



Limited English Proficiency Plan

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

March 2022

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Metro is the federally mandated metropolitan planning organization (MPO)

designated by the governor to develop an overall transportation plan and to allocate federal funds for the greater Portland region.

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

Project web site: oregonmetro.gov/civilrights

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

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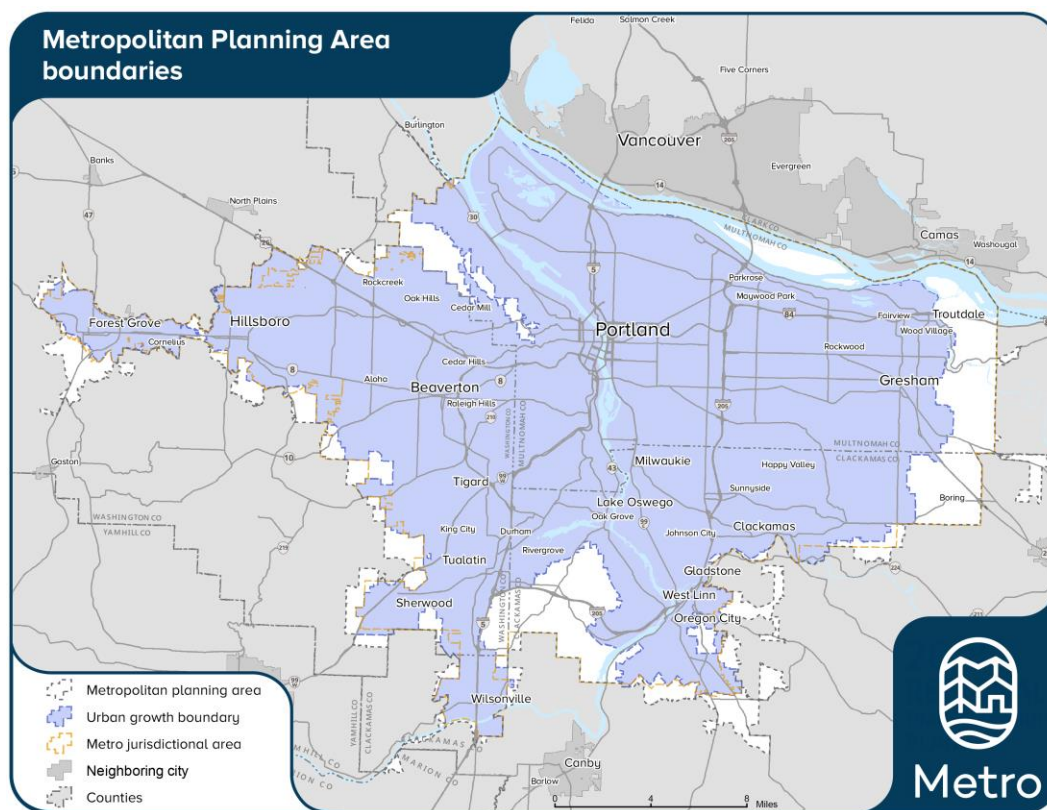
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INTRODUCTION

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

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

Metro Council districts and jurisdiction boundary



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

Metro is also responsible for land use planning and the management of the garbage and recycling system, regional parks and natural areas, the Oregon Zoo, the Oregon Convention Center, Expo and P5 facilities.

PURPOSE AND PROCESS

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

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

In developing the LEP Plan, Metro conducted the four-factor analysis set out by the U.S. Department of Justice, which considers the following: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 335,900 persons over the age of 5, or 20% of the Metro region's over-5 population, speaks a language other than English at home.
- Approximately 125,800 persons over the age of 5 speak a language other than English at home and speak English less than "very well". This population is 7.4% of the Metro region's over-5 population.
- Spanish is the second most predominant language, other than English, spoken in the region
- Seventeen non-native English language groups within Metro's service area have limited English proficient populations of 1,000 persons or more.
- Of all languages spoken in the region, Table 1 shows the languages with more than 1,000 persons with limited English proficiency; no languages meet the threshold 5% of the service area population.²

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

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

Language spoken at home	Population 5 and over speaking a language other than English at home	Population that is LEP, age 5 and over, by native language	Population that is LEP, age 5 and over, by native language, margin of error	Percent of total LEP population by native language	Percent of total Metro region population age 5 and over (1,473,411), LEP, by language
Spanish	153,848	57,310	+ 2,575	37.3%	3.4%
Vietnamese	23,714	14,705	+ 1,492	11.7%	0.9%
Chinese	23,684	11,463	+ 1,037	9.1%	0.7%
Russian	15,736	6,447	+ 880	5.1%	0.4%
Korean	7,824	3,724	+ 590	3.0%	0.2%
Arabic	6,771	2,578	+ 666	2.0%	0.2%
Japanese	6,305	2,349	+ 394	1.9%	0.1%
<i>Ukrainian *</i>	<i>no ACS data</i>	<i>2,149</i>	<i>+ 464</i>	<i>1.7%</i>	<i>0.1%</i>
Tagalog	8,230	2,124	+ 444	1.7%	0.1%
Khmer	2,750	1,526	+ 395	1.2%	0.1%
<i>Romanian *</i>	<i>no ACS data</i>	<i>1,468</i>	<i>+ 295</i>	<i>1.2%</i>	<i>0.1%</i>
<i>Somali *</i>	<i>no ACS data</i>	<i>1,133</i>	<i>+ 240</i>	<i>0.9%</i>	<i>0.1%</i>
Persian	4,012	1,122	+ 297	0.9%	0.1%
<i>Thai *</i>	<i>no ACS data</i>	<i>965</i>	<i>+ 248</i>	<i>0.8%</i>	<i>0.1%</i>
Hindi	6,050	898	+ 255	0.7%	0.1%
Lao	<i>no ACS data</i>	831	+ 213	0.7%	0.05%
Telugu	3,080	780	+ 302	0.6%	0.05%
Total, all non-English languages	335,948	125,808	+ 3,903	100.0%	7.4%

Data source: American Community Survey 2015-2019, 5 year estimate, Table B16001, Language spoken at home, except:

** Languages not disaggregated in Census: estimates derived from Oregon Department of Education school language dataset for 2018-2019.*

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

While Nepali, Chuukese, and Karen were on the list of languages that met the guidelines for translation in Metro’s 2018 Title VI report, they did not meet the safe harbor guidelines for translation of vital documents in the 2021 analysis.

