specific outreach, but expressed that any materials that could help those with limited English proficiency understand and navigate the transit system should be available in other languages.

Because of the potential for moderate implications to individuals if language barriers prevent participation in or benefits from the information and resources provided by the Regional Travel Options program, it is important to include outreach to limited English proficiency communities. This may be best achieved through translation of vital documents and marketing materials and focusing outreach on, or partnering with, agencies, organizations or advocacy groups that serve LEP populations to ensure that these resources reach these populations.

### **Regional flexible funds (importance level: 4)**

Every three years,<sup>18</sup> JPACT and the Metro Council decide how best to spend money from two federal funds: Congestion Mitigation Air Quality and Surface Transportation Block Grant programs. Under the allocation processes for funds for the 2014-2015 fiscal years and the 2016-2018 fiscal years, workshops made up of service providers and community advocates was undertaken during the MTIP and RFFA policy development advised on how to address the needs of environmental justice and underserved communities. Additionally, during the solicitation process for projects additional outreach was undertaken and community organizations provided a significant level of

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<sup>18</sup> Prior to the 2016 federal fiscal year, allocations were determined every two years.

public comment at JPACT and Metro Council meetings in the lead up of the decision. During public engagement to inform the decision on the proposed projects, materials were translated into multiple languages, with targeted social media outreach to LEP populations. Collaboration under this process lead to a list of projects submitted by cities and counties and programs submitted by Metro to be publicized for public comment.

- *Identify your agency's most critical services.* Because of the direct transportation project and program funding implications, the regional flexible funds process could have moderate implications in the short- to mid-term for individuals if language barriers prevent a person from participating in or benefiting from the funding process and results. Local jurisdictions conduct general public, environmental justice and Title VI (including to residents with limited English proficiency) outreach and garner input as part of the submission process. Different from the MTIP, however, there is still opportunity for input that could affect flexible funds projects as they are reviewed, prioritized and approved by JPACT and the Metro Council. Lack of language service may frustrate input that could affect allocation decision on projects that will take three to five years to complete and, therefore, language service is of moderate importance to LEP populations, given Metro's role in the flexible funds allocation process.
- *Review input from community organizations and LEP persons.* As above, because this program does not affect immediate transportation needs, most participants in the agency and organization discussion group indicated that it is of lower importance to populations with limited English proficiency. One participant expressed the importance of allowing these populations to advocate for investments in their communities, but agreed that that was best handled by local jurisdiction outreach. The Spanish-language discussion group made similar statements, stating the need for Spanish speakers with limited English proficiency to be involved with funding decisions in their communities. They agreed that this could be best achieved through local jurisdiction outreach.

Because of the potential for moderate implications to individuals if language barriers prevent a person from participating in or benefiting from the planning process and results, Metro can implement clearer guidance to local jurisdictions to ensure consistency and effectiveness in general public, Title VI (including to residents with limited English proficiency) and environmental justice outreach as part of the submission process. Additionally, it is important to provide information about the process and funding allocations as well as provide opportunity for input during the approval process. This may be best achieved through translation of vital documents<sup>19</sup>

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<sup>19</sup> "The following actions will be considered strong evidence of compliance with the recipient's written-translation obligations: (a) The DOJ recipient provides written translations of vital documents for each LEP language group that constitutes five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered..." U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41464, June 18, 2002. "Whether or not a document (or the information it contains or solicits) is 'vital' may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner," U.S. Department of Health and Human Services, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, Appendix A, Questions and Answers Regarding the Department of Health

and consultation with agencies, organizations or advocacy groups that serve limited English proficiency populations to determine any issues that are unique to those populations.

### **Regional Transportation Plan (importance level: 2)**

The Regional Transportation Plan presents the overarching policies and goals, system concepts for all modes of travel, funding strategies and local implementation requirements. The plan recommends how to invest anticipated federal, state and local transportation funding in the Portland metropolitan area during the next 20 years.

- *Identify your agency's most critical services.* The Regional Transportation Plan contains the framework and goals for a 25-year planning horizon for a healthy and prosperous region. RTP implementation is carried out through transportation corridor planning, the Metropolitan Transportation Improvement Program and the regional flexible funds process. Looking at the Regional Transportation Plan on its own, this long-term, regional level planning process could have limited implications for individuals if language barriers prevent a person from benefiting from the planning process. Adding a project to the RTP's financially constrained project list makes it eligible for federal funding, among the most important and shorter-term impacts of the plan. But even this has little impact on LEP and other populations, since the projects are often still conceptual and require more local planning and public involvement before funding decisions and, eventually, potential construction. In addition, projects are drawn from plans (e.g., local transportation system, subarea, topical, modal or transit service plans), with the expectations that sponsoring jurisdictions conduct general public, environmental justice and Title VI (including to residents with limited English proficiency) during the development of those plans. (For the public engagement and non-discrimination certification checklist required of project sponsors for the 2018 Regional Transportation Plan, see Appendix E)
- *Review input from community organizations and LEP persons.* Because of the long-range and overarching approach to the Regional Transportation Plan, the agency and organization discussion group indicated that it is of lower importance to populations with limited English proficiency, citing difficulty that many of these residents have in meeting immediate transportation needs. One participant cautioned that it is important to include LEP residents in long-range planning, allowing them to advocate for more long-term investments in their communities. The Spanish-language discussion group made similar statements, agreeing that it is important for Spanish speakers with limited English proficiency to learn to participate in long-range planning as members of the larger community. Though participants said that the Regional Transportation Plan is important to all residents, including those with limited English proficiency, they recommended only moderate effort in translating documents, translated information on the website and language-specific outreach.

In spite of limited implications to individuals if language barriers prevent a person from benefiting from the planning process, it is important not to overlook the LEP communities in long-range

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and Human Services Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 68 FR 47322, Aug. 8, 2003.

regional plans. This may be best achieved through translation of vital documents and consultation with agencies, organizations or advocacy groups that serve LEP populations to learn about issues that may be unique to those populations.

### **Metropolitan Transportation Improvement Program (importance level: 1)<sup>20</sup>**

For transportation projects to receive federal funds, they must be included in the Regional Transportation Plan; however, the RTP approves more projects than can be afforded by the region in any given year. The MTIP process is used to determine which projects included in the plan will be given funds year to year, determining a schedule of spending of federal transportation money along with significant state and local funds in the greater Portland region over a four-year period. It includes project lists whose development is led by the TriMet (Tri-County Metropolitan Transportation District of Oregon) and SMART (South Metro Area Regional Transit, Wilsonville, Ore.) transit agencies and the Oregon Department of Transportation, in partnership with cities and counties. Metro's own allocation of regional flexible funds is added to the MTIP after funding decisions have been made in the regional flexible funds allocation process (above).

- *Identify your agency's most critical services.* Because of the direct transportation project phasing implications, these plans could have modest implications in the short- to mid-term to individuals if language barriers prevent a person from participating in or benefiting from the planning process and results. Local jurisdictions conduct general public, environmental justice and Title VI (including to residents with limited English proficiency) outreach and gather input prior to submitting projects to Metro. (A public engagement and non-discrimination certification checklist similar to the one provided for the 2018 Regional Transportation Plan is required of project sponsors; see Appendix E) As the project list is developed, reviewed, prioritized and approved by JPACT and the Metro Council, there is little opportunity for residents to add further input to affect the process. Lack of language service would not frustrate meaningful input and, therefore, language service is of limited importance to LEP populations, given Metro's role in the MTIP process.
- *Review input from community organizations and LEP persons.* Because this program does not affect immediate transportation needs, most participants in the agency and organization discussion group indicated that it is of lower importance to populations with limited English proficiency. One participant expressed the importance of allowing these populations to advocate for investments in their communities, but agreed that that was best handled by local jurisdiction outreach. The Spanish-language discussion group made similar statements, stating the need for Spanish speakers with limited English proficiency to be involved with funding decisions in their communities. They agreed that this could be best achieved through local jurisdiction outreach.

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<sup>20</sup> The importance level represents Metro's role in public involvement and comment; as noted, local jurisdictions conduct community outreach and initiate their own plans for public involvement and comment, during which residents can have more of an impact on project design and prioritization. The local jurisdictions comply with their own environmental justice and Title VI (and limited English proficiency) involvement plans in the development of projects to submit for Metropolitan Transportation Improvement Program funding.

In spite of limited implications to individuals if language barriers prevent a person from benefiting from the planning process, it is important not to overlook the perspectives of LEP communities in the MTIP. This may be best achieved through translation of vital documents and consultation with agencies, organizations or advocacy groups that serve LEP populations to learn about issues that may be unique to those populations.

#### **Factor 4: Resources available to the recipient and costs**

The U.S. Department of Transportation has put forth this guidance on Factor 4:

A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.<sup>21</sup>

In addition, FTA suggests a four-step process for Factor 4 analysis:<sup>22</sup>

1. Inventory language assistance measures currently being provided, along with associated costs.
2. Determine what, if any, additional services are needed to provide meaningful access.
3. Analyze your budget.
4. Consider cost effective practices for providing language services.

#### **Inventory of language assistance measures currently being provided, along with associated costs**

Assessing available resources is an ongoing activity. It includes identifying staff and volunteer language interpreters, the amount paid professional interpreters and translation services, appropriate documents for critical translation and appropriate financial and in-kind sources needed. Typically, translation is priced as a per-word cost, based on the number of words in the original source content. For professional translation via a translation agency, costs may vary, depending on the language, turnaround times and specialized content. Metro is committed to providing professional and cost-effective language services when called for.

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<sup>21</sup> U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.

<sup>22</sup> Federal Transit Administration Office of Civil Rights, Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, a Handbook for Public Transportation Providers, pp. 21-22, April 13, 2007.

## **Determination of any additional services are needed to provide meaningful access**

### Flexible service contracts

In addition to communications products available in alternate languages, Metro has set up internal resources in the form of several professional communication contracts to provide translation and communication services on an as needed basis across all agency departments and programs.

The Communications department and the Diversity, Equity and Inclusion program coordinate to provide these service contracts on an ongoing basis and communicates the availability and range of services available from the contracts to program managers regularly. The use of the contracts across the agency reduces staff time conducting similar procurements for these services, and by means of providing the resource, encourages departments and programs to use the services. Current contract amounts and duration are listed with each contract category.

Procurement efforts follow state and federal contracting guidelines allowing programs in receipt of federal funds to use the contacts. Existing staffing requirements to coordinate procurement process and award and monitor contracts is approximately 0.40 full-time equivalent. On a per project basis program staff spend a percentage of their time coordinating scope of work, deliverables and schedules for each effort totaling approximately 2.0 full-time equivalent across agency programs.

### Language translation and multicultural communications services

One contract awarded totaling up to \$350,000; expires March 2020

- Written products, letters, brochures, handouts | \$80 to 100 per hour (500 words)

### Telephonic interpretation services

One contract awarded totaling up to \$5,000; expires June 2020

- Telephonic interpretation, on-demand and scheduled | \$1.15 per minute

### Onsite interpretation services

One contract awarded totaling up to \$150,000; expires March 2020

- One-on-one in person interpretation | \$156 for the first two hours, \$78 per hour after
- Group in person interpretation | \$196 for the first two hours, \$98 per hour after

### Altered hearing/hearing impairment services (non-LEP)

One contract totaling \$60,000, expires June 2020

- Closed captioning services for televised meetings | \$122 per hour

### Onsite American Sign Language interpretation (non-LEP)

As needed personal service contracts up to \$10,000

- Onsite ASL interpretation | \$178 for the first two hours, \$89 per hour after

### **Analysis of budget**

It is typical for most Metro planning programs to have communication and public engagement resources in their budgets. Prior to annual budget submissions, staff will be informed of average translation and interpretation costs to plan according. In some cases, existing resources may be able to achieve more than one outcome or be repurposed to assist with LEP language assistance.

### **Consideration of cost effective practices for providing language services**

The Diversity, Equity and Inclusion program will ensure new translated content is easily accessible to all departments in the agency and inventoried and stored in Metro's language bank for future translation projects.

Metro staff will work with the preferred vendor to maintain a language bank of frequently used terms to avoid duplication of translated content. Once an item is translated, and if available, bilingual Metro staff will proofread for accuracy.

### **Results summary**

Metro is always considering effective best practices for engaging the public, including LEP populations. As Metro continues to learn more about reaching and engaging LEP populations and providing effective language assistance, it will improve best practices to guide future planning efforts and allocate resources needed to accomplish the work in a timely and cost-effective manner.



## SECTION II: LEP IMPLEMENTATION PLAN

### Metro's implementation plan on language assistance

Metro continues to implement its plan and will review it annually to meaningfully address the needs of the LEP populations in the region. Metro follows the recommendations in the FTA handbook, Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, April 13, 2007, as described below. For a detailed timeline including completed tasks and anticipated tasks of Metro's LEP Implementation Plan (2011-2019), see the LEP implementation plan schedule on the following pages.

#### Identifying LEP populations who need language assistance

As part of implementation, programs and projects may conduct a program or project specific LEP four-factor analysis as a way to define protected or sensitive populations, appropriate engagement methods and translation needs.

Data collected from the regional Factor 1 analysis will be available to programs and projects as they need to identify LEP populations and analysis support will be available when the program or project area is smaller than the whole region. In addition to data collection, Metro will implement the following tactics to identify individuals who need language assistance:

- *Annual survey to front line staff* To better understand the types of language requests Metro's front line staff receive, Metro will conduct an annual staff questionnaire. The survey will help track the frequency of language requests and additional resources needed to help staff engage or communicate with people who don't speak English well.
- *Multilingual questionnaire* Metro will conduct a short online satisfaction questionnaire to improve viewers' experience of the language hub ([oregonmetro.gov/languagehub](http://oregonmetro.gov/languagehub)). The questionnaire will be available in multiple languages and will be conducted throughout the year. Metro will provide incentives for those that complete the survey. The survey results will inform future translation needs.
- *Demographic collection at open houses/community events* Metro tracks demographic information of participants attending open houses and community events by using a demographic form. The demographic collection is voluntary and the form is translated into multiple languages.
- *Language line usage* Metro will continue to monitor the volume and types of requests for the language line.
- *Local engagement and non-discrimination checklist* Metro developed a checklist to provide best practices designed to help local cities and counties meet federal non-discrimination requirements and assure full compliance with the Title VI of the Civil Rights Act of 1964, Executive Order 12898 on Environmental Justice and related statutes and regulations to help ensure effective local engagement. (See Appendix E)

## Language assistance measures

Metro employs various methods and strategies to provide LEP persons with information critical to accessing programs and services. Metro's language assistance measures include:

- *Language resource guide* Metro developed a language resource guide which outlines effective practice in written translation, helps staff identify steps to consider when translating materials for a program or a project, and provides resources for staff when an event calls for or a community member requires interpretation. The language resource guide is intended for Metro staff providing translation or interpretation services for community members that don't speak English well.
- *Language line* Metro maintains a contract with Certified Languages International for telephone interpretation services in up to 205 different languages. The contract is through June 2020.
- *Bilingual staff* Metro continues to annually update a list of volunteer staff interpreters who are available to provide language interpretation services on request. This list is made available to all Metro staff and provided during annual language training to administrative support and communications staff throughout the agency. The list, updated in August 2016, identifies 19 employees who are available to help with interpretation of 12 spoken languages plus American Sign Language.
- *Metro's language hub* ([oregonmetro.gov/languagehub](http://oregonmetro.gov/languagehub)) Metro redesigned and launched a new website in May 2014. The new site has improved access for visitors that have a limited ability to understand English and connects them with key pages readable in as many as 16 languages.<sup>23</sup> There is a special emphasis on meeting the needs of the region's growing population of Spanish, Chinese, Vietnamese and Russian speakers.
- *Multilingual videos* Metro contracted with Immigrant and Refugee Community Organization (IRCO) to hire local talent fluent in Spanish, Russian, Vietnamese and Chinese and produced four short videos to inform visitors about the various programs or services Metro provides. To view the videos, visit [oregonmetro.gov/languagehub](http://oregonmetro.gov/languagehub).

## Translated material

The following vital documents have been translated into Arabic, Chinese, Hmong, Japanese, Korean, Laotian, Mon-khmer Cambodian, Nepali, Persian, Romanian, Russian, Somali, Spanish, Tagalog, Ukrainian and Vietnamese:<sup>24</sup>

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<sup>23</sup> In August 2018, a website technical issue was discovered in that Arabic and Persian are displaying backwards (right to left like English would be read instead of left to right as those languages are read). If unable to address the technical issue by November 2018, Metro will create PDFs of this content until the website programming can be corrected.

<sup>24</sup> While Hmong was on the list of languages that met the guidelines for translation in Metro's 2013 Title VI report, Hmong did not meet the safe harbor guidelines for translation of vital documents in the 2015 or 2018 analysis. In addition to the populations of Hmong speakers with limited English proficiency in the region slightly decreasing, a more precise methodology in the 2015 analysis shows that Hmong speakers with limited English proficiency is well below the safe harbor guidelines. Documents considered vital as of 2013 are available in Hmong on the Metro website. While Laotian was on the list of languages that met the guidelines for translation in Metro's 2015 Title VI report, Laotian did not meet the safe harbor

- nondiscrimination and Title VI civil rights notice
- nondiscrimination and Title VI civil rights complaint procedures
- discrimination and Title VI civil rights complaint form
- information about Metro's language line
- language and accessibility assistance notice
- notice of potential real property impacts (to be translated during specific National Environmental Policy Act (NEPA) process)
- notice of right to participate in formal comment period (to be translated during NEPA process or formal land use action)
- description about Metro programs and services
- notice of how to provide public testimony.

