



# Limited English Proficiency Plan

*A plan for improving access to Metro for persons with limited English proficiency, focusing on Metro's metropolitan planning organization functions*

October 2024

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Metro is the federally mandated metropolitan planning organization (MPO) designated by the governor to develop an overall transportation plan and to allocate federal funds for the greater Portland region.

The Joint Policy Advisory Committee on Transportation (JPACT) is a 17-member committee that provides a forum for elected officials and representatives of agencies involved in transportation to evaluate transportation needs in the region and to make recommendations to the Metro Council. The established decision-making process strives for a well-balanced regional transportation system and involves local elected officials directly in decisions that help the Metro Council develop regional transportation policies, including allocating transportation funds. JPACT serves as the MPO board for the region in a unique partnership that requires joint action with the Metro Council on all MPO decisions.

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

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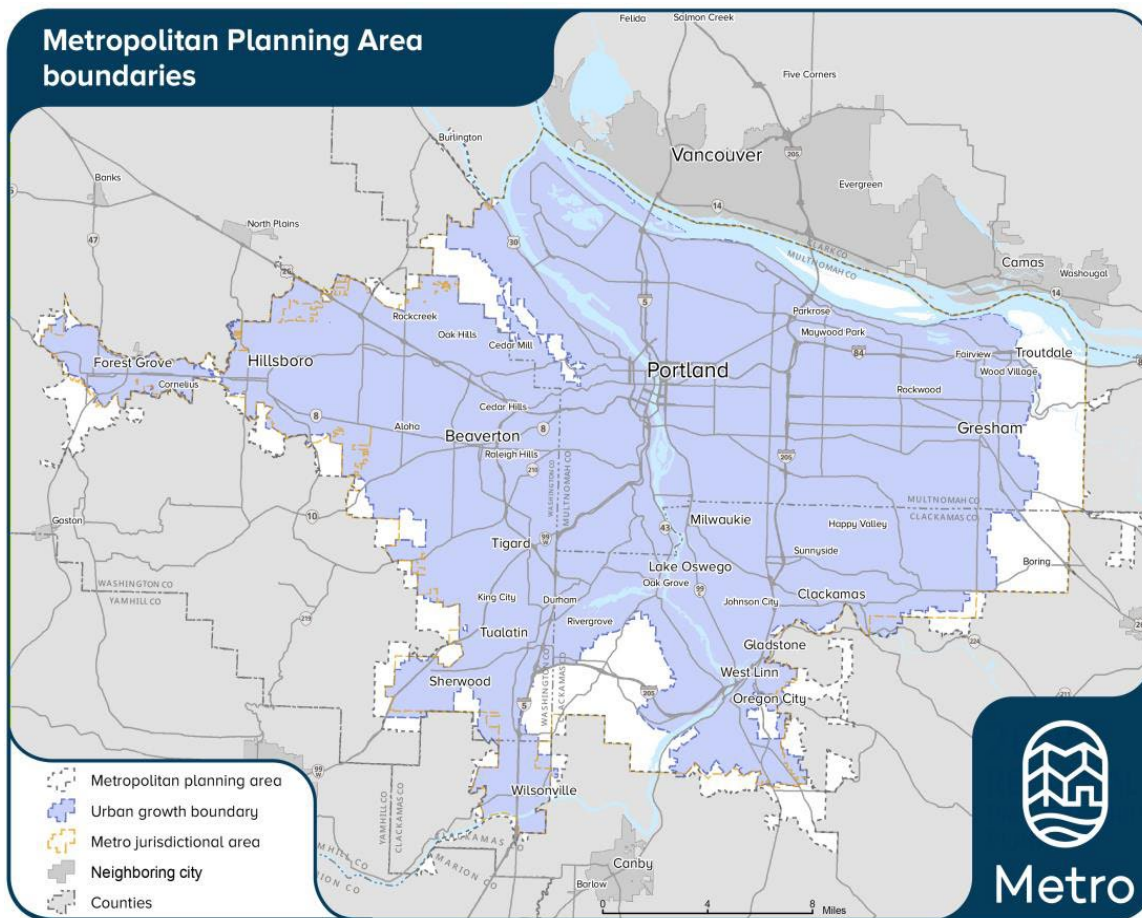
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## INTRODUCTION

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 process for providing meaningful access to individuals who are limited English proficient to federally assisted and federally conducted programs and activities 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 1.7 million people living in the urbanized areas of the greater Portland, Oregon 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.

Metro is also responsible for land use planning and the management of the garbage and recycling system, regional parks and natural areas, the Oregon Zoo, the Oregon Convention Center, Portland Expo Center and Portland's 5 Centers for the Arts.

## **PURPOSE AND PROCESS**

The purpose of the Limited English Proficiency (LEP) Plan is to provide language assistance for 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 people 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 individuals with limited English proficiency 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 individuals with limited English proficiency 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 1: LIMITED ENGLISH ACCESS NEEDS ASSESSMENT**

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

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

- 340,023 persons over the age of 5, or 19.6 percent of the Metro region's over-5 population, speaks a language other than English at home.
- 118,398 persons over the age of 5 speak a language other than English at home and speak English less than "very well". This population is 6.8 percent of the Metro region's over-5 population.
- Spanish is the second most predominant language, other than English, spoken in the region
- Sixteen languages within Metro's service area have limited English proficient populations that may meet or exceed 1000 persons.
- Table 1 shows the languages that may meet or exceed 1,000 persons with limited English proficiency; no language exceeds 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 Metro region<sup>3</sup> that may exceed 1,000 LEP persons**

<b>Language spoken at home</b>	<b>Population 5 and over speaking a language other than English at home</b>	<b>Population that is LEP, age 5 and over, by native language</b>	<b>Population that is LEP, age 5 and over, by native language, margin of error</b>	<b>Percent of total LEP population by native language</b>	<b>Percent of total Metro region population age 5 and over (1,735,490), LEP, by language</b>
Spanish	150,380	51,773	+ - 2,986	43.7%	3.0%
Vietnamese	24,997	14,700	+ - 1,427	12.4%	0.8%
Chinese	22,834	11,007	+ - 1,106	9.3%	0.6%
Russian	16,097	6,339	+ - 1,178	5.4%	0.4%
Korean	7,885	3,711	+ - 593	3.1%	0.2%
Arabic	8,105	2,684	+ - 767	2.3%	0.2%
<i>Ukrainian *</i>	<i>no ACS data</i>	2,390	+ - 561	2.0%	0.1%
Tagalog	8,325	2,043	+ - 487	1.7%	0.1%
Japanese	7,111	1,930	+ - 353	1.6%	0.1%
Persian	4,392	1,231	+ - 454	1.0%	0.1%
Khmer	2,091	1,043	+ - 300	0.9%	0.1%
<i>Somali *</i>	<i>no ACS data</i>	1,022	+ - 261	0.9%	0.1%
<i>Romanian *</i>	<i>no ACS data</i>	969	+ - 222	0.8%	0.1%
<i>Thai *</i>	<i>no ACS data</i>	921	+ - 237	0.8%	0.1%
Hindi	6,068	846	+ - 280	0.7%	0.05%
<i>Lao *</i>	<i>no ACS data</i>	799	+ - 206	0.7%	0.05%
<b>Total, all non-English languages</b>	<b>340,023</b>	<b>118,398</b>	<b>+ - 6,019</b>	<b>100.0%</b>	<b>6.8%</b>

Data source: American Community Survey (ACS) 2018-2022, 5-year estimates, Table B16001, Language spoken at home, except:

*\* Languages not in ACS: estimates derived from Oregon Department of Education school language dataset for 2018-2022. Limited English proficiency defined as speaking another language at home and speaking English less than “very well.”*

### **LEP population data sources**

Several data sources were used to conduct the Factor 1 analysis in Metro’s service area to understand the number or percentage 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.).

<sup>3</sup> Defined as the Census Public Use Microdata Areas (PUMAs) that intersect the Metro jurisdictional boundary.

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:

- 2018-2022 American Community Survey (ACS) 5-Year estimates, aggregated by census public use microdata areas (PUMAs)
- Oregon Department of Education (ODE): 2018-2022 school year enrollment data for school districts in Clackamas, Multnomah and Washington counties.

**LEP population analysis**

2018-2022 American Community Survey

Metro’s jurisdiction includes most of Clackamas, Multnomah, and Washington counties. However, Metro’s jurisdictional boundary does not conform to the geographic boundaries of Census data (e.g., block groups, tracts). Public Use Microdata Areas (PUMAs) that intersect the Metro jurisdictional boundary – which includes all PUMAs in Clackamas, Multnomah, and Washington counties – are used to calculate the number and percentage of LEP populations in the region (see Figure 1). Approximately 91% of the three-county population lives inside the Metro jurisdiction.<sup>5</sup>

The estimated total counts of LEP population from table B16001 in the 2018-2022 ACS PUMA data were obtained by aggregating estimates from the PUMAs in the three-county area of persons over age 5 that “speak English less than very well.”

In the PUMAs that intersect Metro’s jurisdictional boundary, the LEP population represents 6.8% of persons aged five years and older (Table 2).

**Table 2: Aggregate estimates, Public Use Microdata Areas in Metro’s jurisdictional boundary area**

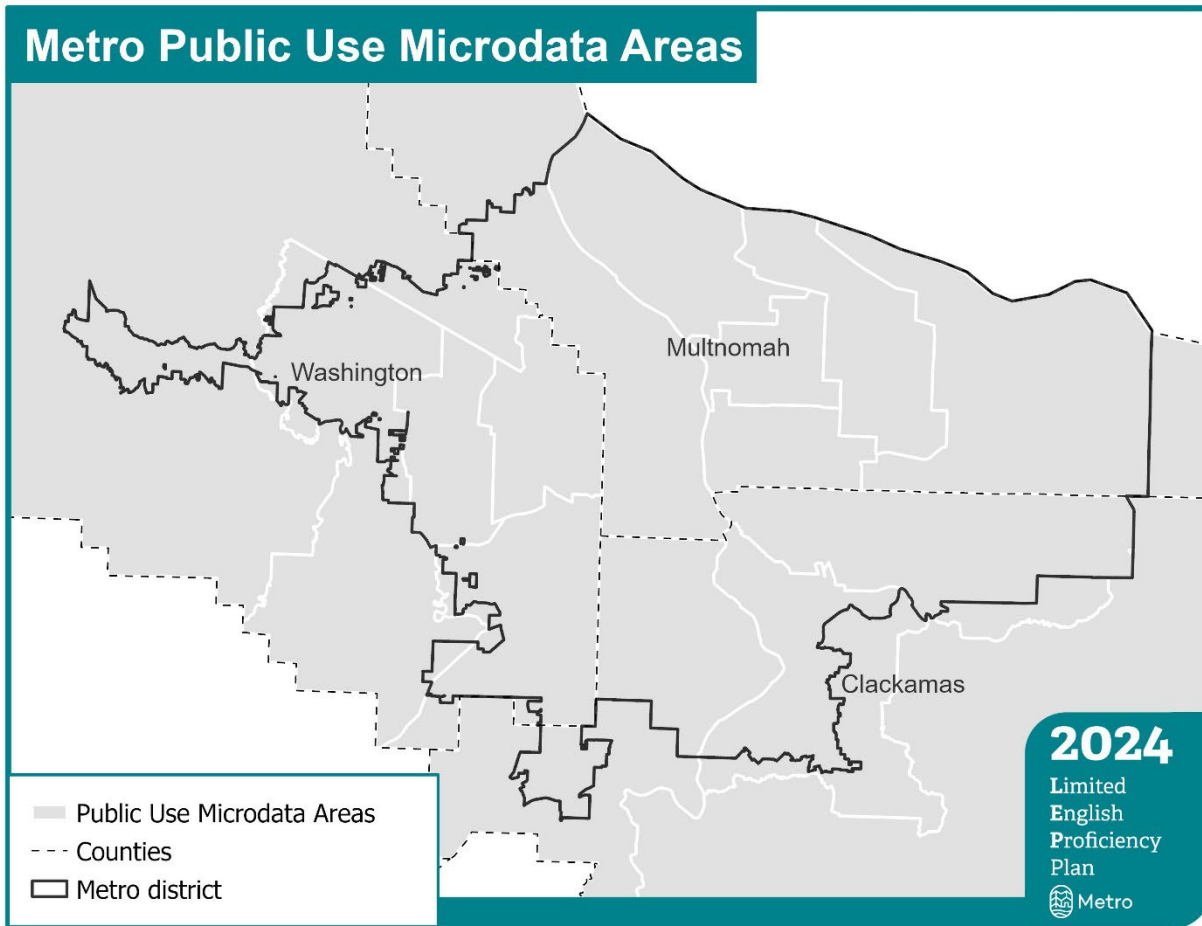
<b>Total population, persons age 5 and older</b>	<b>Persons age 5 and older, speak a language other than English at home</b>	<b>Persons age 5 and older, speak a language other than English at home, speak English less than very well (LEP)</b>	<b>Percent of estimated regional population age 5 and older that is LEP</b>
1,735,490	340,023	118,398	6.8%

Source: 2018-2022 ACS, Public Use Microdata Areas, Table B16001

<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> Estimate derived from 2020 decennial Census blocks in three-county region compared with blocks whose centroids intersect the Metro jurisdictional boundary.

**Figure 1: Clackamas, Multnomah and Washington county Public Use Microdata Areas**

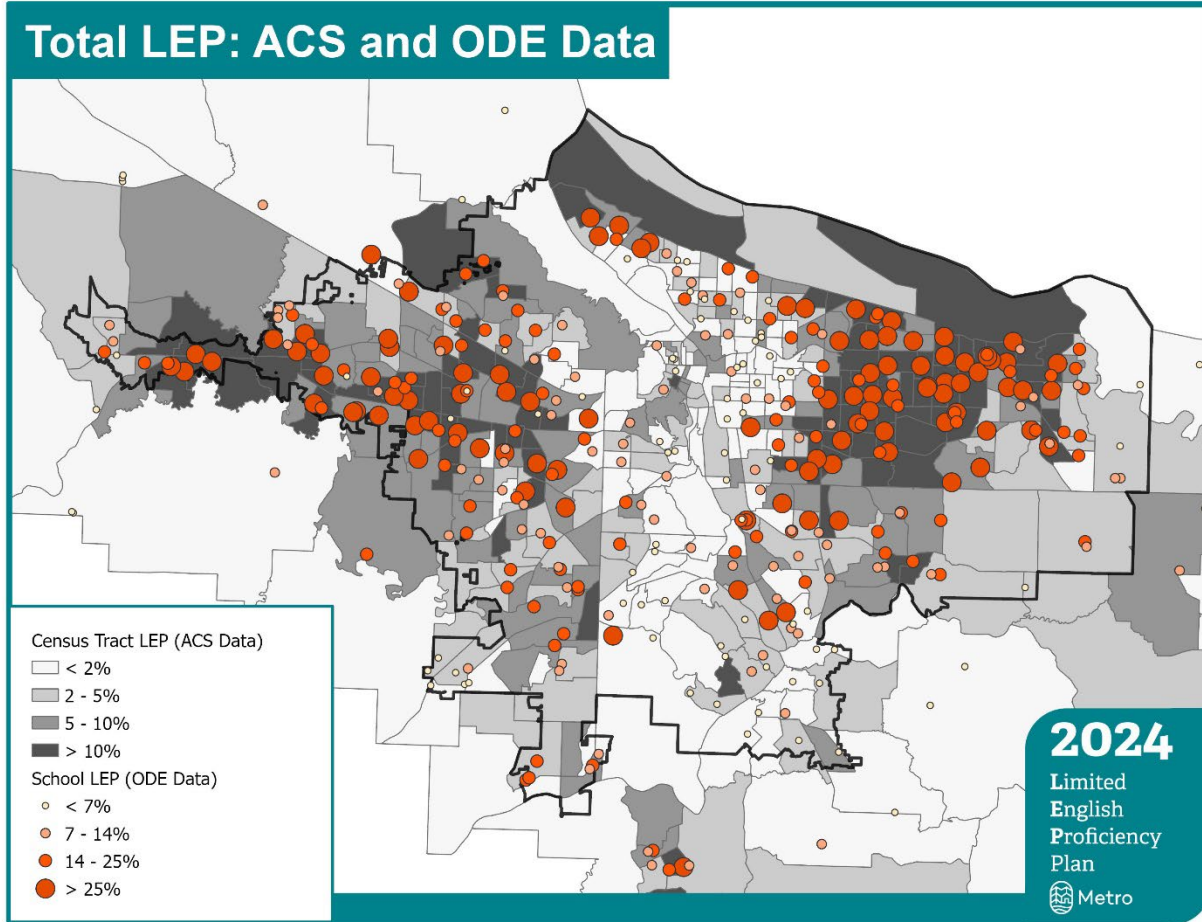


Sources: U.S. Census Bureau, Metro

For visualizing the geographic distribution of LEP populations in the Metro area, a more generalized ACS language table (C16001) is used at census tract level. Part of the usefulness of C16001, despite having more generalized languages than B16001, is to see smaller neighborhood-level spatial patterns of LEP within the region, as well as to see the general spatial agreement between ACS and ODE data (Figure 2).

In Appendix B, Figures B1-B16, illustrate the spatial concentration of LEP speakers for each of the 16 languages that may meet or exceed the 1,000 person LEP threshold in the Metro region.

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



Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; Oregon Department of Education, 2018-2019 enrollment data

The ACS-based summary counts revealed eleven individual languages with LEP populations that may meet or exceed 1,000 persons within the PUMAs that intersect the Metro jurisdictional boundary, with eight of the eleven individual ACS languages having LEP populations that may exceed 2000 persons.<sup>6</sup> Additionally, seven ACS language groups have populations of LEP speakers that may exceed 1,000.<sup>7</sup>

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

Data from the U.S. Census Bureau aggregates hundreds of distinct languages into forty-two categories in Table B16001. This table includes twenty-nine unique languages and thirteen groupings of multiple languages. Seven of these thirteen language groupings contained LEP populations that may exceed 1,000 persons. The language groups include:

<sup>6</sup> Individual ACS languages that may exceed 2000 LEP persons in the Metro region include Spanish, Vietnamese, Chinese, Russian, Korean, Arabic, Tagalog, and Japanese.

<sup>7</sup> ACS language groups that may exceed 1000 LEP persons in the Metro region include Other Slavic, Other Afro-Asiatic, Other Languages of Asia, Other Tai-Kadai, Other Indo-European, Other Austronesian, and Other Indic.

- Other Slavic Languages
- Other Afro-Asiatic Languages
- Other Indo-European Languages
- Other Languages of Asia
- Tai-Kadai Languages
- Other Austronesian Languages
- Other Indic Languages.

To determine if a single language population embedded within one of these group language categories has a population that may exceed 1,000 persons, 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) 2018-2019 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
- 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 educational data is highly detailed, with hundreds of 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 fewer than ten students are counted in an individual language. Metro has calculated an estimate for the number of students who are represented by a suppressed value to more precisely estimate regional language trends. Hundreds of schools are aggregated in this process, so confidentiality protections are preserved.

The Oregon Department of Education 2018-2022 data helped refine Metro’s estimates of languages which have significant LEP populations in the schools but are not reported in the U.S. Census. Many individual language populations that do not appear in the American Community Survey<sup>8</sup> have prominent LEP populations in the ODE data, including Ukrainian, Somali, Romanian, Thai, and Lao (see Appendix C, Table C4).

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

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<sup>8</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.