LEP population data sources

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

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

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

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

LEP population analysis

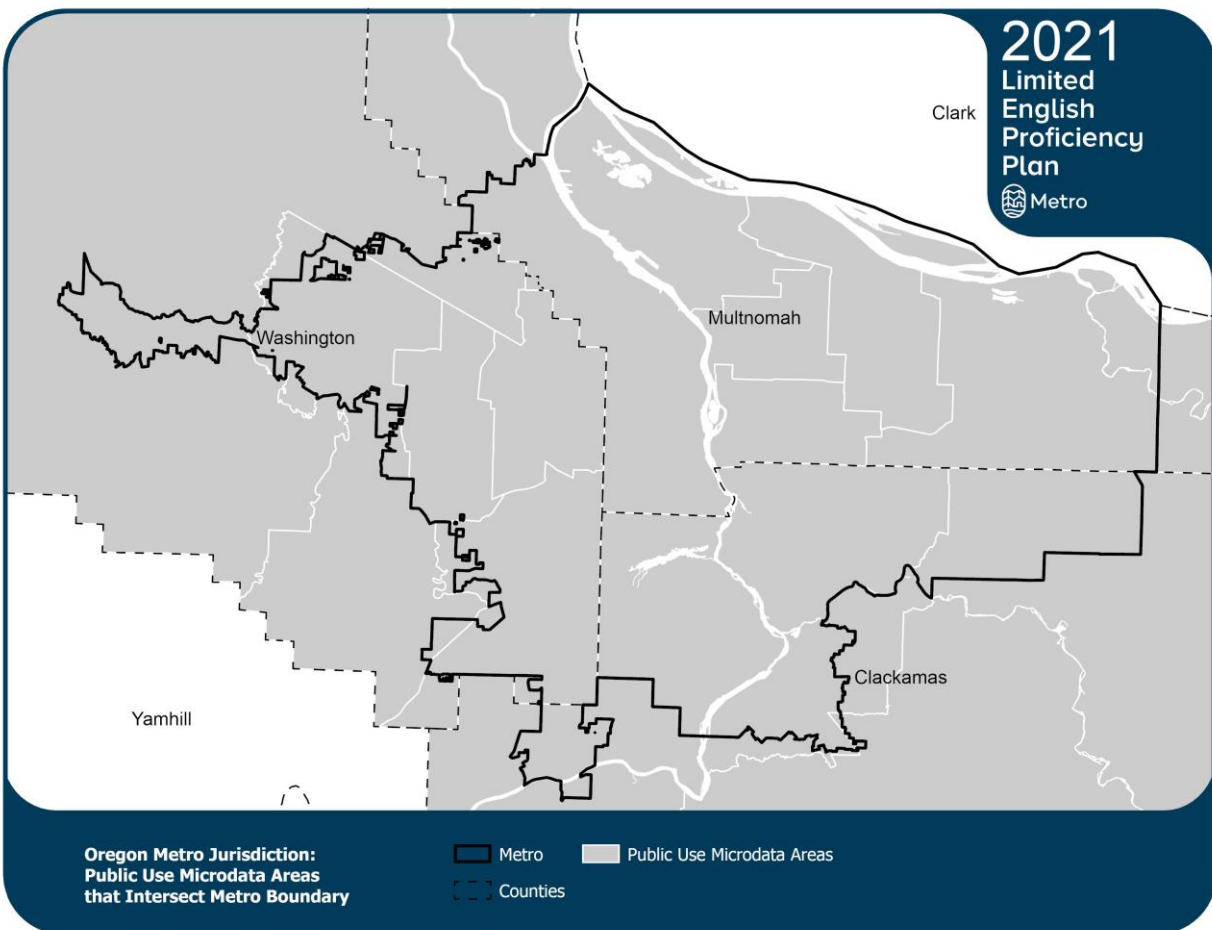
2015-2019 American Community Survey

Metro's jurisdictional boundary area includes the urban/most populous areas of Clackamas, Multnomah, and Washington counties. However, Metro's jurisdictional boundary does not conform to the geographies of Census data. In order to estimate the LEP populations within the jurisdictional boundary area, Metro staff collected and analyzed Census Public Use Microdata Areas (PUMAs). All PUMAs that were either partly or completely within Metro's service area boundary are included in the analysis (Figure 1). Because of this process, the entirety of Clackamas, Multnomah, and Washington counties are included. Approximately 93% of the three county population lives inside the Metro jurisdiction.

The estimated total counts of LEP population from table B16001 in the 2015-2019 ACS PUMA data were obtained by aggregating estimates from the PUMAs in the three county area of persons over age 5 that "speak English less than very well."

⁴ 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 Public Use Microdata Areas included in Metro 2021 Factor 1 Analysis



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

In the PUMAs that intersect Metro’s jurisdictional boundary, the LEP population represents 7.4% of persons aged five years and older (Table 2).

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

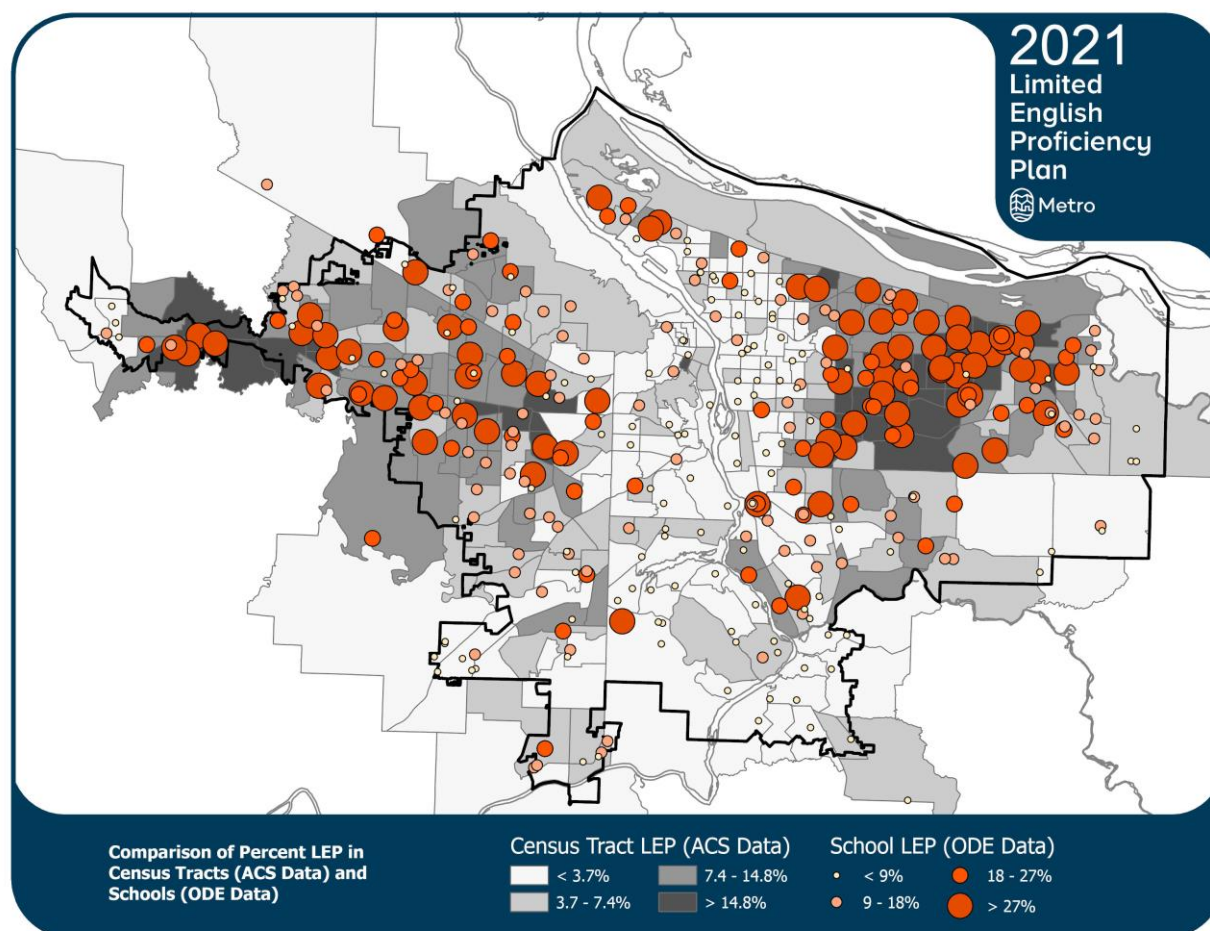
Total population, persons age 5 and older	Persons age 5 and older, speak a language other than English at home	Persons age 5 and older, speak a language other than English at home, speak English less than very well (LEP)	Percent of estimated regional population age 5 and older that is LEP
1,702,379	335,948	125,808	7.4%

Source: 2015-2019 ACS, Public Use Microdata Areas, Table B16001

For the purposes of visualizing the geographic distribution of LEP populations in the Metro area, we use a more generalized language table available at census tract level. Part of the usefulness of this type of visualization is to see smaller neighborhood-level spatial patterns of LEP with the region, but analytically it also helps to verify the general spatial agreement between ACS and ODE data (Figure 2). 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,”⁵ by showing census tracts where the percentage of LEP persons is greater than the regional average of 7.4%. In Appendix B, Figures B1-B17, illustrate the spatial concentration of LEP speakers for each of the 15 languages, in map form.

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



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

The ACS-based summary counts revealed twelve individual languages with LEP populations that may exceed 1,000 persons within the PUMAs that intersect the Metro jurisdictional boundary, with eight of the twelve individual ACS languages having LEP populations that may exceed 2000.⁶ Additionally, eight ACS language groups have populations of LEP speakers that may exceed 1,000.⁷

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

Data from the U.S. Census Bureau aggregates hundreds of distinct languages into forty-two categories in Table B16001. This table includes twenty-nine unique languages and thirteen

⁵ *Ibid*, p. 16.

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

⁷ ACS language groups that may exceed 1000 persons in the Metro region include Other Slavic, Other Afro-Asiatic, Other Indo-European, Other Languages of Asia, Other Tai-Kadai, Other Austronesian, Other Indic, and Other Languages of Central, Eastern, and Southern Africa.

groupings of multiple languages. Eight of these thirteen language groupings contained LEP populations that may exceed 1,000 persons. The language groups include:

- Other Slavic Languages
- Other Afro-Asiatic Languages
- Other Indo-European Languages
- Other Languages of Asia
- Tai-Kadai Languages
- Other Austronesian Languages
- Other Indic Languages
- Languages of Central, Eastern, and Southern Africa.

To determine if a single language population embedded within one of these group language categories has a population that may exceed 1,000 persons, Metro collected and analyzed data from the Oregon Department of Education as a secondary data source. Metro used ODE data in conjunction with the ACS 5-year releases to determine rough estimates for populations age five and older that live within Metro's jurisdictional boundaries that are LEP within that specific language population.

Oregon Department of Education (ODE) 2018-2019 Enrollment data

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

- non-native English speaking students
- LEP students
- socio-economic data; and race/ethnicity.

The data represent 100% 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 hundreds of individual languages represented and LEP data collected for native speakers of each language.

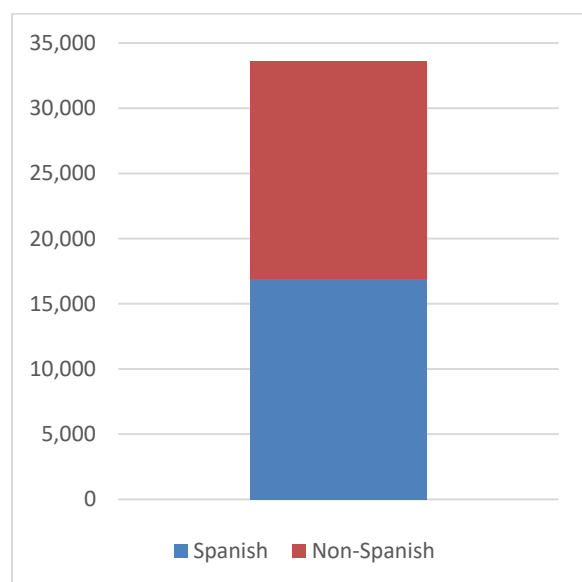
However, ODE cautions that the language classification is not highly validated. To protect student confidentiality, ODE suppresses data at the individual school level when fewer than ten students are counted in an individual language. Metro has calculated an estimate for the number of students who are represented by a suppressed value in order to more precisely estimate regional language trends. Hundreds of schools are aggregated in this process, so confidentiality protections are preserved.