#### **Project specific translated material**

##### Powell-Division Transit and Development Project

- Web content about the project available in Spanish, some content available in Russian, Chinese and Vietnamese; translation hotline number accompanies this content
- Spanish-language factsheet
- Multilingual factsheet in Spanish, Russian, Chinese and Vietnamese
- One-question in-person questionnaire at community events and meetings; translated to Spanish, Russian, Chinese and Vietnamese
- Questionnaire via interactive posters with multiple languages

##### Southwest Corridor Plan

- General Southwest Corridor 2012 factsheet and fall 2013 factsheet, translated into Spanish and Vietnamese
- 2012 Shape SW questionnaire to help determine the transportation (transit, walking, biking and driving) investments needs of the corridor into Spanish and Vietnamese
- 2017 newsletter translated in Spanish and outreach with interpreters and traditional foods at Spanish and Vietnamese church services and cultural events
- 2017 translation of interactive map and survey questions in Spanish and Vietnamese. Facebook advertisements run in Vietnamese and Spanish to invite participation

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guidelines for translation of vital documents in the 2018 analysis. Documents considered vital as of 2015 are available in Laotian on the Metro website.

Vital documents will be translated into Chuukese and Karen per the 2018 Factor 1 analysis and made available on the Metro website as part of this implementation plan.

- 2018 translation of fact sheet into Spanish, Vietnamese, Somali, and Arabic. Translation of DEIS executive summary and two more newsletters in Spanish
- 2018 Interpretation at public meetings during DEIS comment period, including a bilingual meeting and public hearing held at local church
- 2018 Advertisements in Spanish and Vietnamese published in local newspapers. Translation of project website and online survey in Spanish. Facebook advertisement in Spanish to invite participation

#### Regional flexible funds

- Public comment map tool on proposed projects into Spanish, Russian, Chinese, Vietnamese and Korean; language-specific outreach on social media to encourage participation

#### Notices

- Public notices include multiple languages to explain the general nature of the notice and contact information for more information. For an example, see Appendix F for the 2018 Regional Transportation notice.

#### **Staff training**

##### Annual language assistance training

Each year, Metro holds language assistance training for front line staff to increase their awareness of agency language resources and staff responsibilities for language assistance. Training objectives include:

- learning how to use Metro's language line to communicate with persons who don't speak English well
- learning about Metro resources available for community members who don't speak English well
- gaining an understanding of LEP policies and procedures.

To view language training materials, see Appendix G.

#### **Learning opportunities**

Metro encourages staff to seek training to improve the agency's expertise in outreach to low communities that don't speak English well and underserved communities. Because of its role as a metropolitan planning organization, the agency often attracts guest speakers on planning topics that sometimes include environmental justice, equity or civil rights as part of their presentations.

#### **Cultural competency, plain language and readability**

The Diversity, Equity and Inclusion program and the Communication department will monitor translation and interpretation requests and will work with the staff to ensure materials are clearly written in plain language with a minimum of technical terms to enable people with limited English proficiency or low literacy to participate or engage with Metro.

## Providing notice of rights and available services to LEP persons

Metro's current and planned measures to inform LEP persons of availability of language assistance include the following:

- *Metro respects civil rights signage* Metro posts Title VI and LEP notice in three places in its headquarters building, the Metro Regional Center: at the building entrance, at the entrance to the Metro Council Chamber and on a bulletin board in the Human Resources Department. The 11 x 17 sign says, in 13 languages:<sup>25</sup>

Metro respects civil rights.

For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights).

If you need language assistance, call 503-797-1890 (8:00 am to 5:00 pm weekdays) 5 business days before the meeting.

To view the updated sign, see Appendix H.

- *"I speak" sign* Metro posts an "I speak" sign in three places in its headquarters building, the Metro Regional Center: at the building entrance, at the entrance to the Metro Council Chamber and on a bulletin board in the Human Resources Department. The sign has information in 23 languages and notifies LEP persons of their right to an interpreter at no cost.
- *Public notifications on agendas* Metro Council agendas with supporting materials are posted on Metro's website and mailed or sent electronically to councilors, advisory committee members and interested parties at least seven days in advance of all regularly scheduled meetings. Meeting packets contain materials pertaining to agenda items, a summary of the last meeting when required and a date and time of the next meeting. Information is also included on how to receive meeting materials in alternative formats, including the TDD number.

Included on the agenda are notifications in 13 languages regarding civil rights protection, instructions on how to file a civil rights complaint and instructions on how to request a language interpreter.

If the public has difficulty accessing meeting materials electronically, printed versions are available upon request. All public meetings are posted to the Metro online calendar found at: [oregonmetro.gov/calendar](http://oregonmetro.gov/calendar).

## Monitoring and updating the LEP plan

Metro will follow the Title VI Program monitoring and reporting schedule for the LEP plan which includes yearly reports to the Oregon Department of Transportation (ODOT) and FTA. Reports will include a review of plan components addressing questions such as:

- How many LEP persons were encountered?
- What is the current LEP population in the greater Portland region?

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<sup>25</sup> Appendix H shows the newest sign, at 18 X 24 that includes 16 languages and will be installed October 2018.

- Has there been a change in the languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified for Metro programs or projects? Are there other programs that should be included?
- What is the extent of available technological, staff and financial resources?
- How many complaints were received?

Metro will review and update the plan as needed. Metro will consider whether new documents and services need to be made accessible for LEP persons and will also monitor changes in demographics in the region.

## LEP IMPLEMENTATION PLAN SCHEDULE: FISCAL YEARS 2018-2022

Metro will update the LEP Plan in October 2018, based on the three-year schedule required by FTA Title VI Circular 4702.1B, Oct. 1, 2012.

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>I. Data tracking and plan scope</b>							
<b>A. Gather and prepare data for four-factor analysis</b>	✓	✓			X		Submit new plan by Oct. 1, 2021
<b>1. Inventory LEP data needs and potentially related data needs by tract within the Metro area</b>	✓	✓			X		
<b>a. Consult demographic data from school systems and local governments (factor 1)</b>	✓	✓			X		
<b>b. Consult anecdotal information from community organizations and agencies and legal aid entities, especially Coalition of Communities of Color reports (factors 1, 2 and 3).</b>	✓	✓			X		
<b>c. Conduct LEP focus groups (factor 2)</b>	✓				X		
<b>2. Develop and review processes and data analysis plans that can be used for Title VI reporting purposes, region-wide long-term planning and corridor level planning efforts that arise between Title VI reporting periods and Metro's other functions</b>	✓	✓		X			
<b>a. Gather and quality check data with local jurisdictions</b>	✓	✓	X	X	X	X	As appropriate
<b>b. Decide data extent and develop maintenance plan for all LEP needs</b>	✓	✓	X	X	X	X	As needed
<b>c. Coordinate with other jurisdictions to standardize data collection and sharing</b>	✓	✓	X	X	X	X	Ongoing
<b>3. Complete regional LEP Factor 1 analysis every three years</b>	✓	✓			X		
<b>a. Identify concentrations of LEP populations within the Metro area</b>	✓	✓				X	
<b>B. Use new regional LEP Factor 1 analysis to estimate costs and resources for carrying out LEP implementation plan</b>	✓	✓				X	
<b>C. Add LEP questions in multiple languages to Title VI tracking form for metropolitan planning organization-function public events</b>	✓	✓	X	X	X	X	Ongoing

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>I. Data tracking and plan scope (continued)</b>							
<b>D.</b> Improve consistency and breadth of data collection through Metro public involvement events and surveys <sup>26</sup> done for Metro metropolitan planning organization functions	✓	✓	X	X	X	X	Ongoing
<b>1.</b> Explore best practices to track participation of underserved populations in the public comment process <sup>27</sup> and Coalition of Communities of Color reports	✓	✓	X	X	X	X	Ongoing
<b>2.</b> Monitor current conversations about the ability to collect demographic data, i.e. the greater Portland Pulse project <sup>28</sup>	✓	✓	X	X	X	X	Ongoing
<b>II. Translation services (See LEP Factor 4 for more information)</b>							
<b>A.</b> Provide telephone interpretation for phone and walk-in customers at the Metro Regional Center	✓	✓	X	X	X	X	Ongoing
<b>B.</b> Explore telephone interpretation staff training for phone and walk-in customers at other Metro sites		✓	X	X	X	X	
<b>C.</b> Provide process for in-person interpreter services upon request at public meetings and important events for metropolitan planning organization functions	✓	✓	X	X	X	X	Ongoing
<b>1.</b> Estimate and allocate costs for in-person interpreter services	✓	✓	X	X	X	X	By project or program
<b>D.</b> Provide process for in-person interpreter services upon request at public meetings and important events for other Metro functions.	✓	✓	X	X	X	X	Ongoing
<b>E.</b> Annually survey staff to determine existing language resources	✓	✓	X	X	X	X	
<b>1.</b> Define conditions under which Metro employees will assist with translation through annual review	✓	✓	X	X	X	X	

<sup>26</sup> Diversity Action Plan item 3.1.14

<sup>27</sup> Diversity Action Plan item 3.1.12

<sup>28</sup> Diversity Action Plan item 3.1.11



Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>II. Translation services (see LEP Factor 4 for more information) (continued)</b>							
<b>F. Establish process for translating vital documents</b>	✓						
1. Define what constitutes a vital document for metropolitan planning organization functions, using the FTA Title VI Circular as guidance	✓	✓			X		
2. Explore defining what constitutes a vital document for other Metro functions	✓	✓	X			X	
3. In coordination with records retention staff, identify and inventory vital documents for metropolitan planning organization functions, including Title VI notice and complaint form	✓	✓			X		
4. In coordination with records retention staff, explore identifying and inventorying vital documents for other Metro functions	✓		X			X	
5. Translate vital metropolitan planning organization documents and establish tracking process	✓	✓	X			X	
6. Establish process to monitor for new metropolitan planning organization documents that may be considered vital	✓						
7. Explore establishing process to track vital non-metropolitan planning organization documents and their translation	✓	✓	X			X	
8. Explore establishing process to monitor for new non-metropolitan planning organization documents that may be considered vital	✓		X			X	
<b>G. Establish procedures for translating non-metropolitan planning organization documents</b>	✓						
1. Explore establishing process for providing notice of right to free language assistance on non-vital documents	✓		X			X	
a. Establish internal prioritization process through assessing resources and translation needs	✓						
b. Translate documents in priority order	✓	X	X	X	X		Ongoing
2. Establish process for routing written translation requests for non-vital documents	✓						

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>III. Notices</b>							
<b>A.</b> Post information in multiple languages about Title VI civil rights compliance and complaint process through signage	✓	✓	X	X	X	X	Ongoing
1. Update signage once Factor 1 analysis is completed	✓	✓	X			X	
2. Consider identifying locations beyond Metro Regional Center that will receive signs and where they will be posted; create/post signs and train staff at other sites as needed	✓	✓					
<b>B.</b> Post information in multiple languages about notice of right to language assistance	✓	✓	X			X	Update to include any new safe harbor languages
1. Identify physical locations for signs within the metropolitan planning organization function	✓	✓	X			X	
a. Create signs and post	✓	✓	X			X	
b. Train point people at sites regarding signage and response process	✓	✓	X	X	X	X	Annually
2. Consider identifying physical locations for signs within other Metro functions	✓	✓		X			
a. Create signs and post	✓	✓		X			
b. Train point people at sites regarding signage and response process	✓	✓		X	X	X	Annually, as appropriate
3. Post information about notice of right to language assistance and civil rights complaint process on websites	✓	✓		X			
a. Translate main Metro website notice of right to language assistance and civil rights complaint process into multiple languages	✓	✓	X			X	Update to include any new safe harbor languages
4. Improve website accessibility/navigability for resources in other languages	✓	✓			X		With website redesign
5. Identify other Metro websites where posting should occur and post information	✓	✓		X			
<b>C.</b> Post Title VI/EJ/LEP/AOA notice information on metropolitan planning organization function meeting and event notices	✓	✓	X	X	X	X	Ongoing
<b>D.</b> Consider how and when to include notice of availability of free language assistance in other outreach documents	✓	✓		X			
<b>E.</b> Share LEP plan	✓	✓	X			X	
1. Post plan to Metro website(s)	✓	✓	X			X	
2. Provide copies of the plan to Oregon Department of Transportation, Federal Highway Administration, Federal Transportation Administration and any person or agency requesting a copy	✓	✓	X			X	

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>IV. Procurement</b>							
<b>A.</b> Develop and review contract language to ensure all contractors for providing goods and services to metropolitan planning organization functions are in compliance with Title VI regulations	✓	✓		X			
<b>1.</b> Follow metropolitan planning organization subrecipient assistance and compliance procedures for all metropolitan planning organization-related contracts	✓	✓	X	X	X	X	Ongoing
<b>B.</b> Consider developing and reviewing contract language to ensure all contractors that provide goods and services to other Metro functions are in compliance with Title VI regulations	✓	✓		X			
<b>V. Training</b>							
<b>A.</b> Identify metropolitan planning organization staff likely to come into contact with LEP populations	✓	✓	X	X	X	X	Ongoing
<b>B.</b> Consult with other Title VI-compliant organizations regarding training modules	✓	✓	X	X	X	X	Ongoing
<b>C.</b> Deliver basic training to all current metropolitan planning organization function workgroups on Title VI and LEP responsibilities, including LEP plan and implementation plan, understanding Title VI LEP responsibilities, documentation of language assistance requests and how to handle a complaint	✓	✓	X	X	X	X	Annually
<b>1.</b> Ensure all new metropolitan planning organization function employees receive basic training on Title VI and LEP responsibilities, including LEP plan and implementation plan	✓	✓	X	X	X	X	Annually
<b>D.</b> Determine need and timing for Title VI and LEP responsibilities, including LEP plan and LEP implementation plan training, for all employees in other Metro functions	✓	✓	X	X	X	X	Annually
<b>E.</b> Design and implement a Metro Learning Center training module for all current Metro staff on Title VI responsibilities, including civil rights notice, complaint procedure and language assistance	✓	✓	X	X	X	X	Annually
<b>1.</b> Ensure all new employees complete Metro Learning Center training module on Title VI responsibilities, including civil rights notice, complaint procedure and language assistance	✓	✓	X	X	X	X	Annually
<b>F.</b> Provide any additional Title VI and LEP resources to Metro employees on internal website	✓	✓	X	X	X	X	Ongoing

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>VI. Outreach</b>							
<b>A. Conduct research to assess services to LEP populations and barriers to service<sup>29</sup></b>	✓	✓			X		
<b>1. Identify community organizations Metro has contacted in the past</b>	✓	✓			X		
<b>a. Identify prior experiences with LEP populations within the metropolitan planning organization function</b>	✓	✓			X		
<b>b. Identify prior experiences with LEP in Metro's other functions</b>	✓	✓			X		
<b>2. Develop questions to ask community organizations how best to serve LEP populations and transcend barriers<sup>30</sup>, including:</b> Size and location of populations the organization serves Needs of populations relative to other Metro functions Data sources and/or demographic trends they can provide or assist with Advice on communication and engagement with populations they serve	✓	✓			X		
<b>3. Contact community organizations to ask the above questions and collect information</b>	✓	✓			X		
<b>B. Develop process for targeted community outreach to LEP populations for specific efforts and services, focusing first on metropolitan planning organization functions</b>	✓	✓			X		
<b>1. Partner with key community leaders and organizers of LEP populations through one-on-one meetings, phone and email contact with individual leaders and participation in community events to determine best ways to reach LEP populations</b>	✓	✓	X	X	X	X	
<b>a. Develop cultural awareness training concepts for external outreach<sup>31</sup></b>	✓	✓			X		

<sup>29</sup> Diversity Action Plan item 3.2.2

<sup>30</sup> Diversity Action Plan item 3.1.6

<sup>31</sup> Diversity Action Plan item 3.1.7

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>VI. Outreach (continued)</b>							
<b>b.</b> Develop culturally specific methods for diverse communities to access Metro metropolitan planning organization information most effectively <sup>32</sup>	✓	✓	X	X	X	X	Ongoing
<b>c.</b> Develop culturally appropriate material in target languages, test materials with key constituencies, promote messages through community media and develop print, radio and television ads in target languages, depending on project needs <sup>33</sup>	✓	✓	X	X	X	X	Ongoing
<b>d.</b> Develop leadership and capacity-building program for future work with diverse communities and LEP populations	✓	✓	X	X	X	X	Ongoing
<b>2.</b> In coordination with community organizations, target outreach as appropriate per project and community needs to key gathering places identified by LEP community organizations, such as churches, schools, community colleges, libraries, grocery stores, parks and social service and community activist organizations	✓	✓	X	X	X	X	By project
<b>3.</b> Establish a greeter table as appropriate per project and community needs at metropolitan planning organization-specific events with a sign-up sheet and staff member that can informally gauge attendees' ability to speak and understand English; provide U.S. Census Bureau "I Speak Cards" to identify language needs for future meetings	✓	✓	X	X	X	X	By project
<b>4.</b> Consider how to incorporate notice in multiple languages of language assistance availability into metropolitan planning organization outreach materials	✓	✓	X	X	X	X	By project