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 two data sources included in this report identified sixteen specific languages in Metro’s jurisdictional area with LEP populations that may meet or exceed 1,000 persons.

LEP populations for eleven of sixteen languages could be determined from ACS data alone, whereas ODE data was needed to interpolate the populations of five languages, including Ukrainian, Romanian, Somali, Thai and Lao from within their parent ACS language groupings – Other Slavic Languages, Other Indo-European Languages, Other Afro-Asiatic Languages, and Other Tai-Kadai Languages respectively. Of the LEP populations, approximately  $\frac{1}{2}$  speak Spanish as their first language, and approximately  $\frac{3}{4}$  speak Spanish, Vietnamese, Chinese (Mandarin and Cantonese) or Russian.

Metro has determined that translation of vital documents should be performed for sixteen languages, including vital documents found on Metro’s website: [oregonmetro.gov/languagehub](https://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.

## **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>9</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)
4. Regional flexible funding allocation (allocation of the Surface Transportation Block Grant program and Congestion Mitigation and Air Quality Improvement program)

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<sup>9</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.

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, and 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 years that 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 impact 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 (MTIP), which plan for and consider the transportation system – and include transportation projects – across the entire greater Portland region. Some functions address smaller, yet 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 people with limited English proficiency in 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>10</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 are 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 people with limited English proficiency. Further, these proposals are developed 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 Surface Transportation Block Grant (STPBG) and Congestion Mitigation and Air Quality (CMAQ) funds to pay for and, in some cases, manage marketing and grant programs that encourage use of carpooling, public transit, bicycling

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<sup>10</sup> See, for example: Public engagement reports for the Powell-Division Transit and Development Project, [oregonmetro.gov/powelldivision](https://oregonmetro.gov/powelldivision).



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 output 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 June 2024 to determine the frequency of contact with people with limited English proficiency. The survey was sent to all employees in Metro's Planning, Development and Research department, administrative and communications staff who may come in contact with the public, and planning staff who are subject matter experts for the metropolitan planning organization's programs and land use planning programs.<sup>11</sup> Thirty-two staff completed the survey. Below is a summary of the findings for the period between 2021 and June 2024:

- **Requests for language interpreters for meetings or for information about a program.** Two respondents noted that they received requests once a month, while 11 said once or twice a year. Meetings or programs for which requests for interpreters were made included the TV Highway Transit and Development Project, Regional Travel Options, Metropolitan Transportation Improvement Program, Priority Climate Action Plan and general information about Metro.
- **Requests for translation of a document, sign or notice to better understand a Metro program or project.** Two respondents noted that they received requests once a month, while 14 said once or twice a year. Materials or documents that required translation included various Metro fact sheets, Southwest Corridor Equitable Development Strategy and Community Placemaking Grant application.
- **Most requested languages:** Spanish, Vietnamese, and Russian.
- **How requests were made:** Survey respondents reported that most people requested an interpreter or translation by either calling or emailing Metro. Occasionally, requests were made in person or through a contractor.
- **Targeted outreach to people with limited English proficiency.** Metro has been proactive in reaching out to people with limited English proficiency and in providing translated materials or interpreters as a standard for outreach. One person said they conducted community outreach once a month to people who speak limited English, while 13 people said they did so once or twice a year. In addition to intentional outreach, Metro took the initiative and provided language assistance for some of its programs, including but not limited to:
  - Regional Transportation Plan workshops in 2023: Spanish, Vietnamese, and Russian interpretation. Conducted in-language Spanish community engagement.

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<sup>11</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.

- Regional Transportation Plan survey in 2023: Translated into Spanish, Vietnamese, and Russian.
- In 2022, Metro translated the 2025-27 Regional Flexible Funds public comment survey into Spanish, Vietnamese, Chinese, Russian and Korean.

Non-metropolitan planning organization programs also focus on multilingual outreach. The Community Placemaking grant program supported multilingual projects, including translating the handbook and application into 13 of the most spoken languages in the greater Portland area in 2022; the Parks and Nature program creates regional natural areas maps in multiple languages and conducts targeted outreach to communities of color; subjects of storytelling efforts on Metro News have included people who have been interviewed in other languages and translated into English; and when non-English preferred communities are impacted or featured in stories on Metro News, those stories have been translated and published in those languages.

### **Results summary**

The results of the staff survey and review of proactively translated materials indicate that a small portion of staff have direct interaction with people with limited English proficiency. Most of the interpretation and translation efforts are a result of Metro partnering with culturally specific organizations to conduct focused outreach and engagement with multi-lingual participants. As Metro continues to focus on engagement with LEP communities, it is anticipated that translation and interpretation requests will increase.

Additionally, as the size of the LEP population increases, so will the probability of future contact with people with limited English proficiency. Metro will continue to monitor requests for language assistance, build relationships with community-based organizations and leaders in these communities, and evaluate the effectiveness of outreach to these populations and determine where additional language tools and resources may be warranted.

### **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>12</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 prevented 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>13</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 Fund 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 jurisdictions in planning for high-

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<sup>12</sup> U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.

<sup>13</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.

capacity transit service, Metro is not a provider of public transit service.<sup>14</sup>

Metropolitan planning organizations are governed by policy boards made up 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.

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

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>14</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 people with limited English proficiency, 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>15</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.

Each corridor level plan will include an LEP four-factor analysis and an outreach plan as part of 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.

### **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. This program also includes Metro's Safe Routes to School program that focuses on providing funds to new and existing local programs, coordinating efforts and establishing best practices, and providing technical assistance opportunities to enhance program development and reduce administrative costs.

*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. The regional Safe Routes to School program focuses on regional

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<sup>15</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.

resources to support localized programs. A lack of language service could have moderate implications for individuals as it may postpone behavior change – including for families with school-aged children – that would lead to safer transportation access.

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 communities with limited English proficiency. This may be best achieved through translation of vital documents, education materials and marketing materials and focusing outreach on, or partnering with, agencies, organizations or advocacy groups that serve populations with limited English proficiency to ensure that these resources reach these populations.

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

Every three years, 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. During public comment periods for regional flexible funds, the online survey and materials are translated into multiple languages, with targeted social media outreach to LEP populations.

*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 people 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 populations with limited English proficiency, given Metro's role in the flexible funds allocation process.

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 people 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>16</sup> and consultation with agencies, organizations or advocacy groups that serve limited English proficiency populations to determine any issues that are unique to those populations.

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<sup>16</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 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 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 greater Portland metropolitan area over the next 20 to 25 years.

*Identify your agency's most critical services.* The Regional Transportation Plan (RTP) contains the framework and goals for a 20 to 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 people with limited English proficiency 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 people 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 2023 Regional Transportation Plan, see Appendix E)

Despite limited implications to individuals if language barriers prevent a person from benefiting from the planning process, it is important not to overlook communities with limited English proficiency in long-range regional plans. This may be best achieved through translation of vital documents and consultation with agencies, organizations or advocacy groups that serve populations with limited English proficiency to learn about issues that may be unique to those populations.



## **Metropolitan Transportation Improvement Program (importance level: 1)<sup>17</sup>**

For transportation projects to receive federal funds, they must be included in the Regional Transportation Plan (RTP). However, the RTP approves more projects than can be afforded by the region in any given year. The Metropolitan Transportation Improvement Program (MTIP) process is used to determine which projects included in the plan will be given funds year to year, determine 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 moderate 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 people 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 2023 Regional Transportation Plan is required of project sponsors; see Appendix E.) As the project list is developed, reviewed, prioritized and approved by the Joint Policy Advisory Committee on Transportation (JPACT) and the Metro Council, there is little opportunity for the public 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 populations with limited English proficiency, given Metro's role in the MTIP process.

Despite 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 communities with limited English proficiency in the MTIP. This may be best achieved through translation of vital documents and consultation with agencies, organizations or advocacy groups that serve populations with limited English proficiency to learn about issues that may be unique to those populations.

### **Step 2: Review of consultation with LEP persons**

To learn more about the needs and interests of community members with limited English proficiency, Metro worked with Lara Media Services (LMS) to organize, recruit, facilitate and capture comments at multi-language focus groups and participant surveys in November 2021. See Appendix D for the discussion group and participant survey report.

LMS hired community members to conduct the focus groups in Mandarin, Russian, Spanish and Vietnamese. LMS gathered qualitative and quantitative data through dynamic virtual focus groups

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<sup>17</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.

and survey questions. The focus groups consisted of fourteen questions about Metro, places, programs, service knowledge, participants' use of media and translation programs, and transportation. The focus groups were 120 minutes. Participants also completed a follow-up survey with questions about transportation priorities, trusted information sources and optional demographic questions.

The information gathered from the focus groups and project-based and ongoing partnerships with community-based organizations helps staff determine best practices to engage communities with limited English proficiency and helps determine which documents and materials, beyond vital documents, are most relevant (i.e., web pages, documents, brochures for differing topics) to translate.

### Key findings

- Participants of the focus groups were highly interested in many of Metro's materials, resources and news, especially information about recycling and Parks and Nature.
- As with previous focus groups, participants would prefer all Metro content be produced in other languages, believing that this would help further community engagement and awareness. Though participants agreed that they would prefer information that is pre-produced in accurate, concise, simple and clear summaries instead of detailed reports.
- Participants believe that more awareness of translation and interpretation services available from Metro is needed.
- Regarding transportation planning, participants of the focus group and community partners serving communities with limited English proficiency have expressed the largest interest and need for engagement on transportation improvements and changes that are more immediate and local. There is some interest in engaging in larger-scope planning (e.g., Regional Transportation Plan, Metropolitan Transportation Improvement Program), reflecting an overall desire to be more included in their government and community, but mostly at the beginning of these processes – to better understand the work and goals – and at key points to help influence decisions.

These findings align with the Step 1 analysis regarding Metro's (metropolitan planning organization) most critical services.

## 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>18</sup>

In addition, FTA suggests a four-step process for Factor 4 analysis<sup>19</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, the cost of translation is 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.

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

#### Flexible service contracts

In addition to communications materials available in alternate languages, Metro has established several professional 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 department collaborate 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

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<sup>18</sup> U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.

<sup>19</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.

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.

#### Interpretation services (includes ASL)

Four contracts awarded totaling up to \$85,000; one contract expired in June 2024.

- Includes virtual and in person services.
- Cost of services varies from \$45 per hour for virtual interpretation to \$60 per hour for onsite interpretation.
- ASL services are \$125 per hour.

As of this writing, the Communications Department is drafting a request for proposals for on-call language access and accessible communication services which includes written translation services, oral interpretation services, and for accessible and effective communication services that includes ASL and real-time captioning.

#### Telephonic interpretation services

- One contract awarded totaling up to \$10,000; expires September 2026
- On call and scheduled telephonic interpretive services | \$1.15 per minute
- On call video remote interpreting services | \$1.15 per minute Translation services
- One contract awarded totaling up to \$25,000; expires June 2025.
- Minimum \$75; cost various depending on language, but ranges from \$0.20 to \$0.38 per word.

#### Captioning and transcription services (non-LEP)

Metro is currently using closed captioning built into the Zoom program for closed captions for live meetings and pays an online video transcription service for produced videos.

- AI Transcription | \$0.25 per minute
- Human Transcription | \$1.50 per minute

#### **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 people with limited English proficiency. As Metro continues to learn more about reaching and engaging populations with limited English proficiency 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 (2011-2022), 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:

- *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 is in the process of updating its 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.
- Bilingual staff Metro is in the process of updating a directory of staff who are bilingual and multilingual speakers and willing to assist with translation on an intermittent basis. This directory will be available to all metro staff who may need a colleague to review a professional translation for accuracy, clarity and cultural relevancy, or do light translations on short notice.
- Metro's language hub ([oregonmetro.gov/languagehub](https://oregonmetro.gov/languagehub)) Metro's website has improved access for visitors that have a limited ability to understand English and connects them with more than 385 key pages readable in as many as 19 languages. There is a special emphasis on meeting the needs of the region's growing population of Spanish, Chinese (simplified), Vietnamese and Russian speakers.

### **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 (additional translations into the most recent Safe Harbor languages based on Factor 1 are in process):

- 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.

### **Staff training**

Metro is in the process of identifying new language assistance trainings for all staff to better inform staff across the entire organization what their responsibilities are for providing language assistance and what tools, best practices and resources Metro offers to help them fulfill their responsibilities. 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.

## 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 Communications department continues to support staff upon request to review and edit their content to ensure materials are clearly written in plain language with a minimum of technical terms. These edits help produce higher quality translations that give people with limited English proficiency or low literacy clearer information about how 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 18 x 24 sign says, in 16 languages:  
Metro respects civil rights.  
For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit [oregonmetro.gov/civilrights](https://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 current notice, see Appendix G. As part of the LEP implementation plan, these will be updated to the 16 languages listed above as having 1,000 or LEP speakers in Metro's service area.

- Public notifications on agendas Metro Council agendas with supporting materials are posted on Metro's website and sent 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 and a summary of the last meeting when required. Information is also included on how to receive meeting materials in alternative formats, including the TDD number.

Included on the agenda are notifications in 14 languages regarding civil rights protection, instructions on how to file a civil rights complaint and instructions on how to request a language interpreter. As part of the LEP Implementation Plan, these will be updated to the 16 languages listed above as having 1,000 or LEP speakers in Metro's service area. To view the current notice, see Appendix H. As part of the LEP implementation plan, these will be updated to the 16 languages listed above as having 1,000 or LEP speakers in Metro's service area.

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](https://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 regular reports to FTA. Reports will include a review of plan components addressing questions such as:

- How many people with limited English proficiency were encountered?
- What is the current LEP population in the greater Portland region?
- 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 FOR FISCAL YEARS 2025-2027**

CATEGORY	ACTIVITES	FY 2025	FY 2026	FY 2027	STATUS
<b>1. Identifying individuals who need language assistance</b>	Gather and analyze demographic data (factor 1).			X	
	Conducting staff surveys to assess frequency of encounters and languages requested.	X	X	X	
	Use new regional LEP Factor 1 analysis to estimate cost and resources for carrying out LEP implementation plan.			X	
	Add LEP questions in multiple languages to Title VI tracking form for metropolitan planning organization function public events.	X	X	X	
	Improve consistency and breadth of data collection through Metro public involvement events and surveys done for Metro metropolitan planning organization functions.	X	X	X	
	Conduct LEP focus groups (factor 2).	X			
<b>2. Develop language assistance measures</b>	Provide interpretation for phone and walk-in customers at the Metro Regional Center.	X	X	X	
	Provide process for in-person interpreter services upon request at public meetings and important events for metropolitan planning organization functions and other important events.	X	X	X	
	Translate vital documents into all safe harbor languages, including establishing a process for translating vital documents.			X	
	Establish process for translating vital documents (include how to define/identify vital documents and how to track).		X		
<b>3. Posting notices</b>	Update signage once Factor 1 analysis is completed.			X	
	Post information in multiple languages about Title VI civil rights compliance and complaint process signate in strategic locations at Metro Regional Center.	X	X	X	

CATEGORY	ACTIVITES	FY 2025	FY 2026	FY 2027	STATUS
Posting notices continued	Post information in multiple languages about notice of right to language assistance at Metro Regional Center.	X	X	X	
	Post Title VI, LEP, Environmental Justice, AOA notice information on metropolitan planning organization function meeting and event notices.	X	X	X	
	Consider how and when to include notice of availability of free language assistance in other outreach documents.	X			
	Post plan to Metro website (public and internal).	X	X	X	
	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	
<b>4. Procurement</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			
	Follow metropolitan planning organization subrecipient assistance and compliance procedures for all metropolitan planning organization-related contracts	X	X	X	
	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>5. Training</b>	Ensure that staff in metropolitan planning organization function understands Metro's LEP policies and procedures.	X	X	X	
	Staff members having contact with the public are trained to work effectively with interpreters.	X	X	X	
	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	

CATEGORY	ACTIVITES	FY 2025	FY 2026	FY 2027	STATUS
Training continued	Train point people and front desk staff at sites regarding signage and response process.	X	X	X	
	Provide any additional Title VI and LEP resources to Metro employees on internal website.	X	X	X	
	Explore staff training for phone and walk-in customers at other Metro sites.	X			
6. Outreach	Conduct research to assess services to LEP populations and barriers to service.	X			
	Develop culturally specific methods for diverse communities to access Metro metropolitan organization information most effectively.	X	X	X	
	Establish methods to coordinate and enhance outreach efforts, focusing first on metropolitan planning organization functions (as appropriate).	X	X	X	
	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	By project
	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	By project
	Consider how to incorporate notice in multiple languages of language assistance availability into metropolitan planning organization outreach materials.	X	X	X	By project
7. Evaluating and reporting	Monitor plan to determine how many LEP persons were encountered, whether their needs were met, how many complaints were received, changes in needs, availability of resources, etc.	X	X	X	

<b>CATEGORY</b>	<b>ACTIVITES</b>	<b>FY 2025</b>	<b>FY 2026</b>	<b>FY 2027</b>	<b>STATUS</b>
Evaluating and reporting continued	Establish process to obtain feedback on Metro's language assistance measures.	X			
	Develop internal assessment of LEP training, materials and procedures.	X			
	Establish process to identify new language assistance needs and adjust service if needed.	X	X	X	
	Establish reporting schedule and work plans for Title VI and LEP requirements to: <ul style="list-style-type: none"> <li>- ODOT annually</li> <li>- FTA according to the Title VI reporting schedule</li> <li>- Metro Council (through the annual public engagement reporting)</li> </ul>	X	X	X	As needed according to reporting schedule

## 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 and 2018 Factor 1 reports, as well as for the 2021 Factor 1 report. The 2021 Factor 1 report identifies seventeen 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.

For the 2021 Factor 1 report, Metro performed a brief updated review of other agencies' Factor 1 methodologies and found that the use of student language data to augment and refine ACS-based LEP estimates has become more common. The agencies that were found to use a combination of ACS and educational language data include City of Portland, City of Beaverton, TriMet, Washington State DOT, Central Puget Sound Regional Transit Authority, King County (WA), Bay Area Rapid Transit, and San Diego Association of Governments.

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

Informed by this review, Metro developed a methodology to conduct the Factor 1 analysis, which is structured around Federal guidelines on "Applying the Four Factor Framework," derived from Federal Transportation Administration's (FTA) circular Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, dated 13 April 2007. Metro's methodology also recognized that Department of Justice (DOJ) and FTA guidelines for Title VI LEP reports direct MPOs to analyze data from the U.S. Census, as supplemented with data generated by state and local governments or non-governmental agencies. However, Metro's service area is not referenced precisely to Census

geographies, and alternatively includes 24 cities across portions of three counties, limiting the availability of language data that are complete and consistent across the entire region.

