

MAKING A
GREAT
PLACE



Limited English Proficiency Plan

Plan for improving access to Metro's programs,
activities and services for persons with limited
English proficiency

August 2015



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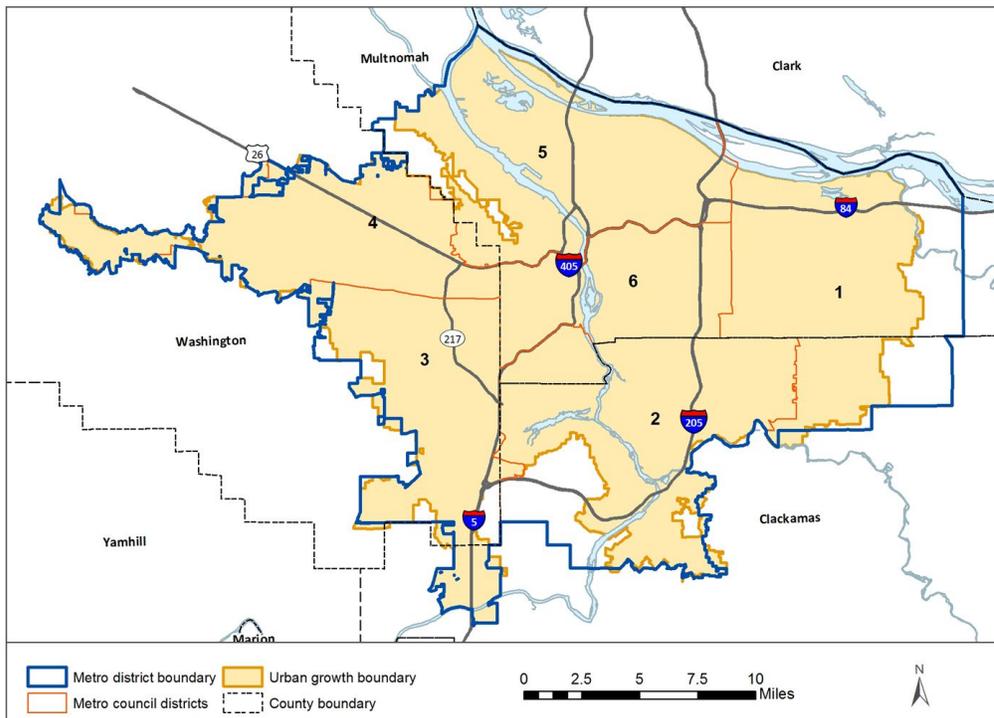
INTRODUCTION

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

Metro is a directly elected regional government serving 1.5 million people living in the urbanized areas of the Portland 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 and active transportation systems.

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 Council districts and jurisdiction boundary



PURPOSE AND PROCESS

The purpose of the Limited English Proficiency (LEP) Plan is to provide language assistance for LEP persons seeking meaningful access to programs as required by Executive Order 13166 and USDOT's policy guidance. This plan details procedures for identifying populations of limited English proficiency, providing language assistance, training staff, notifying LEP persons that assistance is available, and information for future plan updates. The jurisdictional boundaries addressed will focus on the tri-county area designated as the Metro metropolitan planning organization service area.

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

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

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

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

SECTION I: LIMITED ENGLISH ACCESS NEEDS ASSESSMENT

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

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

- Approximately 288,700 persons age 5 and older, or 19.6 percent of the metro region's age 5 and older population, speaks a language other than English at home.
- Approximately 126,500 persons age 5 and older speak a language other than English at home and speak English less than "very well." This population is 8.6 percent of the Metro region's age 5 and older population.
- Spanish is the second most predominant language, next to English, spoken in the region.
- Fifteen non-native English language groups within Metro's service area have limited English proficient populations very near or exceeding the 1,000 person threshold.
- Of all languages spoken in the region, Table 1 shows the languages that are very near or exceed the limited English proficiency threshold of 1,000 persons. No languages meet the 5percent of the service area population threshold.

Table 1. Languages in Metro’s jurisdictional boundary with more than 1,000 LEP persons

Language spoken at home	Population age 5 and older speaking a language other than English at home	Population that is LEP, age 5 and older, by native language	Percent of total LEP population by native language	Percent of total regional population age 5 and older (1,473,411), LEP, by language
Spanish or Spanish Creole	133,781	62,030	49.0%	4.2%
Vietnamese	22,932	14,856	11.7%	1.0%
Chinese	19,526	10,174	8.0%	0.7%
Russian	14,225	6,564	5.2%	0.4%
Korean	7,630	3,760	3.0%	0.3%
Ukrainian *	<i>no ACS data</i>	2,901	2.3%	0.2%
Japanese	5,774	2,145	1.7%	0.1%
Arabic	4,965	2,036	1.6%	0.1%
Romanian *	<i>no ACS data</i>	1,974	1.6%	0.1%
Tagalog	6,041	1,759	1.4%	0.1%
Somali *	<i>no ACS data</i>	1,635	1.3%	0.1%
Mon-Khmer, Cambodian	2,521	1,285	1.0%	0.1%
Nepali *	<i>no ACS data</i>	1,156	0.9%	0.1%
Persian	2,617	1,041	0.8%	0.1%
Laotian	2,108	980	0.8%	0.1%
Total, all non-English languages	288,696	126,493	100.0%	8.6%

Data source: U.S. Census Bureau, American Community Survey 2009-2013, 5-year estimate, Table B16001, Language spoken at home, except:

* Languages not in ACS: estimates derived from Oregon Department of Education school language dataset for 2013-14

LEP population data sources

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

The data sources utilized in the determination of LEP, as recommended by the FTA handbook, *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*, April 13, 2007,² include:

- 2009-2013 American Community Survey (ACS) 5-Year sample: census tract data
- 2009-2013 American Community Survey (ACS) 5-Year sample: county data
- 2006-2008 American Community Survey (ACS) 3-Year sample: state data, special detailed tabulation of language spoken at home by English proficiency (not a part of a standard ACS data release)
- Oregon Department of Education (ODE): 2013-2014 school year enrollment data for school districts in Clackamas, Multnomah and Washington counties

LEP population analysis

2009-2013 American Community Survey

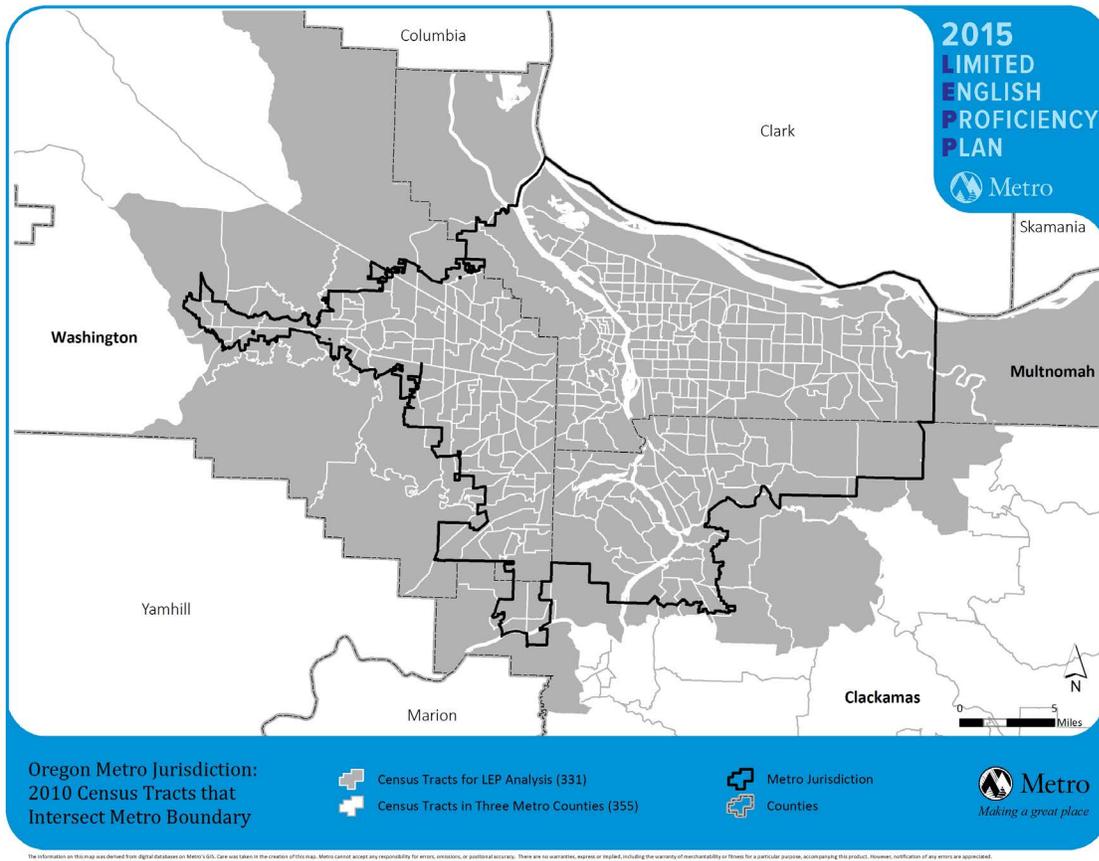
Metro's jurisdictional boundary area includes most of Clackamas, Multnomah and Washington counties. However, Metro's jurisdictional boundary does not conform to the geographies of U.S. Census data. In order to estimate the LEP populations within the jurisdictional boundary area, Metro collected and analyzed census data from the tract level (ACS 2009-2013) – selecting all tracts that were either partly or completely within Metro's service area boundary. As a result of this process, Metro identified 331 census tracts (Figure 1).

The estimated total counts of LEP population obtained from Table B16001 in the 2009-2013 ACS tract data were obtained by aggregating population estimates from 331 census tracts (which include Clackamas, Multnomah and Washington counties) of persons age 5 and older that speak English less than "very well."

While Hmong was on the list of languages that met the guidelines for translation in our 2013 Title VI report, Hmong did not meet the Safe Harbor guidelines for translation of vital documents in the 2015 analysis. In addition to the populations of Hmong LEP in the region slightly decreasing, a more precise methodology in the 2015 analysis shows that Hmong LEP is well below the Safe Harbor guidelines.

² 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.

Figure 1. Clackamas, Multnomah and Washington county census tracts included in Metro 2015 Factor 1 Analysis



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

In the 331 census tracts that intersect Metro’s jurisdictional boundary, the LEP population represents 8.6 percent of persons age 5 years and older (Table 2).

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

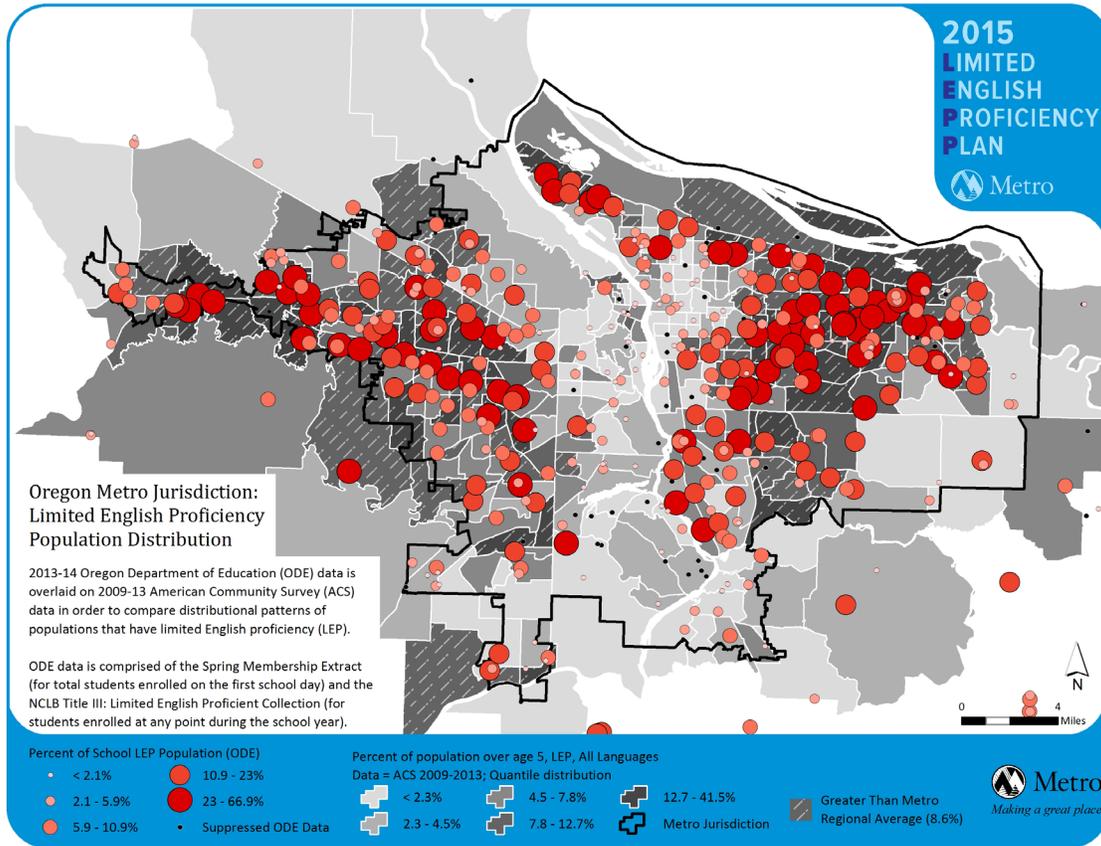
Total population, persons age 5 and older	Persons age 5 and older, speak a language other than English at home	Persons age 5 and older, speak a language other than English at home, speak English less than "very well" (LEP)	Percent of estimated regional population age 5 and older that is LEP
1,473,411	288,696	126,493	8.6%

Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

Figure 2 displays the percentage of all LEP speakers per census tract and schools in a quantile distribution. Also, Metro followed the recommendation in the 2007 FTA handbook to “identify specific census tracts where the proportion of LEP persons exceeds the proportion of LEP

persons in the service area as a whole,”³ by highlighting (white hashes in Figure 2) census tracts where the percentage of LEP persons is greater than the regional average of 8.6 percent. Appendix B Figures B1-B12 illustrate the spatial concentration of LEP speakers for each of the 15 languages.

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



Source: 2009-2013 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2013-2014 enrollment data

The ACS-based summary counts revealed eleven individual languages with LEP populations of more than 1,000 persons within the 331 tracts that intersect the Metro jurisdictional boundary. Although seven of the 11 individual languages have LEP populations exceeding 2,000, three of the languages have populations that slightly exceed the 1,000 person minimum threshold for the entire region, including Tagalog (1,759), Mon-Khmer (1,285), and Persian (1,041). The final individual language that has been included in Metro’s Limited English Proficiency Plan is Laotian (980). When considering the margins of error, Laotian has approximately a 50 percent probability of being either slightly above or slightly below the 1,000 person LEP threshold.

³ *Ibid*, p. 16.

Additionally, six ACS aggregated language groups also have populations of LEP speakers greater than 1,000, including “Other Slavic” (3,077), “African” (2,690), “Other Asian” (2,557), “Other Indo-European” (2,491), “Other Indic” (1,633), and “Other Pacific Island” (1,543).

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

2009-2013 American Community Survey (ACS) county level data

Metro analyzed Clackamas, Multnomah and Washington county census data from the 2009-2013 American Community Survey to confirm estimates, which are more reliable due to the increased sample population and decreased error margins of survey aggregations at larger geographic scales (i.e., counties provide more reliable estimates than tracts). Since the region intersects only three counties, it is possible to aggregate margins of error, as compared with the inability to aggregate margins of error for the 331 census tracts that intersect the Metro jurisdictional boundary (see Appendix C for additional discussion of margins of error for aggregates of estimates). As compared with tract data, the distribution of the LEP populations of individual languages is similar with the county data, which increases Metro’s confidence in the aggregated tract estimates of LEP speakers within the Metro jurisdictional boundary (see Appendix C, Table C2).

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

Total population age 5 and older	Persons age 5 and older, speak a language other than English at home	Persons over 5, speak a language other than English at home, speak English less than "very well" (LEP)	Percent of estimated Tri-County region population that is LEP
1,562,780	296,912	129,776	8.3%

Source: 2009-2013 American Community Survey, County level data, Table B16001

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

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

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

- Other Slavic (one of five sub-groups within the Indo-European language family)

- African
- Other Asian
- Other Indo-European (remaining languages in this family after four sub-groups and 15 individual languages are removed)
- Other Indic
- Other Pacific Island.

To determine if a single language population embedded within one of these group language categories has a population greater than 1,000, Metro collected and analyzed two additional data sets, one from the U.S. Census Bureau and one from the Oregon Department of Education. Metro used these in conjunction with the ACS 5-year releases to determine rough estimates for populations over age five that live within Metro's jurisdictional boundaries that are LEP within that specific language population.

2006-2008 ACS, State of Oregon, Detailed Languages

The U.S. Census Bureau has posted a detailed languages table, a one-time publication of highly detailed estimates of individual language populations at state-level geography, on their website.⁴ It reports data for approximately 135 languages spoken in the U.S., and shows how these are aggregated into the language groups and language families that are used for standard ACS data releases. The table provides valuable insight into the estimated statewide populations of several native languages that are anecdotally known to be significant within Metro's jurisdictional boundary (see Table 4). The special detailed language tabulation is published as Table 39 from the 2006-2008 American Community Survey, and contains only state-level data (see Appendix C, Table C4 for further discussion of the estimation procedure using this dataset).

⁴U.S. Census Bureau. Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over: 2006-2008, retrieved January 2013, from <http://www.census.gov/hhes/socdemo/language/data/other/usernote.html>.