<sup>32</sup> Diversity Action Plan item 3.1.9

<sup>33</sup> Diversity Action Plan item 3.1.10

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>VI. Outreach (continued)</b>							
<b>C.</b> Establish methods to coordinate and enhance outreach efforts, focusing first on metropolitan planning organization functions (as appropriate)	✓	✓	X	X	X	X	Ongoing
<b>1.</b> Consider investing in tools that enable Metro to effectively coordinate stakeholder outreach <sup>34</sup>	✓	✓	X				Community relations manager development in progress
<b>2.</b> Coordinate and maintain list of contacts with diverse communities, including contacts made through Human Resources, Procurement and Communications efforts <sup>35</sup>	✓	✓	X	X	X	X	Ongoing
<b>3.</b> Establish internal working group to meet regularly and identify areas for leverage <sup>36</sup>		✓	X	X	X	X	DEI engagement roundtable; ongoing
<b>VII. Evaluation and reporting</b>							
<b>A.</b> Develop process to monitor and update LEP implementation plan, including:	✓	✓	X	X	X	X	Ongoing
<b>1.</b> Tracking metropolitan planning organization function contact with LEP persons	✓	✓	X	X	X	X	Ongoing
<b>a.</b> How many LEP persons were encountered	✓	✓	X	X	X	X	Ongoing
<b>b.</b> Whether LEP persons' needs were met (important information and services from Metro's Factor 3 analysis)	✓	✓	X	X	X	X	Ongoing
<b>c.</b> How many complaints were received	✓	✓	X	X	X	X	Ongoing
<b>d.</b> Has there been a change in the languages where translation services are needed	✓	✓	X			X	Ongoing
<b>e.</b> Is there still a need for continued language assistance for previously identified for Metro programs or projects? Are there other programs that should be included?	✓	✓	X			X	Ongoing
<b>2.</b> Monitoring LEP data	✓	✓	X			X	
<b>a.</b> Current LEP populations within metropolitan planning organization function	✓	✓	X			X	

<sup>34</sup> Diversity Action Plan item 3.1.16

<sup>35</sup> Diversity Action Plan item 3.2.12

<sup>36</sup> Diversity Action Plan item 3.2.13

Metro LEP Implementation Plan: Fiscal Years 2011-2019							X= Target ✓ = Completed
ACTIVITIES			METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2019	2019-2020	2020-2021	2021-2022	
<b>VII. Evaluation and reporting (continued)</b>							
3. Monitoring LEP resources and costs	✓	✓	X	X	X	X	Ongoing
a. Any change in available resources (data, technology, staff, budget) on an annual basis	✓	✓	X	X	X	X	Ongoing
b. Any change in LEP costs on a Title VI reporting period basis	✓	✓	X	X	X	X	Ongoing
4. Set LEP goals and measures	✓	✓		X			
B. Establish process to obtain feedback on Metro's language assistance measures	✓	✓			X		
1. Obtain feedback from community members through an semi-annual survey	✓	✓		X		X	
2. Conduct annual internal monitoring with agency staff	✓	✓	X	X	X	X	Ongoing
a. Include monitoring question on intake form for frontline staff	✓	✓	X	X	X	X	Ongoing
b. Assess any needed changes in types of languages for translation services	✓	✓	X	X	X	X	Annually
c. Determine whether continued language assistance is needed for previously identified programs	✓	✓	X	X	X	X	Annually
3. Make changes to internal language assistance procedures based on feedback	✓	✓	X	X	X	X	Annually
C. Develop internal assessment of LEP training, materials and procedures one year after instituted	✓	✓	X	X	X	X	Annually
D. Establish process to identify new language assistance needs and adjust service	✓	✓	X			X	
E. Establish reporting schedule and work plans for Title VI and LEP requirements to:	✓	✓	X	X	X	X	
1. ODOT annually	✓	✓	X	X	X	X	
2. FTA according to Title VI reporting schedule	✓	✓	X			X	
a. LEP plan	✓	✓	X			X	
b. LEP implementation plan	✓	✓	X			X	
c. Public involvement plan	✓	✓		X			
3. Determine reporting level to Metro Council according to Title VI reporting schedule	✓	✓	X	X	X	X	Annually through annual public engagement reporting

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## APPENDIX A. FACTOR 1 METHODOLOGY DEVELOPMENT

As part of its effort to provide meaningful access to its programs to residents with limited English proficiency (LEP) and as part of Factor 1 of the four-factor analysis process provided by the U.S. Department of Justice, Metro conducted an extensive review of Title VI, LEP and Factor 1 plans by peer agencies. Informed by this review, Metro developed a four-step methodology to determine the number or proportion of LEP persons over the age of 5 in the Metro service area. Implementation of this methodology resulted in Metro's Factor 1 report in 2013, which identified 13 languages that qualified for the Department of Justice's safe harbor provisions.

The methodology used for the 2013 analysis was largely replicated for the 2015 Factor 1 report, as well as for the 2018 Factor 1 report. The 2018 Factor 1 report identifies 16 languages that qualify for the Department of Justice's safe harbor provisions. The workflow associated with this process can be described as follows:

- conducted thorough review of peer agency documentation related to Title VI, Factor 1 compliance
- developed a methodology for analysis of language data
- gathered data
- identified languages that are eligible (or potentially eligible) for safe harbor provisions.

### **1. Metro conducted thorough review of peer agency documentation related to LEP, Factor 1 compliance**

In the fall and winter of 2012, Metro staff reviewed peer agency documentation related to Title VI compliance. This review included LEP and public involvement plans – and, where available, reports – on 26 websites, encompassing 17 metropolitan planning organizations, three state departments of transportation and six regional transit authorities. Metro staff then analyzed the demographic content of these plans to see what data sources were used, at what geographic scale the data were collected and analyzed and whether geographic information system (GIS) mapping was included. The results of this review are presented below. All of the metropolitan planning organizations and transit authorities reviewed serve metropolitan areas with populations of at least 1.5 million.

Of the 17 metropolitan planning organizations:

- Nine had published either a Title VI compliance report or plan, or an explicit LEP plan, completed since 2007 on their web pages.
- Two posted meeting minutes indicating that an LEP plan was in process, to be delivered in 2013.
- Six agencies made minimal reference to Federal Transportation Administration's (FTA) LEP policy compliance within the searchable content on their websites.

Transit authorities (Atlanta; Washington D.C.; RTD, Denver, Colo.; BART, Bay Area, Calif.; King County, Wash.; TriMet, Portland, Ore.):

- Four, including TriMet, have published explicit LEP plans dated prior to 2010; these four are similar in scope and data quality. Two do not have published plans, but were actively preparing plans at the time of our research.

State DOTs (Washington, California, Oregon):

- Washington has published a thorough LEP plan reflecting the elements in the 2007 FTA directive
- Oregon DOT's LEP document was completed in 2003-2004
- California's Caltrans has an extensive LEP plan but presents no demographic data.

Summary of demographic content analysis:

- Among the nine plans by peer metropolitan planning organizations we examined, the Atlanta Regional Commission's appears to match the scope of Metro's efforts to date in data analysis and visualization.
- Of the 16 total completed reports, four included school district data. All these are by transportation agencies; none of the metropolitan planning organization plans included schools data.
- Six plans used the most recent 5-year ACS data estimates (2006-2010); three plans used the 2005-2009 5-year estimates. The remaining 6 plans including demographic data present either 2000 SF3 data, or use single-year ACS estimates.

Additionally, Metro staff examined past similar work within Metro, including the environmental justice analysis for the 2016-2018 regional flexible funding allocation and ongoing agency-wide Equity Strategy Program work. Staff also conferred with staff from local agencies working on similar plans, including TriMet, City of Portland and City of Gresham.

## **2. Metro developed a methodology for analysis of language data**

Informed by this review, Metro began developing a methodology to conduct the Factor 1 analysis. This methodology was structured around Federal guidelines on "Applying the four -factor framework," from Federal Transportation Administration's (FTA) handbook, Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, April 13, 2007. Metro's methodology also recognized that Department of Justice (DOJ) and FTA guidelines for Title VI LEP reports direct metropolitan planning organizations to analyze data from the U.S. Census and to supplement this analysis with data generated by state and local governments or non-governmental agencies.

Metro's service area is not referenced to census geographies and includes 24 cities<sup>37</sup> across portions of three counties, limiting the availability of language data that are complete and

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<sup>37</sup> In 2013 and 2015, Metro's jurisdiction included 25 cities; Damascus disincorporated as a city in 2016.

consistent across the entire region. To overcome this challenge, Metro staff assessed potential data sources in terms of geographic and temporal scale, resolution (i.e., whether languages reported individually or as language groups) and reliability (i.e., margin of error).

Based on this assessment, Metro developed a four-step methodology to identify languages that are spoken by populations of greater than 1,000 in the Metro service area. 1,000 speakers is the lesser of the two minimum thresholds, as 5 percent of the regional population age 5 and older was, 75,900 based on the most current detailed language data available from the American Community Survey (2011-2015), Table B16001. Unfortunately, for economic and privacy reasons, in the current 2012-2016 ACS release, Table B16001 has been discontinued for smaller geographies (including tracts), which necessitated the use of the previous 2011-2015 release.<sup>38</sup>

Metro's proposed methodology sought to reduce uncertainty in American Community Survey (ACS) estimates and to disaggregate language groupings by analyzing ACS data at two spatial scales: Census tracts and counties. The analysis was then validated against data on language spoken at home and LEP status from the Oregon Department of Education (ODE), which implements standards for consistent, comprehensive language-related data. These steps are outlined below:

- a. *Determine languages (or language groupings) with >1,000 speakers using tract-level data.* These tract-level data most closely followed Metro's service area boundary, but were associated with a relatively high margin of error.
- b. *Confirm tract-level estimates with county-level data.* As a cross-check, population counts from tract-level data were compared to county-level data, which had larger sample sizes and thus lower margins of error. Although these data do not follow Metro's boundary as closely as census tracts, 2010 U.S. Census data indicated that ~94 percent of the population in the tri-county area resides within the urbanized area contained within Metro's jurisdictional boundary.
- c. *Disaggregate language groupings with supplemental data.* Both of the above ACS sources include estimates of the populations of 29 individual languages and language groupings, rather than providing comprehensive estimates of specific languages; for example, recent 5-year ACS averages provide estimates for the population speaking "African Languages". To address this limitation, Metro examined Oregon Department of Education (ODE) student data from 2015-16, which are provided as a detailed dataset that uses 100 percent counts and does not aggregate languages into groupings. Metro staff developed a methodology to disaggregate language groupings and then extrapolate from ODE data to the total population age 5 and older in the Metro service area.
- d. *Validate results with supplemental data.* In addition to disaggregating ACS language groupings, the ODE data are used to validate the presence of prominent individual languages. Lack of prominence of an individual language in the ODE data (as compared with its prominence in the ACS data) does not automatically preclude it from consideration but, rather, the ODE data is

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<sup>38</sup> The previous 2011-2015 ACS release is temporally comparable to the 2015-2016 ODE data used in the 2018 Factor 1 analysis.

used as a safeguard against potentially large margins of error and as a flag for languages that are not prominent in the ACS data.

### **3. Metro gathered data**

As recommended by the USDOT/FTA Guidelines (April 2007), Metro staff used the following data sources:

- 2011-2015 America Community Survey (ACS) 5-Year sample: census tract data
- 2011-2015 America Community Survey (ACS) 5-Year sample: county data
- Oregon Department of Education (ODE): 2015-2016 school year enrollment data.

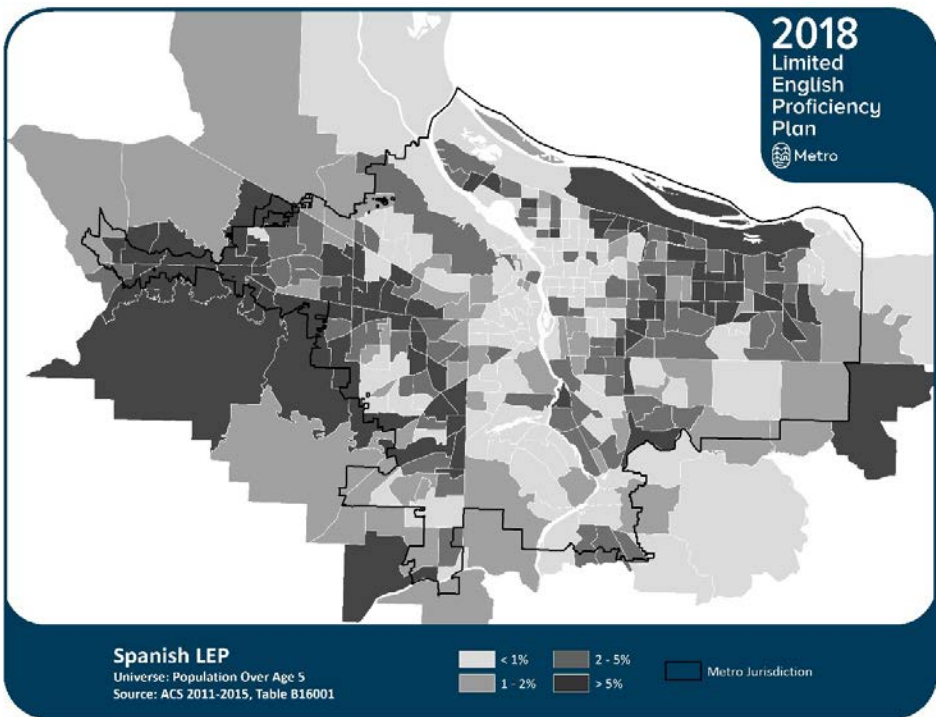
Metro staff obtained ACS data from American FactFinder. To access ODE data, Metro staff submitted a public records request for student language of origin and LEP status for all school districts in Clackamas, Multnomah and Washington counties.

### **4. Metro identified languages that are eligible (or potentially eligible) for safe harbor provisions**

Using the data and methods outlined above, Metro identified 16 languages with LEP populations of 1,000 persons or more, thus triggering eligibility for DOJ's safe harbor provision (see Tables 1 and 5 of Metro's Factor 1 analysis in Section I). Tract-level estimates from ACS revealed 10 distinct LEP populations that very likely have more than 1,000 persons within the Metro jurisdictional boundary area (see Appendix C, Table C1): Spanish, Vietnamese, Chinese (Mandarin or Cantonese), Russian, Korean, Arabic, Japanese, Tagalog, Mon-khmer Cambodian and Persian. Additionally, six language groups were found to have populations of LEP speakers greater than 1,000. Summary counts using aggregated data from Clackamas, Multnomah and Washington Counties yielded similar results, increasing Metro's confidence in the aggregated tract estimates of LEP speakers within the Metro jurisdiction boundary (see Appendix C, Table C2). Disaggregation of language groupings revealed that Somali, Ukrainian, Romanian, Nepali, Chuukese and Karen languages should also be included as safe harbor languages (see Appendix C, Table C5).

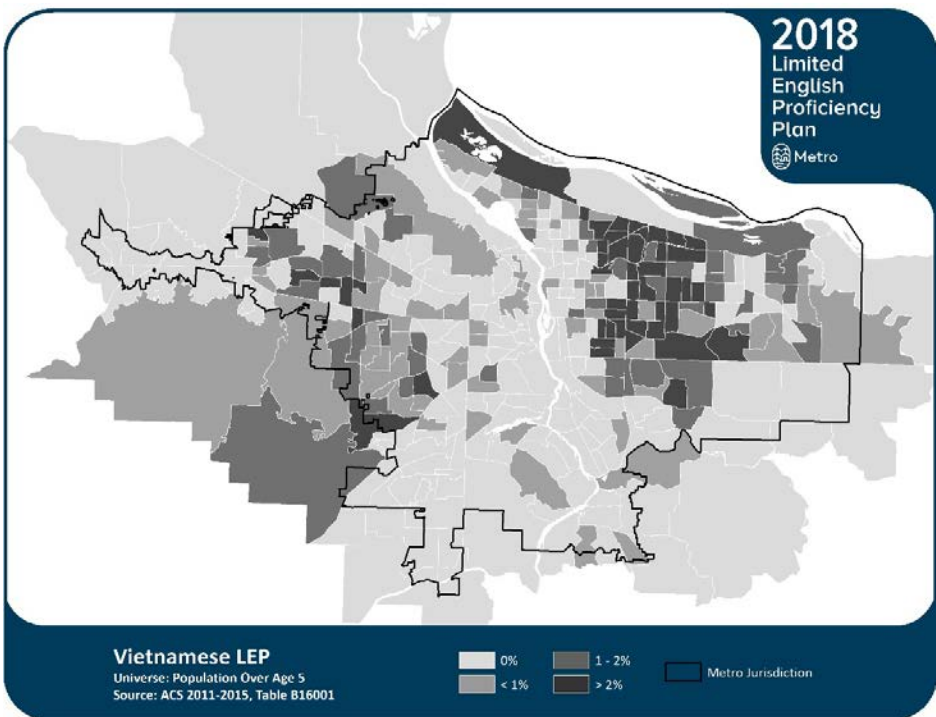
APPENDIX B. LANGUAGE DISTRIBUTION MAPS

Figure B1: Spanish-speaking LEP population by census tract, quantile distribution



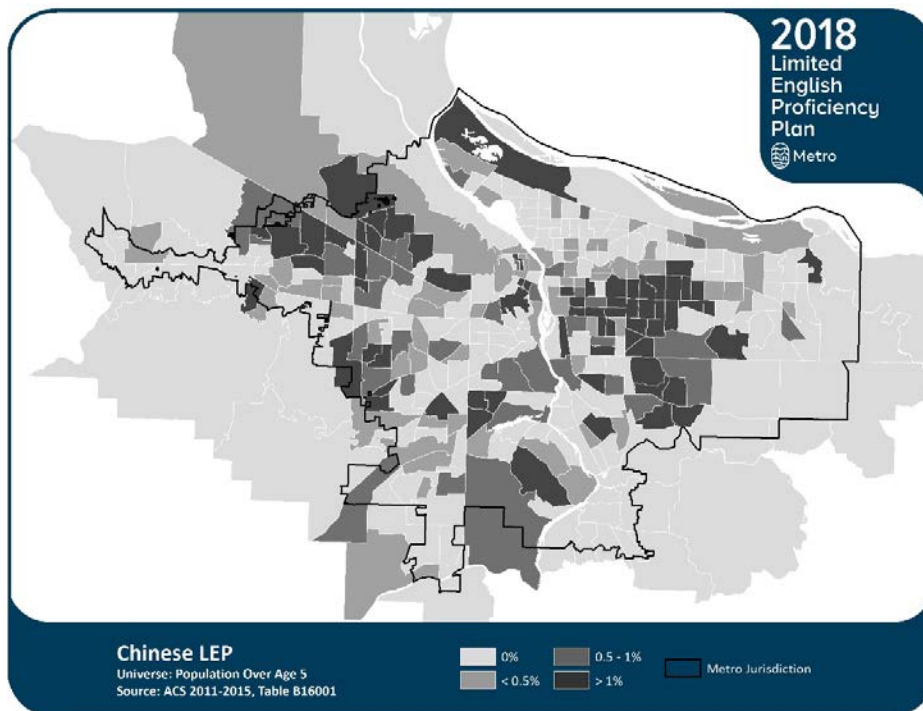
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