To overcome this challenge, Metro staff assessed potential data sources in terms of geographic and temporal scale, resolution (e.g. whether languages reported individually or as language groups), and reliability (e.g. 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% of the regional population over age 5 was approximately 85,000 based on the most current detailed language data available from the American Community Survey (2015-2019). 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. *Evaluate languages (or language groupings) with >1,000 speakers using tracts.* Tract-level data most closely follow Metro's service area boundary, but the available language table for tracts (C16001) represents less individual languages and more grouped languages, as compared with table B16001. Additionally, tracts are associated with relatively high margins of error.
- b. *Evaluate languages (or language groupings) with >1,000 speakers using public use microdata areas (PUMAs).* PUMAs intersecting the Metro boundary encompass the three county area (Washington, Multnomah, Clackamas), but the available language table for PUMAs (B16001) represents more individual languages and less grouped languages, as compared with table C16001. Although PUMAs do not follow Metro's boundary as closely as tracts, approximately 93% of the population over age 5 in the three-county area resides within the urbanized Metro area, according to 2015-2019 ACS data.<sup>20</sup>
- c. *Disaggregate language groupings with supplemental data.* ACS table B16001 includes estimates of the populations of 30 individual and 13 grouped languages, and table C16001 includes 7 individual languages and 6 grouped languages, rather than providing comprehensive estimates of specific languages; for example, recent 5-year C16001 estimates provide estimates for the population speaking "Other Asian and Pacific Island Languages". To address this limitation, Metro examined Oregon Department of Education (ODE) student data from 2018-2019, which are provided as a detailed dataset that uses 100% 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 over age 5 in the Metro area.

### 3. Metro gathered data

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

- 2015-2019 America Community Survey (ACS) 5-Year sample: Census tract data, table C16001).

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<sup>20</sup> For individual languages that are reported in both B16001 and C16001, approximately 95-100% of the LEP populations live in the urbanized Metro area, as defined by Census tracts (C16001) that intersect the Metro jurisdictional boundary. These LEP languages include Spanish, Vietnamese, Chinese, Korean, Arabic, and Tagalog.



- 2015-2019 America Community Survey (ACS) 5-Year sample: Census public use microdata area (PUMA) data, table B16001.
- Oregon Department of Education (ODE): 2018-2019 school year enrollment data.

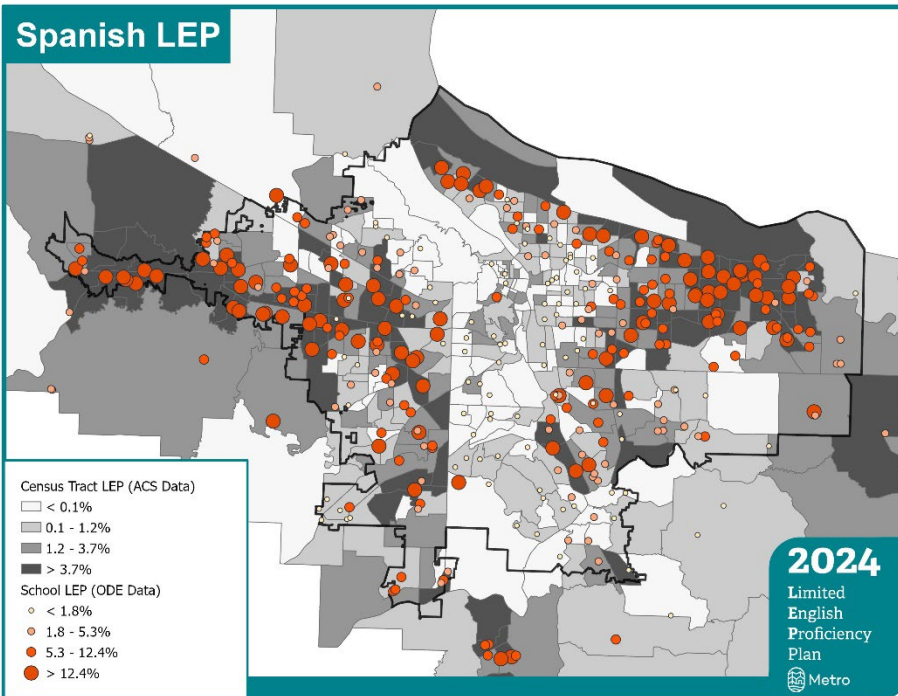
Metro staff obtained publicly available ACS data from the Census Bureau. To access ODE data, Metro staff submitted a public records request for student language of origin and LEP status for all school districts in Clackamas, Multnomah and Washington counties.

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

Using the data and methods outlined above, Metro identified seventeen languages with LEP populations that likely exceed 1,000 persons or more, thus triggering eligibility for DOJ's safe harbor provision (see Tables 1 and 4 of Metro's Factor 1 analysis in Section I). PUMA estimates from ACS revealed twelve distinct LEP populations that 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, Khmer, Persian, Hindi, and Telugu. Additionally, eight grouped languages were found to likely have populations of LEP speakers greater than 1,000. Disaggregation of language groupings revealed that Ukrainian, Romanian, Somali, Thai and Lao languages should also be included as safe harbor languages (see Appendix C, Table C5).

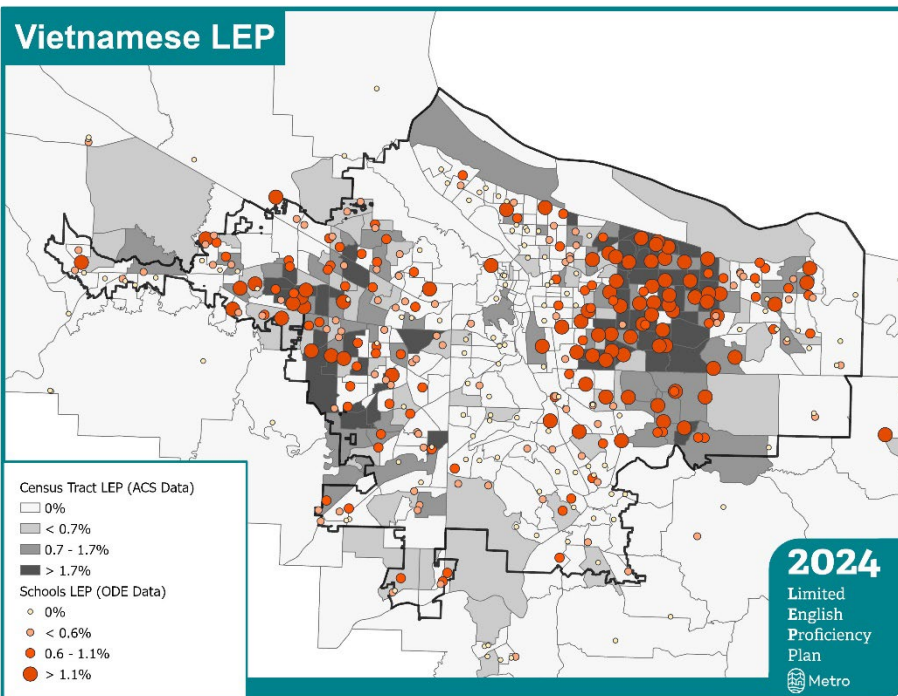
## APPENDIX B. LANGUAGE DISTRIBUTION MAPS

Figure B1: Spanish LEP by census tract and school



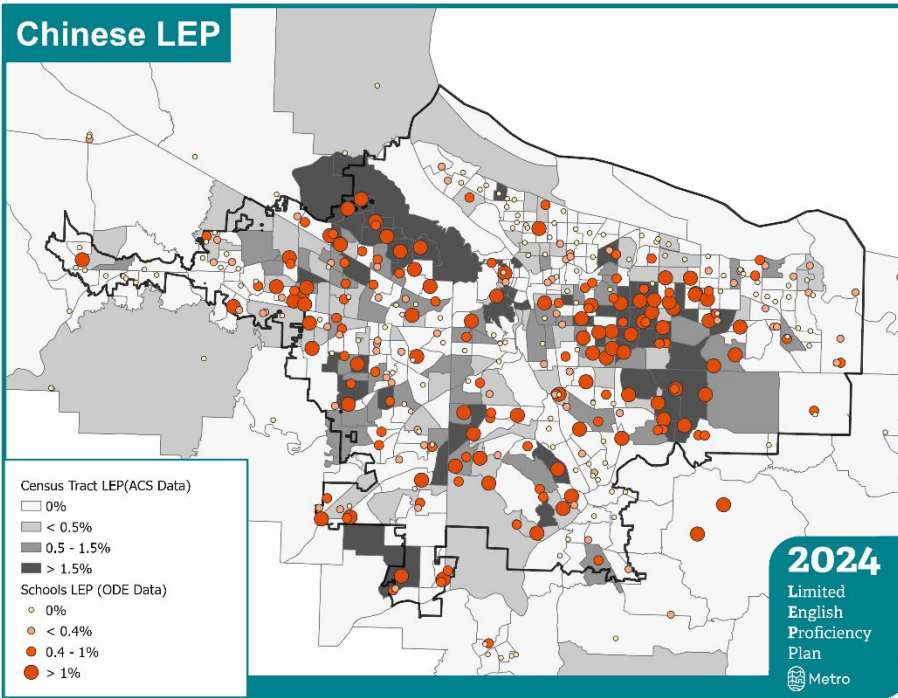
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

Figure B2: Vietnamese LEP by census tract and school



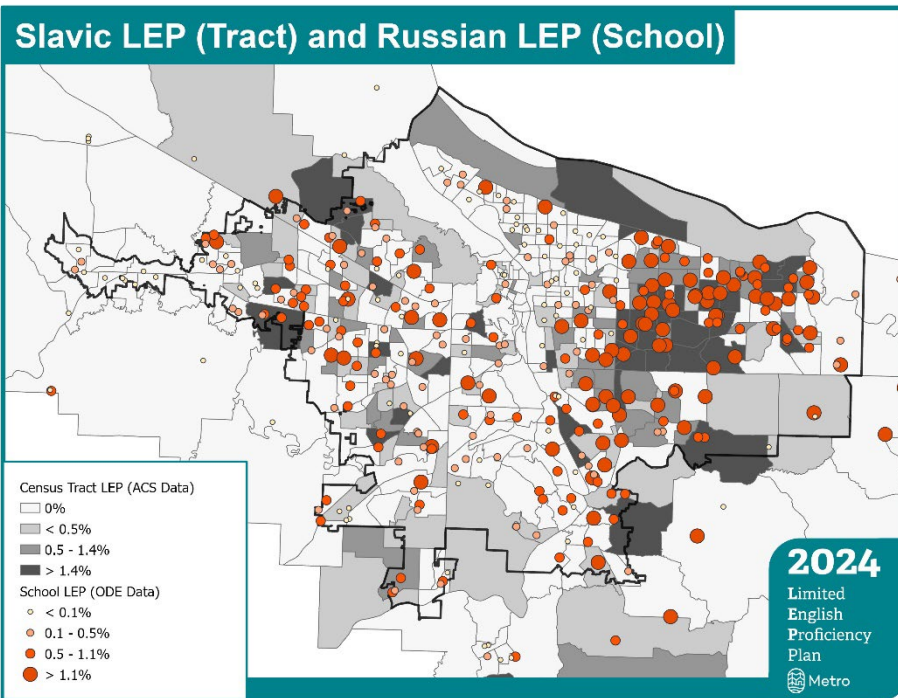
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B3: Chinese LEP by census tract and school**



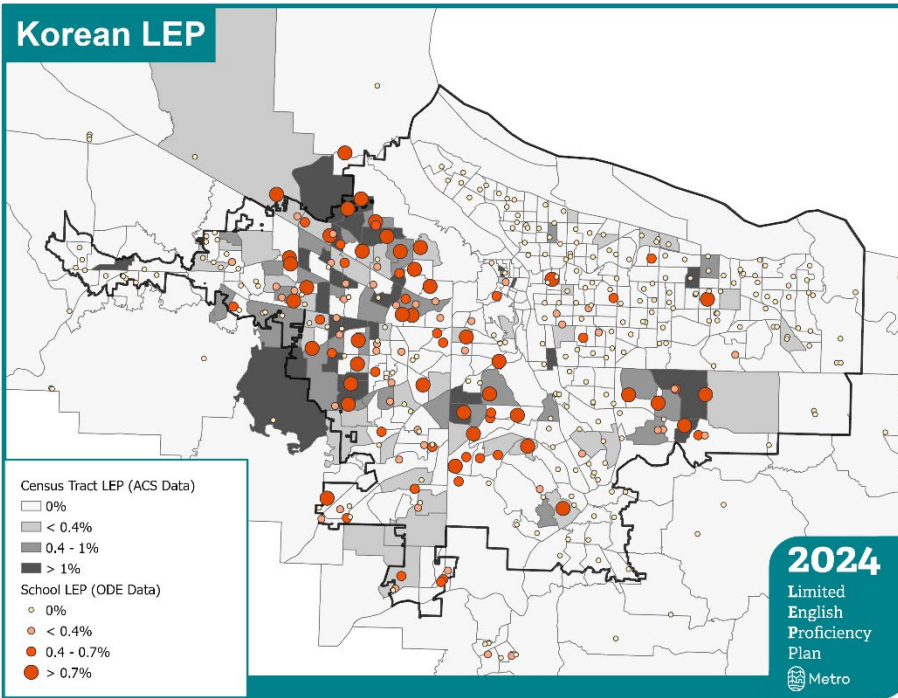
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B4: Slavic LEP by census tract and Russian LEP by school**



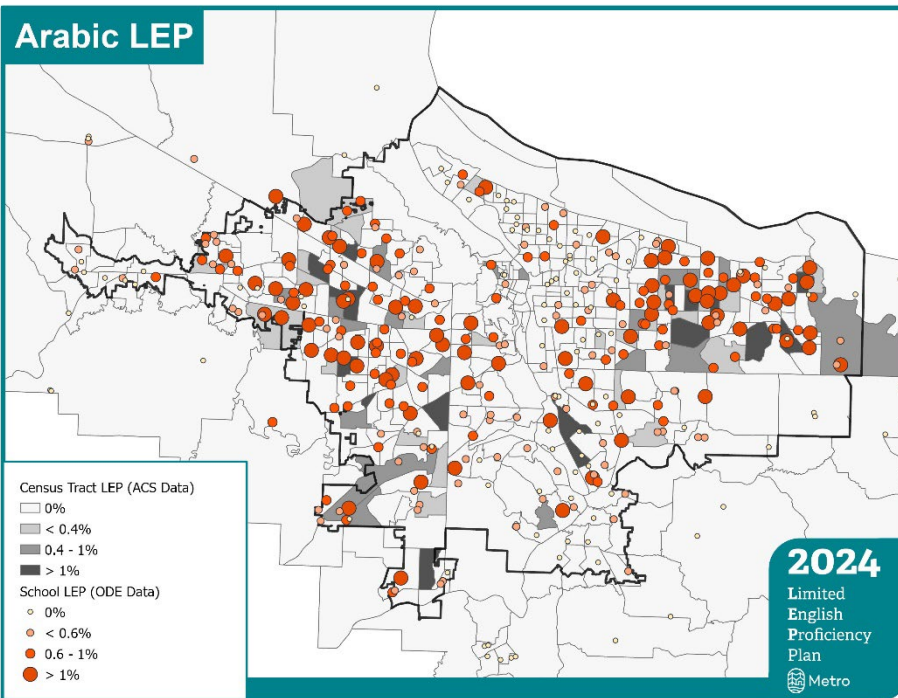
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B5: Korean LEP by census tract and school**



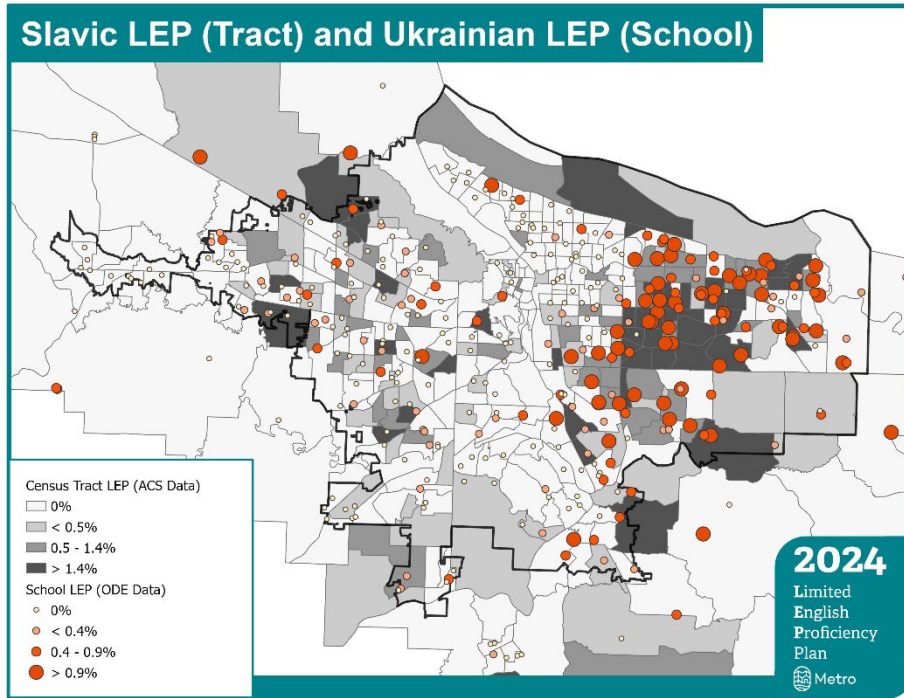
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B6: Arabic LEP by census tract and school**



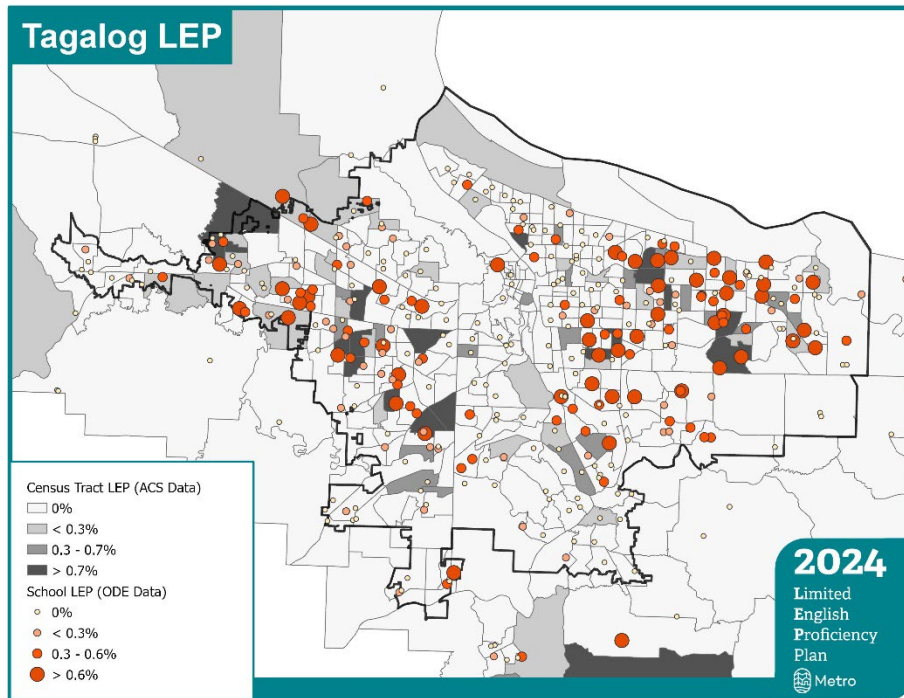
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B7: Slavic LEP by census tract and Ukrainian LEP by school**