Table 4. Estimation of LEP populations embedded within “language groups” reported in the 2009-2013 ACS, using U.S. Census Bureau statewide language data from 2006-2008

Native language other than English spoken at home	Estimated total population age 5 and older				Estimated total population age 5 and older speaks English less than “very well”			
	Table 39 (2006-2008)	Table 39 margin of error	Ratio, language to language group	331 Metro Tracts (2006-2010)	Table 39 (2006-2008)	Table 39 margin of error	Ratio, language to language group	331 Metro Tracts (2009-2013)
Other Slavic	6872	+/- 1515	0.9537	6544	3644	+/- 1010	0.8444	3077
Ukrainian	5261	+/- 1476	“- -“	<i>5018</i>	3143	+/- 953	“- -“	2654
Slovak	571	+/- 407	“- -“	<i>545</i>	320	+/- 356	“- -“	<i>270</i>
Czech	664	+/- 216	“- -“	<i>633</i>	103	+/- 85	“- -“	<i>87</i>
Bulgarian	376	+/- 267	“- -“	<i>359</i>	78	+/- 104	“- -“	<i>66</i>
	Sum, estimated populations: 6554				Sum, estimated populations: 3077			

Italicized cell values are estimated populations for the 331 census tract geography based on ratios generated from Table 39, State of Oregon data. **Bolded** population estimates rise above the 1,000 persons safe harbor threshold.

Oregon Department of Education (ODE) 2011-2012 enrollment data

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

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

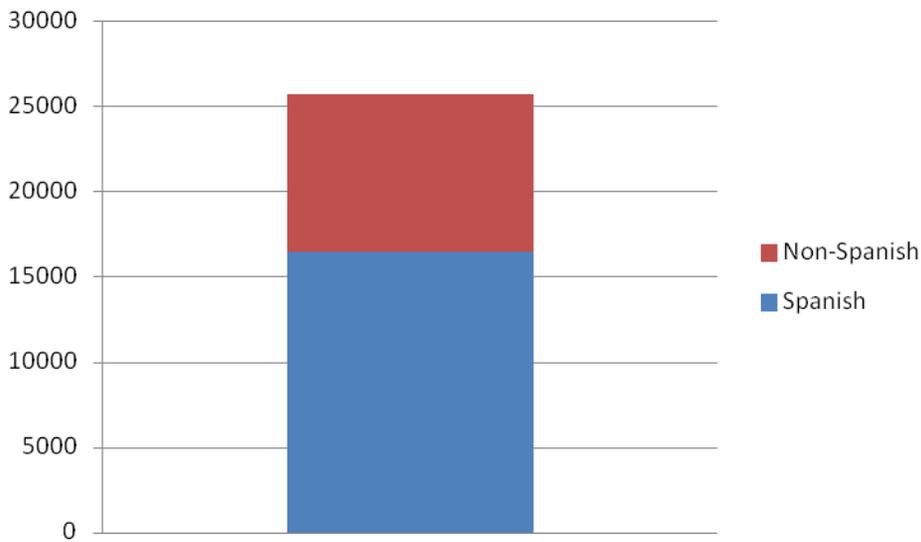
The data represent 100 percent counts rather than sample estimates. ODE collects native language and LEP status data on a rolling basis throughout the academic year in compliance with Title III of the federal No Child Left Behind Act. The schools data is highly detailed, with more than 200 individual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

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

The Oregon Department of Education 2013-2014 data helped refine Metro's estimates of more than a dozen languages which have significant LEP populations in the schools but are not reported in the U.S. Census. Nine language populations that either do not appear in the American Community Survey, or have unusable estimates, have at least 50 LEP speakers in the schools, including Somali, Ukrainian, Romanian, Nepali, Chuukese, Karen, Amharic, Burmese and Swahili (see Appendix C, Table C5).

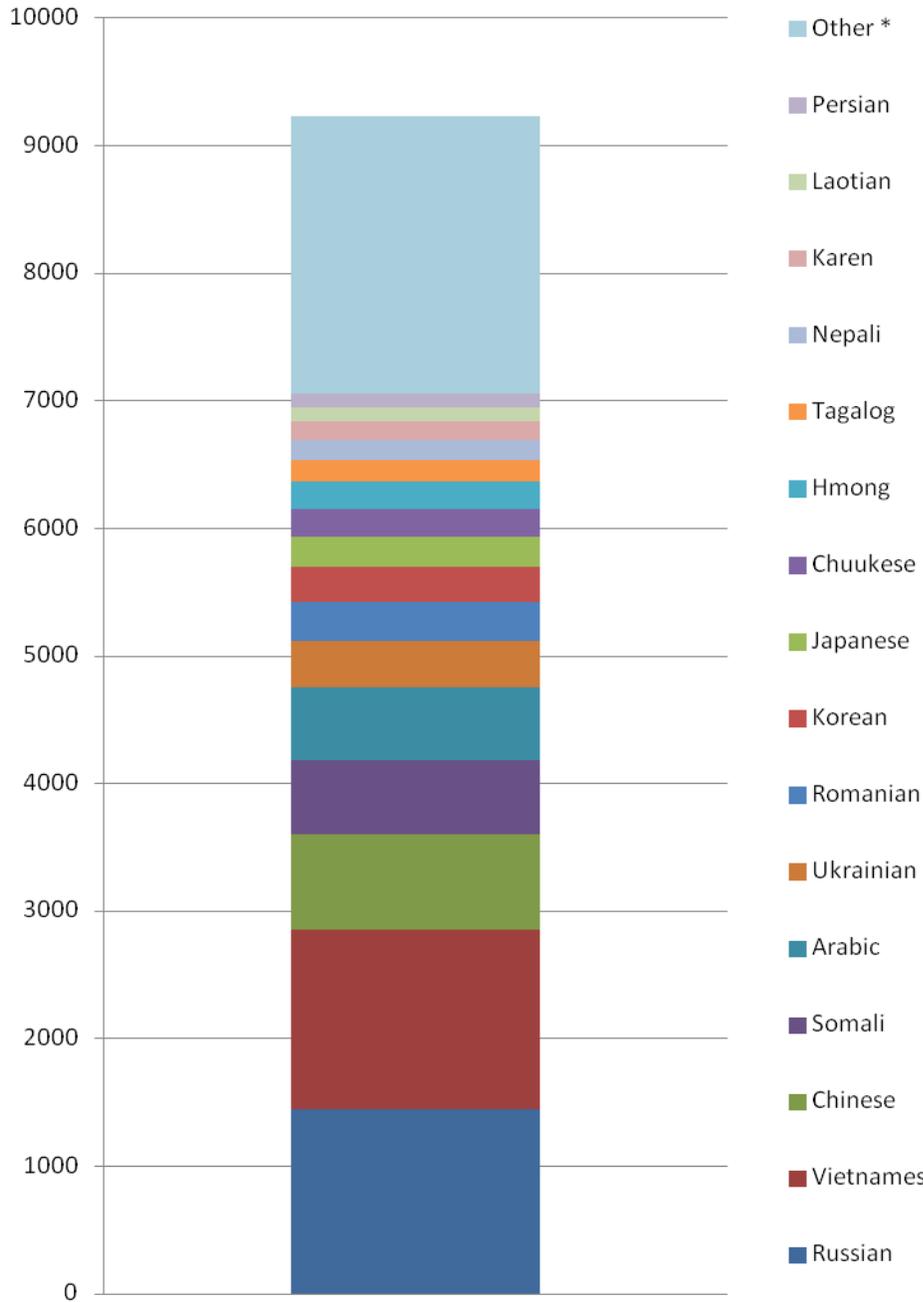
Figures 3 and 4 illustrate all LEP students enrolled in Oregon public and private schools that speak Spanish and all other languages besides Spanish.

Figure 3. LEP students enrolled in public schools within the Metro jurisdiction that speak Spanish and other languages besides Spanish



Source: Oregon Department of Education, 2013-2014

Figure 4. LEP students enrolled in Oregon public and private schools that speak other languages besides Spanish



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

Source: Oregon Department of Education, 2013-2014

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

Results summary

The analysis of the four data sources included in this report identified 15 specific languages in Metro's jurisdictional area with more than 1,000 individuals with limited English proficiency.

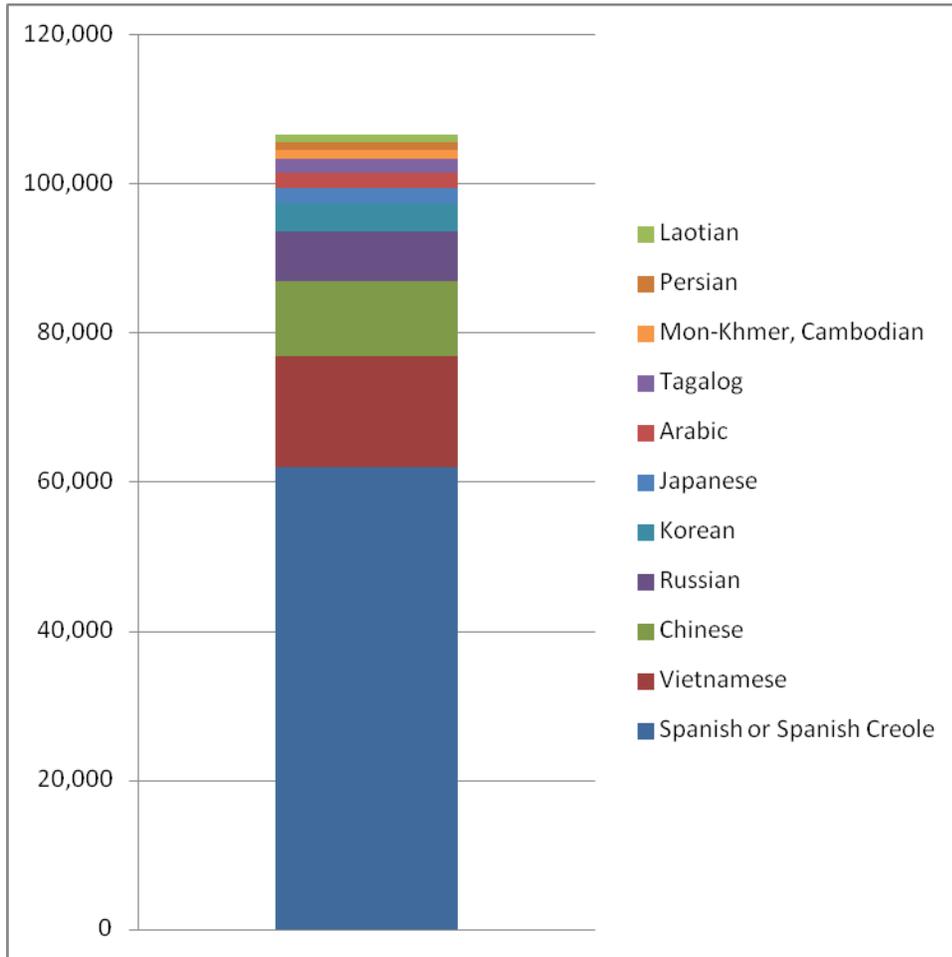
LEP populations for 11 of 15 languages could be determined from ACS data alone (Figure 5), whereas ODE data was needed to interpolate the populations of Ukrainian, Romanian, Somali and Nepali from within their parent ACS language groupings – Other Slavic, Other Indo-European, African and Other Indic respectively (Figure 6). Of the LEP populations, approximately one-half speak Spanish as their first language, and approximately three-quarters speak either Spanish, Vietnamese, Chinese (Mandarin and Cantonese) or Russian as their primary language.

Metro has determined that translation of vital documents should be evaluated for translation into fifteen languages, including vital documents found on Metro's website:

www.oregonmetro.gov. Upon request and subject to available resources, Metro will provide translation of other documents pertaining to programs and services into relevant languages.

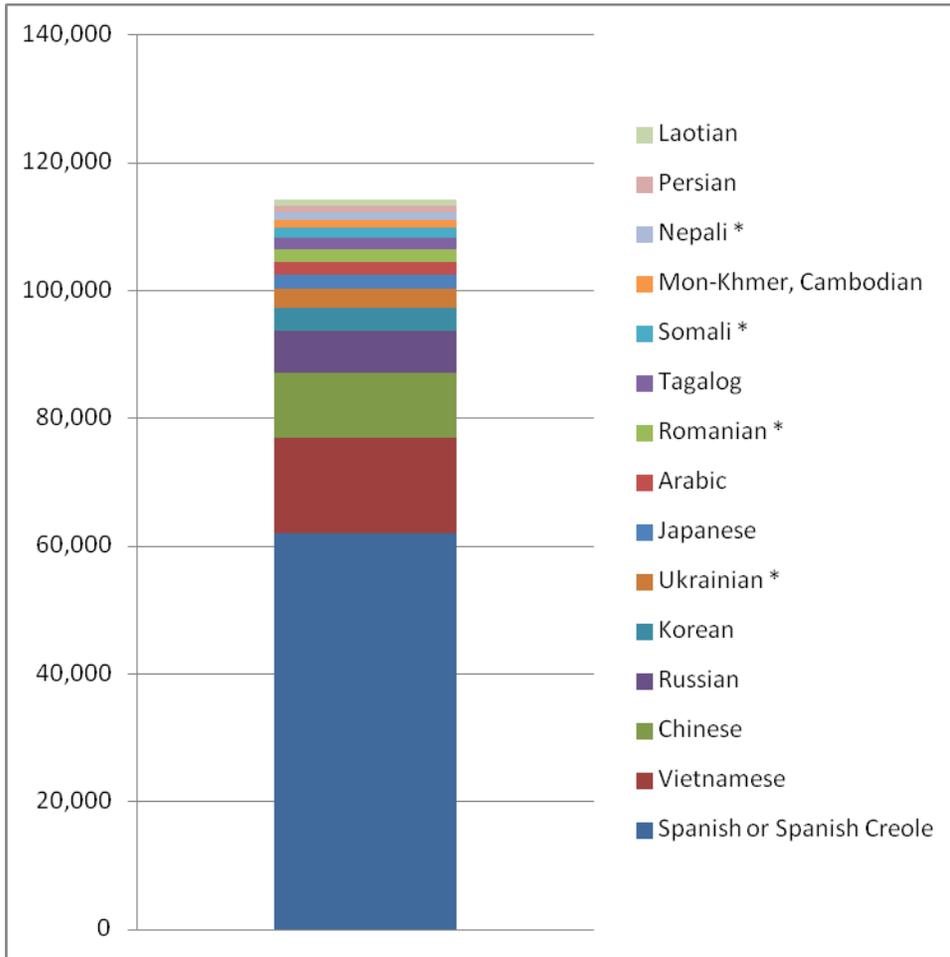
Ukrainian, Romanian, Somali and Nepali languages were added to the eleven languages identified in the 2009-2013 ACS data as having more than 1,000 LEP speakers in the general population age 5 and older. This was done after reviewing Oregon school district data for the region. Table 5 shows the fifteen languages, including the range of possible population sizes generated by different estimation procedures, based on supplemental data for the four languages which are not reported in ACS Table B16001.

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



Source: American Community Survey, 2009-2013

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



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

Table 5. Languages eligible or potentially eligible for safe harbor provisions in Metro-wide services

	1) Estimated persons age 5 and older, language at home is not English	2) Estimated LEP persons age 5 and older, language at home is not English	3) Estimated LEP persons age 5 and older, language at home is not English (from Table C2)	4) Estimated LEP persons age 5 and older, language at home is not English (from Table C2)	5) <i>Estimated regional LEP population > 5, based on schools data</i> (from Table C2)	7) Estimated percentage of total regional population (tracts), by language spoken at home and LEP
DATA	ACS 2009-2013 (tract)	ACS 2009-2013 (tract)	ACS 2009-2013 (county)	ACS 2006-2008 (state)	ACS 2009-2013 (tract)	
GEOGRAPHY	331 tracts	331 tracts	3 counties	State	331 tracts	
All languages	288,696	126,493	129,776	<i>not estimated</i>	<i>not estimated</i>	9.0%
Spanish	133,781	62,030	64,633			4.4%
Vietnamese	22,932	14,856	15,029			1.1%
Chinese	19,526	10,174	10,199			0.7%
Russian	14,225	6,564	6,849			0.5%
Korean	7,630	3,760	3,787			0.3%
Ukrainian	<i>no data</i>	<i>no data</i>	<i>no data</i>	2654	2,901	0.2%
Japanese	5,774	2,145	2,145			0.2%
Arabic	4,965	2,036	2,036			0.1%
Romanian	<i>no data</i>	<i>no data</i>	<i>no data</i>	2040	1,974	0.1%
Tagalog	6,041	1,759	1,759			0.1%
Somali	<i>no data</i>	<i>no data</i>	<i>no data</i>	1237	1,635	0.1%
Mon-khmer	2,521	1,285	1,285			0.1%
Nepali	<i>no data</i>	<i>no data</i>	<i>no data</i>	140	1,147	0.1%
Persian	2,617	1,041	1,054			0.1%
Laotian	2,108	980	983			0.1%
Karen	<i>no data</i>	<i>no data</i>	<i>no data</i>	0	879	0.1%
German	7,431	850	850			0.1%
Chuukese	<i>no data</i>	<i>no data</i>	<i>no data</i>	417	831	0.1%
Serbo-Croatian	1,663	817	817			0.1%
French	5,810	815	833			0.1%

Table incorporates estimates from two different procedures to account for LEP populations of languages not recorded in the 2009-2013 ACS.

Estimated total population over 5 years, Metro region: 1,473,411 (331 tracts); 1,562,780 (three counties).

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.⁵

In its role as metropolitan planning organization for the Portland metropolitan 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 transportation plan)
2. Metropolitan Transportation Improvement Plan (schedule of investment of federal transportation funds)

⁵ U.S. Department of Transportation, *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*, Section V, 70 FR 74087, Dec. 14, 2005.

3. corridor planning (potential New Starts and Small Starts projects)
4. regional flexible funding allocation (allocation of STP and CMAQ)
5. Regional Travel Options (mass marketing of and grant programs related to carpooling, biking and transit use).