Figure B2: Vietnamese-speaking LEP population by census tract, quantile distribution



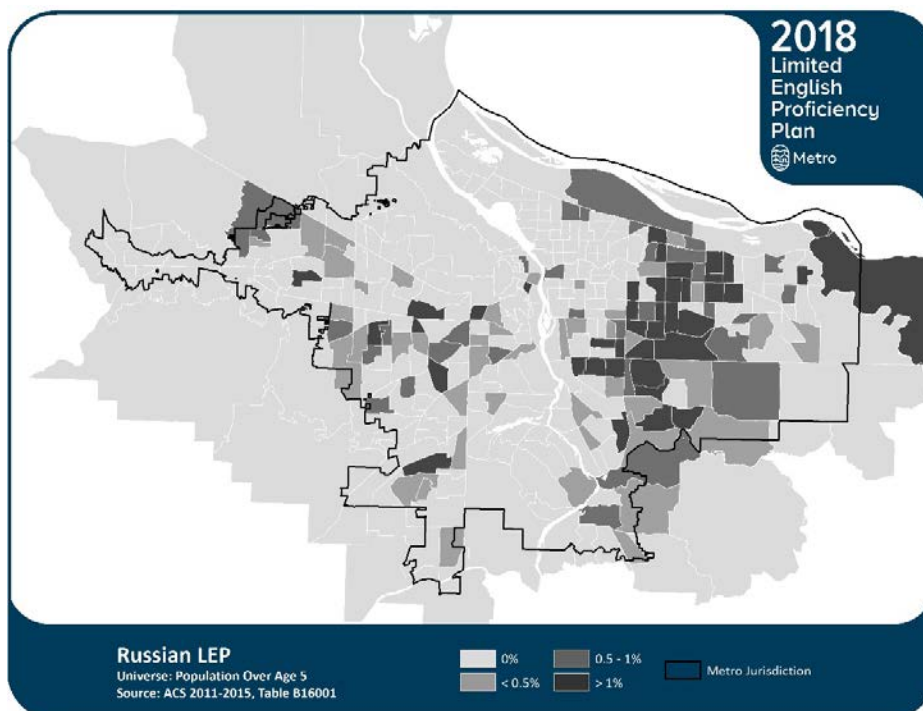
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

**Figure B3: Chinese-speaking LEP population by census tract, quantile distribution**



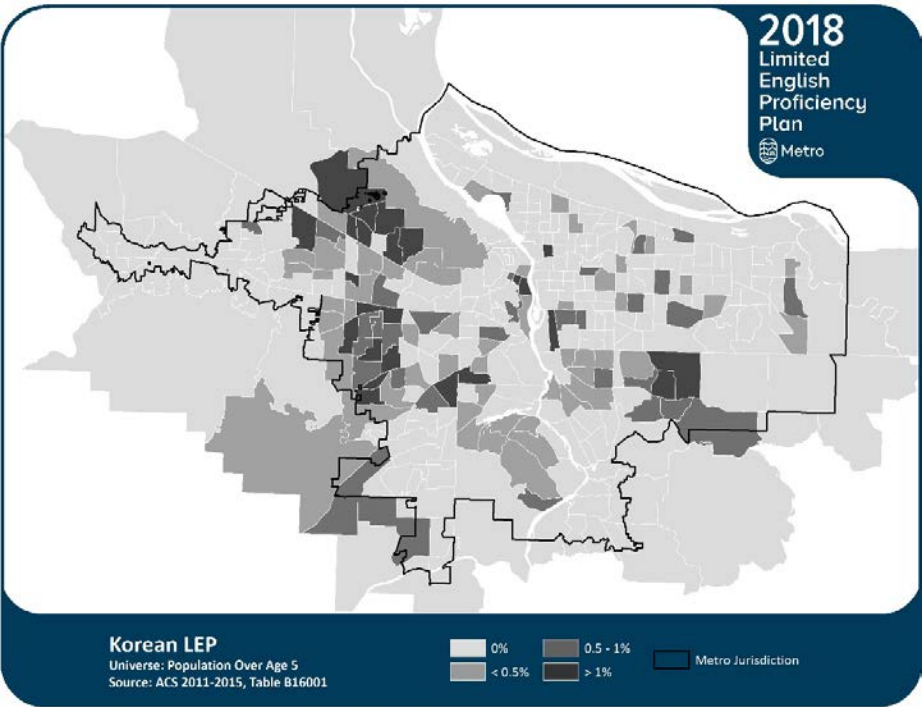
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

**Figure B4: Russian-speaking LEP population by census tract, quantile distribution**



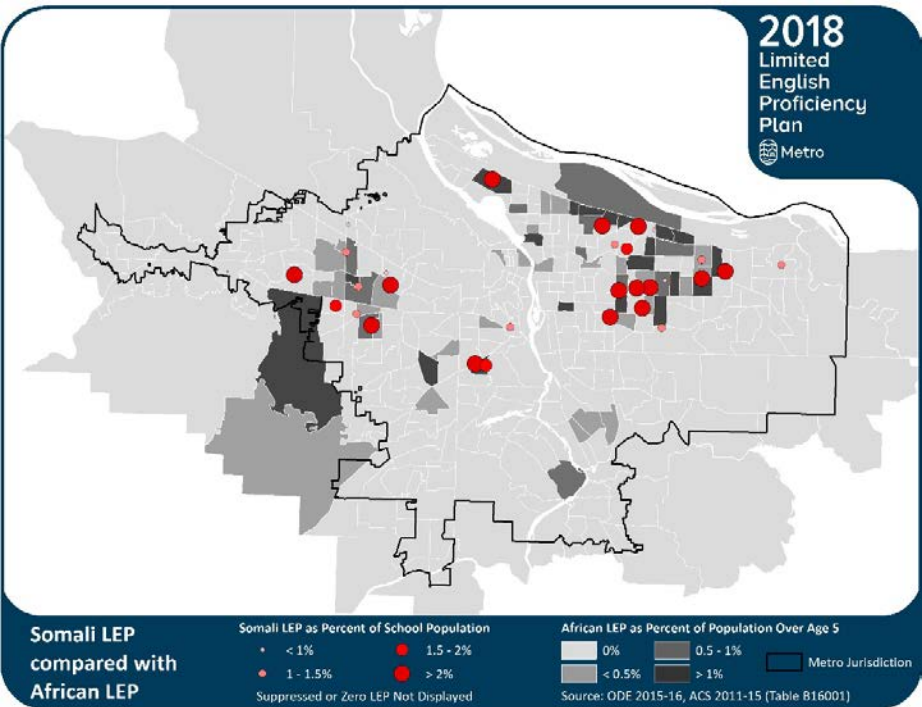
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

Figure B5: Korean-speaking LEP population by census tract, quantile distribution



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

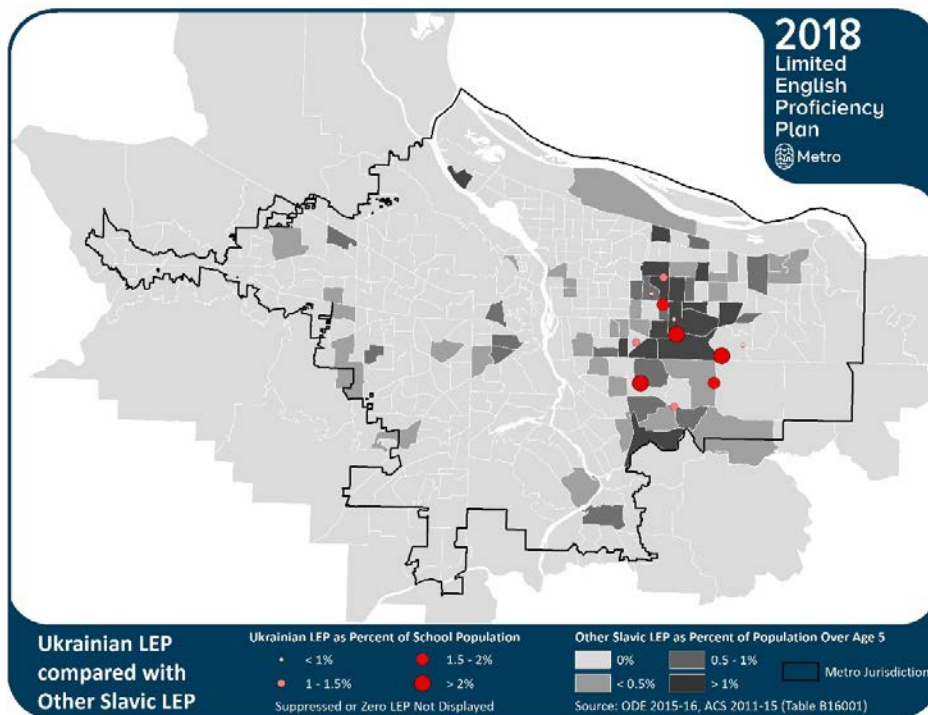
Figure B6: Somali-speaking LEP population by census tract, quantile distribution



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 enrollment data

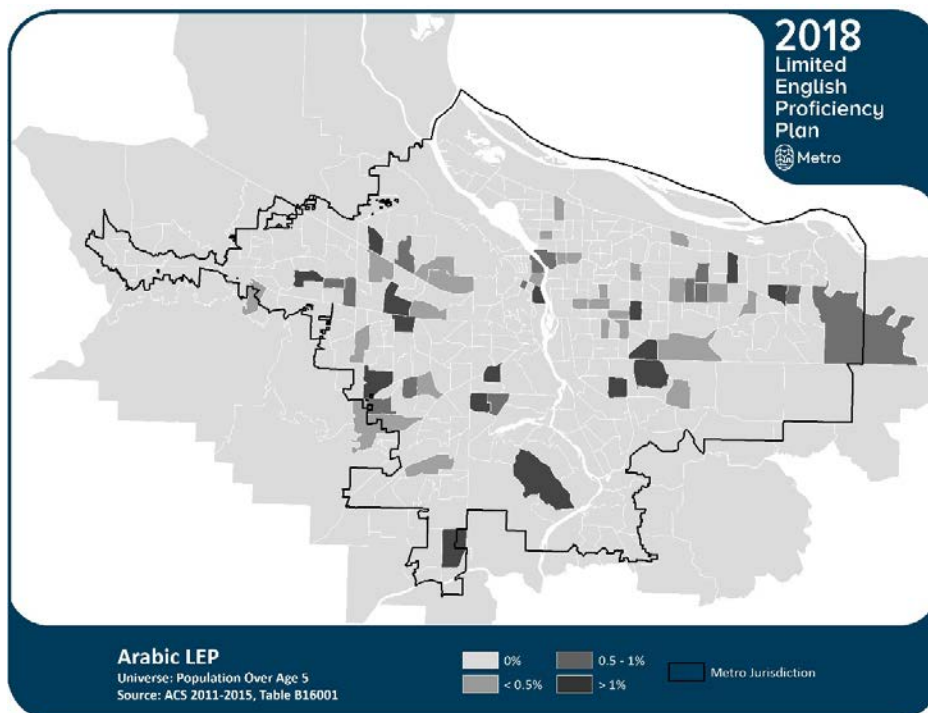


**Figure B7: Ukrainian-speaking LEP population by census tract, quantile distribution**



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 enrollment data

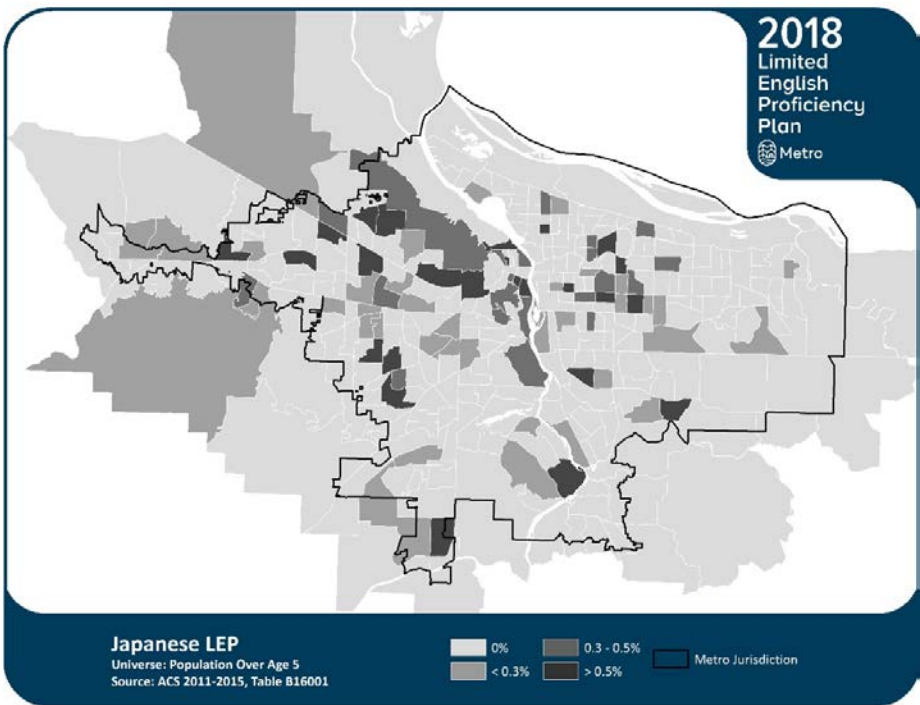
**Figure B8: Arabic-speaking LEP population by census tract, quantile distribution**



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

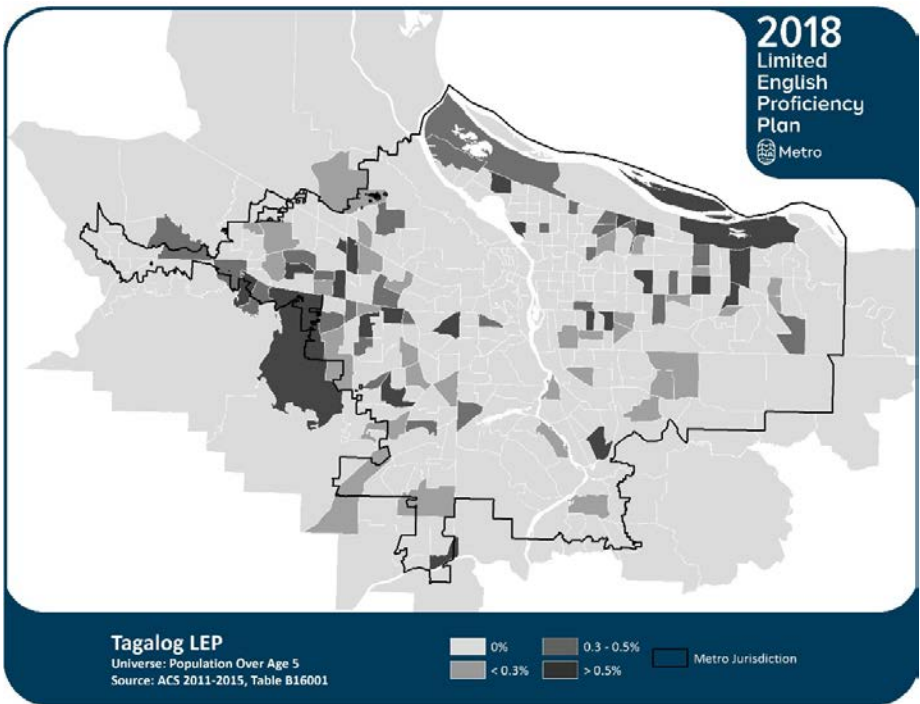


Figure B9: Japanese-speaking LEP population by census tract, quantile distribution



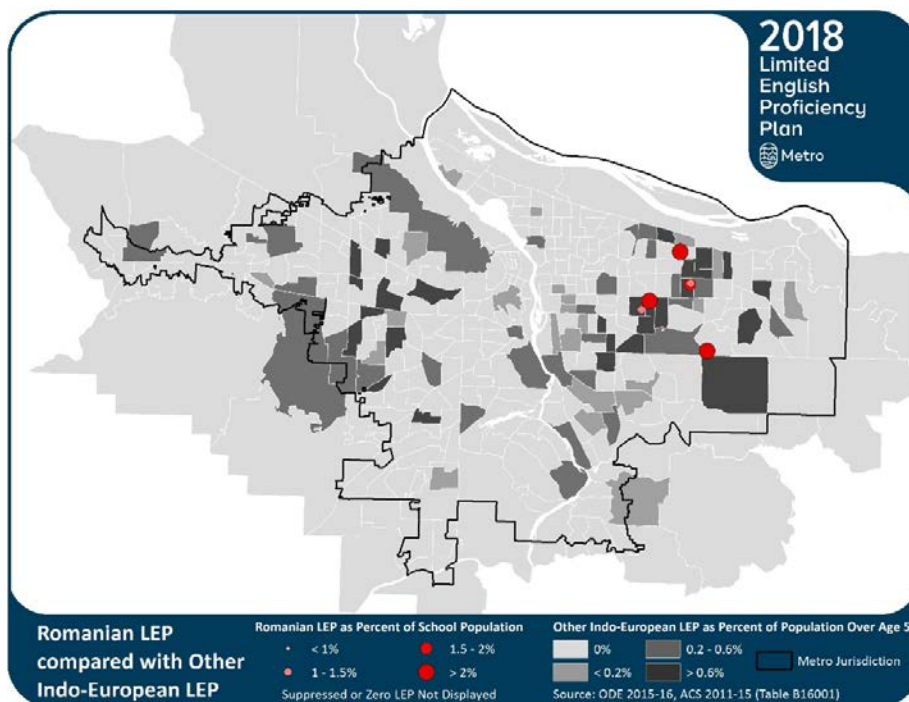
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