The Oregon Department of Education 2018-2019 data helped refine Metro's estimates of languages which have significant LEP populations in the schools but are not reported in the U.S. Census. Many

individual language populations that do not appear in the American Community Survey⁸ have prominent LEP populations in the ODE schools data, including Ukrainian, Somali, Romanian, Karen, Thai, Chuukese, Nepali, and Swahili (see Appendix C, Table C4).

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

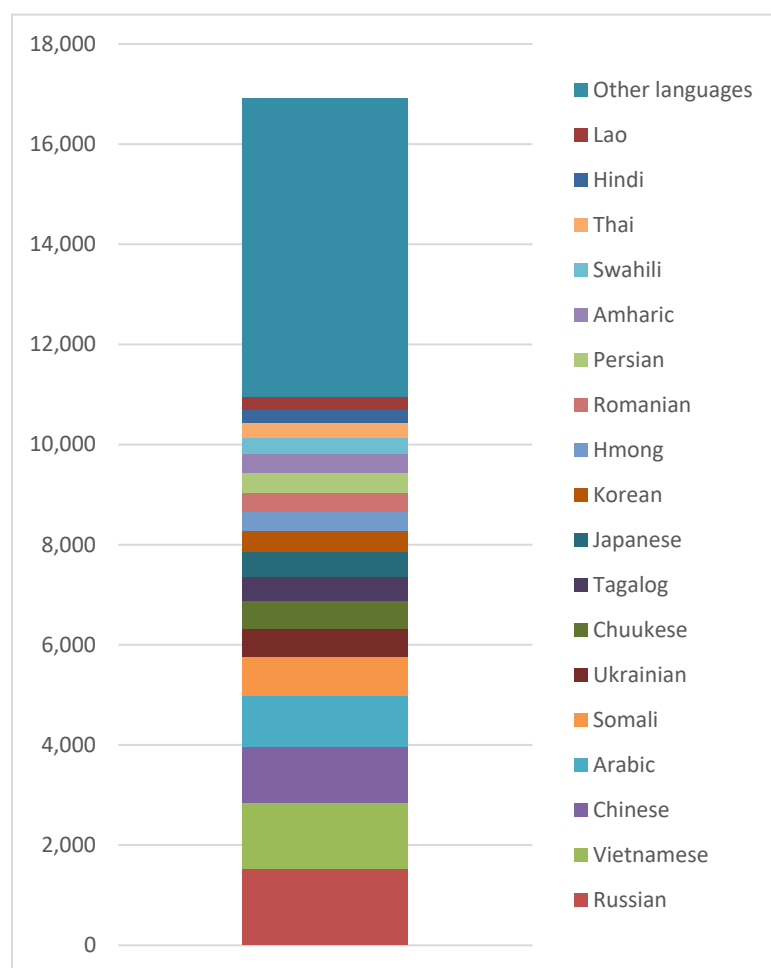
Figure 3. LEP students enrolled in Oregon public schools that speak Spanish compared to all other languages



Source: Oregon Department of Education, 2018-2019

⁸ These noteworthy individual language populations in the ODE are included within group language categories in the ACS and thus do not have available ACS estimates.

Figure 4. LEP students enrolled in public schools within the greater Portland region, all languages besides Spanish



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

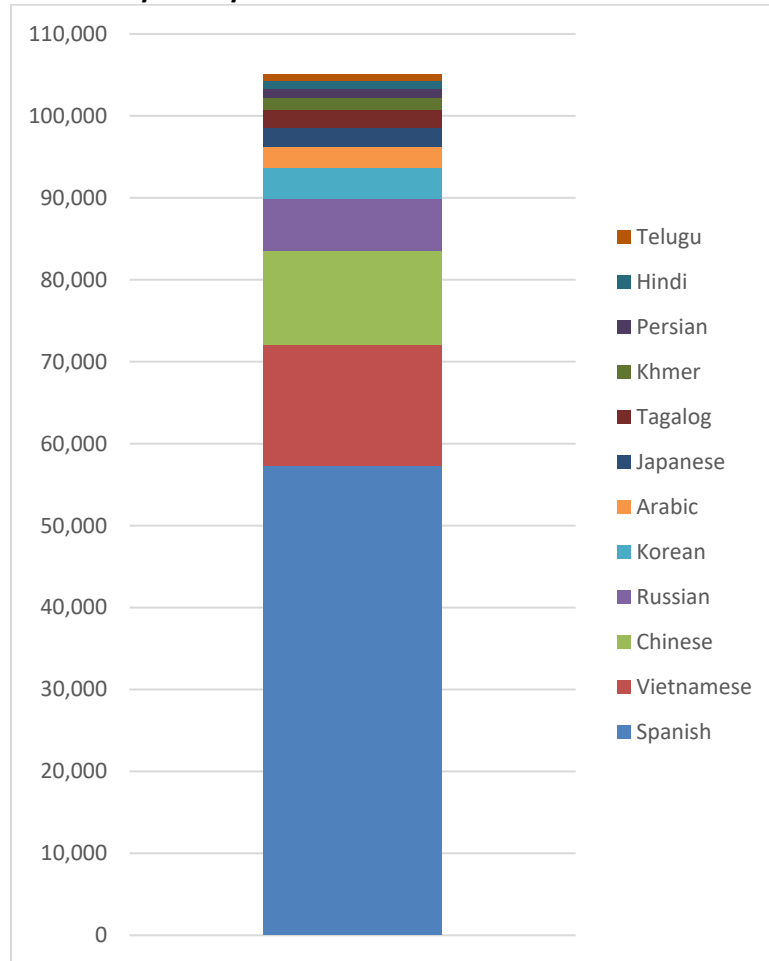
Source: Oregon Department of Education, 2018-2019

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 the Other Slavic dataset 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 two data sources included in this report identified seventeen specific languages in Metro’s jurisdictional area with LEP populations that may exceed 1,000 persons. LEP populations for 12 of 17 languages could be determined from ACS data alone (Figure 5), whereas ODE data was needed to interpolate the populations of Ukrainian, Romanian, Somali and Thai from within their parent ACS language groupings – Other Slavic Languages, Other Indo-European Languages, Other Afro-Asiatic Languages and Tai-Kadai Languages, respectively (Figure 6). Of the LEP populations, approximately one-half speak Spanish as their first language, and approximately three-quarters speak Spanish, Vietnamese, Chinese (Mandarin or Cantonese) or Russian.

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

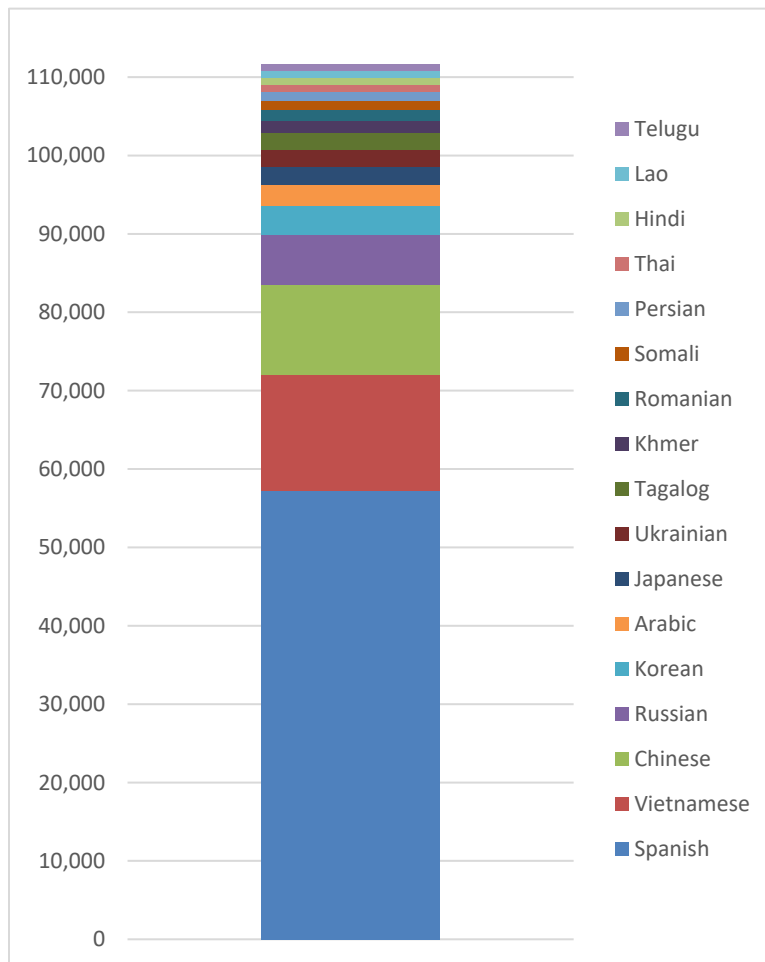


Source: American Community Survey, 2015-2019

Metro has determined that translation of vital documents should be performed for 17 languages, including vital documents found on Metro’s website currently available for 13 of those languages: oregonmetro.gov/languagehub. Metro’s LEP implementation plan assigns the translation of vital documents for the remaining four languages to occur within the 2022 calendar year. Upon request and subject to available resources, Metro will provide translation of other documents (i.e., documents not identified as “vital documents”) pertaining to programs and services into relevant languages.