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

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

Most metropolitan planning organization activities are geographically expansive, such as the RTP and Metropolitan Transportation Improvement Program, which plan for and consider the transportation system –and include transportation projects – across the entire Portland metropolitan region. Some functions address smaller, yet still significant, geographies, such as the planning of high capacity transit and related investments in a corridor that links two or three adjacent cities within one or two counties. Historically, Metro has had little success in engaging LEP populations these planning efforts, but with recent planning efforts that are exploring innovative tools (such as interactive posters with multiple languages) and new community partnerships, contact may increase.⁶

Metro's process for distributing its Surface Transportation Program (STP) and Congestion Mitigation and Air Quality Improvement Program (CMAQ) relies on soliciting project proposals from local jurisdictions. Because the proposals must be weighed against goals, objectives and policies of the RTP and other long-range plans, there is relatively little interest by even English-speaking stakeholders to deeply engage and provide input. Further, these proposals are developed from, and resulting projects are further developed through, city and county

⁶ See, for example: Public engagement reports for the Powell-Division Transit and Development Project, www.oregonmetro.gov/powelldivision.

processes with their own outreach – including outreach to LEP populations – requirements and practices that may allow for more direct and meaningful public influence.

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

Staff questionnaire

A questionnaire for Metro staff was conducted in August 2014 to determine the frequency of contact with residents with limited English proficiency. The survey was sent to 70 employees, including planning, administrative and communication staff who could come direct contact with the public via phone and public outreach events as well as planning staff who are the subject matter experts for the metropolitan planning organization's programs and land use planning programs. 37 of the 70 staff responded.

The staff questionnaire asked the following questions:

1. *Have you received a request from a community member for a language interpreter to be provided at a meeting related to a Metro program or project in the last year (July 1, 2013 - July 1, 2014)?*

All 37 respondents said they had received no requests for a language interpreter to be provided a meeting related to a Metro program or project during the reporting period.

2. *Have you received an information request from a community member (either by phone or in person) who had a hard time speaking English and needed an interpreter to understand information about a program or project in the last year (June 30, 2013 - July 1, 2014)?*

Of the 36 respondents, two (5.6 percent) said they had received an information request from a community member (either by phone or in person) who had a hard time speaking English and needed an interpreter to understand information about a Metro program or project during the reporting period.

3. *Have you received a request from a community member (either by phone or in person) to provide a translated version of a Metro document to better understand a Metro program or project in the last year (June 30, 2013 - July 1, 2014)?*

Of the 35 respondents, two (5.71 percent) said they had received a request from a community member (either by phone or in person) to provide a translated version of a Metro document to better understand a Metro program or project during the reporting period.

4. *Have you conducted community outreach (e.g., open house, table at a community event, etc.) targeted to people who don't speak English well, to obtain input or spread awareness of a Metro program or project in the last year (June 30, 2013 - July 1, 2014)?*

Of the 36 respondents, nine (25 percent) of the respondents said they had conducted outreach targeted to people who don't speak English well, to obtain input or spread awareness of a Metro program or project during the reporting period.

5. *Have you translated a document, sign or notice to help people understand something about a Metro program or project in the last year (June 30, 2013 - July 1, 2014)?*

Of the 36 respondents, 13 (50 percent) said they had translated a document, sign or notice during the reporting period.

These results indicate that a small portion of staff have direct interaction with people who don't speak English well. As targeted outreach to LEP communities continues, it is anticipated that translation and interpretation requests will increase.

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

Review of information obtained from community organizations

Metro convened a discussion group of community based organizations that serve LEP populations from across the agency's tri-county service area on April 16, 2012. Fourteen organizations were invited to send a representative to the meeting, where lunch was provided by Metro, and four attended.

- Roberto Varona, Virginia Garcia Memorial Health Clinic, said that many of the clients he transports, as part of the clinic's van service, are from Mexico or Guatemala. A large portion of the community he works with is migrant workers who travel to Oregon from California or Washington during the harvest season. He said that the migrant workers are often a bit more familiar with the area and how the roads and transit service might work, but many don't have a car or a license, so they often have a difficult time travelling in the Portland metropolitan region. Mr. Varona said his clients often speak only Spanish as a second language, their first language being native/Indian dialects, so they may not be able to read signs that are translated into Spanish. He explained that his agency often uses family members or professional services to interpret signs and directions, even when they are written in Spanish.

- Viktor Berezney, Human Solutions, serves the Slavic community in the Portland area. He explained that the Slavic population he serves can speak Russian, but there are as many as 15 other languages spoken in the community as well. He emphasized that Russian is often used as a common language to communicate to his clients. He also indicated that understanding how to use transit service is key for his clients, especially in their early years in the area. Mr. Berezney also said that his clients can often read Russian.
- Pei-ru Wang, Immigrant and Refugee Community Organization, works with a variety of different populations. She explained that staff at IRCO speak a total of 60 to 70 languages, and their client populations speak many more. Ms. Wang suggested Metro use the Coalition of Communities of Color report on languages spoken in the Portland region to see where the communities are that may need language assistance. Ms. Wang said that often times the smaller populations are more cohesive and supportive of each other as a group, and that the larger, more established populations may be more dispersed. She emphasized the importance of learning the most effective way to communicate with each population, which may be more than printing or translating materials.
- Hector Osuna, OPAL Environmental Justice Oregon, said Spanish is the only foreign language his organization addresses. He suggested that Metro has outreach programs in place, is familiar with community organizations, and knows what resources are needed, but needs to take the next step of implementing those resources.

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

Review of consultation with LEP persons

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

Metro selected six organizations to conduct a series of seven language discussion groups. Three discussions were held with Spanish speaking community members, by far the largest regional LEP population. Metro held a Spanish language discussion group in Clackamas, Multnomah and Washington counties. Two discussion groups were held in Chinese to accommodate the spoken language difference between Cantonese and Mandarin. One discussion group each was held with the Russian and Vietnamese communities.

Table 6. Community organizations contracted for language discussion groups

Community organization	Population served
Adelante Mujeres	Low-income Latina women and their families, primarily in Washington County

Asian Health and Services Center	Cantonese, Mandarin and Vietnamese clients with a focus on being the bridge between Asian and American culture
Immigrant Refugee Community Organization	Large variety of immigrants, refugees and the community at large
Asian Pacific American Network of Oregon	Asian and Pacific Islander population
Latino Network	Latino population, primarily in Multnomah County
Los Niños Cuentan	Latina population, primarily in Clackamas County

Common themes

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

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

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

Key findings

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

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

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

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

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

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

- Bike There and Walk There program
- tips and resources to help reduce the use of toxic products
- help finding a recycler, garbage hauler or places to take household hazardous waste
- information on which public transportation to take in order to attend Metro events.

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

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

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

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

- employment information.

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

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

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

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

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

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

Barriers to participation

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

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

- Limited access to Internet: Provide alternative methods to reach communities (e.g., word of mouth, partner with community organizations or reach parents through schools).
- Limited financial means: Provide low-cost or free options for events.
- Language barriers: Provide interpreter or staff who speak the language.

- Low literacy: Provide written information in clear, easy to understand language (consider developing content at fifth grade reading level or lower).
- Limited time: Participants indicated that time is a limiting factor in participating in decision-making opportunities, as some work multiple jobs or have family obligations that take priority.

Results summary

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

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

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

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

The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual. Decisions by a Federal, state, or local entity to make an activity compulsory, such as requiring a driver to have a license, can serve as strong evidence of the importance of the program or activity.⁷

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

Step 1: Identify your agency's most critical services

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

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

Step 2: Review input from community organizations and LEP persons

Your agency's contact with community organizations that serve LEP persons, as well as contact with LEP persons themselves, should provide information on the importance of the modes or types of service you provide to LEP populations. Depending on the results of your fieldwork, you may conclude that some particular routes or modes of transportation are of particular importance to the LEP population.⁸

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 funds 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

⁷ U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.

⁸ 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.

agencies and jurisdictions in planning for high capacity transit service, Metro is not a provider of public transit service.⁹

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

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

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

To aid in Metro's Factor 3 analysis, contextualize the work of Metro's transportation programs, activities and services, and help prioritize language assistance and outreach efforts, Metro has created a spectrum of importance to LEP persons using the guidance provided by the U.S. Department of Transportation and FTA (see next page). The guidance offers as examples "if language services in these areas are delayed, the consequences to these individuals could be life threatening" and that actions that make the activities compulsory "can serve as strong evidence of the importance of the program or activity." Taking these into account, Metro's LEP importance spectrum considers the potential consequences that could follow from a lack of language access, where life threatening implications are 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.

⁹ Metro works with Federal Transit Administration (FTA), Tri-County Metropolitan Transportation District of Oregon (TriMet), Oregon Department of Transportation (ODOT) and affected cities and counties in planning transportation corridor improvements, including high capacity transit service.

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

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

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

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

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

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

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

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

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

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

Level 2 Long-range planning and strategy development aimed at improving regional access and mobility, assuming no direct impact on construction in the next five years: Lack of language assistance may frustrate input that could affect policy and project selections and identification of regional goals, objectives, needs, challenges and community vision; example: Ability to provide input on Regional Transportation Plan, the Portland metropolitan area's 20-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: 6¹⁰)

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

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

Each corridor level plan will include an LEP four-factor analysis and an outreach plan as part its Title VI and environmental justice outreach plan, focused on the corridor or project area. Such plans will build on Metro's broader engagement 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.

¹⁰ Transportation corridor-focused planning that that could lead to strategies for community investment and development may in turn lead to planning for a major public investment in transit or roadway expansion and require an Environmental Assessment or Environmental Impact Statement. Such project evolution is often not identified as two separate project phases, more often seen as a growth in planning and public involvement efforts through project development. Metro recognizes that there is not a distinct boundary between the level "2," planning that that could lead to strategies for community investment and development, and the level "6," planning that could lead to urgent or important effects (transportation corridor Environmental Assessment and Environmental Impact Statement processes). Rather, there is a steady increase in importance that must be mirrored by a related increase in outreach and language-services as part of that outreach.

Regional Travel Options (importance level: 5)

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

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

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

Regional flexible funds (importance level: 4)

Every three years,¹¹ JPACT and the Metro Council decide how best to spend money from three federal funds: Congestion Mitigation Air Quality, Transportation Alternatives Program, and Surface Transportation Program. Under the allocation processes for funds for the 2014-2015 fiscal years and the 2016-2018 fiscal years, working groups made up of service providers and community advocates advised on how to address the needs of environmental justice and

¹¹ Prior to the 2016 federal fiscal year, allocations were determined every two years.

underserved communities. Collaboration under this process led to a list of projects submitted by cities and counties and programs submitted by Metro to be publicized for public comment.

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

Because of the potential for moderate implications to individuals if language barriers prevent a person from participating in or benefiting from the planning process and results, Metro intends to provide clearer guidance to local jurisdictions to ensure consistency and effectiveness in general public, Title VI (including to residents with limited English proficiency) and environmental justice outreach as part of the submission process. Additionally, it is important to provide information about the process and funding allocations as well as provide opportunity for input during the approval process. This may be best achieved through translation of vital documents¹² and consultation with agencies, organizations or advocacy

¹² "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

groups that serve limited English proficiency populations to determine any issues that are unique to those populations.

Regional Transportation Plan (importance level: 2)

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

- *Identify your agency's most critical services.* The Regional Transportation Plan contains the framework and goals for a 20-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 (below). Looking at the Regional Transportation Plan on its own, this long-term, regional level planning process could have limited implications for individuals if language barriers prevent a person from benefiting from the planning process. Adding a project to the RTP's financially constrained project list makes it eligible for federal funding, among the most important and shorter term impacts of the plan. But even this has little impact on LEP and other populations, since the projects are often still conceptual and require more local planning and public involvement before funding decisions and, eventually, potential construction.
- *Review input from community organizations and LEP persons.* Because of the long-range and overarching approach to the Regional Transportation Plan, the agency and organization discussion group indicated that it is of lower importance to populations with limited English proficiency, citing difficulty that many of these residents have in meeting immediate transportation needs. One participant cautioned that it is important to include LEP residents in long-range planning, allowing them to advocate for more long-term investments in their communities. The Spanish-language discussion group made similar statements, agreeing that it is important for Spanish speakers with limited English proficiency to learn to participate in long-range planning as members of the larger community. Though participants said that the Regional Transportation Plan is important to all residents, including those with limited English proficiency, they recommended only moderate effort in translating documents, translated information on the website and language-specific outreach.

In spite of limited implications to individuals if language barriers prevent a person from benefiting from the planning process, it is important not to overlook the LEP communities in long-range regional plans. This may be best achieved through translation of vital documents and

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

consultation with agencies, organizations or advocacy groups that serve LEP populations to learn about issues that may be unique to those populations.

Metropolitan Transportation Improvement Program (importance level: 1¹³)

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

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

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

¹³ 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.

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

Factor 4: Resources available to the recipient and costs

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

A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.¹⁴

In addition, FTA suggests a four-step process for Factor 4 analysis.¹⁵

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

Since the launch of the new website and investment in translation of its language hub (www.oregonmetro.gov/languagehub) and vital documents, the agency-wide cost to maintain has been low. Besides these agency efforts, Metro's Language Assistance Program has created resources for staff to activate translation and interpretation services as the programs deem valuable for engagement efforts or as limited English proficiency persons require. These resources include the ongoing process of identifying staff and volunteer language interpreters, potential cost of paid professional interpreters and translation services, appropriate documents for critical translation, and appropriate financial and in-kind sources needed. Typically, translation is priced as a per-word cost, based on the number of words in the original source content. For professional translation via a translation agency, costs may vary, depending on the language, turnaround times and specialized content. The need for translation and interpretation

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

¹⁵ 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.

varies across projects and even across phases of those projects, but Metro is committed to providing professional and cost-effective language services when called for.

Determination of any additional services needed to provide meaningful access

Flexible service contracts

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

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

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

Language translation and multicultural communications services

Five on-call, flexible service contracts awarded, up to \$400,000 total, starting April 30, 2012 and expiring March 31, 2016 for:

- written products, letters, brochures, handouts | \$0.18 to 0.22 per word depending on language
- trans-creation communications, providing strategic culturally competition communications and engagement strategies to guide programs that impact diverse audiences | \$85 – 125 per hour depending on project scope.

Telephonic interpretation services

One on-call contract awarded, up to \$5,000 total, expiring April 2018 for:

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

Altered hearing/impairment services (non-LEP)

One scheduled plus on-call contract awarded, up to \$30,000 total, expiring June 30, 2016 for:

- closed captioning services for televised meetings | contracted council meeting broadcasts, \$110 per hour; single event services, \$160 to 200 per hour

Onsite American Sign Language interpretation (non-LEP)

On-call, personal services contracts awarded, up to \$5,000 each, for:

- Onsite ASL interpretation | \$45 to 60 per hour plus mileage and parking

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 accordingly. In some cases, existing resources may be able to achieve more than one outcome or be repurposed to assist with LEP language assistance.

The Diversity, Equity and Inclusion program will help cover translation costs of material identified in the LEP Implementation Plan.

Consideration of cost effective practices for providing language services

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

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

Results summary

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

SECTION II: LEP IMPLEMENTATION PLAN

Metro's implementation plan on language assistance

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

Identifying LEP populations who need language assistance

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

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

- *Annual survey to front line staff* To better understand the types of language requests Metro's front line staff receive, Metro will conduct an annual staff questionnaire. The survey will help track the frequency of language requests and additional resources needed to help staff engage or communicate with people who don't speak English well.
- *Multilingual questionnaire* Metro will conduct a short online satisfaction questionnaire to improve viewers' experience of the language hub (www.oregonmetro.gov/languagehub). The questionnaire will be available in multiple languages and will be conducted throughout the year. Metro will provide incentives for those that complete the survey. The survey results will inform future translation needs.
- *Demographic collection at open houses/community events* Metro tracks demographic information of participants attending open houses and community events by using a demographic form. The demographic collection is voluntary and the form is translated into multiple languages.
- *Language line usage* Metro will continue to monitor the volume and types of requests for the language line.
- *Local engagement and non-discrimination checklist* Metro developed a check list 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.

Language assistance measures

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

- *Language resource guide* Metro developed a language resource guide that outlines effective practice in written translation, helps staff identify steps to consider when translating materials for a program or a project, and provides resources for staff when an event calls for or a community member requires interpretation. The language resource guide is intended for Metro staff providing translation or interpretation services for community members that don't speak English well.
- *Language line* Metro maintains a contract with Certified Languages International for telephone interpretation services in up to 205 different languages. The contract is through April 2018.
- *Bilingual staff* Metro continues to annually update a list of volunteer staff interpreters who are available to provide language interpretation services on request. This list is made available to all Metro staff and provided during annual language training to administrative support and communications staff throughout the agency. The list, updated in April 2015, identifies 15 employees who are available to help with interpretation of 13 spoken languages plus American Sign Language.
- *Metro's language hub* (www.oregonmetro.gov/languagehub) Metro redesigned and launched a new website in May 2014. The new site has improved access for visitors that have a limited ability to understand English and connects them with key pages readable in as many as 13 languages. There is a special emphasis on meeting the needs of the region's growing population of Spanish, Chinese, Vietnamese and Russian speakers.
- *Multilingual videos* Metro contracted with Immigrant and Refugee Community Organization to hire local talent fluent in Spanish, Russian, Vietnamese and Chinese and produced four short videos to inform visitors about the various programs or services Metro provides. To view the videos, visit www.oregonmetro.gov/languagehub.