Figure B10: Tagalog-speaking LEP population by census tract, quantile distribution



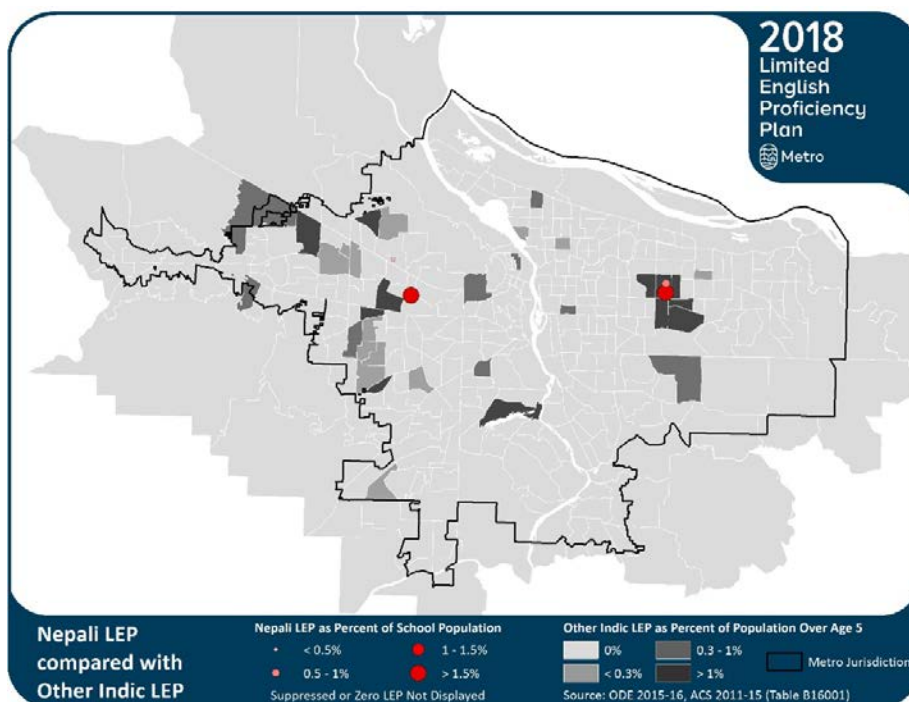
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

**Figure B11: Romanian-speaking LEP population by census tract, quantile distribution**



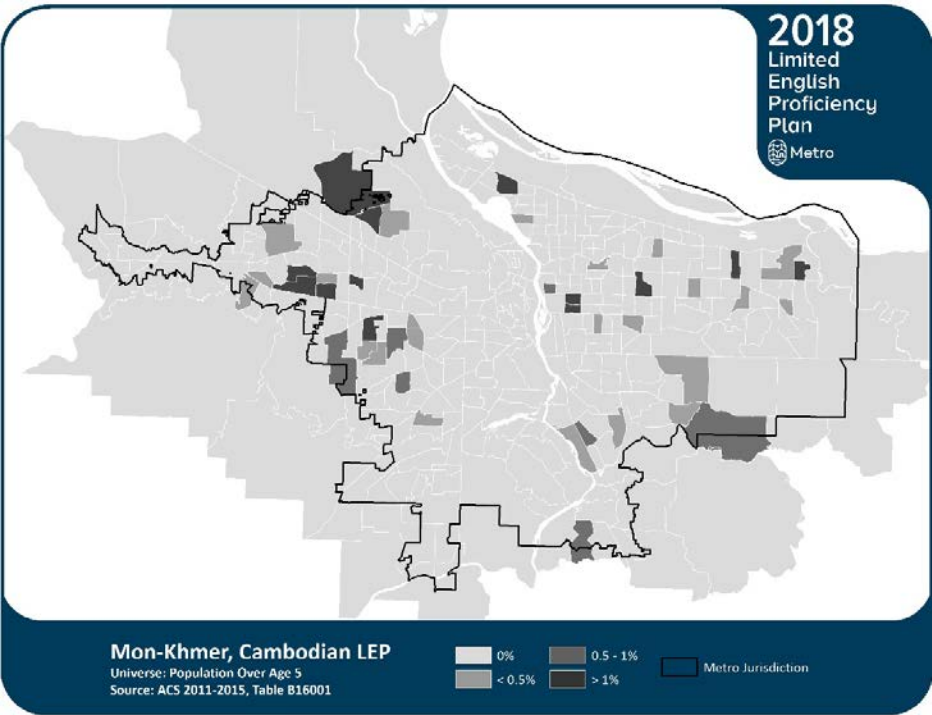
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 enrollment data

**Figure B12: Nepali-speaking LEP population by census tract, quantile distribution**



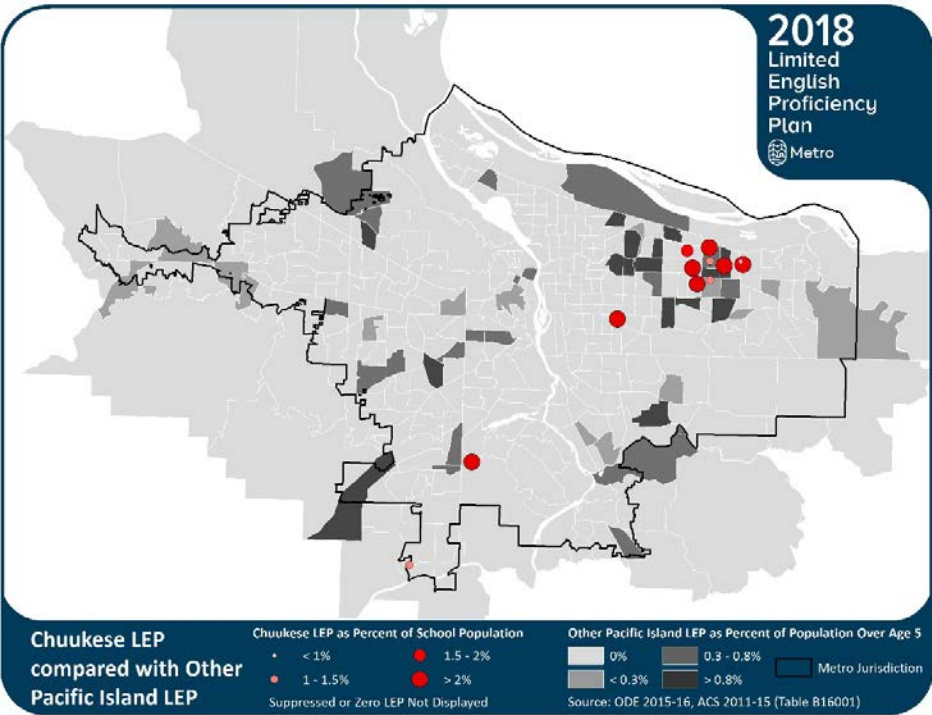
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 enrollment data

Figure B13: Mon-Khmer, Cambodian-speaking LEP population by census tract, quantile distribution



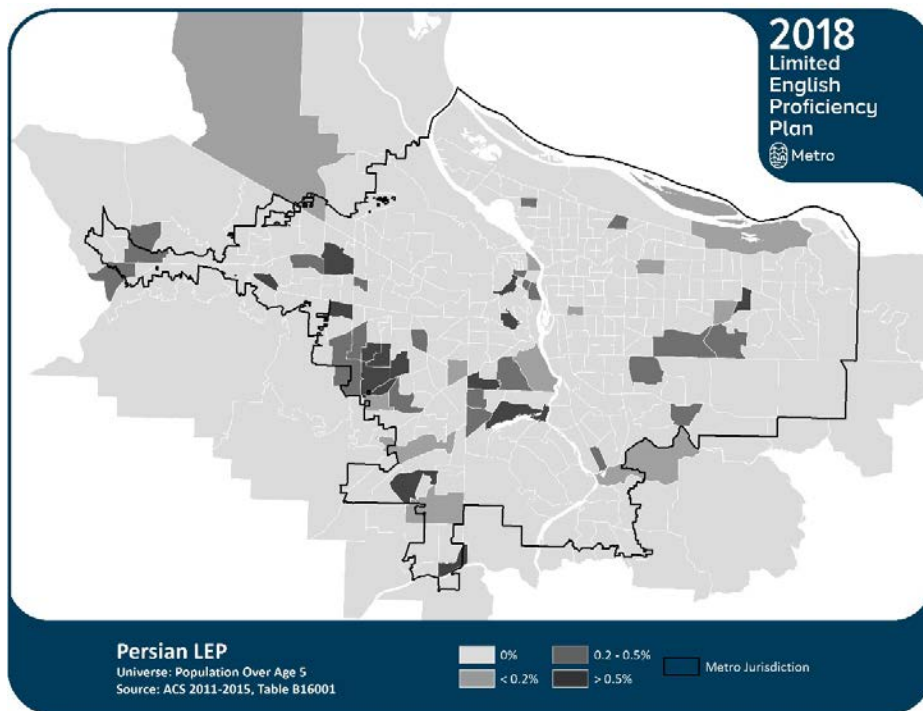
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

Figure B14: Chuukese-speaking LEP population by census tract, quantile distribution



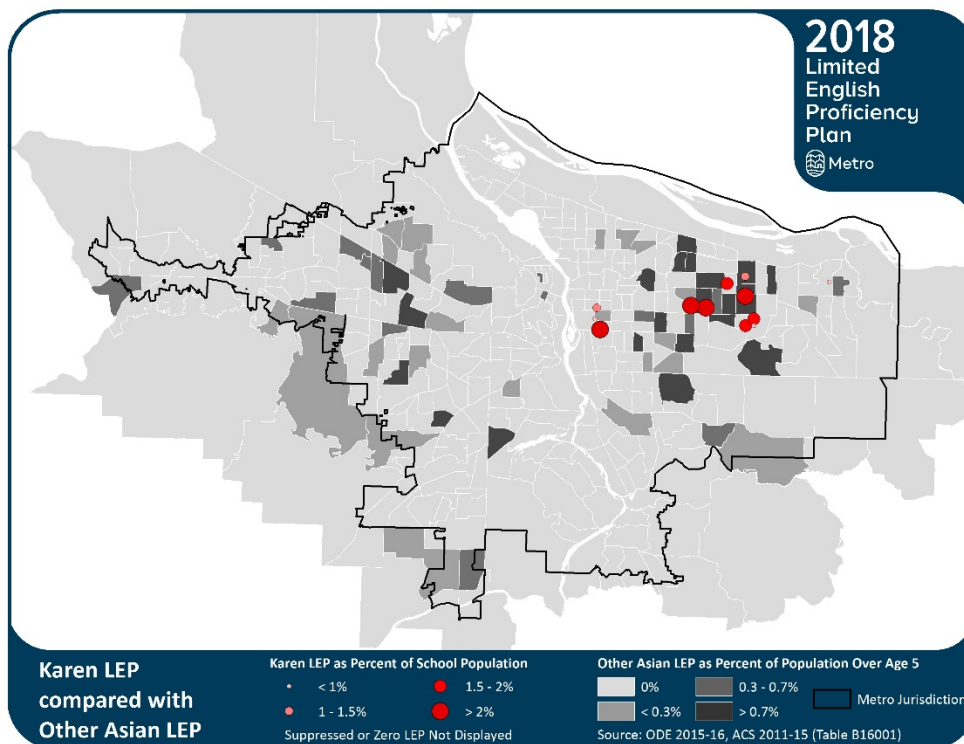
Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 enrollment data

**Figure B15: Persian-speaking LEP population by census tract, quantile distribution**



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

**Figure B16: Karen-speaking LEP population by census tract, quantile distribution**



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 enrollment data



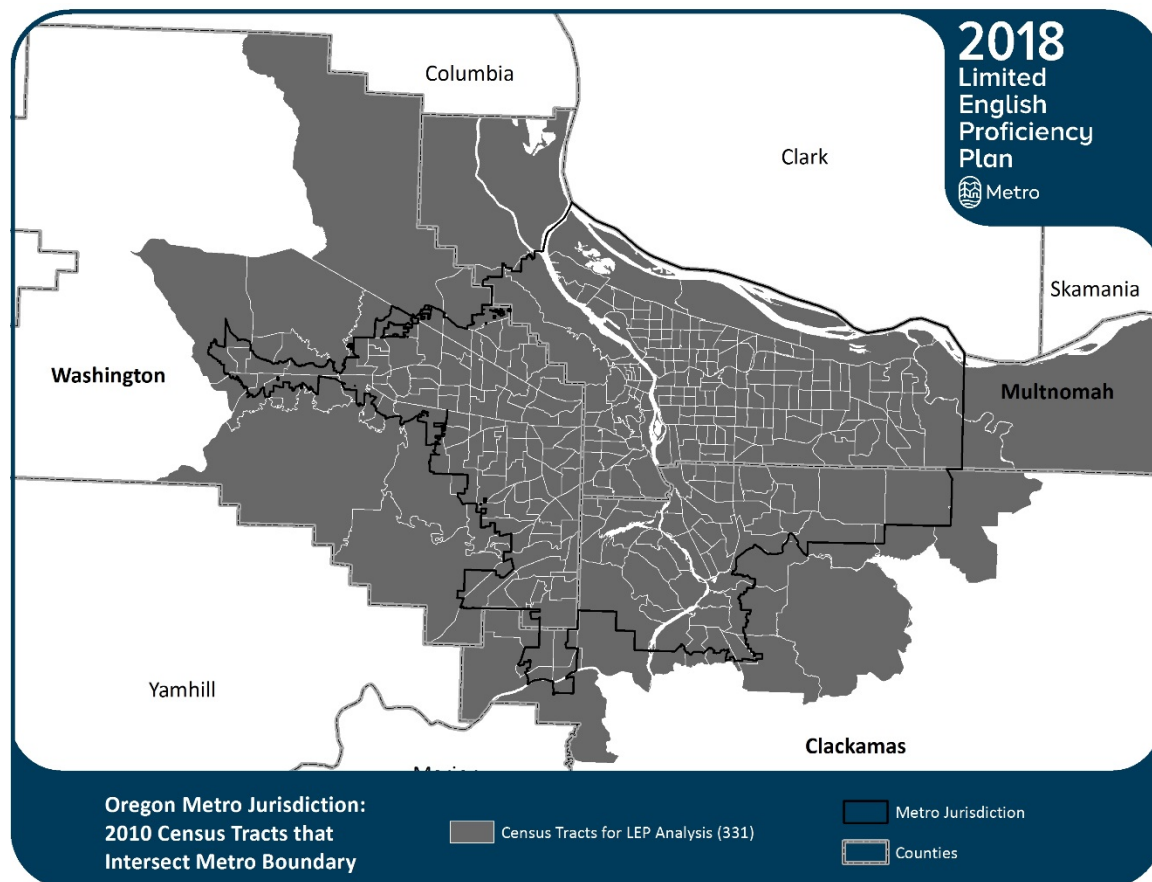
## APPENDIX C. FACTOR 1 METHODOLOGY

### Methods: American Community Survey data analysis

#### 2009-2013 ACS 5-year estimate data: U.S. Census tracts

Metro’s jurisdictional boundary includes most of the populated areas of Clackamas, Multnomah and Washington Counties, Oregon. However, the Metro boundary does not conform precisely to local political boundaries, school attendance areas or census geographies. In order to estimate Metro’s LEP populations, we elected to collect and analyze census data from the tract level. We selected all tracts that are either wholly or partly within Metro’s service area boundary (Figure C1). This process yielded 331 census tracts. We explicitly chose to analyze and map LEP data at the tract, rather than block group, level. We concluded that the margins of error for block group data in the ACS are too high to produce tolerably accurate estimated counts of LEP speakers, and maps showing the spatial distribution of these estimates at block group geography would be potentially misleading as a result.