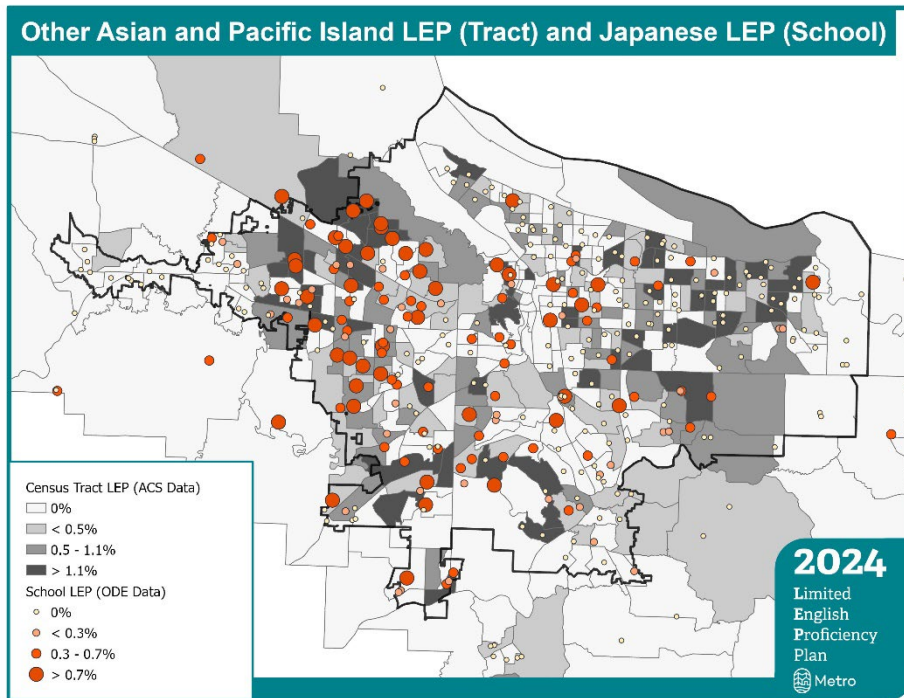
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B8: Tagalog LEP by census tract and school**



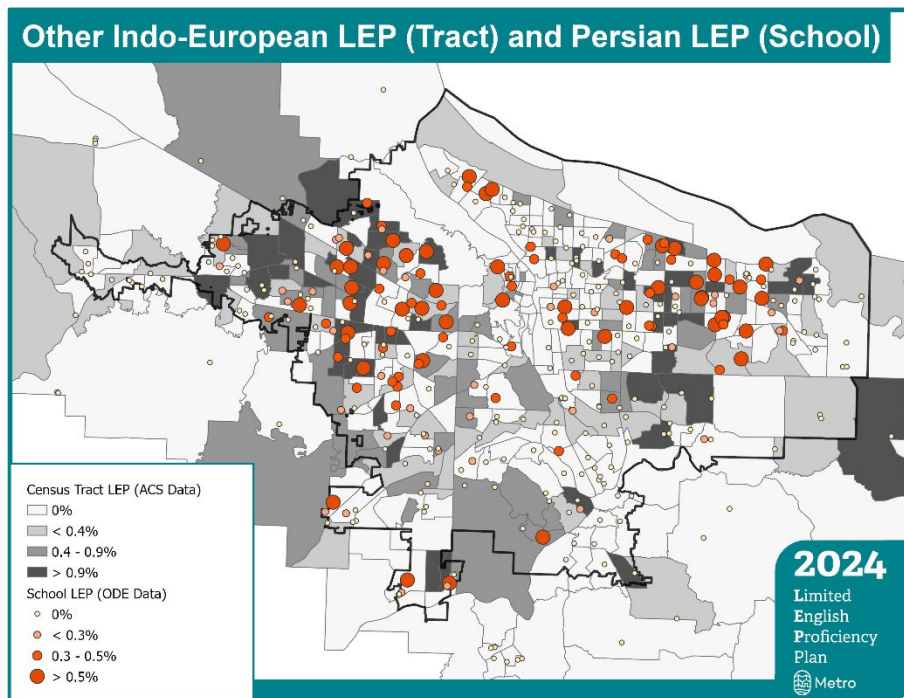
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B9: Other Asian and Pacific Island LEP by census tract and Japanese LEP by school**



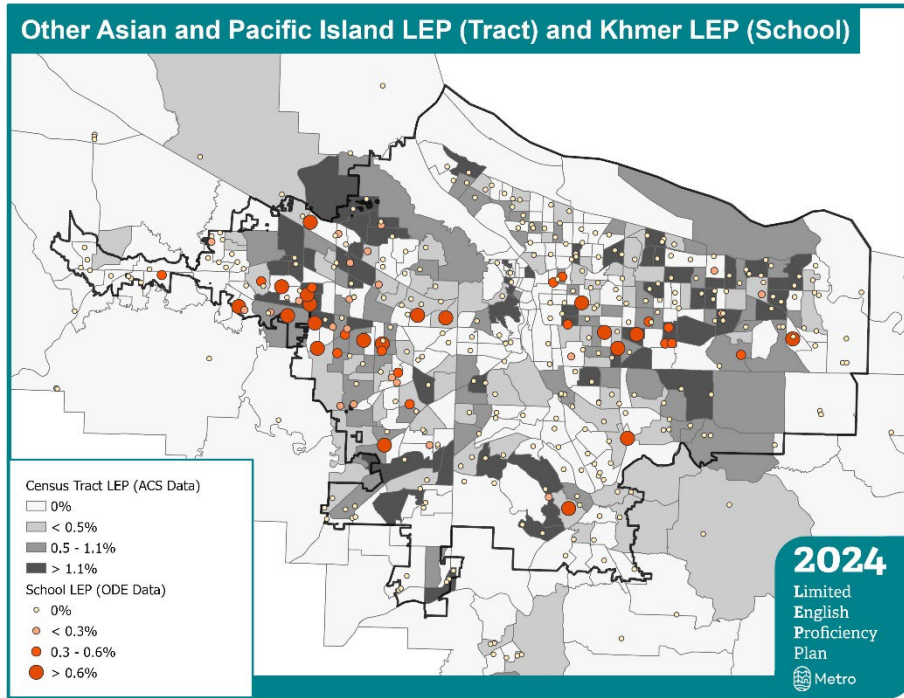
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B10: Other Indo-European LEP by census tract and Persian LEP by school**



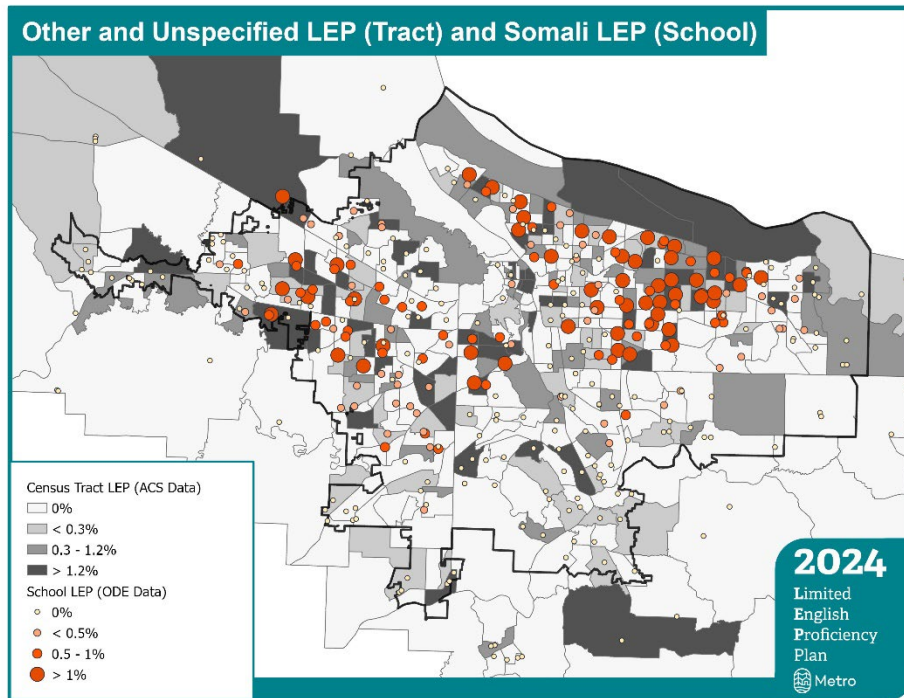
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B11: Other Asian and Pacific Island LEP by census tract and Khmer LEP by school**



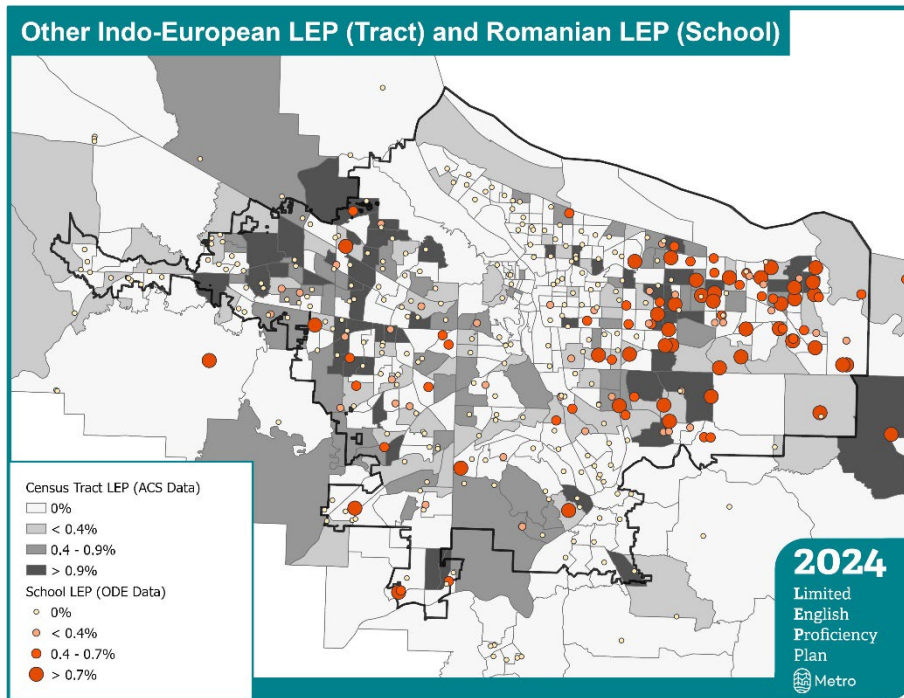
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B12: Other and Unspecified LEP by census tract and Somali LEP by school**



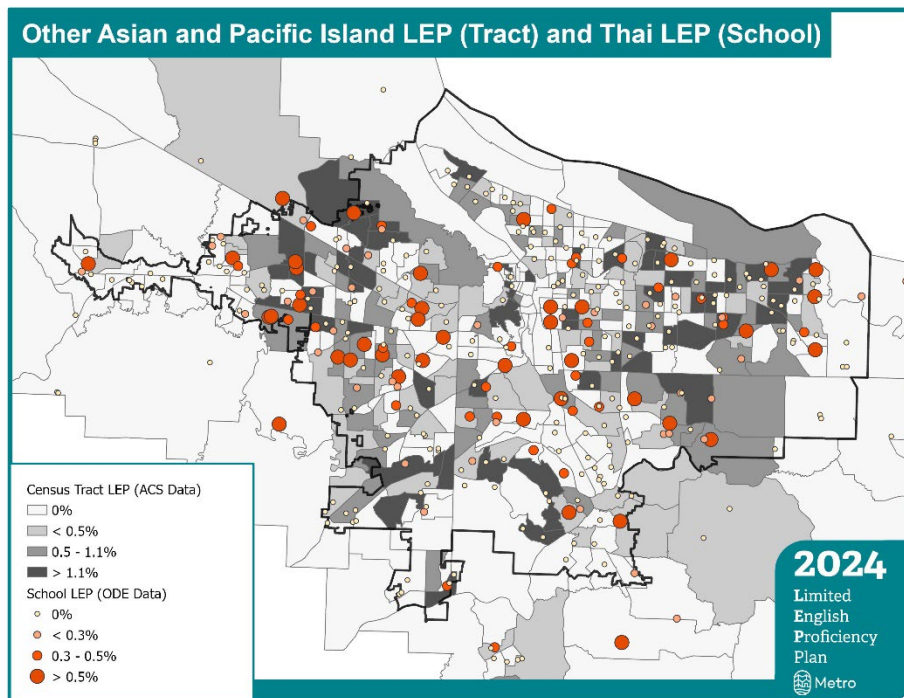
Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B13: Other Indo-European LEP by census tract and Romanian LEP by school**



Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

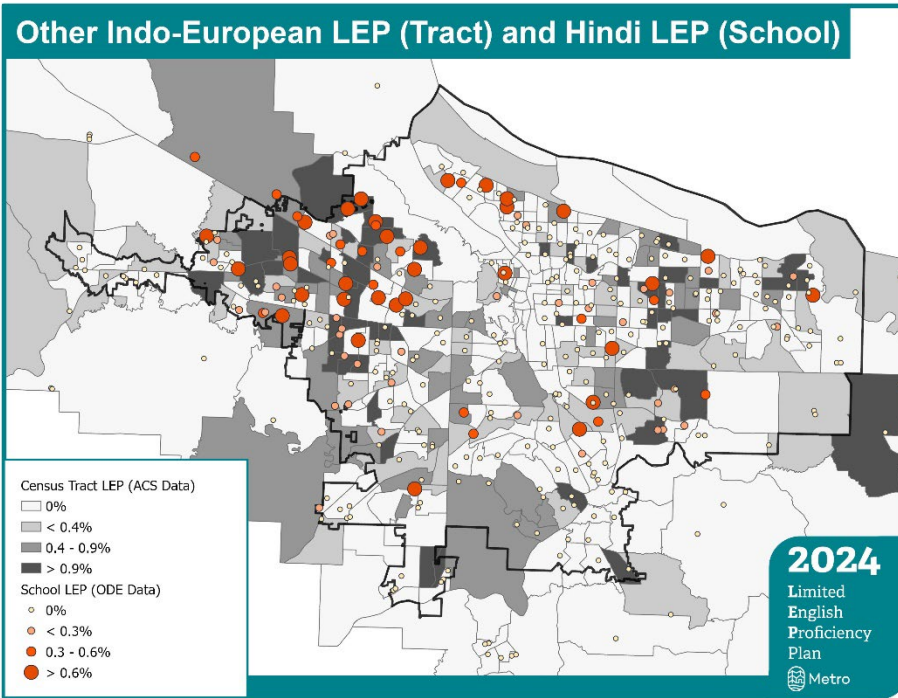
**Figure B14: Other Asian and Pacific Island LEP by census tract and Thai LEP by school**



Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

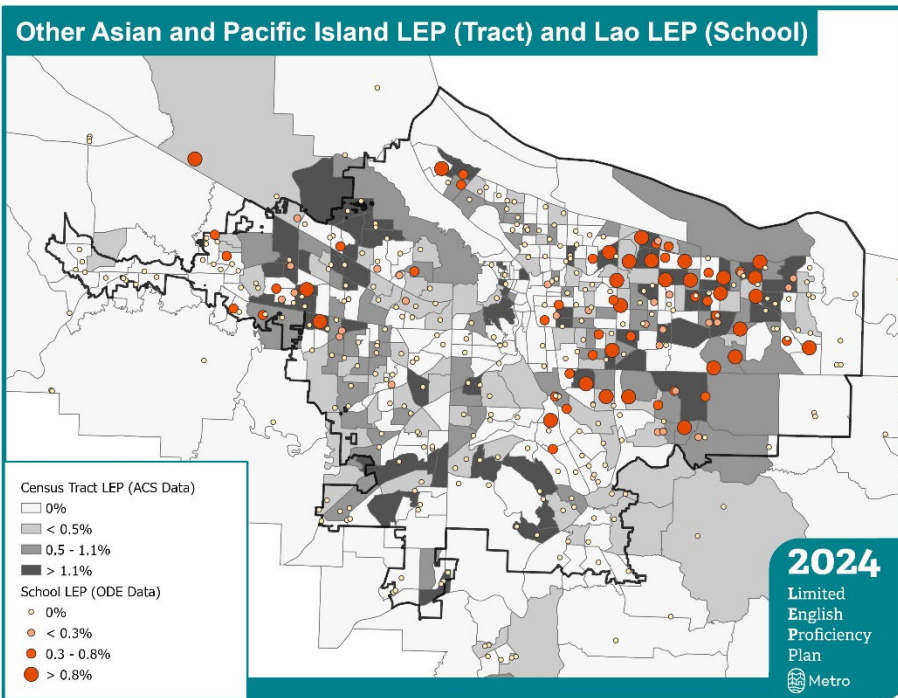


**Figure B15: Other Indo-European LEP by census tract and Hindi LEP by school**



Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

**Figure B16: Other Asian and Pacific Island LEP by census tract and Lao LEP by school**



Source: 2018-2022 ACS, Table C16001; 2018-2022 ODE

## APPENDIX C. FACTOR 1 METHODOLOGY

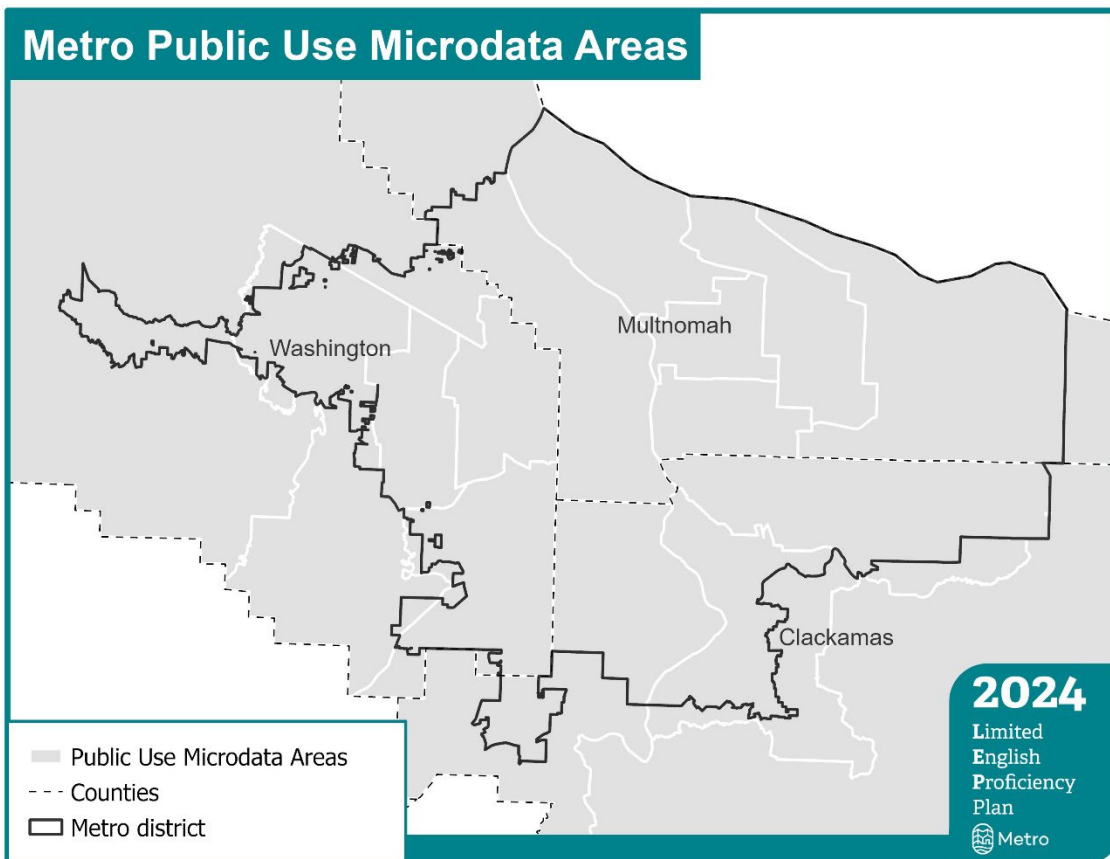
### Methods: American Community Survey data analysis

#### 2018-2022 American Community Survey

To estimate the LEP populations within the jurisdictional boundary area, Metro staff collected and analyzed public use microdata area (PUMA) data, selecting all PUMAs that were either partly or completely within Metro’s service area boundary. Because of this process, the entirety of Clackamas, Multnomah, and Washington counties are included in the LEP analysis. Approximately 91% of the three-county population lives inside the Metro jurisdiction.