Figure 6 and Table 3 show the 17 languages, including the estimated population sizes based on supplemental data for the four languages which are not reported in ACS Table B16001.

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



Sources: American Community Survey, 2015-2019; Oregon Department of Education, 2018-2019

Table 3. Languages eligible or potentially eligible for safe harbor provisions in Metro-wide services

	1) Persons age 5 and older, language at home is not English	2) LEP persons age 5 and older, language at home is not English	3) LEP persons age 5 and older, language at home is not English	4) LEP persons age 5 and older, language at home is not English	5) Percentage of total regional population (tracts), by language spoken at home and LEP
Data source	ACS 2015-2019 (Table B16001)	ACS 2015-2019 (Table B16001)	ACS 2015-2019 (Table C16001)	ACS 2015-2019 (Table B16001), ODE 2018-2019	
Geography	PUMA	PUMA	Tract	PUMA, School Attendance Boundary	
All languages	335,948	125,808	121,915		7.4%
Spanish	153,848	57,310	54,165		3.4%
Vietnamese	23,714	14,705	14,601		0.9%
Chinese	23,684	11,463	11,362		0.7%
Russian	15,736	6,447	<i>no data</i>		0.4%
Korean	7,824	3,724	3,718		0.2%
Arabic	6,771	2,578	2,566		0.2%
Japanese	6,305	2,349	<i>no data</i>		0.1%
Ukrainian	<i>no data</i>	<i>no data</i>	<i>no data</i>	2,149	0.1%
Tagalog	8,230	2,124	2,088		0.1%
Khmer	2,750	1,526	<i>no data</i>		0.1%
Romanian	<i>no data</i>	<i>no data</i>	<i>no data</i>	1,468	0.1%
Somali	<i>no data</i>	<i>no data</i>	<i>no data</i>	1,133	0.1%
Persian	4,012	1,122	<i>no data</i>		0.1%
Thai	<i>no data</i>	<i>no data</i>	<i>no data</i>	965	0.1%
Hindi	6,050	898	<i>no data</i>		0.1%
Lao	<i>no data</i>	<i>no data</i>	<i>no data</i>	831	0.05%
Telugu	3,080	780	<i>no data</i>		0.05%

Source: American Community Survey, 2015-2019; Oregon Department of Education, 2018-2019

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.⁹

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

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

Review of relevant programs, activities and services provided

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

1. Regional Transportation Plan (long-range regional transportation plan)
2. Metropolitan Transportation Improvement Plan (schedule of investment of federal transportation funds)
3. corridor planning (potential New Starts and Small Starts projects)
4. regional flexible funding allocation (allocation of the Surface Transportation Block Grant program and Congestion Mitigation and Air Quality Improvement program)

⁹ U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, Section V, 70 FR 74087, Dec. 14, 2005.

5. Regional Travel Options (marketing of and grant programs related to carpooling, biking and transit use).

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

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

Most metropolitan planning organization activities are geographically expansive, such as the RTP and Metropolitan Transportation Improvement Program, which plan for and consider the transportation system – and include transportation projects – across the entire greater Portland region. Some functions address smaller, yet still significant, geographies, such as the planning of high capacity transit and related investments in a corridor that links two or three adjacent cities within one or two counties. Historically, Metro has had little success in engaging LEP populations these planning efforts, but with recent planning efforts that are exploring innovative tools (such as interactive posters with multiple languages) and new community partnerships, contact may increase.¹⁰

Metro's process for distributing its Surface Transportation Block Grant program (STBG) and Congestion Mitigation and Air Quality Improvement Program (CMAQ) relies on soliciting project proposals from local jurisdictions. Because the proposals must be weighed against goals, objectives and policies of the RTP and other long-range plans, there is relatively little regional interest by even English-speaking stakeholders to deeply engage and provide input. Though Metro's most recent allocation process garnered intense interest at the local level in advocating for or against funding of specific project proposals, multilingual outreach and tools for engaging in the process garnered little participation from LEP persons. Further, these proposals are developed from, and resulting projects are further developed through, city and county processes with their own outreach requirements and practices – including outreach to LEP populations – that may allow for more direct and meaningful public influence.

¹⁰ See, for example: Public engagement reports for the Powell-Division Transit and Development Project, oregonmetro.gov/powelldivision.

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

Staff questionnaire

A staff questionnaire was conducted in October 2021 to determine the frequency of contact with residents with limited English proficiency. The survey was sent to all employees in Metro's Planning, Development and Research department as well as administrative and communications 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.¹¹ There were 23 staff who participated in the survey.

The staff questionnaire asked the following questions:

1. ***Pre-COVID, how often did you typically receive requests from a community member for a language interpreter to be provided at a meeting related to a Metro program or project? Please explain which program(s), type of meeting(s) and language(s).***

Fifteen staff indicated that, pre-Covid, they never receive requests for language interpretation. Eight staff responded that they typically received requests for a language interpreter once or twice per year. Seven staff provided details on the programs and types of meetings. One staff person specified that the requests were related to a steering committee meeting for a transportation corridor project and another staff person responded that the requests were for workshops co-hosted with culturally-specific community orgs about transportation programs. An administrative staff responded that the request was general and not program specific. Another administrative staff indicated that requests for interpretation are usually for phone calls to subject matter experts in Metro. One staff person indicated they received a request for sign language at a meeting.

2. ***Since March 2020, how often do you typically receive requests from a community member for a language interpreter to be provided at a (virtual) meeting related to a Metro program or project? Please explain which program(s), type of meeting(s) and language(s).***

Nineteen staff responded that they have receive no requests for language interpretation since March 2020. Four staff responded that they have received requests for a language interpreter once or twice per year since March 2020. Of the staff that responded they have received

¹¹ This questionnaire focused on staff connected to Metro's metropolitan planning organization function. Additional outreach and services in multiple languages are also performed by Metro's garbage and recycling and its parks and natural areas programs.

requests, one of those staff said they were general requests. Another staff person indicated the request was for a community leaders workshop related to the regional transportation plan update.

3. *Pre-COVID, how often did you receive an information request from a community member (either by phone or in person) who spoke limited English and needed an interpreter to understand information about a program or project? Please explain which program(s), project(s) and language(s).*

Fourteen staff people indicated that they never received an information request from a community member who spoke limited English. Seven indicated that they received an information request from a community member who spoke limited English once or twice per year and one staff person indicated they received such a request one a month. The staff member who indicated they received requests once a month said they are phone calls to Metro's front desk or visitors to the building. Two staff indicated that the received requests related to the Regional Transportation Plan and the Transportation Policy Advisory Committee. One staff indicated they had received a request related to Metro's Regional Transportation Options program.

4. *Since March 2020, how often have you received an information request from a community member (either by phone or in person) who spoke limited English and needed an interpreter to understand information about a program or project? Please explain which program(s), project(s) and language(s).*

Three staff responded that they had received an information request from a community members who spoke limited English once or twice per year since March 2020. One of the three staff explained the request and indicated that it was a request for Spanish interpretation related to the Community Placemaking grant program. Twenty staff indicated they have received no information requests from a community member who spoke limited English since March 2020.

5. *Pre-COVID, how often did you receive 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? Please explain which program(s), project(s) and language(s).*

Three staff responded that they had received an information request for translated materials once or twice a month. Two requests were related to the Regional Transportation Plan. Other requests came through community based organization partners.

6. *Since March 2020, how often 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? Please explain which program(s), project(s) and language(s).*

Four staff indicated they received a request for translated documents once or twice a year and one staff indicated they receive requests one a month. The monthly requests are related to Metro's Safe Routes to School program. Metro works with local school, cities and community based organizations who regularly request that safe routes to school materials be translated for distribution to community members. Nineteen staff indicated they have received no request for document translation since March 2020. One staff person indicated they received a request for Community Placemaking grant materials to be translated to Spanish. Another staff described translating intake documents for Metro's Supportive Housing Services program so that counties could provide translated materials to clients.

7. *Pre-COVID, how often did you conduct community outreach targeted to people who speak limited English, to obtain input or spread awareness of a Metro program or project? Please explain which program(s) and language(s).*

Nine staff responded that they conducted community outreach specific to LEP community members once or twice per year. A couple of the respondents indicated that multilingual outreach is conducted for Metro's Planning and Development Grant programs, including the Regional Travel Option Grants. Metro worked with culturally specific organizations to engage communities in conversations about the types of transportation programs that are most needed in the region. Surveys and materials about transportation programs were translated into Spanish, Vietnamese, Simplified Chinese and Russian that were used at community workshops with interpretation. The Emerging Tech Implementation Plan project staff conducted outreach in partnership with culturally specific community based organizations and materials and interpretation were provided in Spanish, Chinese and Vietnamese. Corridor projects, including the Southwest Corridor and Powell-Division projects partnered, with community based organizations to engage community members who speak Spanish, Vietnamese and Russian. Metro's Bike There map products are available in Spanish.