Translated material

The following vital documents have been translated into Arabic, Chinese, Hmong, Japanese, Korean, Mon-khmer Cambodian, Romanian, Russian, Somali, Spanish, Tagalog, Ukrainian and Vietnamese:

- nondiscrimination and Title VI civil rights notice
- nondiscrimination and Title VI civil rights complaint procedures

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

Project specific translated material

Powell-Division Transit and Development Project

- Web content about the project available in Spanish, some content available in Russian, Chinese and Vietnamese; translation hotline number accompanies this content
- Spanish-language factsheet
- Multilingual factsheet in Spanish, Russian, Chinese and Vietnamese
- One-question in-person questionnaire at community events and meetings; translated to Spanish, Russian, Chinese and Vietnamese
- Route alignment questionnaire in Spanish
- Bus rider engagement materials in Spanish, Russian, Chinese and Vietnamese
- Business engagement materials in Spanish, Russian, Chinese and Vietnamese
- Questionnaire via interactive posters with multiple languages
- Additional interpretation/multilingual outreach through workshops (Spanish, Vietnamese, Cantonese), TriMet Service Enhancement Plan engagement at Latino Family Night (Spanish), PLACE Program interviews (Spanish, Chinese) and high school engagement (Spanish, Somali, Farsi, Hmong)

Southwest Corridor Plan

- General Southwest Corridor 2012 factsheet and fall 2013 factsheet, translated into Spanish and Vietnamese

- 2012 Shape SW questionnaire to help determine the transportation (transit, walking, biking and driving) investments needs of the corridor into Spanish and Vietnamese

Regional Transportation Plan, Active Transportation Plan, Metropolitan Transportation Improvement Program, Climate Smart Communities Scenarios Project

- General public focused questionnaire, summer 2014, translated into Spanish

Staff training

Annual language assistance training

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

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

To view language training materials, see Appendix G.

Learning opportunities

Metro encourages staff to seek training to improve the agency’s expertise in outreach to communities that don’t speak English well and other underserved communities. Because of its role as an 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.

Agency coordination

Metro participates in a quarterly coordination and information sharing group initiated by City of Portland and that includes members from ODOT, Metro, TriMet, City of Portland, City of Gresham and Multnomah County. The group discusses agency updates about Title VI and LEP work and ways the group can coordinate, including possible training sessions.

Cultural competency, plain language and readability

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

Providing notice of rights and available services to LEP persons

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

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

Metro respect civil rights.

For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit www.oregonmetro.gov/civilrights or call 503-797-1890.

If you need language assistance, call 503-797-1890 (8:00 am to 5:00 pm weekdays) 7 business days before the meeting.

To view the sign, see Appendix H.

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

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

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

Monitoring and updating the LEP plan

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

- How many LEP persons were encountered?
- What is the current LEP population in the Portland metropolitan 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 SCHEDULE, FISCAL YEARS 2011- 2019

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

Metro LEP implementation plan, fiscal years 2011-2019						X	= Target completion
						✓	= Actual completion
ACTIVITIES	METRO FISCAL YEAR					STATUS	
	2011-2015	2015-2016	2016-2017	2017-2018	2018-2019		
1. Data tracking and plan scope							
A. Gather and prepare data for Factor 1 analysis	✓		X				
1. Inventory LEP data needs and potentially related data needs by tract within the Metro area	✓		X				
a. Consult demographic data from school systems and local governments	✓		X				
b. Consult anecdotal information from community organizations and agencies and legal aid entities, especially Coalition of Communities of Color reports.	✓		X				
2. Develop processes and data analysis plans that can be used for Title VI reporting purposes, region-wide long-term planning and corridor level planning efforts that arise between Title VI reporting periods, and Metro's other functions	✓						
a. Gather and quality check data with local jurisdictions	✓		X				
b. Decide data extent and develop maintenance plan for all LEP needs	✓		X				
c. Coordinate with other jurisdictions to standardize data collection and sharing	✓		X				
3. Complete regional LEP Factor 1 analysis every three years	✓			X			
a. Identify concentrations of LEP populations within the Metro area	✓						
B. Use new regional LEP Factor 1 analysis to estimate costs and resources for carrying out LEP implementation plan	✓						
C. Add LEP questions in multiple languages to Title VI tracking form for metropolitan planning	✓	X	X	X	X	Ongoing	

organization-function public events						
D. Improve consistency and breadth of data collection through Metro public involvement events and surveys ¹⁶ done for Metro metropolitan planning organization functions	✓	X	X	X	X	Ongoing
1. Explore best practices to track participation of underserved populations in the public comment process ¹⁷ and Coalition of Communities of Color reports	✓	X	X	X	X	Ongoing
2. Monitor current conversations about the ability to collect demographic data, i.e. the Greater Portland Pulse project ¹⁸	✓	X	X	X	X	Ongoing

¹⁶ Diversity Action Plan item 3.1.14

¹⁷ Diversity Action Plan item 3.1.12

¹⁸ Diversity Action Plan item 3.1.11

Metro Implementation Plan: Fiscal Years 2011-2019						X	= Target completion = Actual completion
						✓	
ACTIVITIES	METRO FISCAL YEAR					STATUS	
	2011-2015	2015-2016	2016-2017	2017-2018	2018-2019		
2. Translation services (See LEP Factor 4 for more information)							
A. Provide telephone interpretation for phone and walk-in customers at the Metro Regional Center	✓						
B. Explore telephone interpretation options for phone and walk-in customers at other Metro sites	✓						
C. Provide process for in-person interpreter services upon request at public meetings and important events for metropolitan planning organization functions	✓						
1. Estimate and allocate costs for in-person interpreter services	✓						
D. Consider providing process for in-person interpreter services upon request at public meetings and important events for other Metro functions.	✓						
E. Annually survey staff to determine existing language resources	✓	X	X	X	X	Annual	
1. Define conditions under which Metro employees will assist with translation through annual review	✓	X	X	X	X	Annual review	
F. Establish process for translating vital documents	✓						
1. Define what constitutes a vital document for metropolitan planning organization functions, using the FTA Title VI Circular as guidance	✓						
2. Explore defining what constitutes a vital document for other Metro functions	✓						
3. In coordination with records retention staff, identify and inventory vital documents for metropolitan planning organization functions, including Title VI notice and complaint form	✓						
4. In coordination with records retention staff, explore identifying and inventorying	✓						

vital documents for other Metro functions						
5. Translate vital metropolitan planning organization documents and establish tracking process	✓					
6. Establish process to monitor for new metropolitan planning organization documents that may be considered vital	✓					
7. Explore establishing process to track vital non-metropolitan planning organization documents and their translation	✓					
8. Explore establishing process to monitor for new non-metropolitan planning organization documents that may be considered vital	✓					
G. Establish procedures for translating non-metropolitan planning organization documents	✓					
1. Explore establishing process for providing notice of right to free language assistance on non-vital documents	✓					
a. Establish internal prioritization process through assessing resources and translation needs	✓					
b. Translate documents in priority order	✓	X	X	X	X	Ongoing
2. Establish process for routing written translation requests for non-vital documents	✓					

Metro Implementation Plan: Fiscal Years 2011-2016						X	= Target completion = Actual completion
						✓	
ACTIVITIES	METRO FISCAL YEAR					STATUS	
	2011-2015	2015-2016	2016-2017	2017-2018	2018-2019		
3. Notices							
A. Post information in multiple languages about Title VI civil rights compliance and complaint process through signage	✓						
1. Update signage once Factor 1 analysis is completed	✓			X			
2. Consider identifying locations beyond Metro Regional Center that will receive signs and where they will be posted; create/post signs and train staff at other sites as needed	✓						
B. Post information in multiple languages about notice of right to language assistance	✓			X			
1. Identify physical locations for signs within the metropolitan planning organization function	✓						
a. Create signs and post	✓						
b. Train point people at sites regarding signage and response process	✓						
2. Consider identifying physical locations for signs within other Metro functions	✓						
a. Create signs and post	✓						
b. Train point people at sites regarding signage and response process	✓						
3. Post information about notice of right to language assistance and civil rights complaint process on websites	✓						
a. Translate main Metro website notice of right to language assistance and civil rights complaint process into multiple languages	✓						
4. Improve website accessibility/navigability for resources in other languages	✓						
5. Identify other Metro websites where posting should occur and post information	✓						
C. Post Title VI/EJ/LEP/AOA notice information on metropolitan planning organization function meeting and event notices	✓						

D. Consider how and when to include notice of availability of free language assistance in other outreach documents	✓					
E. Share LEP plan	✓					
1. Post plan to Metro website(s)	✓					
2. Provide copies of the plan to Oregon Department of Transportation, Federal Highway Administration, Federal Transportation Administration and any person or agency requesting a copy	✓					

Metro Implementation Plan: Fiscal Years 2011-2016						X	= Target completion = Actual completion
						✓	
ACTIVITIES	METRO FISCAL YEAR					STATUS	
	2011-2015	2015-2016	2016-2017	2017-2018	2018-2019		
4. Procurement							
A. 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	✓						
1. Follow metropolitan planning organization subrecipient assistance and compliance procedures for all metropolitan planning organization-related contracts	✓	X	X	X	X	Ongoing	
B. Consider developing and reviewing contract language to ensure all contractors that provide goods and services to other Metro functions are in compliance with Title VI regulations	X						
5. Training							
A. Identify metropolitan planning organization staff likely to come into contact with LEP populations	✓	X	X	X	X	Ongoing	
B. Consult with other Title VI-compliant organizations regarding training modules	✓	X	X	X	X	Ongoing	
C. Deliver basic training to all current metropolitan planning organization function workgroups on Title VI and LEP responsibilities, including LEP plan and implementation plan, understanding Title VI LEP responsibilities, documentation of language assistance requests and how to handle a complaint	✓	X	X	X	X	Annual	
1. Ensure all new metropolitan planning organization function employees receive basic training on Title VI and LEP responsibilities, including LEP plan and implementation plan	✓	X	X	X	X	Annual	
D. Determine need and timing for Title VI and LEP responsibilities, including LEP plan and LEP implementation plan training, for all employees in other Metro functions	✓						
E. Design and implement a Metro Learning Center training module for all current Metro staff on Title VI responsibilities, including civil	✓	X	X	X	X	Annual	

rights notice, complaint procedure and language assistance						
1. Ensure all new employees complete Metro Learning Center training module on Title VI responsibilities, including civil rights notice, complaint procedure and language assistance	✓	X	X	X	X	Annual
F. Provide any additional Title VI and LEP resources to Metro employees on internal website	✓	X	X	X	X	Ongoing

Metro Implementation Plan: Fiscal Years 2011-2016					X	= Target completion = Actual completion
					✓	
ACTIVITIES	METRO FISCAL YEAR					STATUS
	2011-2015	2015-2016	2016-2017	2017-2018	2018-2019	
6. Outreach						
A. Conduct research to assess services to LEP populations and barriers to service¹⁹	✓					
1. Identify community organizations Metro has contacted in the past	✓					
a. Identify prior experiences with LEP populations within the metropolitan planning organization function	✓					
b. Identify prior experiences with LEP in Metro's other functions	✓					
2. Develop questions to ask community organizations how best to serve LEP populations and transcend barriers²⁰, including: <ul style="list-style-type: none"> • Size and location of populations the organization serves • Needs of populations relative to other Metro functions • Data sources and/or demographic trends they can provide or assist with • Advice on communication and engagement with populations they serve 	✓					
3. Contact community organizations to ask the above questions and collect information	✓					
B. Develop process for targeted community outreach to LEP populations for specific efforts and services, focusing first on metropolitan planning organization functions	✓					
1. Partner with key community leaders and organizers of LEP populations through one-on-one meetings, phone and email contact with individual leaders and participation in community events to determine best ways to reach LEP populations	✓					

¹⁹ Diversity Action Plan item 3.2.2

²⁰ Diversity Action Plan item 3.1.6

a. Develop cultural awareness training concepts for external outreach ²¹	✓					
b. Develop culturally specific methods for diverse communities to access Metro metropolitan planning organization information most effectively ²²	✓					Ongoing
c. Develop culturally appropriate material in target languages, test materials with key constituencies, promote messages through community media and develop print, radio and television ads in target languages, depending on project needs ²³	✓					Ongoing
d. Develop leadership and capacity-building program for future work with diverse communities and LEP populations	✓					Ongoing
2. 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				
3. 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				
4. Consider how to incorporate notice in multiple languages of language assistance availability into metropolitan planning organization outreach materials	✓					
C. Establish methods to coordinate and enhance outreach efforts, focusing first on metropolitan planning organization functions (as appropriate)	✓		X			
1. Consider investing in tools that enable Metro to effectively coordinate stakeholder outreach ²⁴		X				
2. Coordinate and maintain list of contacts	✓		X			

²¹ Diversity Action Plan item 3.1.7

²² Diversity Action Plan item 3.1.9

²³ Diversity Action Plan item 3.1.10

²⁴ Diversity Action Plan item 3.1.16

with diverse communities, including contacts made through Human Resources, Procurement and Communications efforts ²⁵						
3. Establish internal working group to meet regularly and identify areas for leverage ²⁶		X				

²⁵ Diversity Action Plan item 3.2.12

²⁶ Diversity Action Plan item 3.2.13

Metro Implementation Plan: Fiscal Years 2011-2016						X	= Target completion = Actual completion
						✓	
ACTIVITIES	METRO FISCAL YEAR					STATUS	
	2011-2015	2015-2016	2016-2017	2017-2018	2018-2019		
7. Evaluation and reporting							
A. Develop process to monitor and update LEP implementation plan, including:	✓						
1. Tracking metropolitan planning organization function contact with LEP persons	✓	X	X	X	X	Ongoing	
a. How many LEP persons were encountered	✓	X	X	X	X	Ongoing	
b. Whether LEP persons' needs were met (important information and services from Metro's Factor 3 analysis)	✓	X	X	X	X	Ongoing	
c. How many complaints were received	✓	X	X	X	X	Ongoing	
d. Has there been a change in the languages where translation services are needed		X	X	X	X	Ongoing	
e. Is there still a need for continued language assistance for previously identified for Metro programs or projects? Are there other programs that should be included?		X	X	X	X	Ongoing	
2. Monitoring LEP data	✓			X			
a. Current LEP populations within metropolitan planning organization function	✓			X			
3. Monitoring LEP resources and costs	✓	X	X	X	X	Ongoing	
a. Any change in available resources (data, technology, staff, budget) on an annual basis	✓	X	X	X	X	Ongoing	
b. Any change in LEP costs on a Title VI reporting period basis	✓	X	X	X	X	Ongoing	
4. Set LEP goals and measures	✓						
B. Establish process to obtain feedback on Metro's language assistance measures	✓						
1. Obtain feedback from community members through an annual survey	✓	X	X	X	X	Ongoing	
2. Conduct annual internal monitoring with	✓	X	X	X	X		

agency staff						
a. Include monitoring question on intake form for frontline staff	✓					
b. Develop evaluation method for staff that substantively engage with LEP persons	✓					
c. Assess any needed changes in types of languages for translation services	✓	X	X	X	X	
d. Determine whether continued language assistance is needed for previously identified programs	✓	X	X	X	X	
3. Make changes to internal language assistance procedures based on feedback	✓			X		
C. Develop internal assessment of LEP training, materials and procedures one year after instituted	✓					
D. Establish process to identify new language assistance needs and adjust service	✓	X	X	X	X	
E. Establish reporting schedule and work plans for Title VI and LEP requirements to:	✓					
1. ODOT annually	✓	X	X	X	X	
2. FTA according to Title VI reporting schedule	✓					
a. LEP plan	✓	✓			X	
b. LEP implementation plan	✓	✓			X	
c. Public involvement plan	✓				X	
3. Determine reporting level to Metro Council according to Title VI reporting schedule	✓					

APPENDIX A: METHODOLOGY DEVELOPMENT (2012)

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 workflow associated with this process can be described as follows; Metro:

- 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 Fund Allocation and ongoing agency-wide Equity Strategy Program work. Staff also conferred with staff from local agencies working on similar plans, including TriMet, City of Portland and City of Gresham.

2. Metro developed a methodology for analysis of language data

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

Metro's service area is not referenced to census geographies and includes 25 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 percent of the regional population age 5 and older was, 70,317 based on 2006-2010 American Community Survey data. The methodology sought to reduce uncertainty in American Community Survey (ACS) estimates and to disaggregate language groupings reported by ACS by analyzing data at three spatial scales: census tract, county and state. The analysis was then validated against data on language spoken at home and LEP status from the Oregon Department of Education (ODE), which implements standards for consistent, comprehensive language-related data. These steps are outlined below:

- a. *Determine languages (or language groupings) with >1,000 speakers using tract-level data.* These tract-level data most closely followed Metro’s service area boundary, but were associated with a relatively high margin of error.
- b. *Confirm tract-level estimates with county-level data.* As a cross-check, population counts from tract-level data were compared to county-level data, which had larger sample sizes and thus lower margins of error. Although these data do not follow Metro’s boundary as closely as census tracts, 2010 U.S. Census data indicated that ~90 percent of the population in the tri-county area resides within the urbanized area contained within Metro’s jurisdictional boundary.
- c. *Disaggregate language groupings.* Both of the above ACS sources reported the populations of language groupings, rather than estimating populations of specific languages within this grouping; for example, ACS reports the population speaking “African Languages”. To address this limitation, Metro examined a state-level ACS special tabulation of 135 distinct languages.
- d. *Validate results with supplemental data:* Metro staff validated the results of steps *a* through *c* against ODE student enrollment figures, which are provided as a detailed dataset that uses 100 percent counts and does not aggregate languages into groupings. Metro staff developed two techniques to disaggregate language groupings and then extrapolate from ODE data to the total population age 5 and older in the metro region.