The estimated total counts of LEP population from table B16001 in the 2018-2022 ACS PUMA data were obtained by aggregating estimates from the PUMAs in the three-county area of persons over age 5 that “speak English less than very well”.

**Figure C1: Public use microdata areas in Clackamas, Multnomah and Washington counties selected for analysis of 2018-2022 ACS data**



Source: 2018-2022 ACS, U.S. Census public use microdata areas

Additionally, public schools in the three-county area were chosen to compare with the ACS estimates for PUMAs. The distribution of language populations living within the three-county area are assumed to be similar in both PUMAs and schools (Figure C2).

### 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?” The most detailed language table (B16001) that the Census Bureau publishes, however, collapses all coded languages into 42 categories, of which 29 are individual languages and 13 are either a language family, language group or aggregation either of multiple groups within a family or multiple families. For example: “Other Languages of Central, Eastern, and Southern Africa,” one of these 13 categories, aggregates every language, whether related or not related, into a single data line.

Our first round of analysis, displayed in Table C1, focuses on the 29 individual languages from these tables. The “language group” populations require a second round of analysis, for which we use enrollment data from the Oregon Department of Education to disaggregate the group language data found in Table B16001; these analyses are displayed in Tables C2 and C3.

**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**

Population 5 Years and Over <sup>21</sup>	1,735,490					
	Speaks a language other than English at home	LEP	LEP Margin of Error	LEP as a percent of associated language population	LEP as a percent of population 5 years and over	LEP as a percent of total LEP population
Total Population	340,023	118,398				
Spanish	150,380	51,773	+ - 2,986	34.4%	3.0%	43.7%
Vietnamese	24,997	14,700	+ - 1,427	58.8%	0.8%	12.4%
Chinese	22,834	11,007	+ - 1,106	48.2%	0.6%	9.3%
Russian	16,097	6,339	+ - 1,178	39.4%	0.4%	5.4%
Korean	7,885	3,711	+ - 593	47.2%	0.2%	3.1%
Arabic	8,105	2,684	+ - 767	33.1%	0.2%	2.3%

<sup>21</sup> Aggregation of PUMAs intersecting Metro region, which includes entirety of Clackamas, Multnomah, and Washington counties. The Metro jurisdiction represents approximately 93% of the population 5 years and over in the three counties, and approximately 95-100% of individual LEP language groups.

Tagalog	8,325	2,043	+ - 487	24.5%	0.1%	1.7%
Japanese	7,111	1,930	+ - 353	27.1%	0.1%	1.6%
Persian	4,392	1,231	+ - 454	28.0%	0.1%	1.0%
Khmer	2,091	1,043	+ - 300	49.9%	0.1%	0.9%
Hindi	6,068	846	+ - 280	13.9%	0.05%	0.7%

Source: 2018-2022 ACS, U.S. Census tract data, Table B16001

## Consult state and local sources of data

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

The 5-year ACS data 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 13 “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 Languages” category does not include estimated counts for “Other West Germanic Languages,” “Other Slavic Languages,” and “Other Indic Languages,” which are subsidiary to it linguistically. The grouped ACS language categories are:

1. Other West Germanic Languages (group within Indo-European language family)
2. Other Slavic Languages (group within Indo-European language family)
3. Other Indic Languages (group within Indo-European language family)
4. Other Indo-European Languages (remaining languages in this family)
5. Other Dravidian Languages (group within Other Languages of Asia)
6. Tai-Kadai Languages (group within Other Languages of Asia)
7. Other Languages of Asia (remaining languages in this family)
8. Other Austronesian Languages (aggregate of multiple language families)
9. Other Afro-Asiatic Languages (aggregate of multiple language families)
10. Languages of Western Africa (aggregate of multiple language families)
11. Languages of Central, Eastern, and Southern Africa (aggregate of multiple language families)
12. Other Native Languages of North America (aggregate of multiple language families)
13. Other and Unspecified Languages (aggregate of multiple language families)

Of these thirteen grouped ACS language categories, seven have estimated LEP populations that may meet or exceed 1,000 (see Table C2).

**Table C2: 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**

Population 5 Years and Over	1,735,490					
	Speaks a language other than English at home	LEP	LEP Margin of Error	LEP as a percent of associated language population	LEP as a percent of population 5 years and over	LEP as a percent of total LEP population
Total Population	340,023	118,398				
Other Slavic Languages	6,327	2,771	+ - 650	43.8%	0.2%	2.3%
Other Afro-Asiatic Languages	5,862	2,665	+ - 681	45.5%	0.2%	2.3%
Other Languages of Asia	4,873	2,010	+ - 549	41.2%	0.1%	1.7%
Tai-Kadai Languages	3,179	1,720	+ - 443	54.1%	0.1%	1.5%
Other Indo-European Languages	7,804	1,685	+ - 386	21.6%	0.1%	1.4%
Other Austronesian Languages	5,385	1,540	+ - 384	28.6%	0.1%	1.3%
Other Indic Languages	3,782	1,152	+ - 460	30.5%	0.1%	1.0%

Source: 2018-2022 ACS, U.S. Census tract data, Table B16001

### **Oregon Department of Education (ODE) 2018-2022 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 or equal to 250 LEP students.

**Table C3: LEP speakers in regional schools, identified by schools in three-county area**

Student's native language	Student LEP Estimate	Student's native language	Student LEP Estimate
Spanish	17,927	Korean	429
Russian	1,505	Amharic *	429
Vietnamese	1,420	Romanian *	383
Chinese	1,227	Hmong	368
Arabic	1,062	Persian	362
Somali *	743	Swahili *	350
Ukrainian *	672	Thai *	294
Chuukese *	603	Hindi	267
Japanese	525	French	255
Tagalog	469	Lao *	255

\* 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 2018-2022 school year. Language of origin data are not highly validated by ODE prior to their release.

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 language (see following example for the ACS language category Other Slavic Languages):

ODE Language	Estimated LEP	Percent of "Other Slavic"
Sorbian languages	1	0.1%
Slavic (Other)	3	0.4%
Slovenian	4	0.5%
Macedonian	8	1.0%
Slovak	10	1.3%
Bulgarian	35	4.5%
Czech	46	5.9%
Ukrainian	672	86.3%
SUM	779	

- Using this procedure, we estimate that there are 672 Ukrainian speaking LEP students enrolled in Metro-area schools, as a subgroup of an estimated 779 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 Languages."
- 86.3% percent of "Other Slavic" 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:  $86.3\% * 2,771 = 2,390$  Ukrainian-speaking LEP persons age 5 and older in the Metro service. The same method is applied to the margin of error.

In addition to identifying Ukrainian, the ODE extrapolation has also identified Somali, Romanian, Thai, and Lao as potentially exceeding 1,000 persons regionally.

Qualifications with this data:

- Schools are required to suppress observations of fewer than ten 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 and charter schools but does not include private or home-schooled students.
  - 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 any figures where school-based LEP populations are mapped and visually compared with tract-level Census language group counterparts.

**Table C4: Estimated regional LEP speakers extrapolated from Metro-area LEP school students, showing top two dominant individual languages from each language group, with languages highlighted in yellow potentially exceeding 1,000 persons**

ACS Language family / ODE language	Languages – 2018-2019 ODE Data	Estimate, number of native speakers LEP: ACS / Enrolled students, ODE	Percent of total enrolled LEP students within schools language family	Estimate: LEP speakers in Metro region (ODE percent * ACS language family estimate)	MOE: LEP speakers in Metro region (ODE percent * ACS language family MOE)
<b>OTHER SLAVIC LANGUAGES</b>					
ACS Total		2,771 +- 650			
ODE Total		779			
	<b>Ukrainian</b>	<b>672</b>	<b>86.3%</b>	<b>2,390</b>	<b>+- 561</b>
	Czech	46	5.9%	164	+- 38
Remaining Other Slavic		61	7.8%	217	+- 51
<b>OTHER AFRO-ASIATIC LANGUAGES</b>					
ACS Total		2,665 +- 681			
ODE Total		1,937			
	<b>Somali</b>	<b>743</b>	<b>38.4%</b>	<b>1,022</b>	<b>+- 261</b>
	Amharic	429	22.1%	590	+- 151
	Oromo	234	12.1%	322	+- 82
Remaining Other Afro-Asiatic		531	27.4%	731	+- 187
<b>OTHER INDO-EUROPEAN LANGUAGES</b>					
ACS Total		1,685 +- 386			
ODE Total		666			
	<b>Romanian</b>	<b>383</b>	<b>57.5%</b>	<b>969</b>	<b>+- 222</b>
	Kurdish	158	23.7%	400	+- 92
Remaining Other Indo-European		125	18.8%	316	+- 72
<b>TAI-KADAI LANGUAGES</b>					
ACS Total		1,720 +- 443			
ODE Total		549			
	<b>Thai</b>	<b>294</b>	<b>53.6%</b>	<b>921</b>	<b>+- 237</b>
	<b>Lao</b>	<b>255</b>	<b>46.4%</b>	<b>799</b>	<b>+- 206</b>
Remaining Tai-Kadai		0	0%	0	+- 0



# Limited English Proficiency Plan focus groups

Lara Media Services

December 2021

## **Metro respects civil rights**

Metro fully complies with Title VI of the Civil Rights Act of 1964 that requires that no person be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination on the basis of race, color or national origin under any program or activity for which Metro receives federal financial assistance.

Metro fully complies with Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act that requires that no otherwise qualified individual with a disability be excluded from the participation in, be denied the benefits of, or be subjected to discrimination solely by reason of their disability under any program or activity for which Metro receives federal financial assistance.

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 [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) or call 503-797-1536.

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 503-797-1700 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. For up-to-date public transportation information, visit TriMet's website at [trimet.org](http://trimet.org).

Metro is the federally mandated metropolitan planning organization designated by the governor to develop an overall transportation plan and to allocate federal funds for the region.

The Joint Policy Advisory Committee on Transportation (JPACT) is a 17-member committee that provides a forum for elected officials and representatives of agencies involved in transportation to evaluate transportation needs in the region and to make recommendations to the Metro Council. The established decision-making process strives for a well-balanced regional transportation system and involves local elected officials directly in decisions that help the Metro Council develop regional transportation policies, including allocating transportation funds. JPACT serves as the MPO board for the region in a unique partnership that requires joint action with the Metro Council on all MPO decisions.

The preparation of this report was financed in part by the U.S. Department of Transportation, Federal Highway Administration and Federal Transit Administration. The opinions, findings and conclusions expressed in this report are not necessarily those of the U.S. Department of Transportation, Federal Highway Administration and Federal Transit Administration

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## INTRODUCTION

Oregon Metro hired Lara Media Services (LMS) to conduct focus groups to help inform Metro's update to its Limited English Proficiency (LEP) Plan. The LEP Plan defines Metro's process for providing language access to its programs and services according to Title VI of the Civil Rights Act of 1964 and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency.

LMS organized, recruited, facilitated, and captured the sentiments of community members who identify as a person of limited English proficiency. LMS organized, coordinated, and conducted four virtual focus groups in four different languages: Spanish, Russian, Vietnamese, and Mandarin, with a minimum of 9 participants per group. In this report, LMS provides an assessment of Metro's efforts thus far, recommendations to ensure the communities' transportation needs are met, and solutions to best reach and involve LEP community members in future projects.

Metro, a regional government agency in Oregon whose governing body is directly elected by the region's voters, creates long-term transportation plans for the metropolitan area surrounding Portland, OR. Metro also provides services through Garbage and Recycling and Parks and Nature. Metro's primary role is policy and planning, collaborating with cities, counties, and transportation agencies to coordinate and plan investments in the transportation system. They do not provide transit services, build roads and highways, or provide social services or family and health services. The input received through the focus groups will inform factor 2 of the LEP Plan, the frequency with which individuals with limited English proficiency come into contact with programs, activities, and services. The results of the focus groups will also help guide Metro in prioritizing its resources to best meet the needs of the region's community members with limited English proficiency.

LMS's expertise and deep understanding of cultural catalysts, challenges, and opportunities helped Metro understand its target audiences deeply. Using a dynamic storytelling approach improved receptivity and increased emotional connection in a transcultural and multidimensional manner. Lara Media is an MBE/WBE/DBE certified firm with more than twenty years of experience. The vision of LMS is to create an equitable world where everyone can be seen, heard, and treated as a valuable and necessary member of society.

### Objective

The Department of Transportation gave Metro a four-factor analysis tool to help measure and monitor their progress connecting with members of the LEP community. The four criteria that Metro will measure are:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee
- (2) The frequency with which LEP individuals come in contact with the program

- (3) The nature and importance of the program, activity, or service provided by the recipient to people's lives
- (4) The resources available to the recipient and costs

The object of the research shared in this report is to analyze the needs of members of the LEP community concerning the programs and access to programs that Metro offers.

## **Methodology**

LMS coordinated and hosted four focus groups. LMS hired community members to conduct the focus groups in Mandarin, Russian, Spanish, and Vietnamese. The Mandarin and Vietnamese focus groups were held Wednesday, November 18, 2021, while the Russian and Spanish focus groups were held Thursday, November 19, 2021.

The four languages were identified as the most frequently spoken languages, other than English, in the greater Portland region. Metro conducted the language analysis using the following data sources:

- 2015-2019 American Community Survey (ACS) 5-Year estimates, aggregated by census public use microdata areas (PUMAs)
- 2015-2019 American Community Survey (ACS) 5-Year estimates, aggregated by census tracts
- Oregon Department of Education (ODE): 2018-2019 school year enrollment data for school districts in Clackamas, Multnomah, and Washington counties.

Participants were required to have access to an electronic device with a camera and microphone to participate in the focus groups. LMS offered to lend tablets to participants in need of electronic devices; none were requested. LMS also offered Zoom Video conferencing training to all participants who requested assistance; two requested training.

LMS gathered qualitative and quantitative data through dynamic virtual focus groups and survey questions. The focus groups consisted of fourteen questions about Metro, places, programs, service knowledge, participants' use of media and translation programs, and transportation. A follow-up survey was filled out by each participant with questions about transportation priorities, trusted information sources, and optional demographic questions. The focus groups were 120 minutes. All participants were compensated \$100 for their time.

Focus group participants were from the Portland Metro Area and have limited English proficiency or understand the needs of those who have limited English proficiency.

With over 100 people showing interest in participating, LMS screened and confirmed 48 participants. Forty-four attended and participated in the conversations. Each focus group included nine to 12 participants from all three Portland Metro region counties: Clackamas,

Multnomah, and Washington Counties. The Vietnamese group consisted of 11 participants, nine from Multnomah County, one from Washington, and one from Clackamas. The Mandarin group consisted of twelve participants: seven from Multnomah County, three from Washington County, and two from Clackamas County. The Spanish group consisted of nine participants: six participants from Multnomah County, two from Washington County, and one from Clackamas County. The Russian group consisted of twelve participants, five from Multnomah County, four from Washington County, and three from Clackamas County.

LMS has summarized its findings from the focus groups in the following categories:

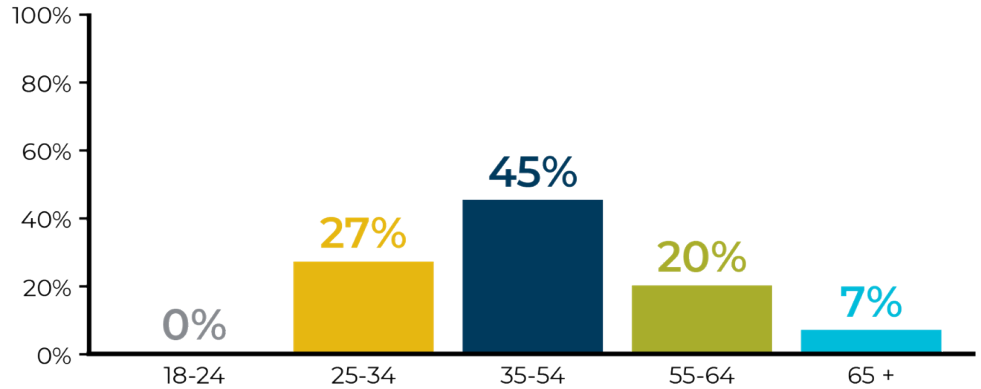
- Government Involvement:
  - Knowledge of Metro and its policy, program, and project focus areas (affordable housing, transportation, garbage and recycling system, parks, and nature) that people are most interested in being involved in.
- Translations:
  - Feedback on translation and interpretation services.
- Media Usage:
  - Social media and media use.
- Metro's Focus Areas:
  - The aspects of each of these areas that people would most like to be involved in policy-making and planning – thinking about the long-term vision or project level planning and implementation.
  - Affordable Housing
  - Transportation:
    - The transportation planning initiatives and programs (regional long- range plans, corridor plans, funding allocations) that are of most interest and other transportation-related priorities.
  - Garbage and Recycling system
  - Parks and Nature
- Community Concerns
  - Issues that people care a lot about or have a passion for and what has kept them from being heard on the issues that they care about.
  - Other aspects that do not fit under Metro's scope of work.

## RESEARCH

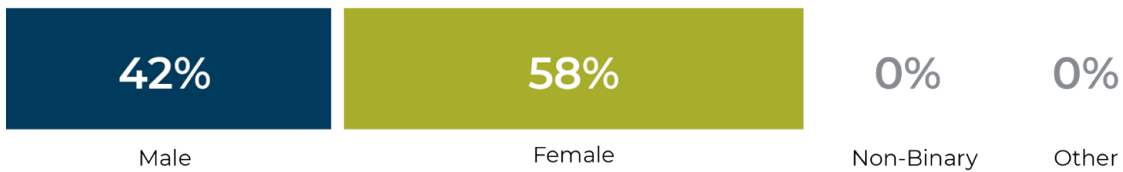
### Participant Description

The following questions were optional, though all 44 participants provided this information.