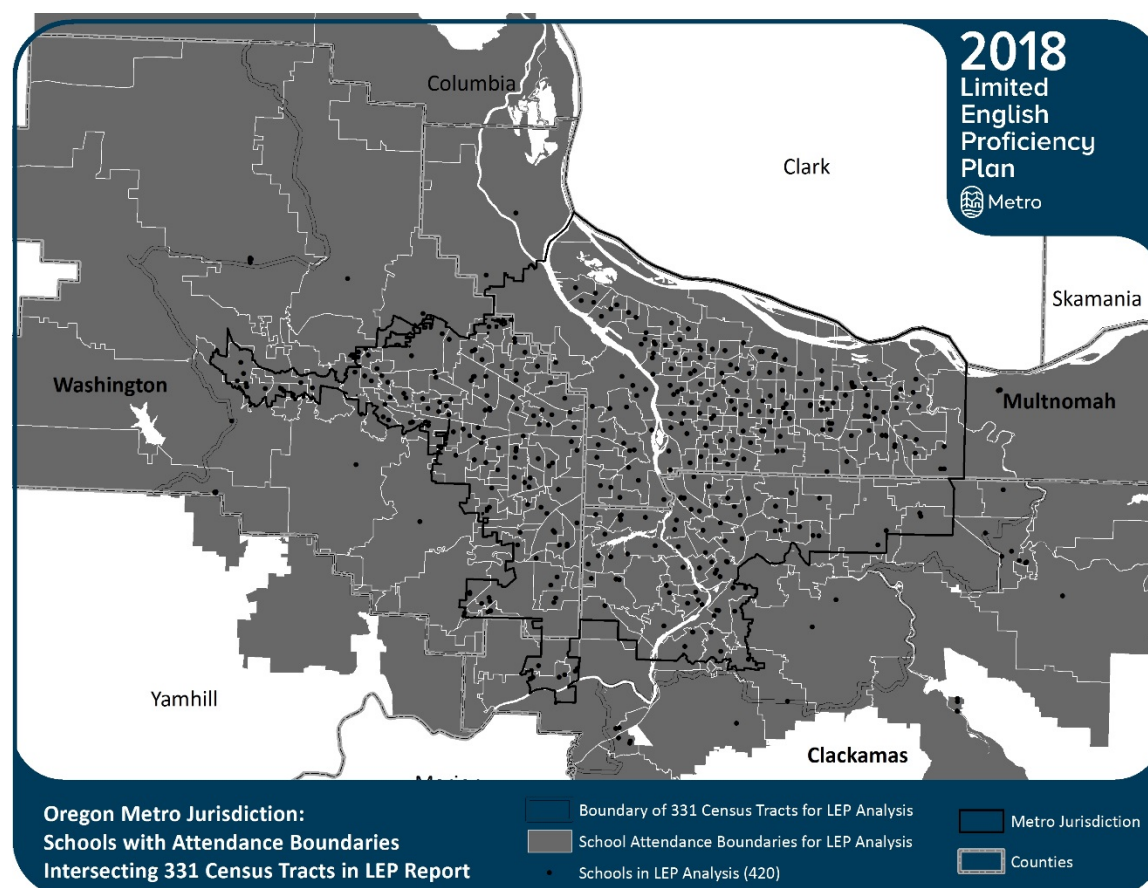
**Figure C1: Census tracts in Clackamas, Multnomah and Washington counties selected for analysis of 2011-2015 ACS data**



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001

Additionally, school attendance boundaries were chosen that intersected the 331 census tracts, so that the distribution of language populations living within the census tracts of interest could be assumed to be captured by relevant school attendance boundaries (Figure C2).

**Figure C2: Individual schools and relevant school attendance areas included in LEP Factor 1 analysis, as compared with extent of 331 census tracts that intersect the Metro jurisdictional boundary**



Source: 2011-2015 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2015-2016 attendance area and enrollment data

### Language data from the ACS

The U.S. Census Bureau maintains 382 unique language codes for coding responses to the ACS surveys on the question of “what language do you speak at home?” However, citing economy and confidentiality protection, the Bureau collapses these into just 39 data lines, of which 29 are individual languages and 10 are either a language family, language group or aggregation either of multiple groups within a family or multiple families. For example: “African languages,” one of these 10 categories, aggregates every language, whether related or not related, from the African continent into a single data line.

The American Community Survey provides 61 tables within the population category “language spoken at home.” In nearly all cases, however, the Census Bureau chooses to stick with four umbrella categories in addition to English: Spanish; Other Indo-European; Other Asian and Pacific

Island; and “Other.” Using tables with this high degree of categorical collapsing would result in a meaningless LEP analysis beyond Spanish.

We chose to analyze data from ACS Table B16001: “Persons 5 Years and Older, by Language Spoken at Home, by English Proficiency.” This table contains the most detailed breakout of languages spoken in the ACS: 29 individual languages plus the 10 language groupings. Our first round of analysis, displayed in Table C3, focused on the 29 individual languages from these tables. The “language group” populations require a second round of analysis, for which we use additional data sets, including state-level ACS data and enrollment data from the Oregon Department of Education, in order to disaggregate the group language data found in Table B16001; these analyses are displayed in Tables C4 and C5.

### **2011-2015 American Community Survey 5-year estimate, counties**

Margin of error estimates are invalid when summary counts are arrived at by aggregating many estimates, such as in the case of aggregating the estimates from the 331 tracts that intersect the Metro jurisdictional boundary. Thus it is impossible to verify with certainty whether the populations of LEP speakers meet the 1,000 persons “safe harbor” threshold.

To further refine our aggregate estimates in Table C1, we compared the aggregate census tract observations in with estimates of the same populations for all of Clackamas, Multnomah and Washington Counties: all of Metro’s service area as well as outlying areas. By aggregating only three observations we are able to achieve a rough estimate of the margin of error for the entire population using a formula provided by the U.S. Census Bureau. For instances in which two to four observations are aggregated, the Bureau recommends using the following formula:

$$MOE (X + Y + Z) = SQRT [(MOE X)^2 + (MOE Y)^2 + (MOE Z)^2 + Covariance]$$

Because the covariance is not reported in the data release, the Bureau recommends treating it as zero. Using this formula we can estimate the margins of error for all individual language LEP populations in Table C1, which enables a better understanding of the potential for estimates that straddle the 1,000 person threshold (e.g., Persian, Thai) to actually fall above or below the safe harbor threshold given their respective margins of errors. A population that falls below the threshold at the tri-county scale will certainly also fall below it within Metro’s jurisdiction. A population rising above the threshold at the tri-county scale may require further examination, but it is likely that it also rises above the threshold within Metro’s jurisdiction since the outlying areas of the three counties beyond the Metro boundary are sparsely populated.<sup>39</sup>

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<sup>39</sup> For further discussion of the problems with estimating margins of error in aggregated observations, refer to: [http://www.census.gov/acs/www/Downloads/data\\_documentation/Accuracy/MultiyearACSAccuracyofData2010.pdf](http://www.census.gov/acs/www/Downloads/data_documentation/Accuracy/MultiyearACSAccuracyofData2010.pdf), pp. 21-28.

**Table C1: Principal languages eligible for safe harbor provisions in Metro-wide initiatives: census tracts within Metro service boundary, all individual languages with at least 1,000 primary speakers who speak English less than very well**

Total Metro Regional Population 5 Years and Over	1,517,300				
	Estimated population that speaks a language other than English at home	Estimated population that speaks a language other than English at home, and English spoken less than very well = LEP	LEP as a percent of associated language population	LEP as a percent of total Metro regional population 5 years and over	LEP as a percent of total regional LEP population
Total Population	304,100	129,400			
Spanish or Spanish Creole	140,500	61,500	43.8%	4.1%	47.5%
Vietnamese	20,900	13,700	65.6%	0.9%	10.6%
Chinese	21,400	11,100	51.9%	0.7%	8.6%
Russian	13,900	6,400	46%	0.4%	4.9%
Korean	8,000	4,000	50%	0.3%	3.1%
Arabic	5,600	2,200	39.3%	0.1%	1.7%
Japanese	6,100	2,200	36.1%	0.1%	1.7%
Tagalog	6,300	1900	30.2%	0.1%	1.5%
Mon-Khmer, Cambodian	2,900	1,600	55.2%	0.1%	1.2%
Persian	3,100	1,200	38.7%	0.1%	0.9%
Thai	1,700	900	52.9%	0.1%	0.7%
French	6,700	800	11.9%	0.1%	0.6%
Hindi	4,600	800	17.4%	0.1%	0.6%
Laotian	1,600	800	50%	0.1%	0.6%
Serbo-Croatian	1,800	700	38.9%	0.0%	0.5%
Hmong	1,500	600	40%	0.0%	0.5%
German	6,600	600	9.1%	0.0%	0.5%

Source: 2011-2015 ACS, U.S. Census tract data, Table B16001



For individual languages in the ACS, the tri-county LEP population estimates are listed in Table C2. As with the tract data, no language spoken at home within Metro’s jurisdiction has enough LEP speakers to reach the 5 percent of total population threshold identified in the Department of Justice Title VI guidelines. The top 17 individual languages in the county data appear in nearly identical relative proportion to the tract data.

It is possible that the population of LEP Persian speakers might be less than 1,000 in the tri-county area if the lower bound of the margin of error is applied; hence within the Metro jurisdiction as well. Similarly, the number of LEP Hindi speakers might exceed 1,000 in the tri-county area, and hence most likely within Metro’s jurisdiction. Additionally, for Thai, with an LEP estimate of 900 and margin of error of 300, there is a fair chance that the actual number is close to (either above or below) the 1000-person LEP threshold. Thai is not included in as a safe harbor language in the the Factor 1 analysis, however, since its estimate of 900 LEP in the Metro region falls below the 1000-person threshold. At the county level the estimate remains approximately 900 LEP, but the margin of error provides a likely bounding box of 300, which in turn provides an effective range of 600 to 1200. Since the majority of the estimate range for Thai LEP is below the 1000-person threshold, Metro’s best estimate determined that Thai is currently below the safe harbor threshold.

**Table C2: Principal languages eligible for safe harbor provisions in Metro-wide initiatives: Tri-county region. All individual languages with enough primary speakers who speak English less than very well after accounting for the possibility that the upper margin of error bound is above 1,000 speakers.**

Total tri-county population over 5 years old = 1,609,500						
	Estimated population that speaks a language other than English at home	Margin of Error	Estimated population that speaks a language other than English at home, and English spoken less than very well = LEP	Margin of Error	LEP as a percent of total tri-county population 5 years and over	LEP as a percent of total tri-county LEP population
Total	312,500	not available	132,500	not available		
Spanish or Spanish Creole	146,500	2,600	63,900	2,100	4%	48.2%
Vietnamese	21,100	1,500	13,900	1,200	0.9%	10.5%
Chinese	21,500	1,500	11,100	900	0.7%	8.4%
Russian	14,800	1,600	6,700	800	0.4%	5.1%
Korean	8,200	1,000	4,100	500	0.3%	3.1%
Arabic	5,800	1,100	2,200	600	0.1%	1.7%

Japanese	6,100	800	2,200	400	0.1%	1.7%
Tagalog	6,400	800	1,900	400	0.1%	1.4%
Mon-Khmer, Cambodian	2,900	600	1,600	400	0.1%	1.2%
Persian	3,100	700	1,200	300	0.1%	0.9%
Thai	1,700	400	900	300	0.1%	0.7%
French	6,800	700	900	200	0.1%	0.7%
Laotian	1,700	400	800	200	0.0%	0.6%
Hindi	4,600	700	800	300	0.0%	0.6%
Serbo-Croatian	1,800	400	700	200	0.0%	0.5%
Hmong	1,500	400	700	300	0.0%	0.5%
German	6,900	600	600	200	0.0%	0.5%

Margin of error estimates are aggregations of three observations (i.e., Clackamas, Multnomah and Washington counties), based on a formula published by the U.S. Census Bureau

Source: 2011-2015 ACS, Census county data, Table B16001

## Consult state and local sources of data

### Further analysis: languages not routinely reported in the ACS

The 5-year ACS data, for both tracts and counties, aggregates many individual native language populations into the language groups, language families or aggregates of families to which they belong, and reports the group or aggregate estimate in lieu of separate rows for each constituent language. This results in 10 “other languages” categories in U.S. Census Table B16001. The categories are not equivalent in terms of linguistic family trees. For example, the “other Indo-European” category does not include estimated counts for the two categories below that are subsidiary to it. The categories are:

#### Other Indo European languages (family)

1. Other Indic languages (group within Indo-European language family)
2. Other Slavic languages (group within Indo-European language family)
3. Other West Germanic languages (group within Indo-European language family)
4. Scandinavian languages (group within Indo-European language family)
5. Other Indo European languages (remaining languages in this family)
6. Other Asian languages (aggregate of multiple language families)
7. Other Pacific Island languages (equivalent to the Austronesian language family)
8. African languages (aggregate of multiple language families)
9. Other Native North American languages (aggregate of multiple language families)

## 10. Other and unspecified languages

Of these, six have estimated LEP populations in the census of greater than 1,000 (see Table C3). The margins of error shown for the county data are calculated in the same manner as the procedure for Table C2.

**Table C3: Individuals who speak one of a group of languages within a language family and *may* be subject to safe harbor provisions depending upon corroboration from other data sources, all language groups with at least 1,000 primary speakers who speak English less than very well**

Total tri-county population over 5 years old = 1,609,500						
	Estimated population that speaks a language other than English at home	Margin of Error	Estimated population that speaks a language other than English at home, and English spoken less than very well = LEP	Margin of Error	LEP as a percent of total tri-county population 5 years and over	LEP as a percent of total tri-county LEP population
TOTAL	312,500	not available	132,500	not available		
African languages	8,000	1,300	3,700	1,000	0.2%	2.8%
Other Asian languages	8,700	1,200	3,100	700	0.2%	2.3%
Other Slavic languages	5,800	1,000	2,700	500	0.2%	2.0%
Other Indo-European languages	6,800	1,100	2,400	500	0.1%	1.8%
Other Indic languages	4,800	1,000	2,200	700	0.1%	1.7%
Other Pacific Island languages	5,400	800	2,200	500	0.1%	1.7%

Margin of Error estimates are aggregations of three observations (i.e., Clackamas, Multnomah and Washington counties), based on a formula published by the U.S. Census Bureau

Source: 2011-2015 ACS, Census county data, Table B16001

## Oregon Department of Education (ODE) 2011-2012 Enrollment data

We used ODE enrollment data to estimate LEP populations for languages that are not reported in the 5-year ACS releases, but that belong to language groups or families which in aggregate do have LEP populations of greater than 1,000 in that data. Table C4 displays the raw data for prominent languages in the ODE data with estimates greater than 100 LEP students.

**Table C4: LEP speakers in regional schools, identified by school districts partly or wholly within Metro jurisdictional boundary.**

Student's native language	Enrolled students whose native language is not English	Enrolled students, native language is not English; and LEP reported value **	Number of suppressed observations, LEP enrolled students **	Sum, mean of the range of possible values at each record with suppressed data ***	Final estimate, enrolled students in Metro area schools who are LEP, by native language
Spanish	35,420	16,537	112	348	16,885
Russian	3,486	1,044	149	368	1,412
Vietnamese	4,101	903	142	369	1,272
Arabic	1,391	439	150	347	786
Chinese	2,502	374	149	361	735
Somali (*)	1,074	404	97	220	624
Ukrainian (*)	946	132	94	235	367
Chuukese (*)	467	116	79	177	293
Romanian (*)	778	67	93	211	278
Japanese	665	90	74	162	252
Korean	833	78	66	169	247
Hmong	496	16	96	196	212
Karen (*)	267	138	27	59	197
Tagalog	451	0	97	185	185
Nepali (*)	239	55	41	75	130
Burmese (*)	212	66	30	62	128
Persian	288	0	68	118	118
Hindi	343	12	48	95	107
Laotian	279	0	57	103	103

(\*) Indicates language that is not reported individually in Table B16001 of the ACS. Data are from Oregon Department of Education Title III (NCLB) rolling collection during the 2015-2016 school year; **Caution:** language of origin data are not highly validated by ODE prior to their release. \*\* Indicates that reported values for observations that are greater than 6 LEP students per school site; for 6 or fewer observations, a suppressed value (0) is recorded. If no observations, the cell in the ODE dataset is <null>. \*\*\* See text for discussion of the method for converting suppressed values to a range of possible values.

In order to interpolate individual language values for ACS group language values, we generated ratios of language-group LEP speakers from the ODE data to those in the ACS tracts data set, as follows:

- The ODE data isolate each individual language spoken by enrolled students.
- We filtered the data fields by assigning raw data for each language and its LEP population to the grouping in which the U.S. Census Bureau classifies that particular language (see following example):

ODE Language	ACS Language Group	Largest national population of speakers	All students - language of origin	
			All	Estimated LEP
Belarusian	Other Slavic	Belarus	6	0
Bulgarian	Indo-European	Bulgaria	49	10.5
Czech	Indo-European	Czech Republic	33	11.5
Macedonian	Indo-European	Macedonia	3	1
Slovak	Indo-European	Slovakia	14	3.5
Ukrainian	Other Slavic	Ukraine	946	367
Other Slavic	Indo-European	NA	2	1
		SUM	1053	394.5

- Using this procedure we estimate that there are 363 Ukrainian speaking LEP students enrolled in Metro-area schools, as a subgroup of an estimated 394.5 LEP students enrolled who speak either Ukrainian or another of the languages which the Census Bureau aggregates along with Ukrainian in the category “Other Slavic.”
- 93 percent of “Other Slavic” language LEP persons in the schools are Ukrainian speakers.
- In this procedure we assume that LEP Ukrainian speakers in the general population make up an identical proportion of all LEP Other Slavic speakers, which may not be a valid assumption – but the error is likely tolerable given the small populations of other languages within this group in the schools data.
  - Applying this percentage to the Census tracts estimate of Other Slavic LEP population produces the following:  $93\% * 2,693 = 2,505$  Ukrainian-speaking LEP persons age 5 and older in the Metro service, which is then rounded to the nearest 100 (i.e., 2,500) in order to avoid communicating a false precision of estimates.

In addition to identifying Ukrainian, the ODE extrapolation has also identified Somali, Romanian, Nepali, Chuukese and Karen as likely exceeding.

Qualifications with this data:

- Schools are required to suppress observations of fewer than six LEP speakers for confidentiality protection, though districts do report the suppressed numbers in aggregate with all district schools.
- ODE is not a 100 percent count of school-aged children who speak a language other than English at home and are LEP, for the following reasons:

- ODE data includes public, charter and private schools, but does not include home-schooled students. The metadata do not indicate how private schools data are treated with respect to suppression and aggregation, but we assume that since private schools do not belong to districts that their school-specific reports are included with the public school district totals, therefore undercounting LEP individuals in private schools where there are fewer than six members of a population.
- General enrollment data is collected on a single day of the school year, so students who are not in attendance may be missed unless they are recipients of aid programs for which schools must track their data throughout the year (such as the federal free- and reduced-price lunch program).