3. Metro gathered data

Metro staff used the following data sources:

- 2006-2010 America Community Survey (ACS) 5-Year sample: census tract data
- 2007-2011 America Community Survey (ACS) 5-Year sample: county data
- 2006-2008 America Community Survey (ACS) 3-Year sample: state data, detailed special tabulation of language spoken at home by English proficiency (not a part of a standard ACS data release)
- Oregon Department of Education (ODE): 2011-2012 school year enrollment data

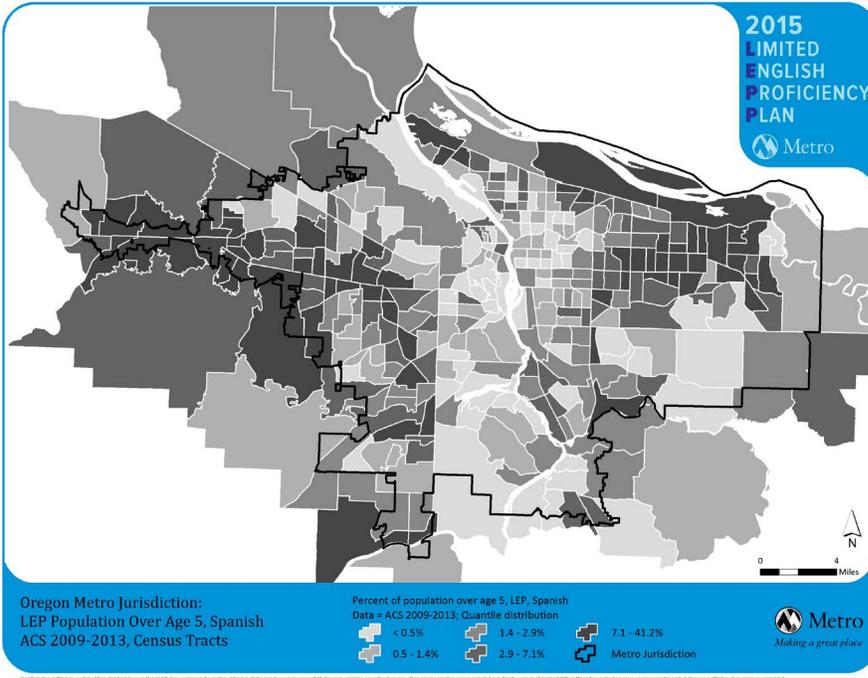
Metro staff obtained ACS data from American FactFinder. To access ODE data, Metro staff submitted a public records request for student language of origin and LEP status for all school districts in Clackamas, Multnomah and Washington counties.

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

Using the data and methods outlined above, Metro identified 13 languages with LEP populations of 1,000 persons or more, thus triggering eligibility for DOJ's safe harbor provision (see Tables 1 and 5 of Metro's Factor 1 Report). Tract-level estimates from ACS revealed nine distinct LEP populations with more than 1,000 persons within the Metro jurisdictional boundary area: Spanish, Vietnamese, Chinese (Mandarin or Cantonese), Russian, Korean, Japanese, Tagalog, Arabic, and Mon-khmer Cambodian. Additionally, five language groups were found to have populations of LEP speakers greater than 1,000. Summary counts using aggregated data from Clackamas, Multnomah and Washington Counties yielded similar results, increasing Metro's confidence in the aggregated tract estimates of LEP speakers within the Metro jurisdiction boundary. Disaggregation of language groupings revealed that Somali, Ukrainian, Romanian, and Hmong languages should also be included as safe harbor languages.

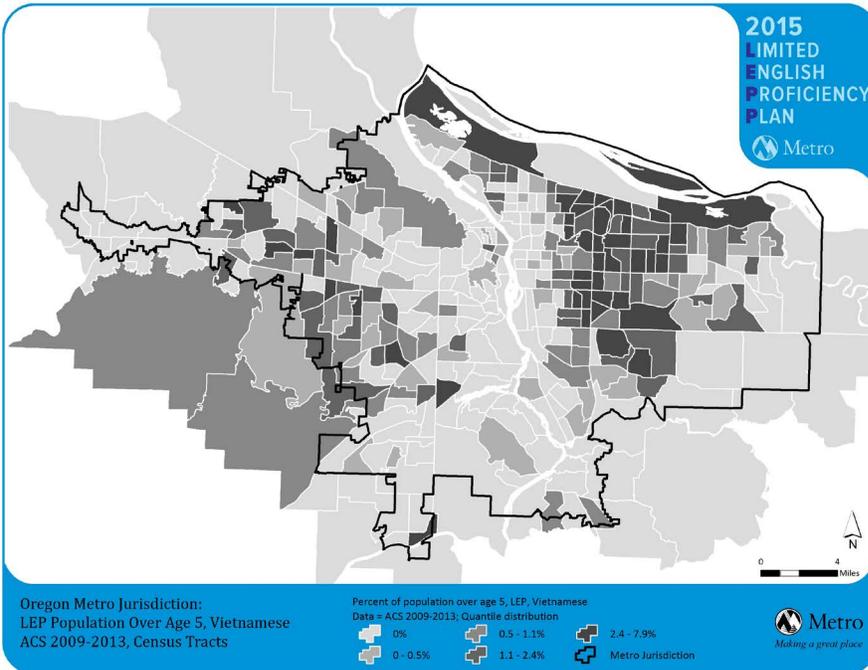
APPENDIX B: LANGUAGE DISTRIBUTION MAPS

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



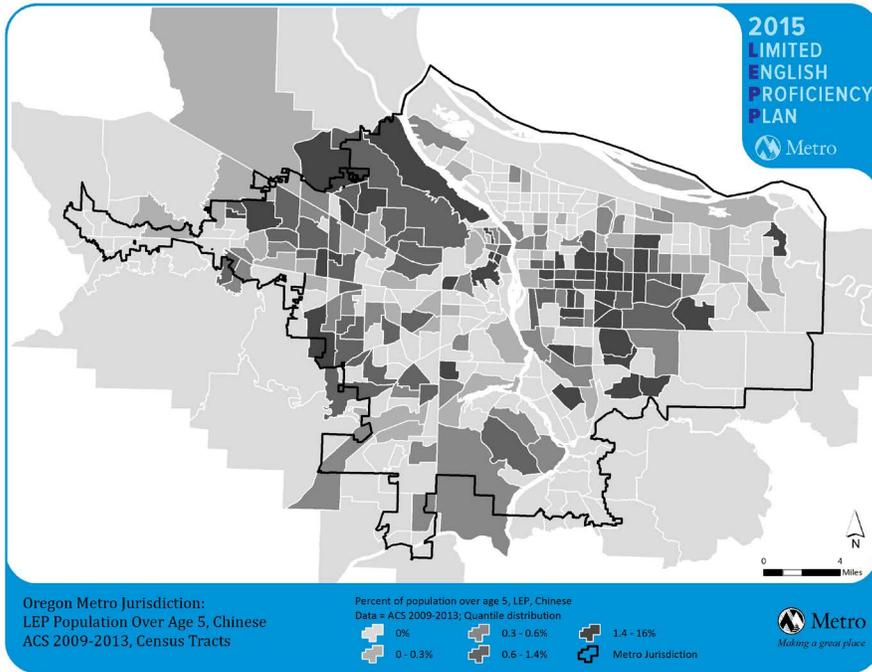
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



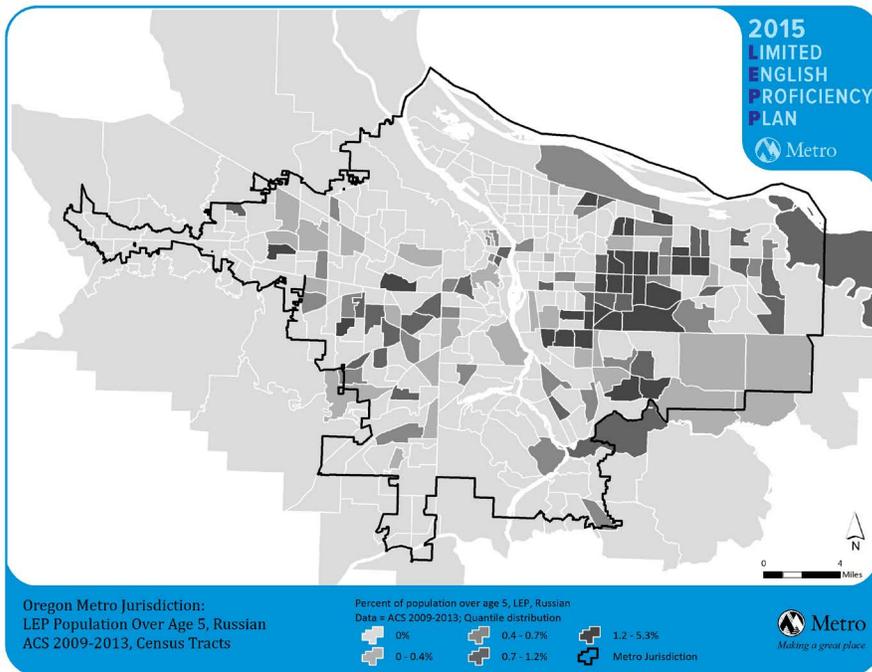
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



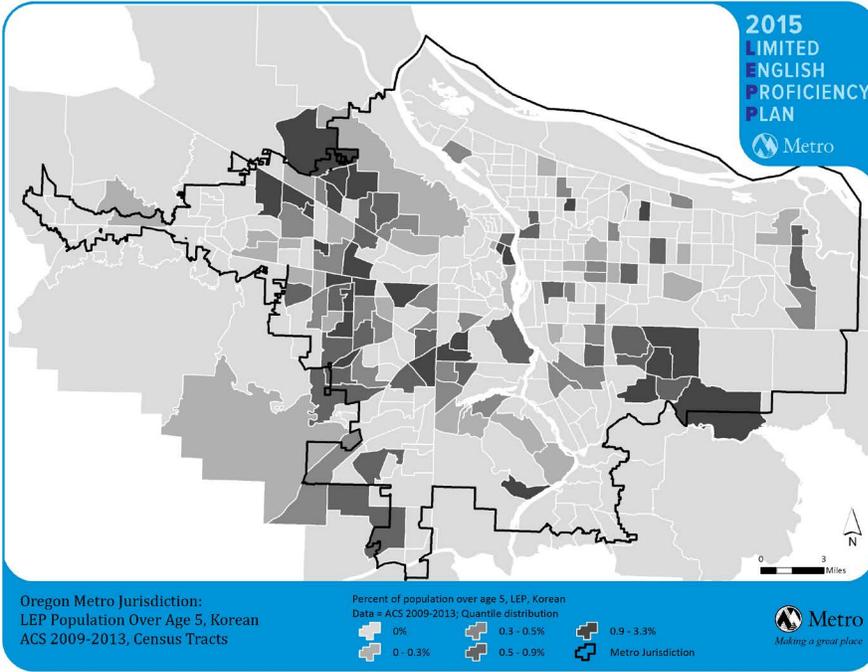
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



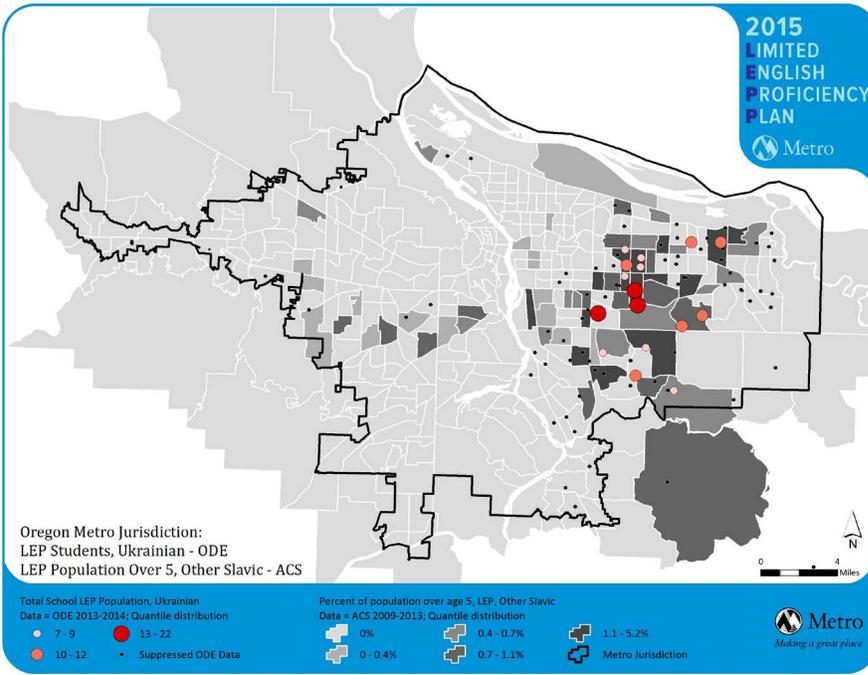
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



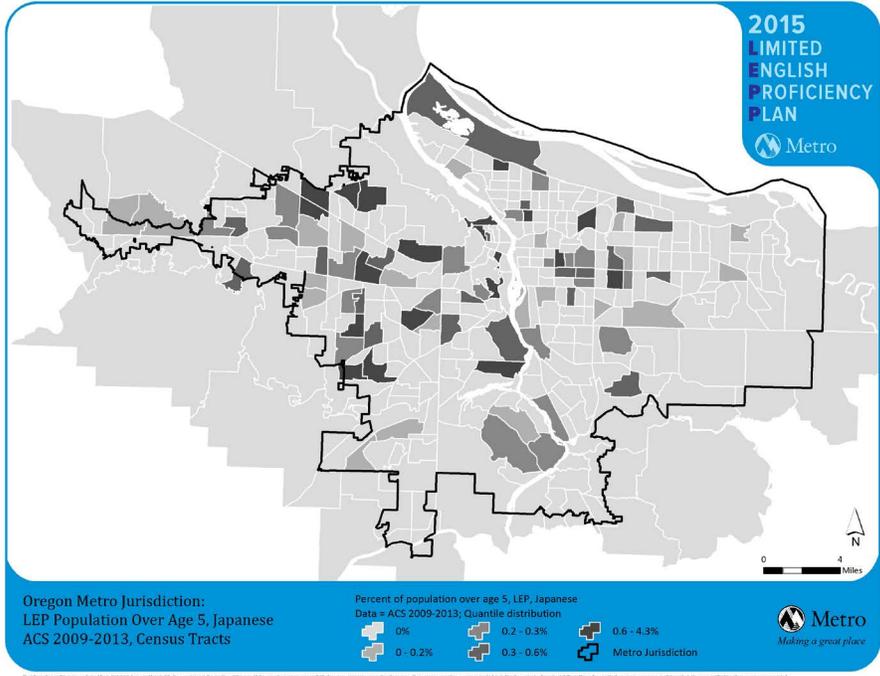
Source: 2009-2013 ACS, U.S. Census tract data, table B16001

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



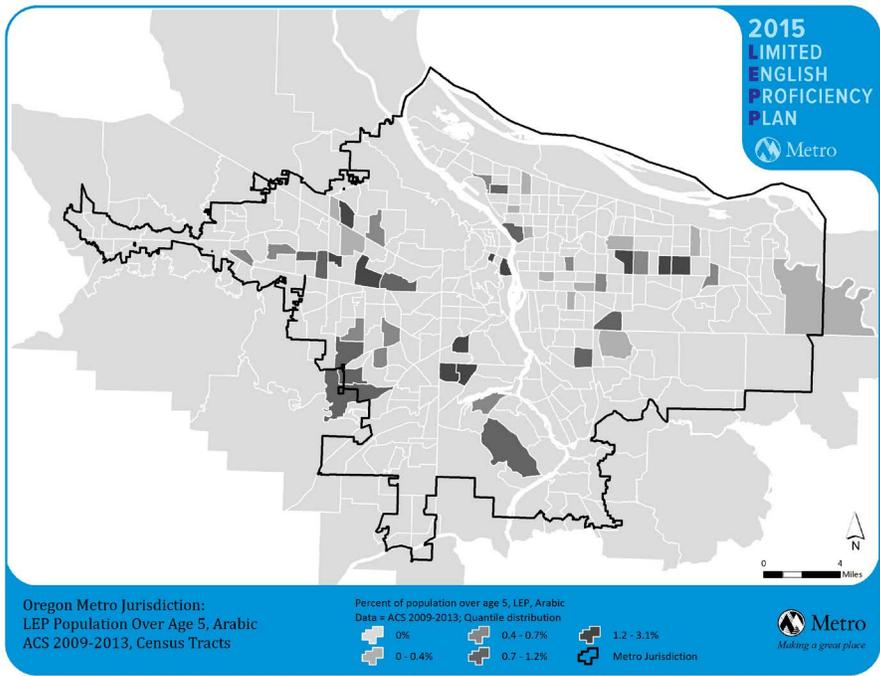
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2013-2014 enrollment data

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



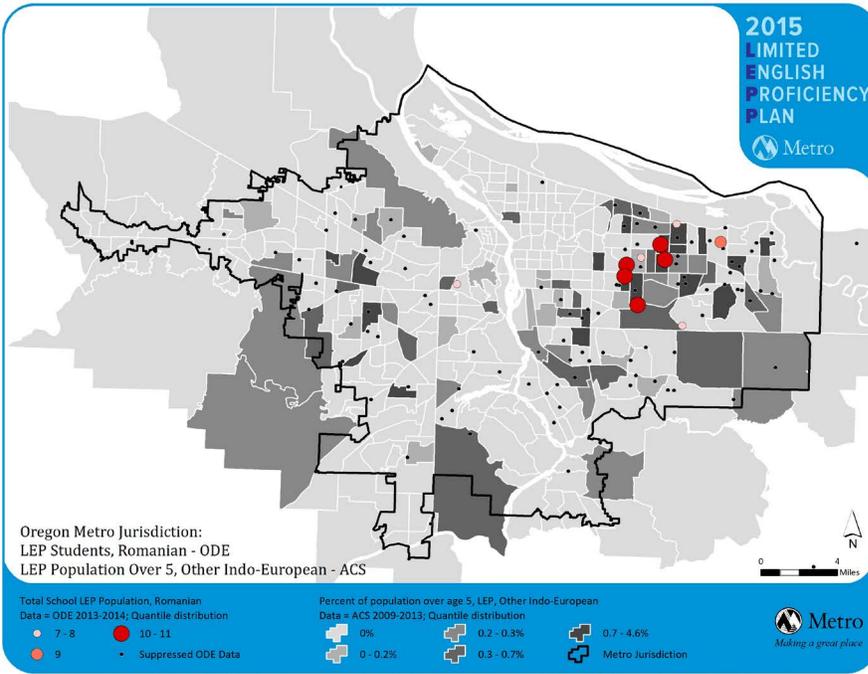
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