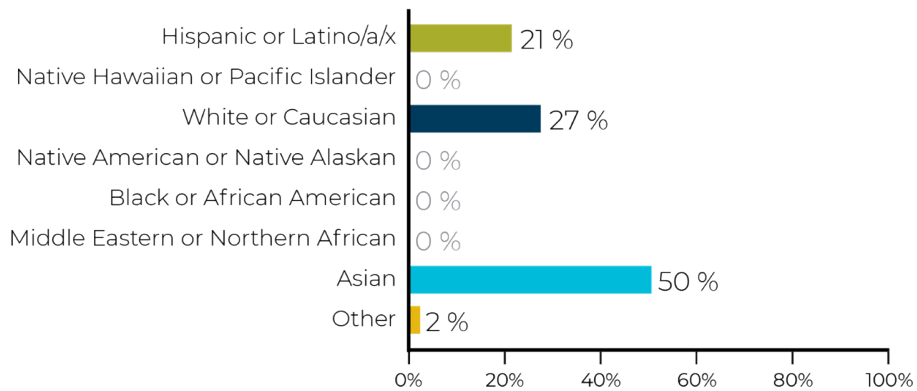
**Figure 1: Participant Age - LEP Survey**  
**What is your age?**



**Figure 2: Gender - LEP Survey**  
**Which of the following best represents your gender?**

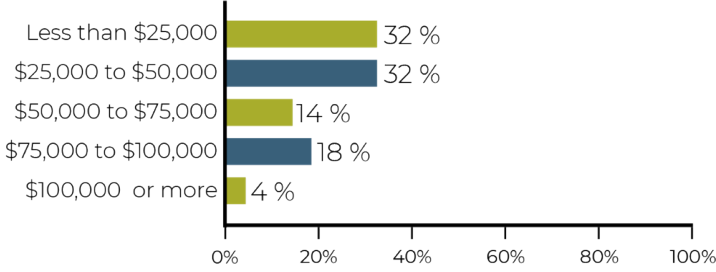


**Figure 3: Race/Ethnicity - LEP Survey**  
**When asked about your racial or ethnic identity, how do you identify?**

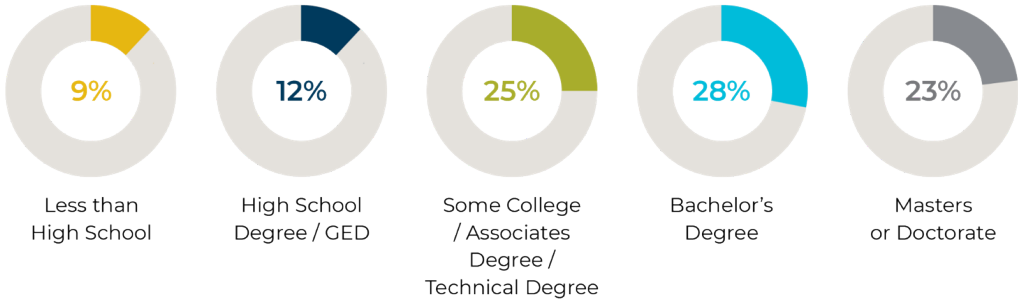




**Figure 4: Household Income - LEP Survey**  
**In 2020, What was your household income?**



**Figure 5: Level of Education - LEP Survey**  
**What is your highest level of education?**



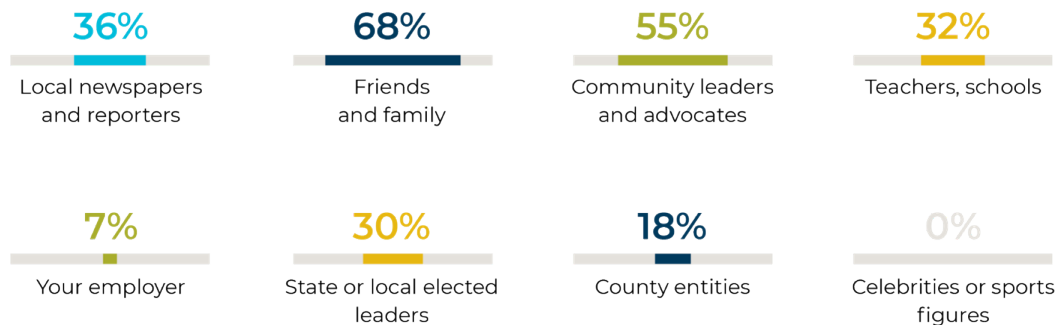
## FINDINGS - GENERAL INSIGHTS

General insights summarize themes heard across all four focus groups. Following general insights, the group-specific findings are summarized.

### Government Involvement

Most participants had not heard of Metro, nor had they reached out to them for resources and information, primarily because they didn't know that the agency existed and had available resources for the community. Those who had reached out to government offices before had mostly sought out offices with information about permits, licenses, and residential codes.

**Figure 6: Trusted Messengers - LEP Survey**  
Which of the following messengers would you trust to share important information? (Select up to 3)



Many people have little trust in the government because they feel that the local agencies historically have not communicated with the general limited English community. The exception being to warn before projects occur. Every group wanted Metro to share their projects and engage the community more often, as they want to have the chance to voice their needs and concerns more clearly before any project occurs and impacts their lives.

In short, participants want to engage more with Metro's projects and activities and share how Metro's work and projects affect or impact their communities. Participants believe that they are best equipped to speak about their issues and positioned to identify the best solutions. To best benefit everyone, they would like to have access to Metro community meetings, round table conversations, and other engagement opportunities in the projects' planning state. Many expressed that they lacked awareness of public policies and programs. More outreach to marginalized and underrepresented groups is needed because participants did not feel represented by the government or local communities.

Participants expressed the desire to understand how the government works to engage accordingly. Participants believed it would be beneficial for Metro, local governments, and

other agencies to provide programs or classes to aid their communities in understanding government systems and policies.

### **Translation**

Currently, many participants use online translation tools and software such as Google Translate. While people find these tools helpful, many prefer more quality and efficient translation tools and materials. They often find that the quality of these virtual tools can vary widely depending on the website, language, and topic. Mistranslations often cause misunderstandings or do not capture the real meaning of the content. These tools lack cultural connotations that play an essential role in effective and worthwhile communication.

The effectiveness of using an in-person translator is also often debated, as not everyone is comfortable using or requesting their services. While most believe translators are necessary for various settings, many participants do not trust that all interpreters are effective due to personal experiences. In the past, many participants have been frustrated when an interpreter leads to misunderstanding and misinformation, and intended meanings get lost.

Participants prefer using interpreters who share the same native tongue, are culturally responsive, and are proficient enough to use the language in professional settings to lessen the chance of misunderstandings or misinformation occurring. Many agreed that it is important to have language spoken cleanly and clearly with accurate words, terms, and expressions in translation without mixing foreign adopted words.

The few participants who have used interpreters from Metro agree that they like requesting translators as they usually trust them to be of good quality. However, many believe it is not reasonable for them to be able to request a translator 5-7 days ahead. It is often hard to plan for when translation services will be necessary, and many would prefer to have interpreters immediately available to them, even if they do not believe that the on-call interpreters are the most accurate.

Video and over-the-phone translations are often considered to be of even lower quality due to the variability of using the technology, the lack of visual or situational context, and the varied quality of the interpreter's professionalism.

Participants feel that it is essential to establish more accessible translation and interpretation services to bridge the language barrier in their communities. This establishment would help them access more opportunities, establish trust, and develop authentic relationships with other communities and organizations.

When asked what information participants would prefer to have prioritized, most groups were highly interested in many of Metro's materials, resources, and news, especially on information about recycling and Parks and Nature. Most agreed that they would like for everything that Metro put out in English to be produced in other languages, believing that this would help further community engagement and awareness.

However, almost all participants agreed that they would prefer information that is pre-produced in accurate, concise, simple, and clear summaries instead of detailed reports (i.e., they would prefer 1-3-page fact-sheets with crucial information, rather than 100 pages or translation of everything). Participants, instead, suggested that complete reports should also be drafted and archived on Metro's website for community members interested in more information.

Participants also believe that more awareness of translation and interpretation services available from Metro is needed. Many people in these communities have little information about translation and interpretation services available to them and little knowledge about how to access them, especially those in most need of these services.

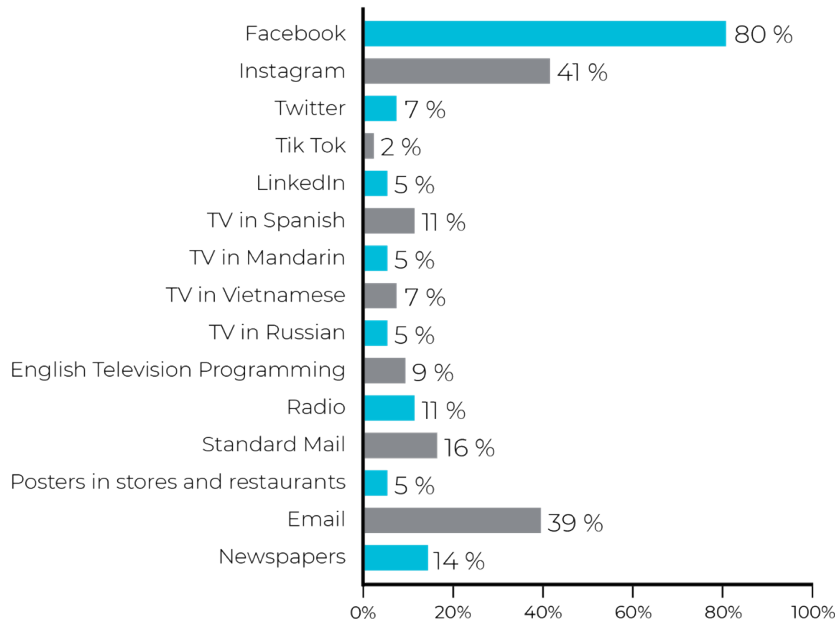
Many also suggested incorporating signage in different languages, especially in hospitals, parks, and other public places, to help people navigate their communities better.

### **Media Use**

Most participants use Facebook, WhatsApp, and Instagram most consistently to connect within their larger communities. Most also follow language-specific and culturally focused news outlets, whether through newspapers, tv/radio, or social media websites. They highly value having access to information, and they were very grateful for this roundtable activity because it provided them with new tools and resources.

**Figure 7: Media Preferences - LEP Survey**

Which of the following places or resources for connecting and learning would you be most likely to use to stay informed about local issues and resources?  
(Select up to 3)



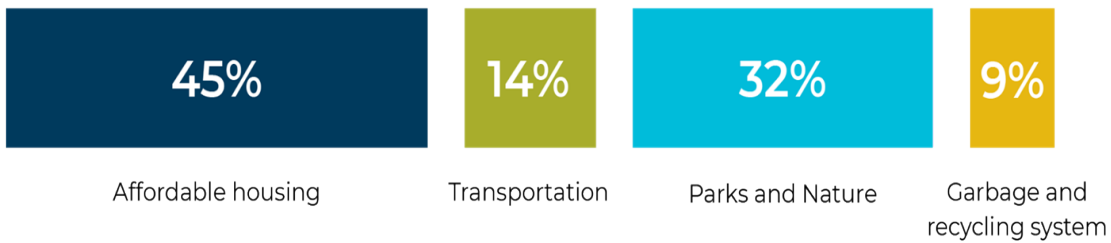
### **Affordable Housing**

The need for affordable housing is a big problem in all communities involved in this research, as the prices of quality housing keep rising. Many participants felt that this was a growing issue in the last couple of years, especially after COVID without much infrastructure to improve or address it. Participants believe that the homeless, disenfranchised, underprivileged, low-income, and impoverished should be prioritized for affordable housing equity.

Homelessness is associated with littering, drug usage, disease, and crime to these communities. Many felt that the increased presence of people needing homes is now affecting the safety and well-being of family members and that the local government should take action on the growing issue.

**Figure 8: Community Interests - LEP Survey**

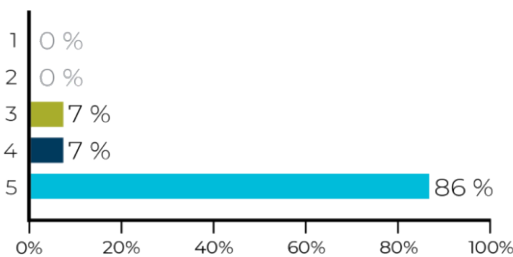
Which area is most interesting to you and your community?



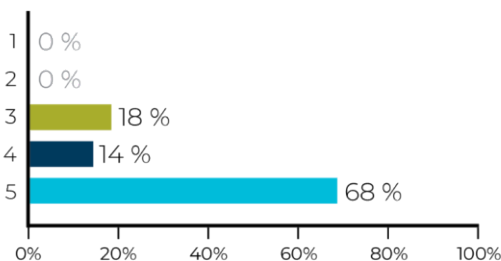
### Transportation

Participants were asked, “How important is it to address the following issues with transportation?” based on a scale of one being ‘not important’ and five being ‘very important.’

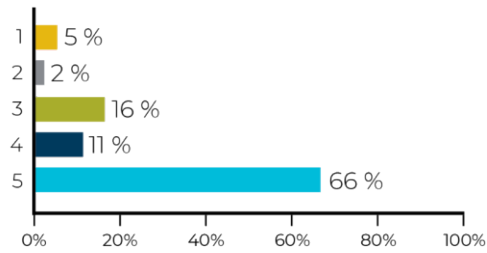
**Figure 9.1: Community Transportation Priorities - LEP Survey**  
Fewer deaths and severe injuries on our roads?



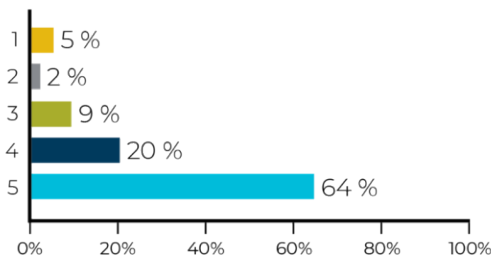
**Figure 9.2: Community Transportation Priorities - LEP Survey**  
Make sure that communities that have had less investment in transportation in the past are served better now and into the future?



**Figure 9.3: Community Transportation Priorities - LEP Survey**  
 Expand the bus and max system?

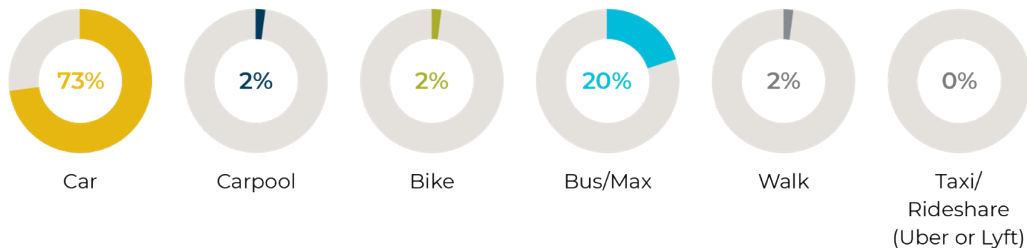


**Figure 9.4: Community Transportation Priorities - LEP Survey**  
 Reduce the impacts our cars, buses, and trucks have on climate



Most groups' primary focus points were roads and public transportation. They focused less on sidewalks and bike paths. Participants in the Mandarin, Vietnamese, and Spanish groups appeared most interested in significant road improvements. In contrast, the Russian group was most interested in addressing public transportation needs, such as more bus and Max signage in their language.

**Figure 10: Transportation Preferences - LEP Survey**  
 What is the primary way you get around?



**Public Transportation**

Although a significant proportion of participants used public transportation, many found it unreliable, ineffective, difficult to use with children, and many disliked it due to the lack of control over their time and environment. Most believed it was difficult to use public transit due to the lack of stations near their preferred or essential destinations, such as hospitals,

grocery stores, and restaurants. Participants in the suburban areas saw it as an unrealistic form of transportation due to the travel time, the distance of destinations, and the cost of constant travel. They said that system is more effective for highly urbanized areas, such as Central Portland versus West Linn.

Many also agreed that the metro area needed more bus stops to make the system more accessible. Participants would also like bus stops and Max stations to be better maintained. They asked for more stops and stations to be covered to protect against the elements, to be more family-friendly, and to have more seating.

### **Roads**

The main concern about roads is the ongoing traffic issues when commuting in Portland. Many suggest opening new carpool lanes or building new freeway off-ramps and on-ramps to help offset the traffic build-up. Several also asked for better-maintained roads and fixed potholes. Some wanted Metro to prioritize local roads as many residential areas have received little maintenance.

Another main focal point was road safety. Many participants are concerned with the amount of lighting on roads and sidewalks, noting that an increase in lighting and reflective signs would help road safety around Portland when traveling at night or in the dark.

Others believe the growing homeless population is also a safety hazard, especially around roadways and public transit stations. Drivers are worried about the tendency of people to cut across busy roads. Public transit commuters feel uncomfortable with the increased presence, even opting to use more private means of transportation.

### **Bicycle Paths**

Bike paths were commonly viewed as an ineffective mode of transportation because it takes too long to get somewhere, and there are not enough bike paths available to provide riders safe access to many areas. They also comment that getting access to a bike is expensive and unrealistic, especially for larger families and people with more than one job. They see it as a solution for a "utopian community" but not a real solution for Black, Indigenous and People of Color (BIPOC) and low-income families. However, many expressed a need for safer bike paths, suggesting that broader bike paths be built and be more distinguishable.

### **Sidewalks/Walkways**

Overall, there was little focus on sidewalks. Although of those that commented, participants agreed that all sidewalks should be kept clean and well maintained. Some noted that many areas required more or wider sidewalks for better use and pedestrian safety.



### **COVID 19 Impact**

Covid has highly impacted our BIPOC communities and caused many changes to transportation use. Many participants had to cease or diminish their use of public transportation and began using more private means of transportation whenever possible. However, many participants plan to return to their usual pre-Covid methods as restrictions lessen or proper Covid protocol is established and followed.

### **Garbage and Recycling**

Except for the Latinx group, most people had little interest in Garbage and Recycling. Latinx participants were very interested in recycling. Several participants wanted information about properly separating the recyclables and trash in their native languages. The participants who already knew Metro had heard about the garbage and recycling program. Participants wanted to know how to do it right and recognized it as the best way to care for the environment and the Earth.

### **Parks and Nature**

While parks for children and families are desired and enjoyed throughout the different communities, it is the only affordable source of activity and entertainment for some families. Participants also agreed that lack of maintenance in some locations is a turnoff. This led to a discussion of community clean-up opportunities or events. Multilingual park signage will help visitors better understand parks' facility usage and layout.

Participants, especially those who are part of underrepresented communities, mentioned they would like more community centers in and around parks. They felt that having community-led centers, programs, or organizations would help further represent the interests of underserved communities and function as a liaison between the community and Metro. This gesture would help develop trust in local government agencies and cooperate in new developments. Many participants were also interested in services and resources that let them learn more about local park wildlife, history, and other outdoor activities. There were requests for outdoor translation services available through Metro's interpreters for local guided nature tours.

### **Community Concerns**

Many participants also felt that there were other barriers and concerns present in their communities besides those mentioned above that were necessary to express to Metro and other government institutions.

Many were concerned with discrimination that they had experienced when dealing with public institutions, such as schools and hospitals. Some staff members often lack respect when treating or working with people for whom English is not their native language.

Concerns regarding health care were also expressed. Several participants feel that health care has become slow and overcrowded, leaving many with long waiting times to access medical help/centers. Some participants also expressed interest in the new Oregon Health Plan. They questioned why certain health procedures were selectively available or not included in the plan.

Others, meanwhile, expressed interest in new educational campaigns against drug usage and on long-term effects due to their rise in commercial drug use. They felt that drug use has become too familiar in our times. Drugs, especially marijuana, are too easy to acquire.

These communities wish to grow more proficient in English and feel that another excellent service would be ESL classes. Many English proficiency classes closed due to COVID-19 restrictions, and while health is essential, this has been detrimental to many communities, limiting their opportunities to progress.

The final other significant issues mentioned were related to gentrification. This includes increased taxes, increased property taxes, and being priced out of their current neighborhoods. There was a lot of fear expressed around this topic.

## **FINDINGS – BY FOCUS GROUP**

### **Results from Vietnamese focus group**

#### **Government Involvement**

Only two out of eleven participants had heard of Metro. Few had ever used Metro's informational services. However, most believe that Metro's issue is that their community doesn't know how to access relevant information or Metro's resources.