These limitations are important in interpreting Figure 2 in the Factor 1 analysis of Section I and especially Figures B6, B7, B11, B12, B14 and B16 in Appendix B, where school-based LEP populations are mapped against the tract-level Census language group counterparts.

**Table C5: Estimated regional LEP speakers extrapolated from Metro-area LEP school students, showing top two dominant individual languages from each language group**

ACS Language family / ODE language	Languages – 2011-12 ODE Data	Estimate, number of native speakers LEP: ACS / Enrolled students, ODE	Percent of total enrolled LEP students within schools language family	Estimate: Total Native language LEP speakers in Metro region (schools ratio * total language family population estimate)
AFRICAN		3734		
All African Languages		867		
	Somali	623.5	72%	2685
	Amharic	97.5	11%	420
	Remaining African	146	17%	629
Other ASIAN		3101		
All Other Asian languages		521.5		
	Karen	196.5	38%	1168
	Burmese	128	25%	761
	Remaining Other Asian	197	38%	1171
Other INDIC		2187		
All Other Indic languages		176.5		
	Nepali	129.5	73%	1605
	Bengali	27	15%	335
	Remaining Indic	20	11%	248

Other INDO-EUROPEAN		2445		
All Other Indo-European languages		362		
	Romanian	277.5	77%	1874
	Kurdish	50	14%	338
Remain. Oth. Indo-European		34.5	10%	233
Other PACIFIC ISLAND		2130		
All other Pacific Island languages		426		
	Chuukese	293	69%	1465
	Marshallese	40.5	10%	203
Remaining Oth Pacific Island		92.5	22%	463
Other SLAVIC		2693		
All other Slavic languages		394.5		
	Ukrainian	367	93%	2505
	Czech	11.5	3%	79
Remaining Other Slavic		16	4%	109

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## APPENDIX D. LANGUAGE GROUP SURVEY AND DISCUSSION QUESTIONS

### Metro discussion group survey

On a scale from 1-5 (1= not important, 5=very important), please tell Metro if information about the following places or services are important to you or not. If you don't know anything about them, circle "don't know".

#### PLACES

1. Oregon Zoo exhibits and attractions and/or concerts and seasonal events such as Zoo Lights.

1                      2                      3                      4                      5                      Don't know

2. Metro Parks annual pass information for places like Oxbow and Blue Lake regional parks, Chinook Landing Marine Park and M. James Gleason Boat Ramp.

1                      2                      3                      4                      5                      Don't know

3. Information on events at Metro's arts, convention and exhibition facilities – things like home and garden shows, the symphony, manufacturing trade shows, rock concerts, business seminars, antiques shows.

1                      2                      3                      4                      5                      Don't know

#### SERVICES

4. Help finding a recycler, garbage hauler or place to take hazardous waste.

1                      2                      3                      4                      5                      Don't know

5. Help finding ways to connect with nature or locating places to hike on trails.

1                      2                      3                      4                      5                      Don't know

6. Tips and resources to help reduce the use of toxic products in your home.

1                      2                      3                      4                      5                      Don't know

7. Tips and resources to help reduce the use of pesticides in your yard.

1                      2                      3                      4                      5                      Don't know

8. Tips for how to properly dispose of old paint cans, motor oil and pesticides at a drop-off center near you.

1                      2                      3                      4                      5                      Don't know

9. Ideas for how to drive your car less, save money on travel costs by finding a carpool to work or taking transit.

1	2	3	4	5	Don't know
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10. The Bike There program (which helps people find safe ways to bike).

1	2	3	4	5	Don't know
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11. The Walk There program (a guide to scenic nature walks in the city).

1	2	3	4	5	Don't know
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12. Information about MetroPaint – including prices, store directions and additional retail outlets in Oregon and Washington.

1	2	3	4	5	Don't know
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13. Information and prices for Metro gravesite and cremation spaces.

1	2	3	4	5	Don't know
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14. Volunteering opportunities: Metro has a variety of done-in-a-day and recurring restoration projects available at parks and natural areas across the region suitable for groups of all sizes and ages.

1	2	3	4	5	Don't know
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## DECISION MAKING

15. A program that plans for transportation projects that will happen sometime in the next 20 years, if funding becomes available.

1	2	3	4	5	Don't know
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16. A program that approves money for roadway, freight, biking and walking facilities that will be designed or built in the next four years.

1	2	3	4	5	Don't know
---	---	---	---	---	------------

17. A project that is coming up with ideas for a new MAX line, bike routes, sidewalks and road improvements.

1	2	3	4	5	Don't know
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## LANGUAGE GROUP DISCUSSION QUESTIONS – DETAILED AGENDA

### 1) Welcome and introductions (5 minutes)

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*Facilitator notes: Metro strives to provide access to information about our programs and services for all of their customers. In order to better serve diverse audiences across the region, Metro wants to know what matters most to the Spanish community. The results from the discussion group will help inform how Metro can better engage with your community and help determine materials to translate.*

### 2) What do you think Metro does? (15 minutes) SURVEY

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*Facilitator notes: I am going to pass around a survey about Metro. Please fill out the survey to your best ability. It is okay if are not familiar or don't know about Metro's services.*

### 3) Overview of Metro (15 minutes)

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*Participants will learn about Metro's services and programs using flip boards.*

- What is Metro?
  - Regional government
  - Represents population of 1.5 million people in 25 cities and three counties
  - Made up of directly elected Metro Council and staff
  - Metro works to make the communities and neighborhoods of the Portland metropolitan area a great place to live, work and play.

*Metro is a great place...*

*To see a show*

- Metro manages public places for you to enjoy like the Oregon Zoo, Portland Center for the Performing Arts, the Oregon Convention Center and the Portland Expo Center.

*To ponder a polar bear*

- From checking out the elephants and penguins to enjoying concerts and special events like Zoo Lights, there's a whole lot to do at the Oregon Zoo. The zoo draws more than 1 million visitors each year and is a safe place for families to share moments of discovery and fun.

*To enjoy nature nearby*

- From Oxbow Regional Park to Smith and Bybee Wetlands to Graham Oaks Nature Park, Metro welcomes more than a million visitors to its parks each year.

- Oxbow Regional Park is a 1,200-acre natural area park located in the wild and scenic Sandy River Gorge. The park offers a wooded campground (open year round), picnic shelters and playgrounds.
- Blue Lake Regional Park, just 20 minutes from downtown Portland, is a great place for a picnic. You can enjoy boating, fishing and swimming or splash in the water spray ground.
- One of Metro's newest parks, Graham Oaks Nature Park in Wilsonville, also offers picnic shelters. Join your friends and family for a bike ride on the Tonquin Trail, walk through the forest or spot birds from a wetland overlook.

#### *To drive less*

- Metro can give you practical tips for getting around the region and is working to make it safer, faster and easier for you to get where you need to go so you can spend more time with your friends and family.

#### *To recycle more*

- People who live here care about reducing waste, keeping air and water clean and making a healthy environment. Metro takes care of the region's recycling and garbage services and can help you find a recycler, garbage hauler or place to take hazardous waste.
- Almost half of the more than 5 million pounds of household hazardous waste Metro collects each year is latex paint. Good quality leftover latex is turned into MetroPaint. You can buy 1-gallon cans and 5-gallon pails for about \$11 or less a gallon at Miller Paint stores and the Metro Paint store on Swan Island.

#### *To work*

- The Metro Council is partnering with businesses to make sure that tax dollars are used to create good jobs now and in the future.

#### *To play*

- Are you interested in fun, free family activities, or biking and walking maps? Visit Metro's website or pick up a copy of Metro GreenScene.

#### *To call home*

Metro is working to keep our region a great place to live and to make sure our kids have a safe and healthy future.

- What does Metro NOT do?
  - Metro does not run buses or light rail (Trimet does). Metro does not determine where bus stops go.

- Metro does not do any building or construction of projects. Metro's main role is on the planning side, not on the construction side. However, Metro may help fund some construction projects.

### **Discussion Questions: (75 minutes)**

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*Facilitator notes: Metro wants to know whether you have heard about the programs that I just described and whether or not they are important to your lives. Let's focus first on places and services. We will spend about 25 minutes on four questions.*

Discussion questions:

1. For those programs you have heard of, or those you haven't, which ones would you like to have information available in Spanish so you could understand it better?
2. Thinking about friends and family who do not speak English well, how do they usually get information about what is going on in town or about city services? ( e.g. from schools, radio, a specific organization, phone call, text message, email, flyers, word of mouth, etc. )
3. If information was available in Spanish would you have take time to read it?
4. What could Metro do to make it easier to use or visit these places or use these services?

*Facilitator notes: Now let's talk about engaging in Metro's decision-making process. We'll have about 50 minutes to review scenarios and answer questions.*

Warm up questions:

1. Do your friends and family tend to be involved government process? Why or why not?
2. Besides work, what kinds of groups and activities do your friends and families participate in? Are there organizations you or your friends and family are a part of? (i.e. civic activities, volunteering in your community or church, farmers market, attending community events, etc.)

I am going to describes three decision-making scenarios

#### **Scenario 1: Regional process – Metro Project Regional Transportation Plan**

One of Metro's jobs is to plan for the long-term future of the transportation system in the region. This means looking at roadway, freight, walking, biking, bus and high capacity transit projects for the next 20 years. No project that needs federal, state or regional money can get built in the region without being part of this plan. The plan is made up of policies for how the region will manage transportation and prioritize funding for projects. The plan is updated every five years. As part of the update process, there are meetings with community leaders, interest groups and the public can provide comment during a select period of time. Comments are summarized and provided verbatim to decision makers.

#### **Scenario 2: Metro Project Corridor planning**

Once a roadway or high capacity transit project is approved for study as part of the Regional Transportation Plan, there is lots of work to do. It begins with brainstorming – all the ideas that could possibly solve the road or high capacity transit problem. Once all the ideas are on the table some analysis is done so people can compare the idea and see which ones should be looked at in more detail. The shorter list of ideas is analyzed more and information is provided to the public and decision-makers who usually select two to three options to study in much more detail, under federal guidelines. This detailed analysis looks at how many people might use the road or ride high capacity transit, what it will cost, how it will affect the environment and communities and more. At several points in this process, there are ways that community members can get involved: giving ideas, helping decide which ideas should be studied further, giving comments on the final choices about which ideas to study in detail. The public can attend open houses, comment online or in-person at meetings held at Metro to provide feedback. Comments inform the process to project team along the way and decision makers at key milestones.

### **Scenario 3: Metro Project Regional Flexible Funds**

Most federal money for transportation projects is assigned to certain types of projects and cannot be spent on other things but some federal money that is spent in the region is split up and assigned to projects. These are called Regional Flexible Funds because regional leaders have the ability to decide how to spend them. These funds become available every two years and there is a process for cities, counties and TriMet to apply for project money. There is an opportunity for the public to comment on the projects before a final decision is made on which ones to select. The public can attend open houses, comment online or in-person at meetings held at Metro to provide feedback. Comments inform the process to project team along the way and decision makers at key milestones. These are some of the possible things that could be implemented: building new sidewalks or bike lanes or engineering new roadways.

Discussion questions:

1. Are these projects relevant to you and why?
2. Have you ever heard of these projects (If so, which ones?)
3. Where or from whom would like to hear about these things?
4. When you heard about these projects, did you wish that information was available in Spanish so you could understand it better?
5. If information was available in Spanish would you have take time to read it?
6. What could Metro do to make it easier for you to participate? (i.e. provide easy way to reach Metro? **TEST PHONE GRAPHIC ICON**)
7. How can Metro build trust with you and your community?

## APPENDIX E. PUBLIC ENGAGEMENT AND NON-DISCRIMINATION CERTIFICATION CHECKLIST REQUIRED OF PROJECT SPONSORS, 2018 REGIONAL TRANSPORTATION PLAN

### Form D. Public engagement and non-discrimination certification checklist for transportation system, subarea, topical, modal, and transit service plan or strategy development

#### 2018 Regional Transportation Plan call for projects

##### Background and purpose

Use of this checklist is intended to ensure project sponsors have offered an adequate opportunity for public engagement, including identifying and engaging historically marginalized communities, during development of local transportation system plans, subarea plans or strategies, topical plans or strategies (e.g., safety), modal plans or strategies (e.g., freight) and transit service plans.

Metro is required to comply with federal (US. Department of Transportation, Federal Highways Administration and Federal Transit Administration) and state (ODOT) guidance on public engagement and on Title VI of the Civil Rights Act and other civil rights requirements. Documentation of the local actions described below may be requested by regulators; if such a request is unable to be met, the Regional Transportation Plan itself may be found to be out of compliance, requiring regional corrective action.

##### Instructions

Applicants must complete this certification, comprising the plan development checklist (section A), summary of non-discriminatory engagement (section B) and certification statement (section C), for plans that include the projects submitted to Metro for inclusion in the 2018 Regional Transportation Plan. Section D allows for documentation of projects emerging from plans that not currently adopted, but anticipated to be ahead of the RTP adoption, by the jurisdiction.

One completed certification form is required for the list of projects submitted by the jurisdiction, agency or special district for the 2018 Regional Transportation Plan. An additional, separate completed certification form (Form E) is required for projects anticipated to be included in the 10-year investment strategy (implementation in the 2018-27 timeframe) and to seek state or federal funding.

Project sponsors should keep referenced records on file in case of a request for information. Records should be retained until the related local transportation system plan, subarea plan or strategy, modal plan or strategy or

*Use this form (Form D) to certify a list of projects with implementation after 2027.*

See also **Form E, Public engagement and non-discrimination certification for projects submitted to the 10-year regional transportation investment strategy (2018-27 implementation)** for projects anticipated to be included in the 2018 RTP 10-year investment strategy (implementation in the 2018-27 timeframe) and to seek state or federal funding to be implemented are expected to:

- *if project development completed,* have performed project level public engagement and analyzed potential inequitable impacts for people of color, people with limited English proficiency and people with low income compared to those for other residents
- *if project development not completed,* attest to the intent to perform project level public engagement and analyze potential inequitable impacts for people of color, people with limited English proficiency and people with low income compared to those for

transit service plan is superseded – or the submitted projects have been completed – plus six years. Retained records do not have to be submitted unless requested by Metro, state regulators or federal regulators.

#### **For plans currently in development**

This form may attest to local transportation system plans, subarea plans or strategies, topical plans or strategies, modal plans or strategies, and transit service plans currently in development – but are anticipated to be adopted prior to the adoption of the 2018 Regional Transportation Plan – that include projects submitted to Metro for inclusion in the 2018 RTP.

Attach a list of projects that have not emerged from a currently adopted (at the time of the call for projects) plan, showing the project number (assigned by the project submission system), name and cost. See page 4 of this form (Form D) for example formatting.

Forward questions regarding this checklist to the Civil Rights program manager, Clifford Higgins at [clifford.higgins@oregonmetro.gov](mailto:clifford.higgins@oregonmetro.gov) or 503-797-1932.

#### **A. Checklist**

- ☐ At the beginning of the agency's transportation system, topical modal, subarea or transit service plan, a public engagement plan was developed to encourage broad-based, early and continuing opportunity for public involvement.  
**Retained records:** *public engagement plan and/or procedures*
- ☐ During the development of the agency's transportation system, topical, modal, subarea or transit service plan, a jurisdiction-wide demographic analysis was completed to understand the locations of communities of color, people with limited English proficiency, people with low income and, to the extent reasonably practicable, people with disabilities, older adults and youth in order to include them in engagement opportunities.  
**Retained records:** *summary of or maps illustrating jurisdiction-wide demographic analysis*
- ☐ Throughout process, public notices were published and requests for input were sent in advance of the project start, engagement activity or input opportunity.  
**Retained records:** *dated copies of notices (may be included in retained public engagement reports)*
- ☐ Throughout the process, public documents included a statement of non-discrimination (Metro can provide a sample).  
**Retained records:** *public documents, including meeting agendas and reports*
- ☐ Throughout the process, timely and accessible forums for public input were provided.  
**Retained records:** *descriptions of opportunities for ongoing engagement, descriptions of opportunities for input at key milestones, public meeting records, online and community survey results (may be included in retained public engagement reports)*
- ☐ Throughout the process, appropriate interested and affected groups were identified, and contact information was maintained, in order to share plan information; updates were provided for key decision points; and opportunities to engage and comment were provided.  
**Retained records:** *list of interested and affected parties, dated copies of communications and notices sent, descriptions of efforts to engage the public, including strategies used to attract interest and obtain initial input, summary of key findings; for announcements sent by mail or email, documented number of persons/groups on mailing list (may be included in retained public engagement reports)*
- ☐ Throughout the process, focused efforts were made to engage historically marginalized populations, including people of color, people with limited English proficiency and people with low income, as well as



people with disabilities, older adults and youth. Meetings or events were held in accessible locations with access to transit. Language assistance was provided, as needed, such as translation of key materials, use of a telephone language line service to respond to questions or take input in different languages, and interpretation at meetings or events.

**Retained records:** *description of focused engagement efforts, list of community organizations and/or community members representing diverse populations with whom coordination or consultation occurred, description of language assistance resources and how they were used, dated copies of communications and notices, copies of translated materials, summaries of key findings (may be included in retained public engagement reports)*

- ☐ Public comments were considered throughout the process, and comments received on the staff recommendation were compiled, summarized and responded to, as appropriate.

**Retained records:** *summary of comments, key findings and changes made to final staff recommendation or adopted plan to reflect public comments (may be included in retained public engagement reports or legislative staff reports)*

- ☐ Adequate notification was provided regarding final adoption of the plan, including how to obtain more detailed information, at least 15 days in advance of adoption. Notice included information on providing public testimony.