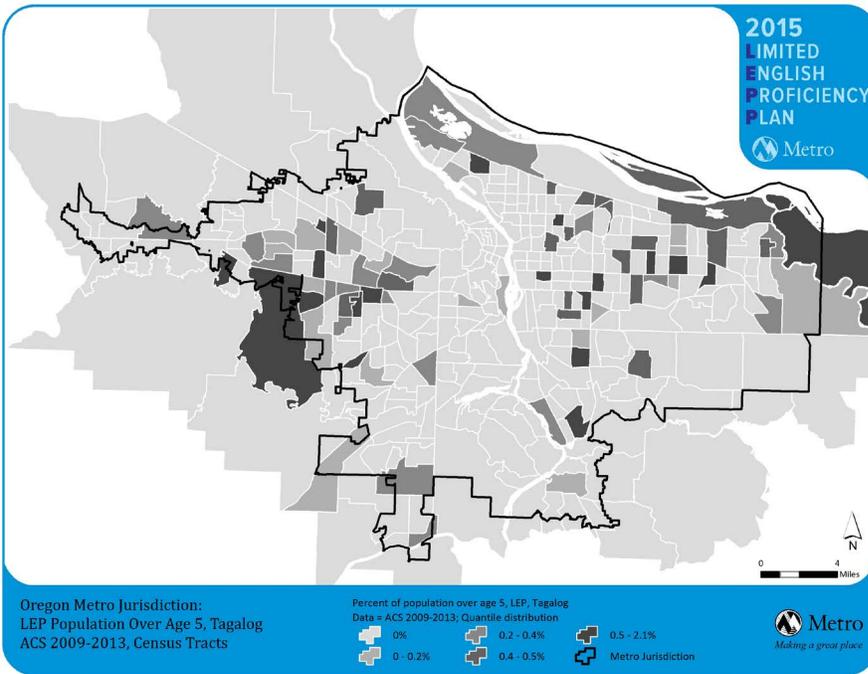
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



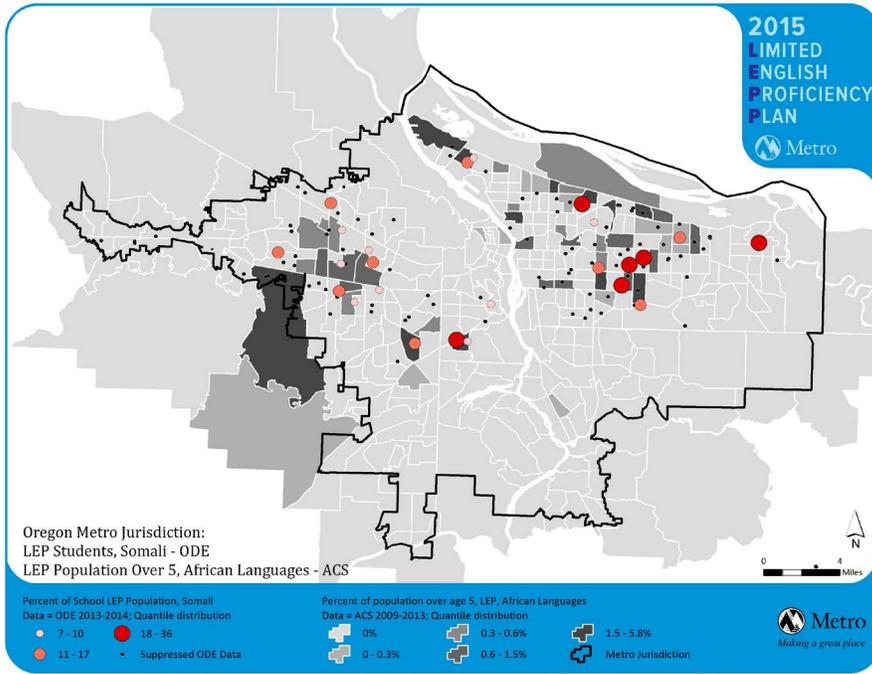
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2013-2014 enrollment data

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



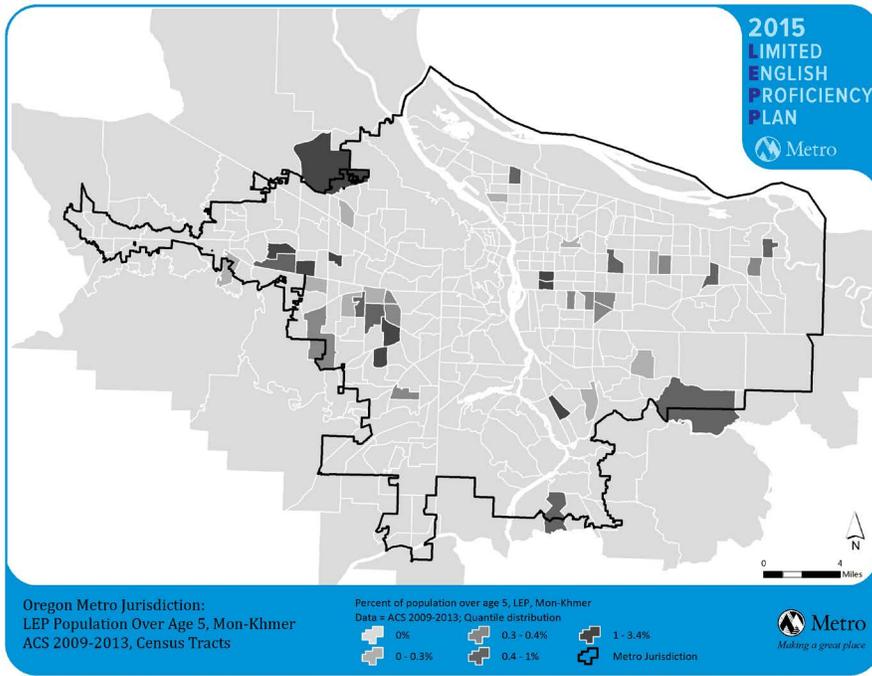
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



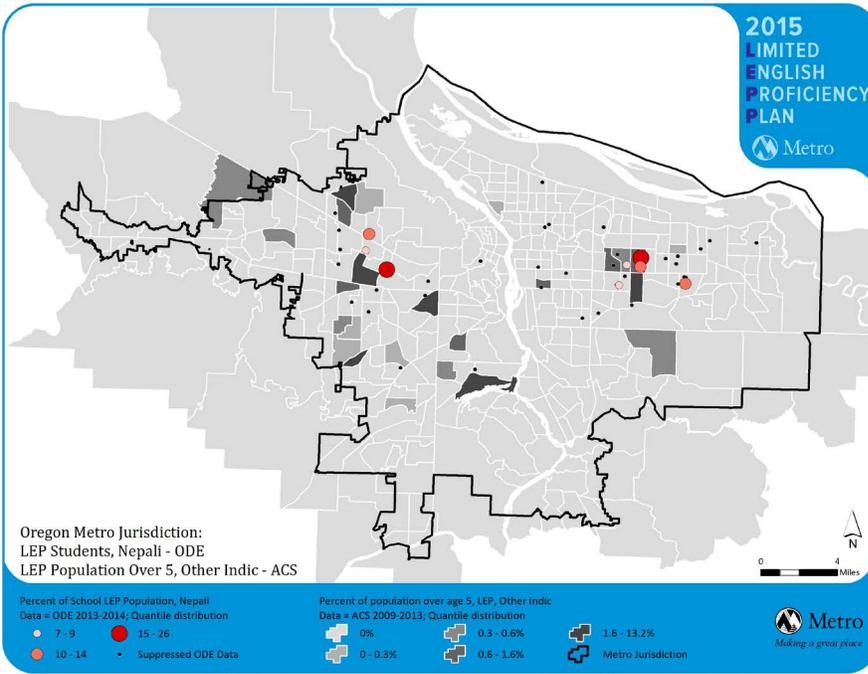
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2013-2014 enrollment data

Figure B12: Mon-Khmer-speaking LEP population by census tract, quantile distribution



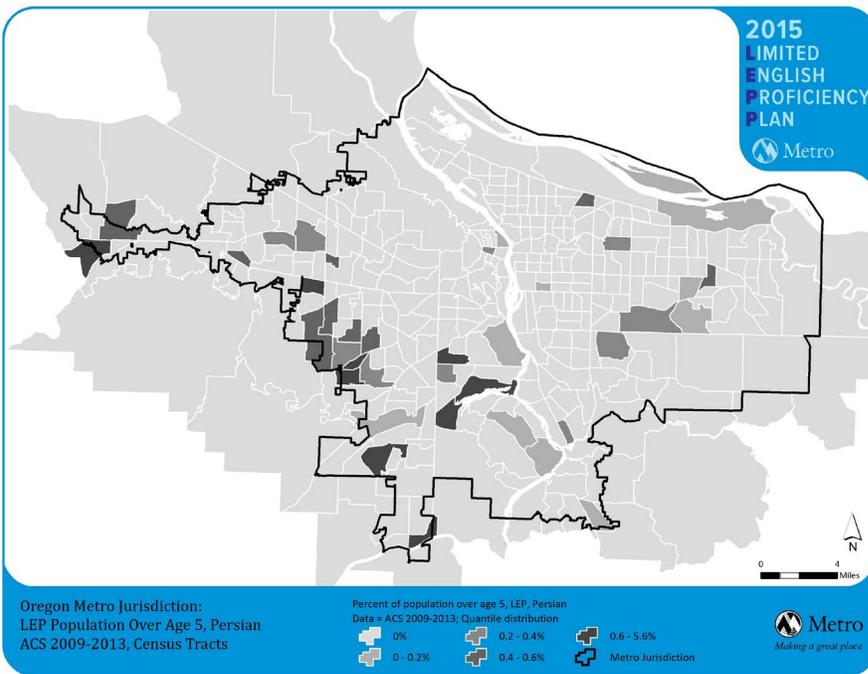
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

Figure B13: Nepali-speaking LEP population by census tract, quantile distribution



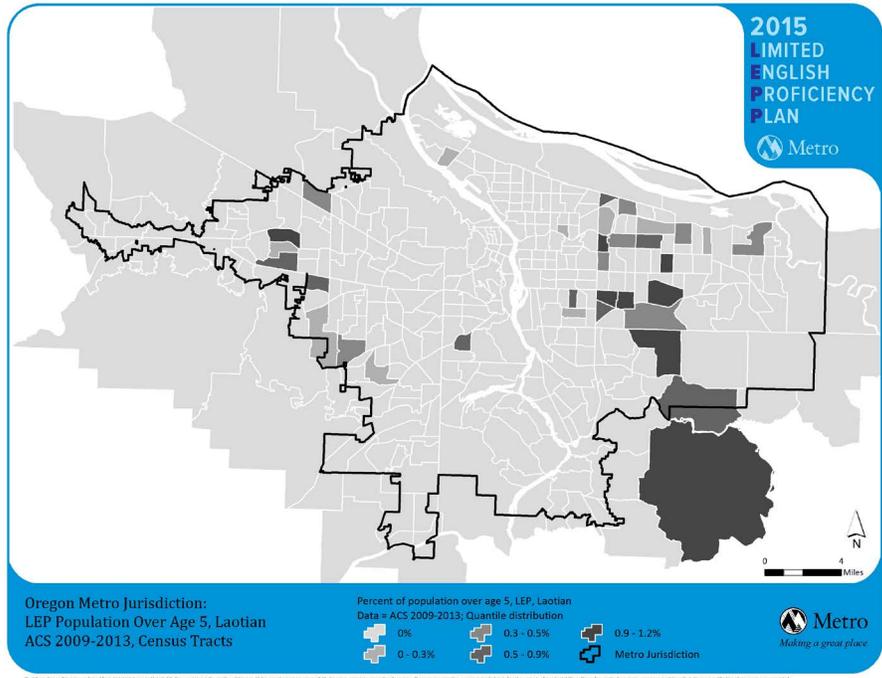
Source: 2009-2013 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2013-2014 enrollment data

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



Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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



Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

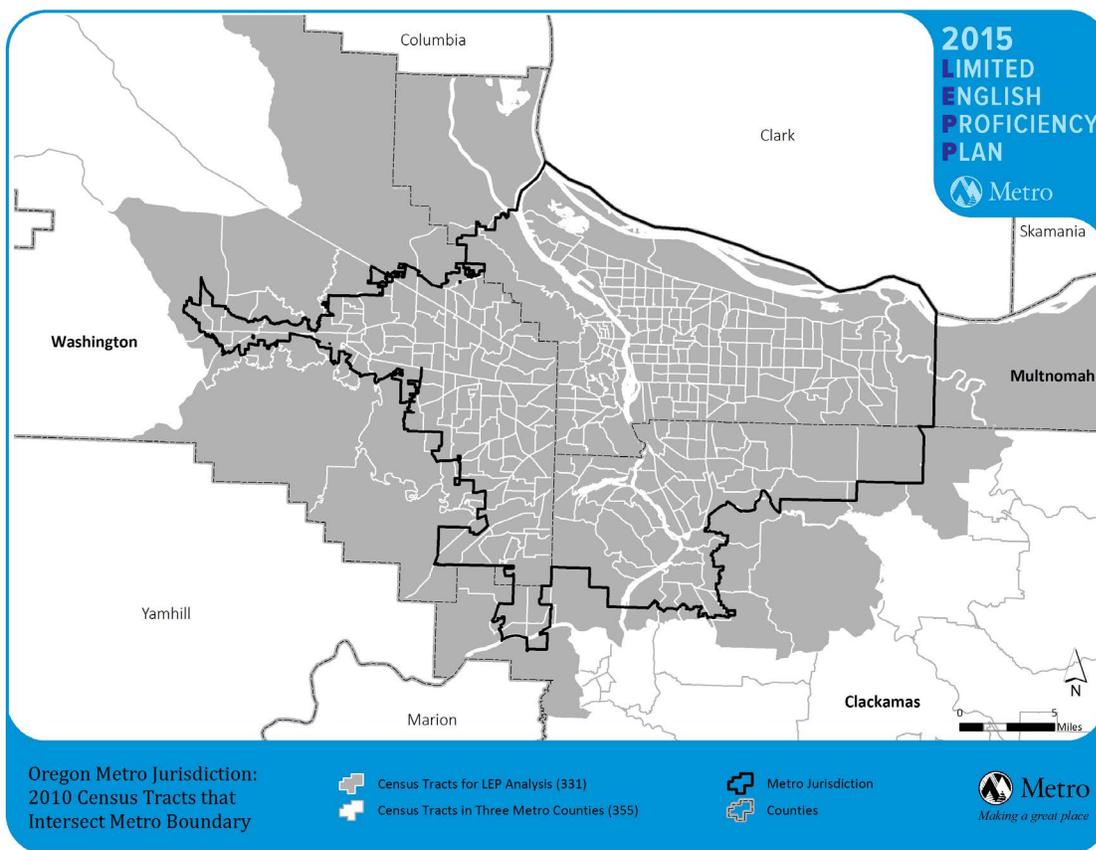
APPENDIX C: LEP FACTOR 1 METHODOLOGY

Methods: American Community Survey data analysis

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

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

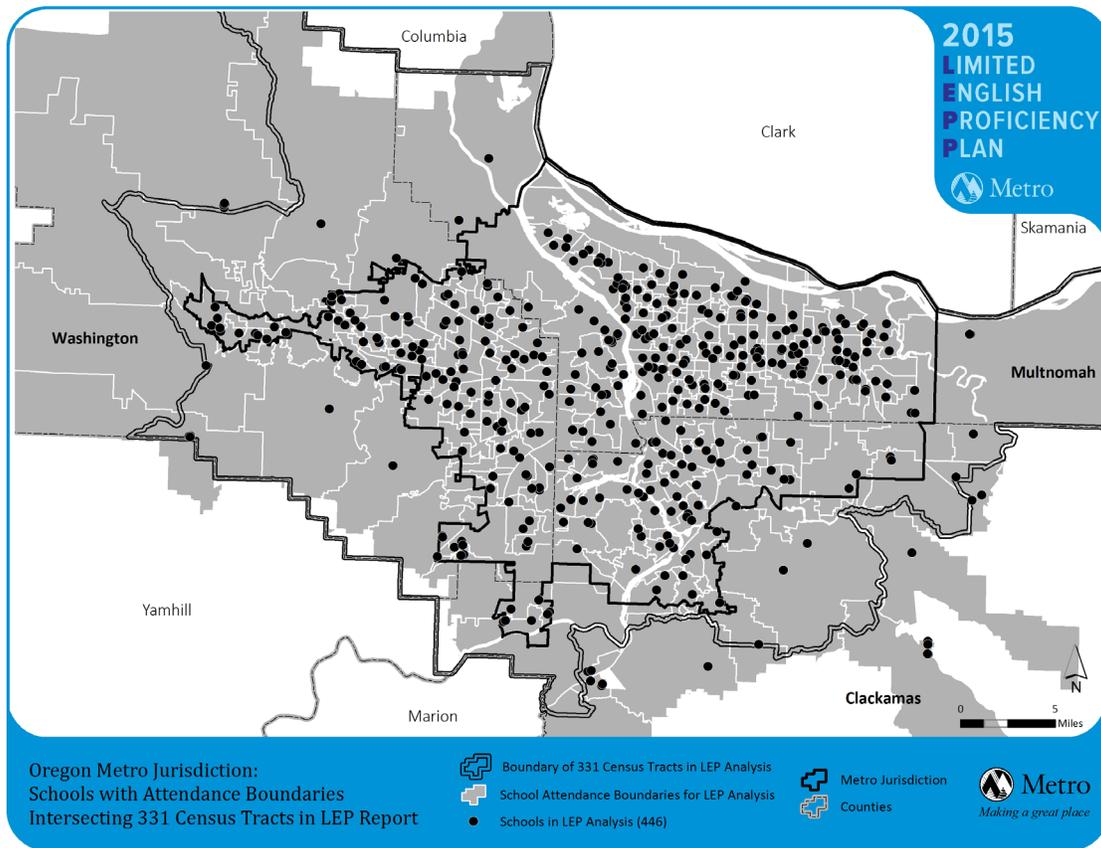
Figure C1: Census tracts in Clackamas, Multnomah and Washington counties selected for analysis of 2009-2013 ACS data



Source: 2009-2013 ACS, U.S. Census tract data, Table B16001

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

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



Source: 2009-2013 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2013-2014 attendance area and enrollment data

Language data from the ACS

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

The American Community Survey provides 61 tables within the population category “language spoken at home.” In nearly all cases, however, the Bureau chooses to stick with four umbrella categories in addition to English: Spanish; Other Indo-European; Other Asian and Pacific Island; and “Other.” Using tables with this high degree of categorical collapsing would result in a meaningless LEP analysis beyond Spanish.