8. *Since March 2020, how often have you conducted community outreach targeted to people who speak limited English, to obtain input or spread awareness of a Metro program or project in COVID times?*

Six staff responded that they have conducted community engagement specific to people who speak limited English one or twice per year and one staff responded once per month. Metro has started translating all Safe Routes to School materials into the five most commonly spoken languages by families in the region. This includes a survey conducted in 2020 to parents/caregivers on transportation concerns returning to school in five languages. We launched a regional safe driving campaign also in five languages.

9. *How often did you translate a document, sign or notice to help people understand something about a Metro program or project in non-COVID times? Please explain which program(s) and language(s).*

Six staff responded that they translated a document, sign or notice once or twice per year and one staff responded once per month. One staff member specified that they translated a notice sent to eligible small businesses who could consider applying for main-street type grants in five languages. Staff also mentioned translating public notices for public comment periods for the RTP and MTIP.

10. *Since March 2020, how often have you translated a document, sign or notice to help people understand something about a Metro program or project in COVID times? Please explain which program(s) and language(s).*

Four staff responded that they translated a document, sign or notice once or twice per year and one staff responded once per month. Staff described that they translated application material for the 2021 Community Placemaking grant (a non-metropolitan planning organization program) into the five most frequently spoken language and that materials for Safe Routes to School are translated whenever possible.

The 2022-24 regional flexible funds allocation was noticed, and engagement tool provided, in multiple languages including Spanish, Vietnamese, Chinese and Russian. The Metropolitan

Transportation Improvement Program noticed in multiple languages, including a “need help?” notice during amendment comment periods; and the Regional Transportation Plan was noticed in multiple languages. Consultants for the Regional Travel Options communications research project were requested to have a multilingual outreach staff.

In addition to what is mentioned above non-metropolitan planning organization programs focus on multilingual outreach: The Community Placemaking grant program has supported multilingual projects; The Parks and Nature program creates regional natural areas maps in multiple languages; subjects of storytelling efforts on Metro News have included people who have been interviewed in other languages and translated into English; and when non-English preferred communities are impacted or featured in stories on Metro News, those stories have been translated and published in those languages.

The results of the staff survey and review of proactively translated materials indicate that a small portion of staff have direct interaction with people who don’t speak English well. The majority of interpretation and translation efforts are a result of Metro partnering with culturally-specific organizations to conduct focused outreach and engagement with multi-lingual participants. As Metro continues to focus on engagement with LEP communities, it is anticipated that translation and interpretation requests will increase.

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

Results summary

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

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.¹²

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.¹³

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

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

¹³ 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.

or shelter). Further, although Metro works closely with other agencies and jurisdictions in planning for high capacity transit service, Metro is not a provider of public transit service.¹⁴

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

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

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

Step 1: Identify your agency's most critical services

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

¹⁴ Metro works with Federal Transit Administration (FTA), Tri-County Metropolitan Transportation District of Oregon (TriMet), Oregon Department of Transportation (ODOT) and affected cities and counties in planning transportation corridor improvements, including high capacity transit service.

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

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

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

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

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

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

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

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

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

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

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

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

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

Transportation corridor Environmental Assessment and Environmental Impact Statement processes (importance level: 6)¹⁵

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

Identify your agency's most critical services. Though typically rendering long-term results, this planning process leads to tangible, on the ground improvements, often with elements of short- to mid-term implementation. Because of the direct community implications, these plans could have serious implications for individuals if language barriers prevent a person from participating in or benefiting from the planning process and results.

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

Regional Travel Options (importance level: 5)

The Regional Travel Options program improves air quality and reduces congestion by working with businesses, local organizations and public agencies to offer residents ways to get around without a car. The program is made up of a marketing effort to reach key audiences; an employer outreach program; a regional rideshare (carpooling) program; and a grant program that funds projects that improve air quality, address community health issues, reduce auto traffic and create more opportunities for walking and biking. This program also includes Metro's Safe Routes to School program that focuses on providing funds to new and existing local programs, coordinating efforts and establishing best practices, and providing technical assistance opportunities to enhance program development and reduce administrative costs.

Identify your agency's most critical services. The Regional Travel Options program focuses on providing information to offer choices to people in how they get around. The goal of the program is behavior change through education and resources to make non-driving-alone travel more convenient, easier and safer. The regional Safe Routes to School program focuses on regional

¹⁵ Transportation corridor-focused planning that that could lead to strategies for community investment and development may in turn lead to planning for a major public investment in transit or roadway expansion and require an Environmental Assessment or Environmental Impact Statement. Such project evolution is often not identified as two separate project phases, more often seen as a growth in planning and public involvement efforts through project development. Metro recognizes that there is not a distinct boundary between the level "2," planning that that could lead to strategies for community investment and development, and the level "6," planning that could lead to urgent or important effects (transportation corridor Environmental Assessment and Environmental Impact Statement processes). Rather, there is a steady increase in importance that must be mirrored by a related increase in outreach and language-services as part of that outreach.

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

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

Regional flexible funds (importance level: 4)

Every three years,¹⁶ JPACT and the Metro Council decide how best to spend money from two federal funds: Congestion Mitigation Air Quality and Surface Transportation Block Grant programs. Under the allocation processes for funds for the 2014-2015 fiscal years and the 2016-2018 fiscal years, workshops made up of service providers and community advocates was undertaken during the MTIP and RFFA policy development advised on how to address the needs of environmental justice and underserved communities. Additionally, during the solicitation process for projects additional outreach was undertaken and community organizations provided a significant level of public comment at JPACT and Metro Council meetings in the lead up of the decision. During public engagement to inform the decision on the proposed projects, materials were translated into multiple languages, with targeted social media outreach to LEP populations. Collaboration under this process 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 frustrate input that could affect allocation decision on projects that will take three to five years to complete and, therefore, language service is of moderate importance to LEP populations, given Metro's role in the flexible funds allocation process.

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

¹⁶ Prior to the 2016 federal fiscal year, allocations were determined every two years.

approval process. This may be best achieved through translation of vital documents¹⁷ and consultation with agencies, organizations or advocacy groups that serve limited English proficiency populations to determine any issues that are unique to those populations.

Regional Transportation Plan (importance level: 2)

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

Identify your agency's most critical services. The Regional Transportation Plan contains the framework and goals for a 25-year planning horizon for a healthy and prosperous region. RTP implementation is carried out through transportation corridor planning, the Metropolitan Transportation Improvement Program and the regional flexible funds process. Looking at the Regional Transportation Plan on its own, this long-term, regional level planning process could have limited implications for individuals if language barriers prevent a person from benefiting from the planning process. Adding a project to the RTP's financially constrained project list makes it eligible for federal funding, among the most important and shorter-term impacts of the plan. But even this has little impact on LEP and other populations, since the projects are often still conceptual and require more local planning and public involvement before funding decisions and, eventually, potential construction. In addition, projects are drawn from plans (e.g., local transportation system, subarea, topical, modal or transit service plans), with the expectations that sponsoring jurisdictions conduct general public, environmental justice and Title VI (including to residents with limited English proficiency) during the development of those plans. (For the public engagement and non-discrimination certification checklist required of project sponsors for the 2018 Regional Transportation Plan, see Appendix E)

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

¹⁷ "The following actions will be considered strong evidence of compliance with the recipient's written-translation obligations: (a) The DOJ recipient provides written translations of vital documents for each LEP language group that constitutes five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered..." U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41464, June 18, 2002. "Whether or not a document (or the information it contains or solicits) is 'vital' may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner," U.S. Department of Health and Human Services, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, Appendix A, Questions and Answers Regarding the Department of Health and Human Services Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 68 FR 47322, Aug. 8, 2003.

Metropolitan Transportation Improvement Program (importance level: 1)¹⁸

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

Identify your agency's most critical services. Because of the direct transportation project phasing implications, these plans could have modest implications in the short- to mid-term to individuals if language barriers prevent a person from participating in or benefiting from the planning process and results. Local jurisdictions conduct general public, environmental justice and Title VI (including to residents with limited English proficiency) outreach and gather input prior to submitting projects to Metro. (A public engagement and non-discrimination certification checklist similar to the one provided for the 2018 Regional Transportation Plan is required of project sponsors; see Appendix E) As the project list is developed, reviewed, prioritized and approved by JPACT and the Metro Council, there is little opportunity for residents to add further input to affect the process. Lack of language service would not frustrate meaningful input and, therefore, language service is of limited importance to LEP populations, given Metro's role in the MTIP process.

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

Step 2: Review of consultation with LEP persons

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

LMS hired community members to conduct the focus groups in Mandarin, Russian, Spanish, and Vietnamese. LMS gathered qualitative and quantitative data through dynamic virtual focus groups and survey questions. The focus groups consisted of fourteen questions about Metro, places, programs, service knowledge, participants' use of media and translation programs, and

¹⁸ 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.

transportation. A follow-up survey was filled out by each participant with questions about transportation priorities, trusted information sources, and optional demographic questions. The focus groups were 120 minutes.