**Retained records:** *dated copies of the notices; for announcements sent by mail or email, documentation of number of persons/groups on mailing list (may be included in retained public engagement reports or legislative staff reports)*

## B. Summary of non-discriminatory engagement

Attach a summary (1-2 pages) of the key elements of the public engagement process for development of local transportation system plans, subarea plans or strategies, modal plans or strategies or transit service plans, including outreach to people of color, people with limited English proficiency and people with low income.

## C. Certification statement

\_\_\_\_\_ (agency) certifies the information provided on this checklist is accurate.

As attested by:

\_\_\_\_\_  
(agency manager signature)

\_\_\_\_\_  
(name and title)

\_\_\_\_\_  
(date)

## D. Project documentation for projects not from currently adopted plan

Form D may attest to local transportation system plans, subarea plans or strategies, topical plans or strategies, modal plans or strategies and transit service plans currently in development – but are anticipated to be adopted prior to the adoption of the 2018 Regional Transportation Plan – that include projects submitted to Metro for inclusion in the 2018 RTP.

Attach a list of projects that have not emerged from a currently adopted (at the time of the call for projects) plan, showing the project number (assigned by the project submission system), name and cost. This will

allow Metro to verify the adoption of and project inclusion in the local transportation system plan, subarea plan or strategy, topical plan or strategy, modal plan or strategy, or transit service plan ahead of the Regional Transportation Plan adoption.

Project number	Project name	Project cost

## APPENDIX F. EXAMPLE: PUBLIC NOTICE, 2018 REGIONAL TRANSPORTATION PLAN

### The future of greater Portland's transportation system Tell us what you think | 45-day comment period

Give your thoughts on the 2018 Regional Transportation Plan – the blueprint for investing federal, state and local transportation funds in the greater Portland region through 2040. The plan lays out more than \$15 billion in priority investments and includes new strategies for transportation safety, transit improvements, freight movement and emerging technology.

**June 29 through Aug. 13, 2018**  
**oregonmetro.gov/rtp**



Submit comments online at [oregonmetro.gov/rtp](http://oregonmetro.gov/rtp) |  
by mail to Metro Planning, 600 NE Grand Ave., Portland, OR 97232 | by email to  
[transportation@oregonmetro.gov](mailto:transportation@oregonmetro.gov) | by phone at 503-797-1750 or TDD 503-797-1804.

The Metro Council is scheduled to hold **public hearings** 2 p.m. **Thursday, Aug. 2** and  
**Thursday, Nov. 8** and is scheduled to hold a **public hearing and take legislative action** 2  
p.m. **Thursday, Dec. 6** at Metro Regional Center, 600 NE Grand Ave., Portland.

**Esta es una notificación** de su oportunidad para comentar sobre las prioridades de transporte en la región.  
Para recibir una traducción de la notificación pública completa en español, llame al 503-797-1890.

**Đây là thông báo về cơ hội** của quý vị được trình bày ý kiến đối với các ưu tiên về chuyên chở trong vùng.  
Muốn nhận được bản dịch đầy đủ của thông báo bằng Tiếng Việt, xin gọi số 503-797-1890.

**本公告旨在通知您利用這個機會評議在您所在社區經營危險廢棄物設施的申請。** 要獲取完整的繁體  
中文翻譯版公告，請撥打503-797-1890。

**Настоящим уведомляем,** что у вас есть возможность оставить свой отзыв относительно  
приоритетов транспортного развития в вашем регионе. Русскую версию настоящего оповещения  
можно запросить по номеру 503-797-1890.

**본 통지서는** 지역 내 교통 관련 우선 사항에 대해 귀하의 의견을 제시할 수 있는 기회를 알려 드리  
기 위한 것입니다. 한국어로 번역된 통지서 전문을 받아보시려면, 503-797-1890로 문의하십시오.

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## APPENDIX G. LANGUAGE TRAINING MATERIALS



### LANGUAGE LINE

**Dickey McMath**  
Certified Languages International  
Language line  
1-800-225-5254



## BRIDGING THE COMMUNICATION GAP



**1 in 5 People Speak a Language Other Than English at Home**

CLI facilitates a conversation between your company and your Limited English Proficient (LEP) customer

**TOP 10 LANGUAGES SPOKEN IN THE U.S. AFTER ENGLISH:**

- Spanish
- Chinese
- French
- German
- Tagalog
- Vietnamese
- Italian
- Russian
- Polish
- Korean

Source: U.S. Census Bureau

**CERTIFIED LANGUAGES INTERNATIONAL**

**CONDUCT MORE BUSINESS WITH MORE LANGUAGES**

## STEPS TO ACCESSING AN INTERPRETER

### STEPS FOR CALLING

**01 Dial**  
Just dial our toll-free number and a customer service representative (CSR) will answer your inquiry.  
**1.800.CALL.CLI**



**02 Connect**  
Our friendly staff will identify your language needs and connect you to a qualified interpreter in seconds.  
**Live Operators**



**03 Talk**  
Our professional interpreters will help you communicate your request with ease and budget-minded expertise.  
**Faster Connections**



### A CLOSER LOOK:

```

graph LR
    A[Your representative will dial CLI's toll-free number.] --> B[A CLI operator will answer within 5 seconds]
    B --> C[The CLI operator will ask what languages is needed.]
    C --> D[If the language is unknown, the CLI operator will help with language identification.]
    D --> E[CLI operator will gather any additional data that you have requested we collect (account #, name of caller, etc.)]
    E --> F[Your rep will notify the CLI operator if a third-party dial out is needed.]
    F --> G[Your billing commences after the CLI operator connects your rep to the CLI interpreter.]
  
```

**CERTIFIED LANGUAGES INTERNATIONAL**

**CONDUCT MORE BUSINESS WITH MORE LANGUAGES**





## SAMPLE INSTRUCTION CARDS

### FRONT

#### NEED AN INTERPRETER?

2. DIAL 1-800-CALL-CLI
3. When the operator answers, tell them:
  - a. Your customer code is XXX
  - b. You are calling from X
  - c. The language you need
  - d. Your XX and XX
  - e. If you need a third party dial-out
4. The operator will connect you promptly.



500+ Languages  
24/7/365  
Direct Dial: 503-464-2425

### BACK

#### Recommendations for Using an Over-the-Phone Interpreter

##### For Outbound Calls:

- If you need to reach a Limited English Proficient (LEP) at home or need a third-party dial-out, please first inform the CLI rep before the interpreter is connected.
- Once the interpreter is connected, you may tell the interpreter who to ask for (the LEP's name).
- At this time you may also tell the interpreter how to proceed if the call goes to voicemail and what message to leave if desired.

##### For Inbound Calls:

- Explain to the LEP that all info is confidential and encourage questions.
- Speak clearly
- Smile and be kind, this helps the LEP feel more comfortable.
- If face-to-face and multiple people are in the room, speak one at a time.
- Speak freely; all CLI interpreters are sworn to confidentiality and the Interpreter's Code of Ethics.
- Encourage the interpreter to clarify terms with you if necessary.



**CONDUCT  
MORE BUSINESS  
WITH MORE LANGUAGES**

## VOLUNTEERS





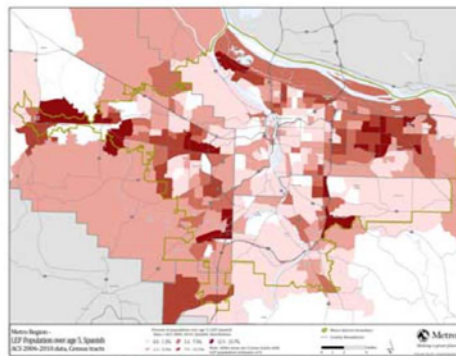


## WHAT IS TITLE VI?

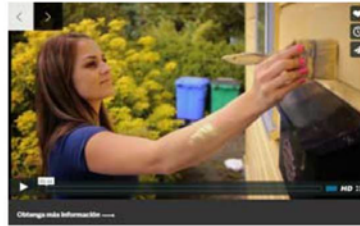
Title VI of the Civil Rights Act of 1964 is a federal statute declaring that no person shall be discriminated against or denied benefits on the basis of race, color, or national origin.

## LANGUAGES OF THE REGION

- ✓ **15** languages
- ✓ **50** percent of LEP populations speak Spanish as their first language
- ✓ Approximately 75 percent of LEP populations speak **Spanish, Vietnamese, Chinese (Mandarin and Cantonese) or Russian**



## TRANSLATED MATERIALS



## CHECK LIST

- ✓ **Greet customer** as usual and make them feel welcomed
- ✓ **Start** with Metro staff
- ✓ If no answer, **call language line**
- ✓ **Inform** appropriate staff
- ✓ **Email** form to [languagehelp@oregonmetro.gov](mailto:languagehelp@oregonmetro.gov)



.....

- 1-800-225-5254

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# Metro

# Hello Kamusta

こんにちは。Hola

Xin chào مرحباً

# Здравствуйте

Bună! សະបាមទី

សសី Nvob zoo

Have سلام 你好

नमस्कार Bitayo

Metro fully complies with Title II of the Civil Rights Act of 1964 and related statutes that ban discrimination. If any person believes they have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age or disability, they have the right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit [www.gomntrio.org/civilrights](http://www.gomntrio.org/civilrights) or call 503-799-1750. Metro provides services or accommodations upon request to persons with disabilities and people who need an interpreter at public meetings. If you need a sign language interpreter, communication aid or language assistance, call 503-799-1750 or TDD/TTY 503-799-1804 (8 a.m. to 5 p.m., Monday-Friday) before the meeting. All Metro meetings are wheelchair accessible. Individuals with service animals are welcome at Metro facilities, even where pets are generally prohibited. For up-to-date public transportation information, visit TriMet's website at [www.trimet.org](http://www.trimet.org).

Metro tôn trọng dân quyền. Muốn biết thêm thông tin về chương trình dân quyền của Metro, hoặc muốn lấy đơn khiếu nại về sự kỳ thị, xin xem trong [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) hoặc gọi số 503-797-1790. Nếu quý vị cần thông dịch viên ra dấu bằng tay, trợ giúp về tiếp xúc hay ngôn ngữ, xin gọi số 503-797-1790 hay TDD/TTY 503-797-1804 (từ 8 giờ sáng đến 5 giờ chiều vào những ngày thường) trước buổi họp 5 ngày làm việc.

Metro з повагою ставиться до громадянських прав. Для отримання інформації про програму Metro із захисту громадянських прав або форми скарги про дискримінацію відвідайте сайт [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) або зателефонуйте за номером 503-797-1790. Якщо вам потрібен перекладач на зборах, для задоволення вашого запиту зателефонуйте за номером 503-797-1790 з 8.00 до 17.00 у робочі дні за п'ять робочих днів до збору.

Metro尊重民權。欲瞭解Metro民權計畫的詳情,或獲取投訴表,請瀏覽網站[www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) 或撥打 503-797-1790。如果您需要口譯方可參加公共會議,請在會議召開前5個營業日撥打503-797-1790(工作日上午8點至下午5點),以便我們滿足您的要求。

Metro waxay ixtiraamtaa xuquuqda madaniga. Haddii aad u baahan gargaar ah luqadda, wac 503-797-1790 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) 5 maalmo shaqo ka hor kullanka. Haddii aad u baahan tahay turjubaan si aad uga qaybqaadatid kullian dadweyne, wac 503-797-1790 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) shan maalmo shaqo ka hor kullanka si loo tixgaliyo codsashadaada.

Metro는 시민권을 존중합니다. Metro의 시민권 프로그램에 대한 정보 또는 차별 항의 시 양식을 얻으려면, [www.orgonmetro.gov/civilrights](http://www.orgonmetro.gov/civilrights). 당신의 언어 지원이 필요한 경우, 회의에 앞서 5 영업일 (오후 5시 주중에 오전 8시) 503-797-1790를 호출합니다. 또는 차별에 대한 불만을 신고 할 수.

Metroでは公民権を尊重しています。Metroの公民権プログラムに関する情報について、または差別苦情フォームを入手するには、[www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights)をご覧ください。503-797-1790までお電話ください。公開会議で言語通訳を必要とされる方は、Metroがご要望に対応できるよう、公開会議の5営業日前までに503-797-1790（平日午前8時～午後5時）までお電話ください。

iginagalang ng Metro ang mga karapatang sibil. Para sa impormasyon tungkol sa programa ng Metro sa mga karapatang sibil, o upang makakuha ng porma ng reklamo sa diskriminasyon, bisitahin ang [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) o tumawag sa 503-797-1790. Kung kailangan ninyo ng interpreter ng wika sa isang pambubulokang pulong, tumawag sa 503-797-1790 (8 a.m. hanggang 5 p.m. Lunes hanggang Biyernes) lima araw ng trabaho bago ang pulong upang mapagbigyan ang inyong kahaliling.

Metro respeta los derechos civiles. Para obtener información sobre el programa de derechos civiles de Metro o para obtener un formulario de reclamo por discriminación, ingrese a [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) o llame al 503-797-1790. Si necesita asistencia con el idioma, llame al 503-797-1790 (de 8:00 a. m. a 5:00 p. m. los días de semana) 7 días laborales antes de la asamblea.

Metro уважает гражданские права. Узнать о программе Metro по соблюдению гражданских прав и получить форму жалоб о дискриминации можно на веб-сайте [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) или по телефону 503-797-1790. Если вам нужен переводчик на общественном собрании, оставьте свой запрос, позвонив по номеру 503-797-1790 в рабочие дни с 8:00 до 17:00 и за пять рабочих дней до даты собрания.

Metro respectă drepturile civile. Pentru informații cu privire la programul Metro pentru drepturi civile sau pentru a obține un formular de reclamație împotriva discriminării, vizitați [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) sau sunați la 503-797-1790. Dacă aveți nevoie de un interpret de limbă la o ședință publică, sunați la 503-797-1790 (între orele 8 și 5, în timpul zilelor lucrătoare) cu cinci zile lucrătoare înainte de ședință, pentru a putea să vă răspundă în mod favorabil la cerere.

Metro tributes cai. Rau cov lus qhia txog Metro txoj cai kev pab, los yog kom sau ib daim ntawv tsis txaus siab, mus saib [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Yog hais tias koj xav tau lus kev pab, hu rau 503-797-1790 (8 teev sawv ntsox txog 5 teev tsaus ntuj weekdays) 5 hnub ua hauj lwj ua ntej ntawm lub rooi sib tham.

Metro អាចស្នើសុំប្រគល់ផ្ទះ ។ សំណើសុំអាចផ្ញើត្រឡប់ទៅស្នើសុំប្រគល់ផ្ទះរបស់ Metro. ប្រតិភាពប្រតិបត្តិការរបស់ Metro, អាចរកឃើញនៅលើគេហទំព័រ [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) ។ ប្រតិភាព អាចជួយអ្នកក្នុងការស្នើសុំប្រគល់ផ្ទះបានផងដែរ, ឬ ទូរស័ព្ទលេខ 503-797-1790 (រវាងម៉ោង 8 ថ្ងៃ ប្រគល់ផ្ទះម៉ោង 5 ថ្ងៃ ប្រតិបត្តិការ) ។ តាមលេខ 5 ថ្ងៃ ប្រគល់ផ្ទះបានផងដែរ។

[illegible][illegible]

تحتج Metro الحقوق المدنية، للزيادة من المعلومات حول برنامج Metro للحقوق المدنية أو لإبداء شكوى ضد التمييز، يُرجى زيارة الموقع الإلكتروني [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) إن كنت بحاجة إلى مساعدة في اللغة، يجب عليك الاتصال مقدماً برقم الهاتف 503-797-1790 (من الساعة 8 صباحاً حتى الساعة 5 مساءً، أيام الاثنين إلى الجمعة) قبل ساعة (٧) أيام عمل من موعد الاجتماع.

503-797-1790 (8 از صبح تا 5 بعد از ظهر روز های هفته) - مشاوره بگیری. برای اطلاعات در مورد برنامه حقوق معنوی ما یا برای دریافت فرم عضویت و وبسایت مربوطه خود نگاه بپایند شما می توانید از خدمات مترجم شفاهی و سایر تسهیلاتی که جهت شرکت در برنامه ها و تصمیمات مربوط به شما کمک می کنند استفاده نمایید. مترو تماسی قوانین مربوط به عدم تبعیض فدرال را رعایت می کند. اگر در یک جلسه خصوصی نیز به یک مترجم شفاهی داشتید، پنج روز قبل از برگزاری جلسه جهت پاسخگویی به درخواست ناز، با شماره 503-797-1790 (8 از صبح تا 5 بعد از ظهر روز های هفته) - مشاوره بگیری. برای اطلاعات در مورد برنامه حقوق معنوی ما یا برای دریافت فرم عضویت و وبسایت مربوطه خود نگاه بپایند شما می توانید از خدمات مترجم شفاهی و سایر تسهیلاتی که جهت شرکت در برنامه ها و تصمیمات مربوط به شما کمک می کنند استفاده نمایید. مترو تماسی قوانین مربوط به عدم تبعیض فدرال را رعایت می کند. اگر در یک جلسه خصوصی نیز به یک مترجم شفاهی داشتید، پنج روز قبل از برگزاری جلسه جهت پاسخگویی به درخواست ناز، با شماره 503-797-1790 (8 از صبح تا 5 بعد از ظهر روز های هفته) - مشاوره بگیری. برای اطلاعات در مورد برنامه حقوق معنوی ما یا برای دریافت فرم عضویت و وبسایت









If you picnic at Blue Lake or take your kids to the Oregon Zoo, enjoy symphonies at the Schnitz or auto shows at the convention center, put out your trash or drive your car – we’ve already crossed paths.

So, hello. We’re Metro – nice to meet you.

In a metropolitan area as big as Portland, we can do a lot of things better together. Join us to help the region prepare for a happy, healthy future.

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Oct. 1, 2018