We chose to analyze data from ACS Table B16001: “Persons 5 Years and Older, by Language Spoken at Home, by English Proficiency.” This table contains the most detailed breakout of languages spoken in the ACS: 29 individual languages plus the ten language groupings. Our first round of analysis, displayed in Table C3, focused on the 29 individual languages from these tables. The “language group” populations require a second round of analysis, for which we use additional data sets, including state-level ACS data and enrollment data from the Oregon Department of Education, in order to disaggregate the group language data found in Table B16001; these analyses are displayed in Tables C4-C6.

2009-2013 American Community Survey 5-year estimate, counties

Margin of error estimates are invalid when summary counts are arrived at by aggregating multiple estimates. Thus it is impossible to verify with certainty whether the populations of LEP speakers meet the 1,000 persons “safe harbor” threshold. The summary count of population estimates are within +/- 500 of the 1,000 persons safe harbor threshold. Margins of error for individual tracts in this data set are in the range of +/- 300. It is very possible that neither Arabic nor Mon-Khmer LEP populations are safe-harbor eligible if the actual counts represent the low end of the error estimate. Conversely, Laotian, French or Serbo-Croatian may be eligible if actual counts are at the upper bound of margins of error for each tract estimates.

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

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

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

since the outlying areas of the three counties beyond the Metro boundary are sparsely populated²⁷.

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"

	Estimated persons, primary language is not English: language spoken at home	Estimated population that speaks other language at home: English less than "very well" (LEP)	Percent of individual language population that Speaks English less than "very well"	Percent of total regional population that speaks English less than "very well," by language	Percentage of all LEP persons in region by individual languages
Total Region population over 5 years old	1,473,411				
Total regional LEP population	288,696	126,493			
Spanish or Spanish Creole	133,781	62,030	46.4%	4.2%	49.0%
Vietnamese	22,932	14,856	64.8%	1.0%	11.7%
Chinese	19,526	10,174	52.1%	0.7%	8.0%
Russian	14,225	6,564	46.1%	0.4%	5.2%
Korean	7,630	3,760	49.3%	0.3%	3.0%
Japanese	5,774	2,145	37.1%	0.1%	1.7%
Arabic	4,965	2,036	41.0%	0.1%	1.6%
Tagalog	6,041	1,759	29.1%	0.1%	1.4%
Mon-Khmer, Cambodian	2,521	1,285	51.0%	0.1%	1.0%
Persian	2,617	1,041	39.8%	0.1%	0.8%
Laotian	2,108	980	46.5%	0.1%	0.8%
German	7,431	850	11.4%	0.1%	0.7%
Serbo-Croatian	1,663	817	49.1%	0.1%	0.6%
French (incl. Patois, Cajun)	5,810	815	14.0%	0.1%	0.6%

Source: 2009-2013 ACS, U.S. Census tract data, Table B16001; Oregon Department of Education, 2013-2014 attendance area and enrollment data

²⁷ For further discussion of the problems with estimating margins of error in aggregated observations, refer to: http://www.census.gov/acs/www/Downloads/data_documentation/Accuracy/MultiyearACSAccuracyofData2010.pdf, pp. 21-28.

For individual languages in the ACS, the tri-county LEP population estimates are listed in Table C2. As with the tract data, no language spoken at home within Metro's jurisdiction has enough LEP speakers to reach the 5% of total population threshold identified in the Department of Justice Title VI guidelines. The top 14 languages appear in nearly identical relative proportion to the tract data. It is possible that the population of LEP Mon-Khmer speakers *might* be less than 1,000 in the tri-county area if the lower bound of the margin of error is applied; hence within the Metro jurisdiction as well. Similarly, the number of German LEP speakers *might* exceed 1,000 in the tri-county area, and hence within Metro's jurisdiction. For Laotian and Persian, given the fact that the estimates are so close to 1000, there is approximately a 50% chance that the real LEP population numbers are greater (or inversely less) than 1000, and again, since the county numbers are a close parallel to the Metro tract numbers, we can assume that the relationships are the same.

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

Total tri-county population over 5 years old = 1,562,780						
	Estimated population: primary language not English: language spoken at home	Aggregate margin of error *	Estimated population: primary language not English: language spoken at home: English spoken less than "very well" = LEP	Aggregate margin of error *	Percent of total tri-county population that speaks English less than "very well," by language	Percent of all LEP persons in tri-county region by language
Total	296,912	+/- 4421	129,776	not available		
Spanish or Spanish Creole	139,741	+/- 2137	64,633	+/- 2278	4.1%	49.8%
Vietnamese	23,196	+/- 1390	15,029	+/- 1050	1.0%	11.6%
Chinese	19,571	+/- 1381	10,199	+/- 931	0.7%	7.9%
Russian	15,246	+/- 1683	6,849	+/- 891	0.4%	5.3%
Korean	7,753	+/- 989	3,787	+/- 507	0.2%	2.9%
Japanese	5,804	+/- 832	2,145	+/- 444	0.1%	1.7%
Arabic	4,993	+/- 1079	2,036	+/- 642	0.1%	1.6%
Tagalog	6,085	+/- 799	1,759	+/- 330	0.1%	1.4%
Mon-Khmer, Cambodian	2,521	+/- 607	1,285	+/- 349	0.1%	1.0%
Persian	2,630	+/- 592	1,054	+/- 333	0.1%	0.8%
Laotian	2,114	+/- 542	983	+/- 307	0.1%	0.8%
German	7,631	+/- 775	850	+/- 221	0.1%	0.7%
French (incl. Patois, Cajun)	5,944	+/- 580	833	+/- 193	0.1%	0.6%
Serbo-Croatian	1,663	+/- 509	817	+/- 286	0.1%	0.6%

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

Source: 2009-2013 ACS, U.S. Census county data, table B16001

Consult state and local sources of data

Further analysis: languages not routinely reported in the ACS

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

Other Indo European languages (family)

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

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

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

Total tri-county population over 5 years old = 1,562,780						
	Estimated population: primary language not English: language spoken at home	Aggregate margin of error *	Estimated population: primary language not English: language spoken at home: English spoken less than "very well" (interpreted as LEP)	Aggregate margin of error *	Percent of total tri-county population that speaks English less than "very well," by language	Percent of all LEP persons in tri-county region by language
TOTAL	296,912	+/- 4421	129,776			
Other Slavic languages	6,631	+/- 1379	3,134	+/- 669	0.2%	2.4%
African languages	5,696	+/- 1078	2,692	+/- 799	0.2%	2.1%
Other Asian languages	7,032	+/- 1052	2,557	+/- 656	0.2%	2.0%
Other Indo-European languages	6,374	+/- 1046	2,492	+/- 653	0.2%	1.9%
Other Indic languages	4,003	+/- 955	1,633	+/- 559	0.1%	1.3%
Other Pacific Island languages	5,072	+/- 643	1,545	+/- 444	0.1%	1.2%

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

Source: 2009-2013 ACS, U.S. Census county data, Table B16001

2006-2008 ACS, State of Oregon, Detailed Languages (Table 39, release April 2010)

To estimate the population of individual language speakers embedded within each of the groups shown in Table C3, we compared the aggregate estimates of non-English native language group or family population from the Metro tract data set with the state estimate from

Table 39.²⁸ The results of this estimation procedure are shown in Tables B4. The procedure is as follows:

- Collect state-wide population estimates for total persons and LEP persons speaking one of the 135 languages, language families, or groups, listed in Table 39.
- Compute the ratio of state-wide population to Metro area tracts population for the major groupings listed in Table C3. For example, the ratio of statewide population to Metro area tracts population of persons speaking an “Other Indo-European” language at home is 0.9621 (refer to Table C4).
- Multiply the resulting ratio by the state-wide population estimate for each individual language population reported within the grouping to which it belongs in the ACS data releases. For example, for all persons speaking Romanian at home = $0.9621 * 5187$ (statewide estimate, Table 39) = 4990. (Table C4)

The product is at best a rough estimate of the individual native language population and its LEP fraction in either the region (331 tracts) or tri-county region. There are two significant problems with the procedure:

- The elapsed time span between the estimation of data in Table 39 and Metro-region tract data is approximately 5 years. For smaller populations that are primarily the result of immigration, significant growth may have occurred during that interval, resulting in a serious under-estimate of the population.
- The procedure assumes that the distribution of individual languages is spatially consistent with that of the major language grouping to which they belong, and that there was no significant shift in the distribution of the major grouping population within the boundaries of the State of Oregon during the elapsed 5 year period.

Because this analysis is highly provisional, we collected and analyzed data from the Oregon Department of Education to further explore the gaps in the standard ACS data.

²⁸ <http://www.census.gov/hhes/socdemo/language/data/other/usernote.html>.

Table C4: Estimated individuals who speak a specific language embedded in a language group or family as published in the census and *may* be subject to safe harbor provisions depending upon corroboration from other data sources

	Estimated total population age 5 and older		Estimated total population age 5 and older, LEP	
Data set	331 tracts	Oregon	331 tracts	Oregon
Total	288696	493513	126493	227081
<i>Ratio</i>	<i>0.585</i>		<i>0.557</i>	
Other Slavic	6554	6872	3077	3644
<i>Ratio</i>	<i>0.9537</i>		<i>0.8444</i>	
<u>Ukrainian</u>	5018	5261	2654	3143
<u>Slovak</u>	545	571	270	320
Other Indo-European	6350	6600	2491	2483
<i>Ratio</i>	<i>0.9621</i>		<i>1.003</i>	
<u>Romanian</u>	4990	5187	2040	2033
<u>Lettish</u>	269	280	180	179
Other Asian	7004	5810	2557	1674
<i>Ratio</i>	<i>1.206</i>		<i>1.527</i>	
<u>Telugu</u>	1725	1431	929	608
<u>Mien</u>	1539	1277	889	582
African	5694	5206	2690	1849
<i>Ratio</i>	<i>1.094</i>		<i>1.455</i>	
<u>Cushite^s</u>	2864	2619	1237	850
<u>Amharic</u>	1190	1088	845	581
Other Pacific Island	5054	4967	1543	1798
<i>Ratio</i>	<i>1.018</i>		<i>0.8582</i>	
<u>Chuukese</u>	838	824	417	486
<u>Marshallese</u>	474	466	263	306
Other Indic	4003	3473	1633	699
<i>Ratio</i>	<i>1.153</i>		<i>2.336</i>	
<u>Punjabi</u>	1398	1213	787	337
<u>Bengali</u>	715	620	313	134
<u>Nepali</u>	332	288	140	60

Sources: 2009-2013 ACS, tract data; 2006-2008 ACS, state of Oregon detailed languages table 39 (see text for discussion of this special tabulation). Cell values in *italics* are estimates for total population age 5 and older, and LEP population over 5 for non-native English language speakers. **Bolded** values highlight estimated LEP populations within the Metro service area greater than 1,000. ^s “Cushite” is not a language but a branch of the Afro-Asiatic language family. Cushitic languages are generally native to the horn of Africa region. They include Oromo (Ethiopia, Kenya), Somali (Somalia, Kenya) and Sidamo (Ethiopia).

Oregon Department of Education (ODE) 2011-2012 enrollment data

We used ODE enrollment data to estimate LEP populations for languages that are not reported in the 5-year ACS releases, but that belong to language groups or families which in aggregate do have LEP populations of greater than 1,000 in that data. Table C5 displays the raw data.

Table C5: LEP speakers in regional schools, identified by school districts partly or wholly within Metro jurisdictional boundary.

Student's native language	Enrolled students whose native language is not English	Enrolled students, native language is not English; and LEP reported value **	Number of suppressed observations, LEP enrolled students **	Sum, mean of the range of possible values at each record with suppressed data ***	Final estimate, enrolled students in Metro area schools who are LEP, by native language
Spanish	35719	16344	137	411	16755
Russian	3486	1084	161	393	1477
Vietnamese	4098	1080	134	348	1428
Chinese	2470	388	155	381	769
Arabic	1094	223	147	357	580
Somali (*)	981	364	91	216	580
Ukrainian (*)	958	173	81	196	369
Romanian (*)	787	90	106	332	309
Korea	835	93	77	181	274
Japanese	586	85	73	154	239
Hmong	529	15	95	203	218
Chuukese (*)	404	62	64	155	217
Tagalog	434	0	94	165	165
Nepali (*)	246	102	36	61	163
Karen (*)	217	80	28	63	143
Lao	302	0	65	112	112
Persian	256	14	53	90	104
Amharic (*)	194	0	63	101	101
Thai	175	0	61	92	92
Burmese (*)	166	41	22	45	86
Hindi	281	7	44	74	81
Swahili (*)	123	16	37	60	76
Serbo-Croatian	195	0	47	101	74
Turkish (*)	116	28	21	31	59
Oromo (*)	121	0	27	58	58

Maay-Maay (*)	92	22	15	34	56
French	159	0	36	52	52
Telugu (*)	263	21	13	30	51
Hebrew	87	26	15	21	47
Kurdish	85	0	24	41	41
Mon-Khmer	95	0	24	40	40
Marshallese (*)	73	16	14	24	40

(*) 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 2011-2012 school year; **Caution:** language of origin data are not highly validated by ODE prior to their release. ** Indicates that reported values for observations that are greater than 6 LEP students per school site; for 6 or fewer observations, a suppressed value (0) is recorded. If no observations, the cell in the ODE dataset is <null>. *** See text for discussion of the method for converting suppressed values to a range of possible values.

In order to interpolate individual language values for ACS group language values, we generated ratios of language-group LEP speakers from the ODE data to those in the ACS tracts data set, replicating the procedure we performed on the Table 39 state data discussed previously (Table C6).

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

ODE Language	Language Family	Largest national population of speakers	All students - language of origin	
			All	Estimated LEP
Ukrainian	Indo-European	Ukraine	946	363
Bulgarian	Indo-European	Bulgaria	49	9
Czech	Indo-European	Czech Republic	32	11
Slovak	Indo-European	Slovakia	10	2
Macedonian	Indo-European	Macedonia	1	0
Other Slavic	Indo-European	NA	1	0
		SUM	1039	385

- Using this procedure we estimate that there are 363 Ukrainian speaking LEP students enrolled in Metro-area schools, as a subgroup of an estimated 385 LEP students enrolled who speak either Ukrainian or another of the languages which the U.S. Census Bureau aggregates along with Ukrainian in the category “Other Slavic.”
- 94.3% of “Other Slavic” language LEP persons in the schools are Ukrainian speakers.

- In this procedure we assume that LEP Ukrainian speakers in the general population make up an identical proportion of all LEP Other Slavic speakers, which may not be a valid assumption – but the error is likely tolerable given the small populations of other languages within this group in the schools data.
 - Applying this percentage to the census tracts estimate of Other Slavic LEP population produces the following: $94.3\% * 3077 = 2901$ Ukrainian-speaking LEP persons age 5 and older in the Metro service.

In addition to identifying Ukrainian, the ODE extrapolation has also identified Romanian and Somali as exceeding the 1,000 person LEP threshold.

Qualifications with this data:

- Schools are required to suppress observations of fewer than six LEP speakers for confidentiality protection, though districts do report the suppressed numbers in aggregate with all district schools.
- The numbers we use in the estimation procedures are the non-suppressed aggregate totals from each school district’s reports and should include data suppressed at the level of the individual school.
- ODE is not a 100% count of school-aged children who speak a language other than English at home and are LEP, for the following reasons:
 - ODE data includes public, charter, and private schools, but does not include home-schooled students. The metadata do not indicate how private schools data are treated with respect to suppression and aggregation, but we assume that since private schools do not belong to districts that their school-specific reports are included with the public school district totals, therefore undercounting LEP individuals in private schools where there are fewer than six members of a population.
 - General enrollment data is collected on a single day of the school year, so students who are not in attendance may be missed unless they are recipients of aid programs for which schools must track their data throughout the year (such as the federal free- and reduced-price lunch program).

These limitations are especially important in interpreting Figure 2 and Appendix C, Figure C2, and especially in Appendix B, Figures B6, B9 and B 11, where school-based LEP populations are mapped against the census language group counterpart at the tract geography. Because we must join the ODE data to the geographic location of specific schools, it is necessary to display the counts at each individual school. Thus:

- Data-swapping errors in the district and individual school tables exist, and may have the effect of reducing the count of LEP populations that are more than six at a given school. The

data set is too large for us to track individual errors of this nature, but the error is in each case an under-report.

Table C7: Estimated regional LEP speakers extrapolated from Metro-area LEP school students, showing top two dominant individual languages from each language group

ACS Language family / ODE language	Languages – 2011-12 ODE Data	Estimate, number of native speakers LEP: ACS / Enrolled students, ODE	Percent of total enrolled LEP students within language family	Estimate: Total LEP speakers in <u>Portland metropolitan region</u> (schools ratio * total language family population estimate)
AFRICAN		2690		
All African Languages		954		
	Somali	580	60.8%	1635
	Amharic	101	10.6%	285
	Remaining African	273	28.6%	770
Other ASIAN		2557		
All Other Asian languages		416		
	Karen	143	34.38%	879
	Burmese	86	20.67%	529
	Remaining Other Asian	187	44.95%	1149
Other INDIC		1633		
All Other Indic languages		232		
	Nepali	163	70.26%	1147
	Bengali	25	10.78%	176
	Remaining Indic	44	18.97%	310
Other INDO-EUROPEAN		2491		
All Other Indo-European languages		390		
	Romanian	309	79.23%	1974
	Kurdish	41	10.51%	262
	Remain. Oth. Indo-European	40	10.26%	255
Other PACIFIC ISLAND		1543		
All other Pacific Island languages		403		
	Chuukese	217	53.85%	831
	Marshallese	40	9.93%	153
	Remaining Oth Pacific Island	146	36.23%	559
Other SLAVIC		3077		
All other Slavic languages		385		
	Ukrainian	363	94.29%	2901
	Czech	11	2.86%	88
	Remaining Other Slavic	11	2.86%	88

APPENDIX D: LANGUAGE GROUP SURVEY

Metro discussion group survey

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

PLACES

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

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

SERVICES

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

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

10. The Bike There program (which helps people find safe ways to bike).

1 2 3 4 5 Don't know

11. The Walk There program (a guide to scenic nature walks in the city).

1 2 3 4 5 Don't know

12. Information about MetroPaint – including prices, store directions and additional retail outlets in Oregon and Washington.