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

Key findings

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

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

Factor 4: Resources available to the recipient and costs

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

A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.¹⁹

In addition, FTA suggests a four-step process for Factor 4 analysis:²⁰

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

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

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

Determination of any additional services are needed to provide meaningful access

Flexible service contracts

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

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

¹⁹ U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.

²⁰ 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.

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

Two contracts awarded totaling up to \$400,000; one contract expires June 2022 and one (Spanish-specific services) expired Dec. 31, 2021

- Written products, letters, brochures, handouts | \$80 to 100 per hour (500 words)
- Spanish translation of social media posts, short-videos and stories | \$85 - \$150 per hour

Spanish translation and multicultural communications services total, expired Dec. 31, 2021, requires an RFP process, which is expected to launch in spring 2022.

Telephonic interpretation services

One contract awarded totaling up to \$10,000; expires September 2026

- On call and scheduled telephonic interpretive services | \$1.15 per minute
- On call video remote interpreting services | \$1.15 per minute

Onsite interpretation services

One contract awarded totaling up to \$150,000; expires March 2022

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

Altered hearing/hearing impairment services (non-LEP)

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

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

Metro is currently using closed captioning built into the Zoom program for closed captions for live meetings and manual captioning for produced videos and will assess and renew needed closed captioning services as its post-COVID-19 meeting practices become clearer.

Onsite American Sign Language interpretation (non-LEP); expires March 2022, renewal expected

- As needed personal service contracts up to \$10,000
- Onsite ASL interpretation | \$178 for the first two hours, \$89 per hour after

Analysis of budget

It is typical for most Metro planning programs to have communication and public engagement resources in their budgets. Prior to annual budget submissions, staff will be informed of average

translation and interpretation costs to plan according. In some cases, existing resources may be able to achieve more than one outcome or be repurposed to assist with LEP language assistance.

Consideration of cost effective practices for providing language services

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

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

Results summary

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

SECTION II: LEP IMPLEMENTATION PLAN

Metro's implementation plan on language assistance

Metro continues to implement its plan and will review it annually to meaningfully address the needs of the LEP populations in the region. Metro follows the recommendations in the FTA handbook, Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, April 13, 2007, as described below. For a detailed timeline including completed tasks and anticipated tasks of Metro's LEP Implementation Plan (2011-2022), see the LEP implementation plan schedule on the following pages.

Identifying LEP populations who need language assistance

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

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

- *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.
- *Demographic collection at open houses/community events* Metro tracks demographic information of participants attending open houses and community events by using a demographic form. The demographic collection is voluntary and the form is translated into multiple languages.
- *Language line usage* Metro will continue to monitor the volume and types of requests for the language line.
- *Local engagement and non-discrimination checklist* Metro developed a checklist to provide best practices designed to help local cities and counties meet federal non-discrimination requirements and assure full compliance with the Title VI of the Civil Rights Act of 1964, Executive Order 12898 on Environmental Justice and related statutes and regulations to help ensure effective local engagement. (See Appendix E)

Language assistance measures

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

- *Language resource guide* Metro developed a language resource guide which outlines effective practice in written translation, helps staff identify steps to consider when translating materials for a program or a project, and provides resources for staff when an event calls for or a

community member requires interpretation. The language resource guide is intended for Metro staff providing translation or interpretation services for community members that don't speak English well.

- *Language line* Metro maintains a contract with Certified Languages International for telephone interpretation services in up to 205 different languages.
- *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 identifies 19 employees who are available to help with interpretation of 12 spoken languages plus American Sign Language.
- *Metro's language hub* (oregonmetro.gov/languagehub) Metro's website has improved access for visitors that have a limited ability to understand English and connects them with key pages readable in as many as 16 languages.²¹ There is a special emphasis on meeting the needs of the region's growing population of Spanish, Chinese, Vietnamese and Russian speakers. The new website, planned to launch in late 2022, will be designed to make language resources more prominent and accessible to site visitors
- *Multilingual videos* Metro contracted with Immigrant and Refugee Community Organization (IRCO) to hire local talent fluent in Spanish, Russian, Vietnamese and Chinese and produced four short videos to inform visitors about the various programs or services Metro provides. To view the videos, visit oregonmetro.gov/languagehub.

Translated material

The following vital documents have been translated into Arabic, Chinese, Hmong, Japanese, Korean, Laotian, Mon-khmer Cambodian, Nepali, Persian, Romanian, Russian, Somali, Spanish, Tagalog, Ukrainian and Vietnamese:²²

- 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

²¹ In August 2018, a website technical issue was discovered in that Arabic and Persian are displaying l (right to left like English would be read instead of left to right as those languages are read). Metro is currently in the process of redesigning its web site; the correction for left-to-right language display is part of the specifications for the new site. The site is expected to launch by late 2022.

²² While Hmong was on the list of languages that met the guidelines for translation in Metro's 2013 Title VI report, Hmong did not meet the safe harbor guidelines for translation of vital documents in the 2015 or 2018 analysis. In addition to the populations of Hmong speakers with limited English proficiency in the region slightly decreasing, a more precise methodology in the 2015 analysis shows that Hmong speakers with limited English proficiency is well below the safe harbor guidelines. Documents considered vital as of 2013 are available in Hmong on the Metro website. While Laotian was on the was on the list of languages that met the guidelines for translation in Metro's 2015 Title VI report, Laotian did not meet the safe harbor guidelines for translation of vital documents in the 2018 or 2021 analysis. Documents considered vital as of 2015 are available in Laotian on the Metro website.

- 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

Southwest Corridor Plan

- General Southwest Corridor 2012 factsheet and fall 2013 factsheet, translated into Spanish and Vietnamese
- 2012 Shape SW questionnaire to help determine the transportation (transit, walking, biking and driving) investments needs of the corridor into Spanish and Vietnamese
- 2017 newsletter translated in Spanish and outreach with interpreters and traditional foods at Spanish and Vietnamese church services and cultural events
- 2017 translation of interactive map and survey questions in Spanish and Vietnamese. Facebook advertisements run in Vietnamese and Spanish to invite participation
- 2018 translation of fact sheet into Spanish, Vietnamese, Somali, and Arabic. Translation of DEIS executive summary and two more newsletters in Spanish
- 2018 interpretation at public meetings during DEIS comment period, including a bilingual meeting and public hearing held at local church
- 2018 advertisements in Spanish and Vietnamese published in local newspapers. Translation of project website and online survey in Spanish. Facebook advertisement in Spanish to invite participation

Regional flexible funds

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

Notices

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

Staff training

Annual language assistance training

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.

Learning opportunities

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

Cultural competency, plain language and readability

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

Providing notice of rights and available services to LEP persons

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

- *Metro respects civil rights signage* Metro posts Title VI and LEP notice in three places in its headquarters building, the Metro Regional Center: at the building entrance, at the entrance to the Metro Council Chamber and on a bulletin board in the Human Resources Department. The 18 x 24 sign says, in 16 languages:

Metro respects civil rights.

For information on Metro’s civil rights program, or to obtain a discrimination complaint form, visit oregonmetro.gov/civilrights.

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

To view the current notice, see Appendix G. As part of the LEP implementation plan, these will be updated to the 17 languages listed above as having 1,000 or LEP speakers in Metro’s service area.

- *“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. As part of the LEP Implementation Plan, these will be updated to the 17 languages listed above as having 1,000 or LEP speakers in Metro's service area. To view the current notice, see Appendix H. As part of the LEP implementation plan, these will be updated to the 17 languages listed above as having 1,000 or LEP speakers in Metro's service area.

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

Monitoring and updating the LEP plan

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

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

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

LEP IMPLEMENTATION PLAN SCHEDULE: FISCAL YEARS 2018-2025

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 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
I. Data tracking and plan scope								
A. Gather and prepare data for four-factor analysis	✓	✓	✓			X		Submit new plan by Oct. 1, 2024
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 (factor 1)	✓	✓	✓			X		
b. Consult anecdotal information from community organizations and agencies and legal aid entities, especially Coalition of Communities of Color reports (factors 1, 2 and 3).	✓	✓	✓			X		
c. Conduct LEP focus groups (factor 2)	✓					X		
2. Develop and review processes and data analysis plans that can be used for Title VI reporting purposes, region-wide long-term planning and corridor level planning efforts that arise between Title VI reporting periods and Metro's other functions	✓	✓	✓		X			
a. Gather and quality check data with local jurisdictions	✓	✓	✓	X	X	X	X	As appropriate
b. Decide data extent and develop maintenance plan for all LEP needs	✓	✓	✓	X	X	X	X	As needed
c. Coordinate with other jurisdictions to standardize data collection and sharing	✓	✓	✓	X	X	X	X	Ongoing
3. Complete regional LEP Factor 1 analysis every three years	✓	✓	✓			X		
a. Identify concentrations of LEP populations within the Metro area	✓	✓	✓				X	
B. Use new regional LEP Factor 1 analysis to estimate costs and resources for carrying out LEP implementation plan	✓	✓	✓				X	
C. Add LEP questions in multiple languages to Title VI tracking form for metropolitan planning organization-function public events	✓	✓	✓	X	X	X	X	Ongoing