#### **Translation**

Many wish that multilingual options existed for automatic answering machines, as they do for Spanish.

#### **Media Use**

Most receive information and local news from Facebook groups (Vietnamese Community of Oregon, Người Việt Portland) as those posts are translated and shared by trusted community members. Most of the posts come from local and national news outlets and are selected and translated into Vietnamese by group members, depending on their interests. Since only a few people can read news in English, people read through the content to make sure it's understandable before posting into groups.

Other methods commonly used by the Vietnamese community to receive news and information include word of mouth: from friends, family, neighbors in an apartment complex; Newsletters via email and mail; calling 211; KGW News; and Google. Many Vietnamese participants also liked the idea of an official Government YouTube channel in Vietnamese, as they tend to listen to US news in Vietnamese on YouTube.

#### **Affordable Housing**

Some participants voiced the need for safety or police for houses and businesses along 82nd Avenue, saying safety in their neighborhoods is essential for them, their families, and their businesses.

#### **Transportation**

The Vietnamese community focused on private transportation and road changes more than any other group. Many participants advocated fixing 82nd Avenue as this road is vital for Vietnamese businesses and needs more driving and parking spaces. Conversely, many advocated against Division Street's renovations and disapproved of similar renovations taking place elsewhere.

Others had issues with road layouts and were displeased with the placement of parking spaces outside of bike spaces on streets due to safety concerns and noted that the need for the right lane for cars was more significant than the need for bus-only lanes.

The participants also disapproved of the I-205 toll, highlighting the class divide and noting that low-income families struggle to pay the toll daily. They believed that this would add more significant burdens to them and the Vietnamese community on top of increased taxes. Although, some argued that they would perceive the toll as more reasonable if I-205 was to be rebuilt or a new bridge added.

### **COVID-19 Impacts on transportation**

Many in this community experienced no changes before the pandemic as most prefer and have access to private means of transportation.

### **Garbage and Recycling**

Participants didn't show much interest in this topic and showed more interest in the other topics.

### **Parks and Nature:**

Many participants want more green spaces, such as community gardens.

### **Barriers/Community Concerns:**

Many Vietnamese community members also expressed several concerns about the K-12 education system. Many believe that the faculty-student ratio is too high and that many students, especially those who are doing poorly, which they noted as disproportionately students of color, do not receive enough support. Others are also dissatisfied with unhealthy school lunches served in schools, suggesting that schools switch to buying/providing healthier school lunches, especially for students who rely on it for nutrition.

### **Results from Mandarin focus group**

#### **Government Involvement**

Most of the people who attended the focus group meeting immigrated to the US over 30 years ago. Many expressed that they had never heard of Metro as a governing agency until now. They were confused about Metro's role in the area. Only one of the participants knew about Oregon Metro and the organization's scope of work and activities.

Participants proposed updating Metro's website with clearer messaging explaining Metro and what Metro does and does not do. Perhaps clarifying the difference between Metro and local and state government's role. Many members were having trouble deciphering the policies Metro can enact separate from other state and local government entities.

#### **Media Use**

Many participants use platforms such as Facebook and YouTube for news. They suggest using web-based platforms, Facebook especially, to connect to their community in the future. The most common social media outlet used in China and locally is WeChat. They use it to connect with friends and family, circulate and access news, and engage with their community.

### **Affordable Housing**

Participants did not express much interest in affordable housing. The only topic that came up was concern regarding the homeless crisis in the Portland Metro Area and its effects on the safety and well-being of community members in the area. One member expressed concern for the impact to his restaurant business in Portland, and he wished the city would do something about it.

### **Transportation**

Most of the participants' knowledge on this topic was about direct transit services like TriMet, Hop cards, light rail, and Max lines. Many members had difficulty grasping Metro's role with transportation if it wasn't about any of the services mentioned.

Several expressed the need to address the increasing heavy Portland traffic. Commuting into downtown and the Portland metro area has worsened over the years, and members wish to see policy changes to improve traffic flow. Many agree that new freeway off-ramps could be a way of improving the traffic jams that occur during rush hours. There was more focus on freeways rather than streets. Most seemed more comfortable driving and believed it to be a more effective means of transportation overall.

### **COVID-19 Impacts on transportation**

Regarding Covid-19, many believe it would be advantageous to highlight Covid-19 precautions and mandates at stations in multiple languages to ensure commuters abide by safety guidelines.

### **Garbage and Recycling**

The Mandarin-speaking community mainly had questions regarding Metro's connection to garbage and recycling in Portland.

- Does Metro manage all the garbage and recycling programs in the Portland Metro area?
- Aside from being a service provider, what is unique about Metro's garbage and recycling policies?

While most participants did not have much to say regarding this field, they appreciated Metro's efforts. One participant expressed that he thinks it's good that Metro encourages residents to adopt composting habits that are better for the environment.

### **Parks and Nature**

Mandarin participants believe Metro needs to increase outreach to many communities about the parks and natural areas metro manages and provide accessible maps. They would like greater information and access to natural areas and zoos for larger multigenerational families, those with young children, or those who have newly immigrated.

## **Results from Spanish focus group**

### **Government Involvement**

Two of the nine participants knew Metro by name in the Latino/a/x group. A few participants had used the local government offices, although the participants did not specify the usage. While many had not used Metro's informational services in the past, participants were interested in Metro's material and resources on cemeteries and burials (particularly the cost and resources available), transportation projects, and local security concerns.

### **Translation**

The Spanish group suggested getting better and culturally responsive translators, tools, and note-takers in government facilities. It is essential to promote and organize meetings and roundtable conversations in Spanish, as well as to publish messages and content in Spanish.

### **Media Use**

Many forms of media are used by this group, such as television ads, newspapers, and flyers, but most use social media most consistently, especially WhatsApp, Facebook, and Instagram.

### **Affordable Housing**

Many feel that it is tough for the unemployed or recently immigrated to find appropriate housing, and COVID has exacerbated the problem. Many apartments are maladjusted to large families, and older buildings are not up to code. Several participants are concerned about potential health issues such as asthma and lung problems and wish to have more information and resources available to help find affordable housing.

### **Transportation**

Many community members wished buses had more stops and for public transit to be punctual. They believe that putting more buses into circulation would help more people get to their destination on time. However, the Spanish-speaking community members had a more significant focus on biking and walking safety concerns.

Several participants noted that bikes are often stolen when left alone and that bringing them as an alternate form of transportation is often not a good or viable option. One participant mentioned the need for a program to teach people to ride bikes and help provide affordable bicycles to increase bike path usage and prevent future safety concerns regarding bicyclists.

Participants believe that more safe road crossings are needed for pedestrians. They like the idea of cameras, and ways to record how fast people are driving would lower the rate of car accidents due to speeding both near high population areas and urban residences. One participant proposed using funds to ensure safe railroad crossings for pedestrians.

But regardless of preferred transportation methods, most participants wanted more information, such as routes, timetables, and maps to be easily accessible. Many suggested adding information to any and all public transit sites, specifically mentioning bus stops, TriMet, and Max stations.

### **Garbage and Recycling**

Latino/a/x participants were very interested to learn more about recycling since they see it as a great way to care for the environment. They also shared stories about reusing and reducing waste

to save money and the planet. Participants agreed that there needs to be more easily accessible information on recycling and separating trash, either in the mail or online.

### **Parks and Nature**

Participants' interest in parks and nature focused on access and safety in the parks. Latino/a/x families expressed how vital parks are for their families, not just for their physical activity and exercise but for recreation, especially for children. Many noted that they do not have parks near their homes and would like more nature access for their community. They would also like to see more green areas and more activity areas in parks, such as places to play soccer, baseball, and basketball. Additionally, many do not feel safe visiting parks in their area due to unlit paths and the increasing homeless population setting up camps in these public areas.

### **Results from Russian focus group**

#### **Government Involvement**

A few participants were familiar with Metro by name but were unaware of the organization's actions.

When asked if they engage with government agencies such as the city or county for information, they answered as follows:

- After a move, some reached out to their county of residence to get information about garbage and recycling setup.
- Reached out for information on opening a business in a new county.
- Communicated with the city/county about permits to build or renovate a condo.
- Looked to the city offices for information about which trees are allowed to be cut down.

Many participants, however, wished for more opportunities to impact their local communities and proposed designating community representatives/liaisons to work directly with Metro and the government to gather and communicate their communities' opinions. The group wanted someone they could access at least three days per week. They say that this will serve as encouragement and motivation for local activity and reassurance for the community that they are heard and will see a positive result.

#### **Translation**

Participants suggested that when targeting Russian speakers to use PDF instead of JPEG/PNG, information can be translated to and copied in Russian because it is inconvenient for non-English speakers to translate information from an image format.

Others suggested that it would be nice to have a direct hotline or link (person to contact) to any government agencies with Russian information and would help make this type of information more accessible to a broader community.

Several participants were concerned about the cost of interpretation services, as some have had to pay out of pocket in the past.

## **Media Use**

The group members said that, of course, for the most part, they use all primary forms of social media, such as Instagram, WhatsApp, Viber; but that Facebook was their primary source for news and events. The community also reads local Russian/Slavic magazines and newspapers, usually available at any Russian store or deli around town, and listens to the Slavic Family Radio.

However, one participant noted that Facebook is often the principal medium used for general advertising. In contrast, Instagram does not have the same volume or type of advertising, and that more attention should be given to Instagram when sharing news about the community. Mainly since the demographic of Instagram includes younger Russian-speaking people, typically 35 and under, while Facebook users are generally older.

## **Affordable Housing**

Participants were mainly concerned with the increasing property tax, complaining that the taxes are rising while their surroundings' quality worsens. They understand that homelessness is a severe issue but felt that Metro should "at least help protect the people already housed" when first focusing on the issue.

## **Transportation**

Transportation is a critical issue that most participants had many concerns about. They would like to have more direct access to more areas without changing buses and lines as this becomes quite expensive.

Public transportation riders would also appreciate more lighting around bus stops and max stations and roads. Many feel uneasy waiting in the early morning, especially around Downtown Portland or other inner-city areas. The fear of traveling in the dark keeps many people participating in community events.

Additionally, more Trimet information in Russian was requested as there are very few resources available in Russian, and several participants highlighted the difficulty of getting driving instruction and a license as a foreign immigrant.

## **COVID-19 Impacts on Transportation**

While most Covid-19 changes led to a decreased use of public transportation since school children no longer had access to school buses, most began to ride the TriMet almost daily. This situation also caused parents to worry as many children reported having felt unsafe on public transportation due to the behavior of other riders during necessary transit.

## **Garbage and Recycling**

The Russian participants were interested in participating in community clean-ups but had no further comments on this topic.

## **Parks and Nature**

The participants expressed an interest related to parks and nature development. The need for signs and notices to include Russian translations was brought up, particularly in parks, and the abundance of homeless camps in parks and nature areas needed to be addressed. Several



participants expressed interest in understanding Metro's responsibilities with Parks and Nature and wanted more information.

### **Barriers/Community Concerns**

Another barrier often felt in the Russian community is a lack of marketable skills, such as computer skills, to help them get ahead, mainly with newly immigrated, low-income, or unemployed. This community group expressed the need for an organization to provide resources directing people towards accessible and affordable programs or provide programs themselves for people looking to gain marketable skills.

## **SURVEY RESULTS BY LANGUAGE GROUPS**

### **Asian/Other: (23 ppl)**

Which of the following places or resources for connecting and learning would you be most likely to use to stay informed about local issues and resources?

1. Facebook (78.26%)
2. Email (39.13)
3. Tied (26.09) - Instagram, Newspapers

Which of the following messengers would you trust to share important information?

1. Friends and Family (82.61%)
2. Community leaders and advocates (65.22%)
3. (T-3) Local newspapers and reporters, Teachers and schools (43.48%)

Which area is most interesting to you and your community?

1. Affordable housing (52.17%)
2. Parks and Nature (26.09%)
3. Transportation (21.74%)

Which of the following issues is most important to address with transportation? Fewer deaths and severe injuries on our roads

Make sure that communities that have had less investment in transportation in the past are served better now and into the future.

1. Reduce the impacts our cars, buses, and trucks have on climate change.

Why do you believe the answers above are important? Do you think it is important that government agencies address this? What other issues should be addressed?

### **Mandarin**

1. It's very important. The traffic congestion problem in Portland is now very serious. Children's indoor and outdoor activities, rainy season and winter, children need more indoor activity space, for example, more children's community [centers].
2. The problem of homeless people and garbage in the city center urgently needs to be dealt with by the government.
3. Because of community safety, which is important, how to deliver messages to [a] specific community is important.
4. Housing and roads
5. I think the transportation in Portland is so bad, and it is very important for the government to focus on it.

6. Now, because of the epidemic, most people travel by themselves, such as shopping and picking up children [from] school. So I think road safety is very important, as well as the maintenance of traffic lights, especially the traffic lights on Division Street.
7. Climate change. Increasing access to nature and outdoors through working with culturally specific organizations like the Taiwanese Association of Greater Portland.
8. It is important because, with a growing population, the road will become more congested in the future. It is important to have the infrastructure in place to accommodate commutes in a safe and efficient manner.
9. It is related to everyone's life and commuting time every day. It is necessary to reduce commuting time, increase safety and convenience.
10. These problems are long-standing problems that require continuous efforts to improve and are closely related to our daily lives. The government is committed to solving these problems and can improve the quality of life of residents. I think some [streets] are congested with traffic, and in some areas, even on weekends, it is inconvenient for residents to commute and takes a long time. The government should improve the road system and distribute the traffic to make it easier for everyone to attend work.
11. Necessary, the traffic jam is too serious now.

### **Vietnamese**

1. [The] police force needs to be highly considered, giving police a priority to protect people and public property and businesses.
2. I hope to have more [affordable] houses or apartments.
3. Homelessness is on the rise in Portland; action is needed
4. Expanding the bus and Max system will help reduce traffic congestion, which in turn will contribute to climate change [due to vehicle smoke].
5. Human life is important; minimizing [homelessness] is best.
6. I believe government regulation is important to encourage people to carpool, etc., to reduce the traffic on the road. [A] Government road plan.
7. Homeless problem
8. [The] homeless population in the Metro area is out of control. We need more affordable housing for people, including BIPOC. Also, please plan to have a parking lot of those housing as well. No parking on the street.
9. This problem is important because it reduces traffic jams and accidents... The problem that needs to be solved now is homelessness and theft.
10. Homeless, safety

What is the primary way you get around?

1. Car (95.65%)
2. Carpool (4.35%)

## Hispanic: (9 ppl)

Which of the following places or resources for connecting and learning would you be most likely to use to stay informed about local issues and resources?

1. Facebook (77.78%)
2. TV in Spanish (55.56%)
3. Instagram (44.44%)

Which of the following messengers would you trust to share important information?

1. Community Leaders and Advocates (55.56%)
2. County Entities (55.56%)
3. Family & Friends (44.44%)

Which area is most interesting to you and your community?

1. Affordable Housing (66.67%)
2. Garbage and recycling system (22.22%)
3. Transportation (11.11%)

Which of the following issues is most important to address with transportation?

1. Fewer deaths and severe injuries on our roads
2. Reduce the impacts our cars, buses, and trucks have on climate change (T-2)
3. Expand the bus and max system (T-2)

Why do you believe the answers above are important? Do you think it is important that government agencies address this? What other issues should be addressed?

1. These are matters that are expected to be provided by government agencies.
2. Homeless, homeless people, but the most important thing is the insecurity that currently exists.
3. Transportation [to] hospitals for immigrants
4. For me, it is very important to take care of the planet, to educate ourselves to recycle. Also to be able to have childcare more accessible to everyone, because that is the basis of their future, I also think that parks should have more fun areas for young people and not only for children, I think there is a lack of places for young people [to] stay busy.
5. Yes, the Governor [should address issues]
6. Community safety and street lighting
7. Because it is important
8. Because there have been many deaths and the safety of us and our children [are important].
9. The transportation system is important and provides access to resources for all people, so expanding the max and bus system would allow more people to be able [to] use community resources and enhance their quality of life.

What is the primary way you get around?

1. Bus/Max (55.56%)
2. Car (33.33%)
3. Bike (11.11%)

### **White/Caucasian/Slavic: (12 ppl)**

Which of the following places or resources for connecting and learning would you be most likely to use to stay informed about local issues and resources?

1. Facebook (83.33%)
2. Instagram (66.67%)
3. Email (41.67%)

Which of the following messengers would you trust to share important information?

1. Friends & Family (58.33%)
2. State or local elected officials (41.67%)
3. Tied - Local Newspapers and Reporters, Community Leaders and Advocates (33.33% each)

Which area is most interesting to you and your community?

1. Parks and Nature (66.67%)
2. Affordable housing (16.67%)
3. Garbage and recycling system (16.67%)

Which of the following issues is most important to address with transportation?

1. Expand the Bus and Max
2. Fewer deaths and severe injuries on our roads

Why do you believe the answers above are important? Do you think it is important that government agencies address this? What other issues should be addressed?

1. I know some people of [the] Portland area live in places without bus stops. Unfortunately, a lot of Russian immigrants [do] not earn a lot of money. That's why they cannot afford to pay for the car or taxi. Also, information about new routes will let people choose new places [to] rent or buy houses in [the] future.
2. Safety is important
3. I think this is very important.
4. Yes, I think it's important.
5. This is [a] very important issue for me and people who live in my apartment complex in West Linn. We do not have a bus stop nearby. People have to take Uber to get to the bus stop on Highway 43. This is very expensive and inconvenient. Public transportation issues should be addressed by local or county authorities.
6. Homeless
7. Property taxes, homeless people, and dirt on the streets.
8. It is important. [Transportation] needs to be made more accessible for Russian-speaking people.
9. Yes. These are very important issues and need to be addressed.
10. Safety. More bus lines.

What is the primary way you get around?

1. Car (58.33%)
2. Bus/Max (33.33 %)
3. Walk (8.33%)

## **CLOSING REMARKS**

Participants thanked LMS and Oregon Metro for the opportunity to engage and share their thoughts, opinions, and ideas. The facilitators who conducted the conversations were astounded by the level of engagement from the communities.

LEP communities are open, interested, and willing to participate in Metro's projects and the processes needed to make them happen. They see the importance and value of expressing their opinions and needs. Most of the participants were first or second-generation immigrants. They are generally younger and continue working for more hours than their white counterparts. They come from countries where gathering information from the public is different and not present. The community members want to contribute but do not have practice with similar processes from their home country.

LMS believes that each community has its unique challenges and needs, but the contributions, dreams, values, and barriers are similar. They want to engage and be engaged. Each group has community members interested in being part of the planning Metro manages. Metro will need to work on its communication strategy to access these willing communities of limited English proficiency. LMS has an obligation to the participants involved in this research to relay to Metro that they and their communities want to participate in the planning process.

Participants in the focus groups were most interested in understanding the resources available in their locality. They wanted clear, direct, and concise information, with the option to read more if desired in a timely way. They want to provide ideas for projects and be involved in policy-making and planning. Community members also want an array of options to engage with Metro, especially for those who don't have the access required to engage electronically, such as the hardware or the experience of navigating resources virtually. These communities may be good with technology in general, but they will need training on using the tools required to be involved with Metro.

## **RECOMMENDATIONS**

Metro's Language Proficiency Plan outlines Metro's responsibilities to persons with limited English proficiency. It defines Metro's process for providing language access to its programs and services under Title VI of the Civil Rights Act of 1964. It is required under Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency.