1 2 3 4 5 Don't know

13. Information and prices for Metro gravesite and cremation spaces.

1 2 3 4 5 Don't know

14. Volunteering opportunities: Metro has a variety of done-in-a-day and recurring restoration projects available at parks and natural areas across the region suitable for groups of all sizes and ages.

1 2 3 4 5 Don't know

DECISION MAKING

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

1 2 3 4 5 Don't know

16. A program that approves money for roadway, freight, biking and walking facilities that will be designed or built in the next four years.

1 2 3 4 5 Don't know

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

1 2 3 4 5 Don't know

APPENDIX E: DEMOGRAPHIC INFORMATION SURVEY

OPTIONAL INFORMATION

Please note this optional information must remain on a separate page from the rest of the application. Metro asks that you voluntarily provide the following information. Metro will use this information to help improve public engagement and for statistical purposes, such as tracking the geographical diversity of board, commission, or advisory committee member selections. By providing this information, you will help us ensure that selections represent a broad cross-section of the community.

You are under no legal obligation to provide this information. State and federal law prohibit the use of this information to discriminate against you. Metro will treat this information as confidential to the fullest extent allowed by law.

What is your ZIP Code? _____

Age

- 19 and under
- 20 to 34
- 35 to 49
- 50 to 64
- 65+

Race/Ethnicity (Check all that apply)

Please share your origin, ethnicity, ancestry or Tribal affiliations in whatever way you wish.

What is your race or origin? Mark as many boxes as appropriate.

- Asian
 - Chinese
 - Filipino
 - Japanese
 - Korean
 - Vietnamese
 - Other Asian (*Please print your origin or country*)
- Latino/Hispanic
 - Mexican
 - Central American

- South American
- Caribbean
- European
- African
- Black/African American
- Middle Eastern/North African (*Please print your origin or country*)
- American Indian/Alaskan Native
- Native Hawaiian/Pacific Islander
 - Native Hawaiian
 - Guamanian or Chamorro
 - Other Pacific Islander (*Please print your origin or country*)
- Slavic (*Please print your origin or country*)
- White
- Other (*Please print your origin or country*)

Gender

- Female
- Male
- Transgendered
- Other
- Prefer not to respond

Disability

- Yes
- No

If yes, please specify: _____

Languages spoken: _____

APPENDIX F: LANGUAGE GROUP DISCUSSION QUESTIONS

LANGUAGE GROUP DISCUSSION QUESTIONS – DETAILED AGENDA

1) Welcome and introductions (5 minutes)

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

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

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

3) Overview of Metro (15 minutes)

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

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

Metro is a great place...

To see a show

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

To ponder a polar bear

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

To enjoy nature nearby

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

To drive less

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

To recycle more

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

To work

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

To play

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

To call home

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

- What does Metro NOT do?
 - Metro does not run buses or light rail (Trimet does). Metro does not determine where bus stops go.
 - Metro does not do any building or construction of projects. Metro’s main role is on the planning side, not on the construction side. However, Metro may help fund some construction projects.

Discussion Questions: (75 minutes)

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

Discussion questions:

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

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

Warm up questions:

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

I am going to describes three decision-making scenarios

Scenario 1: Regional process – Metro Project Regional Transportation Plan

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

Scenario 2: Metro Project Corridor planning

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

Scenario 3: Metro Project Regional Flexible Funds

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

Discussion questions:

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

APPENDIX G: LANGUAGE TRAINING MATERIALS

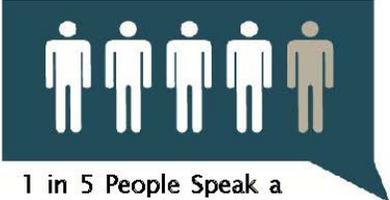


LANGUAGE LINE

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



BRIDGING THE COMMUNICATION GAP



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

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

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

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

Source: U.S. Census Bureau



CONDUCT MORE BUSINESS WITH MORE LANGUAGES

STEPS TO ACCESSING AN INTERPRETER

STEPS FOR CALLING

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



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

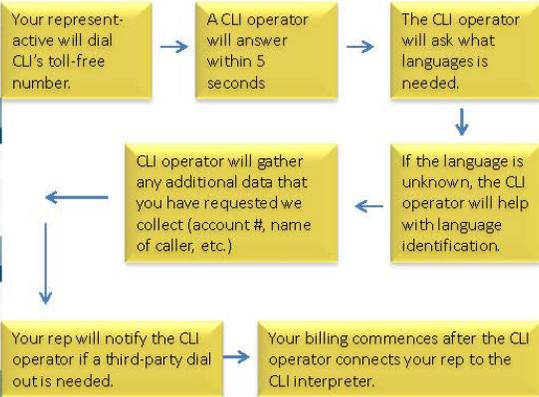


03 Talk
Our professional interpreters will help you navigate your session with ease and a pleasant experience.
Faster Connections





A CLOSER LOOK:



CONDUCT MORE BUSINESS WITH MORE LANGUAGES



SAMPLE INSTRUCTION CARDS

FRONT

NEED AN INTERPRETER?

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

CERTIFIED LANGUAGES
INTERNATIONAL

300+ Languages
24/7/365
Direct Dial: 505-464-2425

BACK

Recommendations for Using an Over-the-Phone Interpreter

For Outbound Calls:

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

For Inbound Calls:

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



**CONDUCT
MORE BUSINESS
WITH MORE LANGUAGES**

VOLUNTEERS



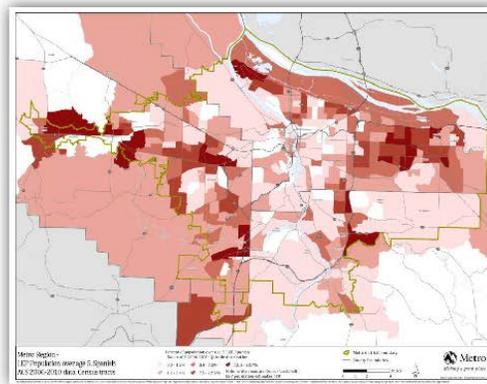


WHAT IS TITLE VI?

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

LANGAUGES OF THE REGION

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



TRANSLATED MATERIALS

- What can Metro do for you? *Videos in Spanish, Russian, Vietnamese and Chinese*
- Guidelines for public testimony
- What to expect when you call the language line
- About Metro, information on parks, tools for living (Haz tu parte) and Metro venues
- Know your rights
- How to file a Title VI and discrimination complaint
- Non-discrimination notice for agendas for public meetings

CHECK LIST

- ✓ Greet customer as usual and make them feel welcomed
- ✓ Start with Metro staff
- ✓ If no answer, call language line
- ✓ Inform appropriate staff
- ✓ Post form in [T:\Language Help](#)



RESOURCES

- Visit: <http://imet.metro-region.org/languagehelp>
- T:\Language Help
- Oregonmetro.gov/languagehub

DEI staff

- Cassie Salinas – ext. 7586

Certified Language International

- 1-800-225-5254





Metro | *Making a great place*

Procedures for providing language assistance for customers who do not speak English well:

Over the phone

Step 1. Welcome the customer to Metro, as usual.

Step 2. If they are having a hard time asking for information, ask the caller to identify the language s/he speaks. Ask the caller in English to please hold for an interpreter.

Step 3.A. Put the caller on hold. Seek a staff interpreter to help with intake. Call one from the staff volunteer interpreter list. Staff interpreter answers the phone? **Go to Step 4.**

No answer? Go to 3.B.

Step 3. B. Call **Certified Languages International (CLI)**: 1-800-CALL-CLI (1-800-225-5254).

- Say you're with Metro in Portland, Oregon and need an interpreter in the language the customer identified. CLI customer service can also help identify the language.
- Give customer code: 14133.
- Tell CLI customer's name and topic (if you know them) for tracking purposes.

Conference in the customer and interpreter, so all three of you can hear.

For conference call instructions, visit <http://imet.metro-region.org/languagehelp>.

Step 4. B. Tell interpreter:

- "I have a customer who speaks XXX. Can you tell him/her that you are an interpreter provided free of charge by Metro and ask what topic he or she is asking about?"
- Note the topic or concern on the **Language Assistance Intake Form**.
- **Follow up with interpreter:** "I need his/her name and contact information so we can have an expert on that subject contact him/her with the right information. Please ask for a name, phone number and the best time to call."

Step 5. Write down contact information on **Language Assistance Intake Form**.

- **Tell interpreter:** Please relay the following information to the customer. "Thank you for calling Metro. I will make sure that someone from Metro calls you on the phone in the next two days to answer your questions and provide you the information you're looking for. Is there any other way I can help you today?"
- Place the completed **Intake Form** in the [Language Help Folder](#).

Step 6. Alert Metro's Title VI staff to the request for information:

- Fill out the **Intake Form**.
- **Send** the completed **Intake Form** to Clifford Higgins and Cassie Salinas with Subject Line: "Telephone Interpreter Needed."
- In the email, **describe the time and place** of the contact and direct staff to see the attached form.
- Title VI staff will find the appropriate subject matter expert to respond to the inquiry.



Metro | *Making a great place*

Procedures for providing language assistance for customers who do not speak English well:

In-person contact

Desired outcome: Customers identified as needing language assistance receive interpretation services and receive assistance from the appropriate Metro subject matter expert.

Step 1. Welcome the customer to Metro, as usual.

Step 2. If the customer is having a hard time asking for information, offer a **Language ID sheet**. Ask the customer to indicate the language s/he speaks.

Step 3. A. Seek a staff interpreter to help with intake. Call one from the staff volunteer interpreter list. **No answer? Go to 3.B.**
Staff interpreter answers the phone? **Go to Step 4.**

Step 3. B. Call **Certified Languages International (CLI)**: 1-800-CALL-CLI (1-800-225-5254).

- Say you're with Metro in Portland, Oregon and need an interpreter in the language the customer identified on the Language ID sheet.
- Give customer code: 14133.
- Tell CLI customer's name and topic (if you know them) for tracking purposes.

Step 4. Tell interpreter:

- "I have a customer who speaks XXX. Can you tell him/her that you are an interpreter provided free of charge by Metro and ask what topic he or she is asking about?"
- Note the topic or concern on the **Language Assistance Intake Form**.
- **Follow up with interpreter:** "I need his/her name and contact information so we can have an expert on that subject contact him/her with the right information. Please ask for a name, phone number and the best time to call."

Step 5. Write down contact information on **Language Assistance Intake Form**.

- **Tell interpreter:** Please relay the following information to the customer. "Thank you for coming to Metro. I will make sure that someone from Metro calls you on the phone in the next two days to answer your questions and provide you the information you're looking for. Is there any other way I can help you today?"
- Place the completed **Intake Form** in the **Limited English Folder** at your work station.

Step 6. Alert Metro's Title VI staff to the request for information:

- Fill out the **Intake Form**.
- **Send** the completed **Intake Form** to Clifford Higgins and Cassie Salinas with Subject Line: "Telephone Interpreter Needed."
- In the email, **describe the time and place** of the contact and direct staff to see the attached form.
- Title VI staff will find the appropriate subject matter expert to respond to the inquiry.
- **Retain** your original **Language Assistance Intake Form** in [Language Help Folder](#).



You have the right to an interpreter at no cost to you. Please point to your language.

Shqip / Albanian

Ju keni te drejten e nje perkthyesi, pa asnje lloj shpenzimi nga ana juaj. Ju lutem, tregoni gjuhën tuaj, nje perkthyes do te thirret

اللغة العربية / Arabic

من حَقك الحصول على مترجم مجاناً، الرجاء تحديد لغتك.

Bosanski / Hrvatski / Bosnian / Croatian

Vi imate pravo da Vam se pruži tumač i to je bezplatno. Vama. Molim Vas izaberite svoj jezik.

中文 / Chinese

您有权利免费获得口译员服务。请指出您的母语。

Kreyòl / Creole

Ou gen dwa a yon entèprèt san li pa kouté w anyen. Tanpri chwazi lang w pale a.

فارسی / Farsi

هزینه اضافی دارید. لطفاً به زبان مورد نظر خود اشاره کرده شما حق استفاده از مترجم را بدون

Français / French

Vous avez le droit à un interprète à titre gratuit. Veuillez indiquer du doigt la langue que vous parlez.

Ελληνικά / Greek

Έχετε το δικέωμα για υπηρεσίες του ειδικού μεταφραστή στο κλάδος υγείας. Παρακαλώ, δείξτε, τι γλώσσα μιλάτε, και εμείς.

ਪੰਜਾਬੀ / Hindi

आपको बिना किसी शुल्क के द्भाषिये की सेवाएं प्राप्त करने का अधिकार है. कृपया अपनी भाषा की तरफ इशारा कीजिए.

Hmoob / Hmong

Yog koj tsi paub lus Askiv, peb mam nrhiav ib tus neeg los pab txhais lus rau koj dawb dawb.

日本語 / Japanese

通訳に費用はかかりません。御自分の言語を指示して下さい。

ភាសាខ្មែរ / Khmer / Cambodian

លោកអ្នកមានសិទ្ធិទទួលសេវាកម្រិតប្រើប្រាស់បេតិកភ័ណ្ឌថ្មី។ សូមចង្អុលទៅភាសារបស់អ្នកដើម្បីប្រើប្រាស់បេតិកភ័ណ្ឌថ្មី។

한국어 / Korean

귀하는 무료 통역 서비스를 받을 권리가 있습니다. 원하는 언어를 가르키세요.

ພາສາລາວ / Laotian

ທ່ານມີສິດທີ່ຈະມີນາຍແປພາສາໂດຍບໍ່ຄິດໄລ່ເງິນຈາກທ່ານ. ກະລຸນາຊີ້ໃສ່ພາສາຂອງທ່ານ

Tagalog / Philippines

Mayroon kang karapatan sa isang tagasalin nang walang gastos sa iyo. Mangyari lamang na ituro ang iyong lengguwaha.

Português / Portuguese

Você tem direito à um intérprete sem nenhum custo à você. Favor aponte para o seu idioma.

Русский / Russian

Вы имеете право на бесплатные услуги переводчика. Пожалуйста просим Вас указать на Ваш язык.

Soomaali / Somali

Waxaad xaq u leedahay inaad heshid tujumaan caafimaad oo aan lacag kuugu fadhin. Fadlan tilmaan luqaddaada, tujumaan ayaa laguugu wici doonaaye.

Español / Spanish

Usted tiene derecho a un intérprete sin costo alguno para Usted. Por favor, señale su idioma

(Ki)Swahili / Swahili

WEWE UNA HAKI YA KUPATA HUDUMA ZA MKALIMANI BILA MALIPO YOYOTE. *TAFADHALI ONYESHA YAKONI IPI

Türkçe / Turkish

Ücretsiz tercüman hakkınız vardır. Sadece konutduğunuz dili işaretleyin.

Українська / Ukrainian

Ви маєте право на отримання безкоштовних послуг перекладача. Будь-ласка, вкажіть на вашу рідну мову. і ми вам покличемо перекладача.

Tiếng Việt / Vietnamese

Quý vị có quyền có thông dịch viên miễn phí. Xin chỉ vào ngôn ngữ của quý vị.

Posted as part of Metro's compliance with Title VI of the Civil Rights Act of 1964. For assistance, contact administrative staff in communication, planning or council office, or contact Karen Withrow, Public Involvement Manager, ext. 1932. For more information on civil rights compliance, see oregonmetro.gov/civilrights





Language Assistance Intake Form

For telephone or in-person contact

Name of Metro employee:

Date, time, location of contact from customers who don't speak English well (Limited English Proficiency)

Customer name, phone number, best time to call to respond with information:

Question/topic of inquiry:

Other observations:

Immediately Alert Metro's Transportation Title VI staff to this request for information:

- **Fill in this form and forward** the filled in document in an email message to Clifford Higgins, Patty Unfred, Cassie Salinas, and Valerie Cuevas, with Subject Line: "Telephone Interpreter Needed."
- In the email, **describe the time and place** of the contact and direct staff to see the attached form.
- Metro staff will find the appropriate subject matter expert to respond to the inquiry.
- **Retain** your original **Language Assistance Intake Form** in your folder.



Metro staff volunteer language interpreters

Updated April 2015

Language – Name – MRC Extension

Bosnian

Patrick Morgan 1520

Chinese Languages

Mandarin

Qing Yang 1538

Mel Huie 1731

Croatian

Patrick Morgan 1520

French

Betty Shelley 1860

Bill Stein 1855

Aaron Breakstone 1823

Minott Kerr 1679

Juan Carlos Ocana-Chiu 1921

German

Gabriele Schuster 1577

Katy Weil 1688

Hausa

Bill Stein 1855

Italian

Patrick Morgan 1520

Maria Roberts 1683

Japanese

Riko Frohnmayer 1620

Portuguese

Juan Carlos Ocana-Chiu 1921

Russian

Runar Gareyev 1606

Serbian

Patrick Morgan 1520

Sign Language

Gina Granato, 1601

Spanish

Dominic Luina 1857

Maria Roberts 1683

Robert Spurlock 7560

Patrick Morgan 1520

Juan Carlos Ocana-Chiu 1921