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
I. Data tracking and plan scope (continued)								
D. Improve consistency and breadth of data collection through Metro public involvement events and surveys 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	✓	✓	✓	X	X	X	X	Ongoing
2. Monitor current conversations about the ability to collect demographic data	✓	✓	✓	X	X	X	X	Ongoing
II. Translation services (See LEP Factor 4 for more information)								
A. Provide telephone interpretation for phone and walk-in customers at the Metro Regional Center	✓	✓	✓	X	X	X	X	Ongoing
B. Explore telephone interpretation staff training for phone and walk-in customers at other Metro sites		✓	✓	X	X	X	X	
C. Provide process for in-person interpreter services upon request at public meetings and important events for metropolitan planning organization functions	✓	✓	✓	X	X	X	X	Ongoing
1. Estimate and allocate costs for in-person interpreter services	✓	✓	✓	X	X	X	X	By project or program
D. Provide process for in-person interpreter services upon request at public meetings and important events for other Metro functions.	✓	✓	✓	X	X	X	X	Ongoing
E. Annually survey staff to determine existing language resources	✓	✓	✓	X	X	X	X	
1. Define conditions under which Metro employees will assist with translation through annual review	✓	✓	✓	X	X	X	X	

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
II. Translation services (see LEP Factor 4 for more information) (continued)								
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	✓	✓	✓			X		
2. Define and reassess what constitutes a vital document for other Metro functions	✓	✓	✓	X			X	
3. In coordination with records retention staff, identify and inventory vital documents for metropolitan planning organization functions, including Title VI notice and complaint form	✓	✓	✓			X		
4. In coordination with records retention staff, explore identifying and inventorying vital documents for other Metro functions	✓			X			X	
5. Translate vital metropolitan planning organization documents and establish tracking process	✓	✓	✓	X			X	
6. Establish process to monitor for new metropolitan planning organization documents that may be considered vital	✓							
7. Explore establishing process to track vital non-metropolitan planning organization documents and their translation	✓	✓	✓	X			X	
8. Explore establishing process to monitor for new non-metropolitan planning organization documents that may be considered vital	✓			X			X	
G. Establish procedures for translating non-metropolitan planning organization documents	✓							
1. Assess process for providing notice of right to free language assistance on non-vital documents	✓		✓	X			X	
a. Establish internal prioritization process through assessing resources and translation needs	✓							
b. Translate documents in priority order	✓	✓	✓	X	X	X		Ongoing
2. Establish process for routing written translation requests for non-vital documents	✓							

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
III. Notices								
A. Post information in multiple languages about Title VI civil rights compliance and complaint process through signage	✓	✓	✓	X	X	X	X	Ongoing
1. Update signage once Factor 1 analysis is completed	✓	✓	✓	X			X	
2. Consider identifying locations beyond Metro Regional Center that will receive signs and where they will be posted; create/post signs and train staff at other sites as needed	✓	✓	✓					
B. Post information in multiple languages about notice of right to language assistance	✓	✓	✓	X			X	Update to include any new safe harbor languages
1. Identify physical locations for signs within the metropolitan planning organization function	✓	✓	✓	X			X	
a. Create signs and post	✓	✓	✓	X			X	
b. Train point people at sites regarding signage and response process	✓	✓	✓	X	X	X	X	Annually
2. Consider identifying physical locations for signs within other Metro functions	✓	✓	✓		X			
a. Create signs and post	✓	✓	✓		X			
b. Train point people at sites regarding signage and response process	✓	✓	✓		X	X	X	Annually, as appropriate
3. Post information about notice of right to language assistance and civil rights complaint process on websites	✓	✓	✓		X			
a. Translate main Metro website notice of right to language assistance and civil rights complaint process into multiple languages	✓	✓	✓	X			X	Update to include any new safe harbor languages
4. Improve website accessibility/navigability for resources in other languages	✓	✓		X				With website redesign
5. Identify other Metro websites where posting should occur and post information	✓	✓			X			
C. Post Title VI/EJ/LEP/AOA notice information on metropolitan planning organization function meeting and event notices	✓	✓	✓	X	X	X	X	Ongoing
D. Consider how and when to include notice of availability of free language assistance in other outreach documents	✓	✓	✓		X			
E. Share LEP plan	✓	✓	✓	X			X	
1. Post plan to Metro website(s)	✓	✓	✓	X			X	
2. Provide copies of the plan to Oregon Department of Transportation, Federal Highway Administration, Federal Transportation Administration and any person or agency requesting a copy	✓	✓	✓	X			X	

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
IV. 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	✓	✓	✓		X			
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			
V. 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	Annually
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	Annually
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	✓	✓	✓	X	X	X	X	Annually
E. Design and implement a Metro Learning Center training module for all current Metro staff on Title VI responsibilities, including civil rights notice, complaint procedure and language assistance	✓	✓	✓	X	X	X	X	Annually
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	Annually
F. Provide any additional Title VI and LEP resources to Metro employees on internal website	✓	✓	✓	X	X	X	X	Ongoing

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
VI. Outreach								
A. Conduct research to assess services to LEP populations and barriers to service	✓	✓	✓			X		
1. Identify community organizations Metro has contacted in the past	✓	✓	✓			X		
a. Identify prior experiences with LEP populations within the metropolitan planning organization function	✓	✓	✓			X		
b. Identify prior experiences with LEP in Metro's other functions	✓	✓	✓			X		
2. Develop questions to ask community organizations how best to serve LEP populations and transcend barriers, including: Size and location of populations the organization serves Needs of populations relative to other Metro functions Data sources and/or demographic trends they can provide or assist with Advice on communication and engagement with populations they serve	✓	✓				X		
3. Contact community organizations to ask the above questions and collect information	✓	✓	✓			X		
B. Develop process for targeted community outreach to LEP populations for specific efforts and services, focusing first on metropolitan planning organization functions	✓	✓	✓			X		
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	✓	✓	✓	X	X	X	X	
a. Develop cultural awareness training concepts for external outreach	✓	✓				X		

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
VI. Outreach (continued)								
b. Develop culturally specific methods for diverse communities to access Metro metropolitan planning organization information most effectively	✓	✓	✓	X	X	X	X	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	✓	✓	✓	X	X	X	X	Ongoing
d. Develop leadership and capacity-building program for future work with diverse communities and LEP populations	✓	✓	✓	X	X	X	X	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	X	X	X	By project
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	X	X	X	By project
4. Consider how to incorporate notice in multiple languages of language assistance availability into metropolitan planning organization outreach materials	✓	✓	✓	X	X	X	X	By project

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
VI. Outreach (continued)								
C. Establish methods to coordinate and enhance outreach efforts, focusing first on metropolitan planning organization functions (as appropriate)	✓	✓	✓	X	X	X	X	Ongoing
1. Consider investing in tools that enable Metro to effectively coordinate stakeholder outreach	✓	✓	✓	X				Community relations manager development in progress
2. Coordinate and maintain list of contacts with diverse communities, including contacts made through Human Resources, Procurement and Communications efforts	✓	✓	✓	X	X	X	X	Ongoing
3. Establish internal working group to meet regularly and identify areas for leverage		✓	✓	X	X	X	X	DEI engagement roundtable; ongoing
VII. Evaluation and reporting								
A. Develop process to monitor and update LEP implementation plan, including:	✓	✓	✓	X	X	X	X	Ongoing
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	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	Ongoing
2. Monitoring LEP data	✓	✓	✓	X			X	
a. Current LEP populations within metropolitan planning organization function	✓	✓	✓	X			X	

Metro LEP Implementation Plan: Fiscal Years 2011-2025								X= Target ✓ = Completed
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ACTIVITIES				METRO FISCAL YEAR				STATUS
	2011-2015	2015-2018	2018-2021	2021-2022	2022-2023	2023-2024	2024-2025	
VII. Evaluation and reporting (continued)								
3. Monitoring LEP resources and costs	✓	✓	✓	X	X	X	X	Ongoing
a. Any change in available resources (data, technology, staff, budget) on an annual basis	✓	✓	✓	X	X	X	X	Ongoing
b. Any change in LEP costs on a Title VI reporting period basis	✓	✓	✓	X	X	X	X	Ongoing
4. Set LEP goals and measures	✓	✓	✓		X			
B. Establish process to obtain feedback on Metro's language assistance measures	✓	✓	✓			X		
1. Obtain feedback from community members through an	✓	✓	✓			X		
2. Conduct annual internal monitoring with agency staff	✓	✓	✓	X	X	X	X	Ongoing
a. Include monitoring question on intake form for frontline staff	✓	✓	✓	X	X	X	X	Ongoing
b. Assess any needed changes in types of languages for translation services	✓	✓	✓	X	X	X	X	Annually
c. Determine whether continued language assistance is needed for previously identified programs	✓	✓	✓	X	X	X	X	Annually
3. Make changes to internal language assistance procedures based on feedback	✓	✓	✓	X	X	X	X	Annually
C. Develop internal assessment of LEP training, materials and procedures one year after instituted	✓	✓	✓	X	X	X	X	Annually
D. Establish process to identify new language assistance needs and adjust service	✓	✓	✓	X			X	
E. Establish reporting schedule and work plans for Title VI and LEP requirements to:	✓	✓	✓	X	X	X	X	
1. ODOT annually	✓	✓	✓	X	X	X	X	
2. FTA according to Title VI reporting schedule	✓	✓	✓	X			X	
a. LEP plan	✓	✓	✓	X			X	
b. LEP implementation plan	✓	✓	✓	X			X	
c. Public involvement plan	✓	✓	✓		X			
3. Determine reporting level to Metro Council according to Title VI reporting schedule	✓	✓		X	X	X	X	Annually through annual public engagement reporting