For Metro to succeed with its plan, they will want to be thoughtful in engaging members of the LEP community through all stages of the process and projects.

Based on Metro's role and request, and after listening to the LEP community participants, LMS curated the following recommendations:

- 1) Community members with limited English need more culturally responsive communication and engagement from Metro to meet them where they are at. This includes:

- Start the process and conversations early, even before the projects exist. Include LEP community members to help form the foundation of future projects and partnerships. Metro needs to understand the value of meeting tri-county residents where they are.
  - Recognize that LEP communities have much to contribute to Metro. Metro will benefit from hearing and understanding the values, needs, and desires of all community members.
  - In many ways, Metro currently has a clean slate. The LEP community members do not have a clear image or really, much of an image at all of Metro. Metro can use this moment to build a strong brand with the LEP communities that will pass on to future generations.
- 2) Be culturally appropriate and responsive when doing outreach to specific communities.
- When doing outreach to targeted communities, use the known media channels for each group. All groups mentioned Facebook and Instagram to learn about local issues, using the local Portland feeds for each community.
    - The Latino/a/x community selected TV in Spanish as the second-most used form of media to learn about local issues.
    - The Mandarin and Vietnamese communities selected Email and Newspapers as choices for learning about local issues. Vietnamese mention KGW as their preferred local news outlet.
    - The Russian community selected Instagram, then emails as their two preferred media sources for local issues.
  - When creating outreach materials and invitations, consider literacy level and use simple messaging because the message may have to be translated into other languages. Using fewer words and simple graphics are easy ways LEP communities can recognize the meaning and understand messages.
  - Participants were interested in community clean-ups. Metro would benefit from considering the need for communities to bring the whole family: children, parents, and grandparents. Community events like clean-ups unite people with one common goal and strengthen the community.
  - When publishing messages or invitations, make them easy to find and available without hiding them behind English or just adding a link.
  - Use photos that represent the diversity in the communities you want to reach.
  - Minimize the amount of information required when registering participants for future events.
  - Do social media blasts and invest in making sure LEP communities hear your message.
- 3) Express the same level of gratitude to these communities for engaging with Metro as they express to Metro.
- Ask for their help instead of volunteering their time and make sure they feel invited and valued while participating.
  - Implement more explicit guidance and information about participating in the project process and funding allocations for Metro projects.

- For public meetings and community engagement, provide access to LEP participants with:
  - Oral interpretation services.
  - Bilingual staff.
  - Telephone service lines interpreters.
  - Written translation services.

### **Acknowledgment**

Lara Media Services thanks Metro for this opportunity to connect with the hearts and minds of Limited English Proficiency communities in the Portland Metro Area. From doing this outreach and research, it is evident that there are many opportunities in the future waiting to unfurl.



## APPENDIX E. PUBLIC ENGAGEMENT AND NON-DISCRIMINATION CERTIFICATION CHECKLIST FACTOR 1 METHODOLOGY, 2023 REGIONAL TRANSPORTATION PLAN



### 2023 REGIONAL TRANSPORTATION PLAN Public Engagement and Non-discrimination Certification and Documentation for projects submitted in the 2023 Regional Transportation Plan Call for Projects

#### Purpose

This form provides documentation and a description of the public engagement opportunities that have been provided by project sponsors during the planning and development of projects submitted in the 2023 Regional Transportation Plan (RTP) call for projects. Completion of the form declares that the project sponsors have provided adequate opportunities for public engagement during the development of plans and projects, including identifying and engaging marginalized communities, including people with low income, people with disabilities, people with limited English proficiency, and Black, Indigenous and other people of color.

Metro retains these forms to demonstrate compliance with federal (U.S. Department of Transportation, Federal Highways Administration and Federal Transit Administration) and state (Oregon Department of Transportation) guidance on public engagement and on Title VI of the Civil Rights Act and other civil rights requirements (see [FTA Circular 4702.1B](#) and Code of Federal Regulations [450.210](#) and [450.316](#)). Documentation of the local actions described in this form may be requested by federal or state regulators.<sup>22</sup>

One form must be completed for the list of projects submitted by each nominating agency for the 2023 RTP. Metro will use the information provided to document and describe the array of public engagement opportunities that contributed to the development of the 2023 RTP. All or parts of the completed form may be included in the 2023 RTP public engagement report.

For questions, contact Ally Holmqvist, Senior Transportation Planner at [ally.holmqvist@oregonmetro.gov](mailto:ally.holmqvist@oregonmetro.gov)

#### Overview of Instructions

**1) Complete this form** for all projects and programs submitted to 2023 RTP.

- **Section A:** Public Engagement Checklist
- **Section B:** Signed Certification Statement
- **Section C:** Documentation of Source(s) of Projects Submitted
- **Section D:** Summary of Engagement (*for NEPA projects only*)

**2) Submit list of projects for 2023 Regional Transportation Plan**

**3) Submit letter of endorsement from your governing body** (e.g., city council, board, commission) for all projects submitted

**4) Ensure records are retained by your agency** in accordance with instructions in this form

<sup>22</sup> 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**

By February 17, 2023, nominating agencies must fill out each section of this form and submit the completed form to Metro along with the list of projects submitted to the 2023 RTP.

By May 24, 2023, nominating agencies must submit a letter of endorsement from their governing body indicating support for the projects submitted to the 2023 RTP.

Nominating agencies must keep referenced records on file in case of a request for information.

### **Section A: Public Engagement Checklist**

The checklist in this section outlines federal and state Title VI and engagement requirements for transportation planning and project development. By checking each box, project sponsors are confirming that the submitted projects have met the associated requirements to support Title VI and engagement compliance for the 2023 RTP. The type of records that should be retained are listed where appropriate. These do not need to be submitted to Metro, but must be retained by project sponsors as described above. The completed checklist may be included in the final 2023 RTP public engagement report.

### **Section B: Signed Certification Statement**

By signing this section, project sponsors certify:

- (1) That projects submitted to the 2023 RTP comply with federal and state Title VI and engagement requirements;
- (2) their commitment to retaining records documenting this compliance; and
- (3) their commitment to conducting future project development processes for projects in the RTP that are compliant with federal and state Title VI and engagement requirements.

### **Section C: Documentation of Source(s) of Projects Submitted**

In this section, project sponsors provide a list of (1) the adopted local transportation system plans, subarea plans or strategies, topical plans or strategies, modal plans or strategies, transit service plans or any other such plans or studies that were developed with opportunities for public feedback, in which the submitted projects are included and where additional information on public engagement may be found; and, if needed, (2) information for plans, strategies, etc. that are not yet adopted, but are anticipated to be adopted through a public process prior to the adoption of the 2023 RTP.

### **Section D: FOR NEPA PROJECTS ONLY - Summary of non-discriminatory, inclusive engagement for NEPA projects**

In this section, project sponsors provide additional information on public engagement elements and activities that illustrate how requirements are being met and best practices that are being utilized for any projects subject to the [National Environmental Policy Act](#) (NEPA). These are typically large-scale, major projects, anywhere from \$100 to 500 million in cost ([CFR 40 1508.18](#)), may be constructed in multiple phases, have a high level of public, legislative or congressional interest and require more extensive public outreach and engagement. Completed summaries may be included in the final 2023 RTP public engagement report.

### **Letter of Endorsement Signed by Governing Body – Due May 24**

A letter of endorsement from your governing body that indicates support for projects submitted to the 2023 RTP must be provided to Metro.

### **Requirements for Retention of Records**

Records should be retained until the related local transportation system plan, subarea plan or strategy, topical plan or strategy, modal plan or strategy, transit service plan or other plan or study is superseded, or the submitted projects have been completed or removed from the RTP plus six years. Retained records do not have to be submitted unless requested by Metro, state regulators or federal regulators.

## Section A. Public Engagement Checklist for Projects Submitted

This checklist outlines federal and state Title VI and engagement requirements for transportation planning and project development. By checking each box, project sponsors are confirming that the submitted projects have met the associated requirements to support engagement compliance for the 2023 RTP.

Project Sponsor Agency: \_\_\_\_\_

Total number of projects submitted in 2023 RTP Call for Projects: \_\_\_\_\_

- All projects submitted in the call for projects are included in one or more of the documents listed in Table 1 in Section C of this form.

*Retained records: Copies of all documents listed in Section C.*

**OR**

- Not all projects submitted in the call for projects are included in one or more of the documents listed in Table 1 in Section C of this form. These projects are listed in Table 2 in Section C of this form.

- The nominating agency or governing body has adopted a Title VI Plan and administrative procedures to implement it in compliance with Federal Title IV of the Civil Rights Act and implementing regulations.

- Projects submitted for the 2023-30 implementation timeframe have conducted, or will conduct, documented project-specific public engagement and analyzed potential inequitable impacts for Black, Indigenous and other people of color, people with limited English proficiency and people with low income compared to those for other population groups.

*Retained records: Documentation of public engagement activities.*

- Projects submitted for the 2031-45 implementation timeframe have conducted, or will conduct, project-specific public engagement and analyze potential inequitable impacts for Black, Indigenous and other people of color, people with limited English proficiency and people with low income compared to those for other population groups.

*Retained records: Documentation of public engagement activities.*

- A public engagement plan was developed for each of the plans, strategies, etc., listed in Table 1 of Section C, in compliance with Federal Title IV of the Civil Rights Act of 1964 and implementing regulations, including the following (check all that are true):
  - A statement of non-discrimination.
  - Public notices were published and requests for input were sent in advance of the project start, engagement activity or input opportunities.
  - Timely, convenient and accessible forums for public input throughout the process. These forums included accommodations for people with disabilities (e.g., screen reader-compatible materials, ASL interpretation), people with limited English proficiency (e.g., translation) and other accommodations (e.g., hybrid meetings).
  - Interested and affected groups were identified, and contact information maintained, in order to share plan information; updates were provided for key decision points; and opportunities to engage and comment were provided throughout the process.
  - Efforts were made to engage marginalized populations, including Black, Indigenous and other people of color, people with limited English proficiency, people with low income, people with disabilities, older adults and youth. Meetings or events were held at times and locations that are convenient and accessible for marginalized populations 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.
  - During project and/or plan development, a demographic analysis was completed to understand the locations of Black, Indigenous and other 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, at the minimum consistent with Title VI requirements.
  - Analysis was conducted to document potential inequitable impacts for Black, Indigenous and other communities of color, people with limited English proficiency and people with low income compared to those for other residents.
  - Public comments were considered throughout the process, and comments received on the staff recommendation were compiled, summarized and responded to, as appropriate.
  - 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:** *Public engagement plans and documentation of each element that is checked.*

- ❑ One or more projects or programs included in the submitted list identified potential inequitable impacts through demographic analysis and public outreach. If box is checked, list each project and describe the response to identified potential inequitable impacts.
  - RTP # (if assigned)
  - Project name
  - Project description
  - Response to potential inequitable impacts

*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).*

**Section B. Signed Certification Statement – 2023 Regional Transportation Plan**

*By signing this section, project sponsors certify:*

- (1) that projects submitted to the 2023 RTP comply with federal and state Title VI and engagement requirements;*
- (2) their commitment to retaining records documenting this compliance; and*
- (3) their commitment to conducting future project development processes for projects in the RTP that are compliant with federal and state Title VI and engagement requirements.*

\_\_\_\_\_ (project sponsor agency)  
certifies the information provided in Section A of this form is accurate.

As attested by:

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

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

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







#### **Section D. For NEPA Projects Only - Summary of non-discriminatory, inclusive engagement**

*In this section, the project sponsor provides additional information on public engagement elements and activities that illustrate how requirements are being met and best practices are being utilized for any projects subject to the National Environmental Policy Act (NEPA).*

Provide a brief summary describing the engagement approach, practice and processes for each project subject to the [National Environmental Policy Act](#) (NEPA). The summary may be included in the final public engagement report for the 2023 RTP. List the project name and number for each project. Please respond to each of the following:

- Project name
- RTP Project ID#
- Project sponsor and agency partner(s)
- Brief description of the overall public engagement process, including time period
- Description of compliance with Title VI and Oregon [Goal 1: Citizen Involvement](#) and Goal [12: Transportation Planning](#) Administrative Rules, including:
  - Description of how the community has been involved to date and how community will continue to be involved through project design and/or development, including Black, Indigenous and other people of color, people with limited English proficiency and people with low income.
  - How input helped shape project or plan development and prioritization, including what changes came about because of community input particularly for Black, Indigenous and other people of color, people with limited English proficiency and people with low income; and what community stability and anti-displacement strategies have been or will be considered and included in the project and/or plan development.
- Any additional best practices that contributed to equity, transparency, and accountability.

## APPENDIX F. EXAMPLE OF PUBLIC NOTICE WITH TRANSLATION

### Tell us what you think | 30-day comment period

Review and comment on the draft Metropolitan Transportation Improvement Program, which documents how greater Portland communities will invest federal transportation money from 2021 to 2024. The Metropolitan Transportation Improvement Program also demonstrates how the list of projects complies with federal regulations regarding fiscal constraint and public involvement.

April 17 through May 18, 2020  
[oregonmetro.gov/mtip2021-24](http://oregonmetro.gov/mtip2021-24)



Submit comments April 17 through May 18, 2020: online at [oregonmetro.gov/mtip2021-24](http://oregonmetro.gov/mtip2021-24) | by mail to Metro Planning - MTIP, 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.

Provide written or verbal public comment at the Metro Council public hearings: **2 p.m. Thursday, April 23, 2020** and **2 p.m. Thursday, July 23, 2020**. Metro Council meetings are currently being held virtually. Check [oregonmetro.gov/council](http://oregonmetro.gov/council) for meeting information.

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**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 503-797-1888.

**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 503-797-1888.

**本公告旨在通知您利用這個機會評議在您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 503-797-1888。**

**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 503-797-1888.

**본 통지서는 지역 내 교통 관련 우선 사항에 대해 귀하의 의견을 제시할 수 있는 기회를 알려 드리기 위한 것입니다. 한국어로 번역된 통지서 전문을 받아보시려면, 503-797-1888로 문의하십시오.**



## APPENDIX H. CIVIL RIGHTS NOTICE INCLUDED IN COUNCIL AND COMMITTEE AGENDAS

### Metro respects civil rights

Metro fully complies with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act and other 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 [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) or call 503-797-1890. 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 503-797-1890 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) 5 business days 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 [trimet.org](http://trimet.org)

#### Thông báo về sự Metro không kỳ thị của

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). Nếu quý vị cần thông dịch viên ra dấu bằng tay, trợ giúp về tiếp xúc hay ngôn ngữ, xin gọi số 503-797-1700 (từ 8 giờ sáng đến 5 giờ chiều vào những ngày thường) trước buổi họp 5 ngày làm việc.

#### Повідомлення Metro про заборону дискримінації

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 Якщо вам потрібен перекладач на зборах, для задоволення вашого запиту зателефонуйте за номером 503-797-1700 з 8.00 до 17.00 у робочі дні за п'ять робочих днів до зборів.

#### Metro 的不歧视公告

尊重民權。欲瞭解Metro民權計畫的詳情，或獲取歧視投訴表，請瀏覽網站 [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights)。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503-797-1700（工作日上午8點至下午5點），以便我們滿足您的要求。

#### Ogeysiiska takooris la'aanta ee Metro

Metro waxay ixtiraamtaa xuquuqda madaniga. Si aad u heshid macluumaad ku saabsan barnaamijka xuquuqda madaniga ee Metro, ama aad u heshid warqadda ka cabashada takoorista, booqo [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Haddii aad u baahan tahay turjubaan si aad uga qaybqaadatid kullaan dadweyne, wac 503-797-1700 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) shan maalmo shaqa ka hor kullanka si loo tixgaliyo codsashadaada.

#### Metro의 차별 금지 관련 통지서

Metro의 시민권 프로그램에 대한 정보 또는 차별 항의서 양식을 얻으려면, 또는 차별에 대한 불만을 신고 할 수 [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). 당신의 언어 지원이 필요한 경우, 회의에 앞서 5 영업일 (오후 5시 주중에 오전 8시) 503-797-1700를 호출합니다.

#### Metro의差別禁止通知

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)。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がご要請に対応できるよう、公開会議の5営業日前までに503-797-1700（平日午前8時～午後5時）までお電話ください。

**សេចក្តីជូនដំណឹងអំពីការមិនរើសអើងរបស់ Metro**  
ការគោរពសិទ្ធិពលរដ្ឋរបស់ ។ សំរាប់ព័ត៌មានអំពីកម្មវិធីសិទ្ធិពលរដ្ឋរបស់ Metro ឬដើម្បីទទួលបានការបណ្តឹងរើសអើងសូមទូរសព្ទទៅលេខ 503-797-1700 ។  
[www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights)។  
បើលោកអ្នកត្រូវការអ្នកបកប្រែភាសានៅពេលរដ្ឋប្រជុំសាធារណៈ សូមទូរសព្ទទៅលេខ 503-797-1700 (ម៉ោង 8 ព្រឹកដល់ម៉ោង 5 ល្ងាច ថ្ងៃច័ន្ទ) ។  
ថ្ងៃច័ន្ទ មុនថ្ងៃប្រជុំដើម្បីអាចឲ្យគេសម្រួលតាមសំណើរបស់លោកអ្នក ។

#### إشعار بعدم التمييز من Metro

تتكرم Metro الحقوق المدنية. للمزيد من المعلومات حول برنامج Metro للحقوق المدنية أو لإيداع 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 503-797-1700 (من الساعة 8 صباحاً حتى الساعة 5 مساءً، أيام الاثنين إلى الجمعة) قبل خمسة (5) أيام عمل من موعد الاجتماع.

#### Paunawa ng Metro sa kawalan ng diskriminasyon

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). Kung kailangan ninyo ng interpreter ng wika sa isang pampublikong pulong, tumawag sa 503-797-1700 (8 a.m. hanggang 5 p.m. Lunes hanggang Biyernes) lima araw ng trabaho bago ang pulong upang mapagbigyan ang inyong kahilingan.

#### Notificación de no discriminación de Metro

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). Si necesita asistencia con el idioma, llame al 503-797-1700 (de 8:00 a. m. a 5:00 p. m. los días de semana) 5 días laborales antes de la asamblea.

#### Уведомление о недопущении дискриминации от Metro

Metro уважает гражданские права. Узнать о программе Metro по соблюдению гражданских прав и получить форму жалобы о дискриминации можно на веб-сайте [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Если вам нужен переводчик на общественном собрании, оставьте свой запрос, позвонив по номеру 503-797-1700 в рабочие дни с 8:00 до 17:00 и за пять рабочих дней до даты собрания.

#### Avizul Metro privind nediscriminarea

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). Dacă aveți nevoie de un interpret de limbă la o ședință publică, sunați la 503-797-1700 (între orele 8 și 5, în timpul zilelor lucrătoare) cu cinci zile lucrătoare înainte de ședință, pentru a putea să vă răspunde în mod favorabil la cerere.

#### Metro txoj kev ntxub ntxaug daim ntawv ceeb toom

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 503-797-1700 (8 teev sawv ntxov txog 5 teev tsaus ntuj weekdays) 5 hnub ua hauj lwm ua ntej ntawm lub rooj sib tham.

January 2021

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.

**Stay in touch with news, stories and things to do.**

[oregonmetro.gov/news](http://oregonmetro.gov/news)

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**Auditor**

Brian Evans

600 NE Grand Ave.

Portland, OR 97232-2736

503-797-1700