APPENDIX A. FACTOR 1 METHODOLOGY DEVELOPMENT

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

The methodology used for the 2013 analysis was largely replicated for the 2015 and 2018 Factor 1 reports, as well as for the 2021 Factor 1 report. The 2021 Factor 1 report identifies seventeen languages that qualify for the Department of Justice's safe harbor provisions. The workflow associated with this process can be described as follows:

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

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

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

Of the 17 metropolitan planning organizations:

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

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

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

State DOTs (Washington, California, Oregon):

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

Summary of demographic content analysis:

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

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

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

2. Metro developed a methodology for analysis of language data

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

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

To overcome this challenge, Metro staff assessed potential data sources in terms of geographic and temporal scale, resolution (e.g. whether languages reported individually or as language groups), and reliability (e.g. margin of error). Based on this assessment, Metro developed a four-step methodology to identify languages that are spoken by populations of greater than 1,000 in the Metro service area. 1,000 speakers is the lesser of the two minimum thresholds, as 5% of the regional population over age 5 was approximately 85,000 based on the most current detailed language data available from the American Community Survey (2015-2019). Metro's proposed methodology sought to reduce uncertainty in American Community Survey (ACS) estimates and to disaggregate language groupings by analyzing ACS data at two spatial scales: Census tracts and counties. The analysis was then validated against data on language spoken at home and LEP status from the Oregon Department of Education (ODE), which implements standards for consistent, comprehensive language-related data. These steps are outlined below:

- a. *Evaluate languages (or language groupings) with >1,000 speakers using tracts.* Tract-level data most closely follow Metro's service area boundary, but the available language table for tracts (C16001) represents less individual languages and more grouped languages, as compared with table B16001. Additionally, tracts are associated with relatively high margins of error.
- b. *Evaluate languages (or language groupings) with >1,000 speakers using public use microdata areas (PUMAs).* PUMAs intersecting the Metro boundary encompass the three county area (Washington, Multnomah, Clackamas), but the available language table for PUMAs (B16001) represents more individual languages and less grouped languages, as compared with table C16001. Although PUMAs do not follow Metro's boundary as closely as tracts, approximately 93% of the population over age 5 in the three county area resides within the urbanized Metro area, according to 2015-2019 ACS data.²³
- c. *Disaggregate language groupings with supplemental data.* ACS table B16001 includes estimates of the populations of 30 individual and 13 grouped languages, and table C16001 includes 7 individual languages and 6 grouped languages, rather than providing comprehensive estimates of specific languages; for example, recent 5-year C16001 estimates provide estimates for the population speaking "Other Asian and Pacific Island Languages". To address this limitation, Metro examined Oregon Department of Education (ODE) student data from 2018-2019, which are provided as a detailed dataset that uses 100% counts and does not aggregate languages into groupings. Metro staff developed a methodology to disaggregate language groupings and then extrapolate from ODE data to the total population over age 5 in the Metro area.

3. Metro gathered data

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

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

²³ For individual languages that are reported in both B16001 and C16001, approximately 95-100% of the LEP populations live in the urbanized Metro area, as defined by Census tracts (C16001) that intersect the Metro jurisdictional boundary. These LEP languages include Spanish, Vietnamese, Chinese, Korean, Arabic, and Tagalog.

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

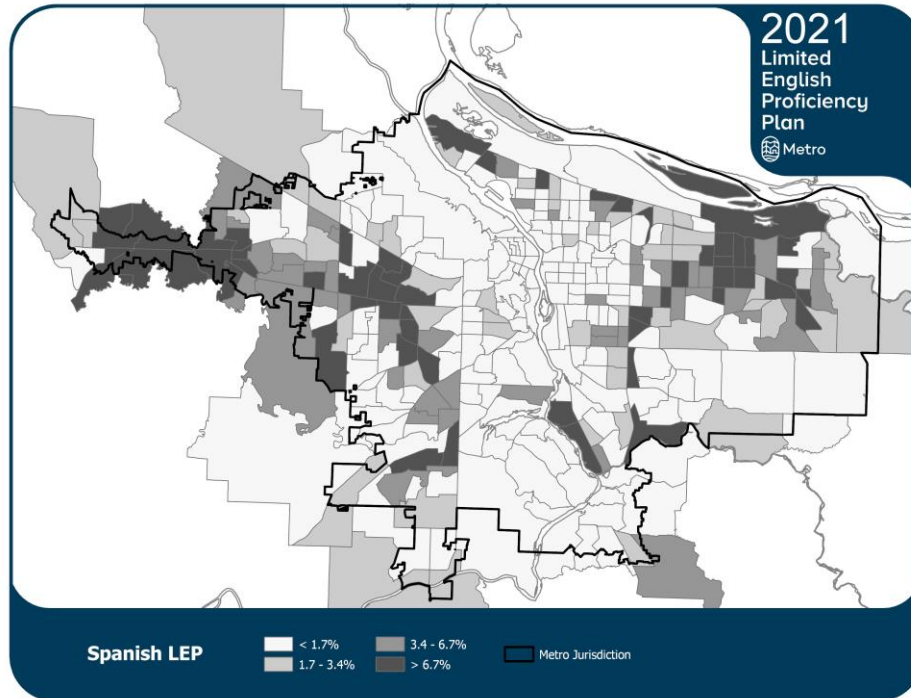
Metro staff obtained publicly available ACS data from the Census Bureau. To access ODE data, Metro staff submitted a public records request for student language of origin and LEP status for all school districts in Clackamas, Multnomah and Washington counties.

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

Using the data and methods outlined above, Metro identified seventeen languages with LEP populations that likely exceed 1,000 persons or more, thus triggering eligibility for DOJ's safe harbor provision (see Tables 1 and 4 of Metro's Factor 1 analysis in Section I). PUMA estimates from ACS revealed twelve distinct LEP populations that likely have more than 1,000 persons within the Metro jurisdictional boundary area (see Appendix C, Table C1): Spanish, Vietnamese, Chinese (Mandarin or Cantonese), Russian, Korean, Arabic, Japanese, Tagalog, Khmer, Persian, Hindi, and Telugu. Additionally, eight grouped languages were found to likely have populations of LEP speakers greater than 1,000. Disaggregation of language groupings revealed that Ukrainian, Romanian, Somali, Thai and Lao languages should also be included as safe harbor languages (see Appendix C, Table C5).

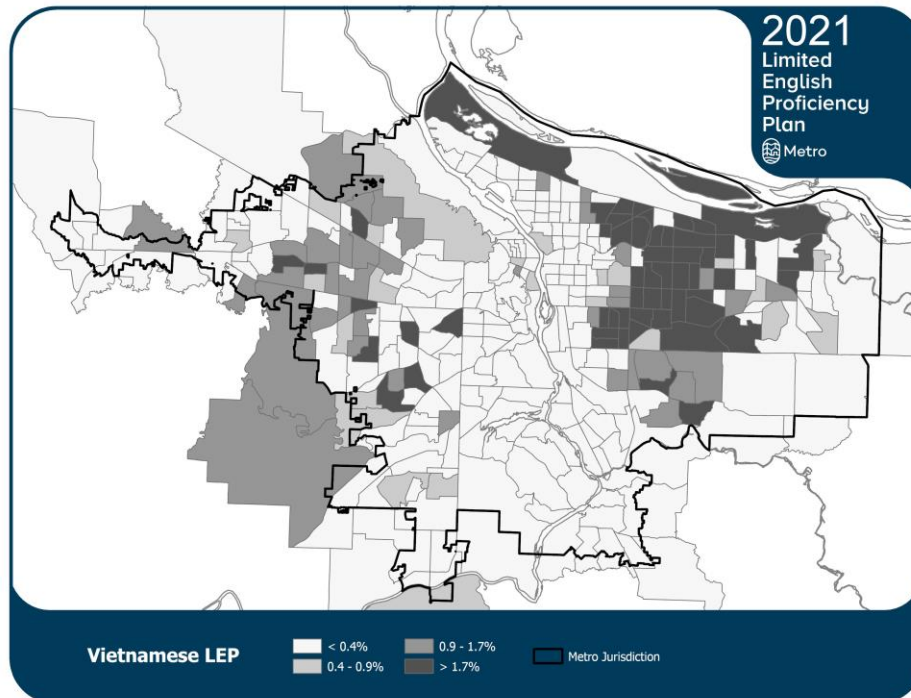
APPENDIX B. LANGUAGE DISTRIBUTION MAPS

Figure B1: Spanish LEP by census tract



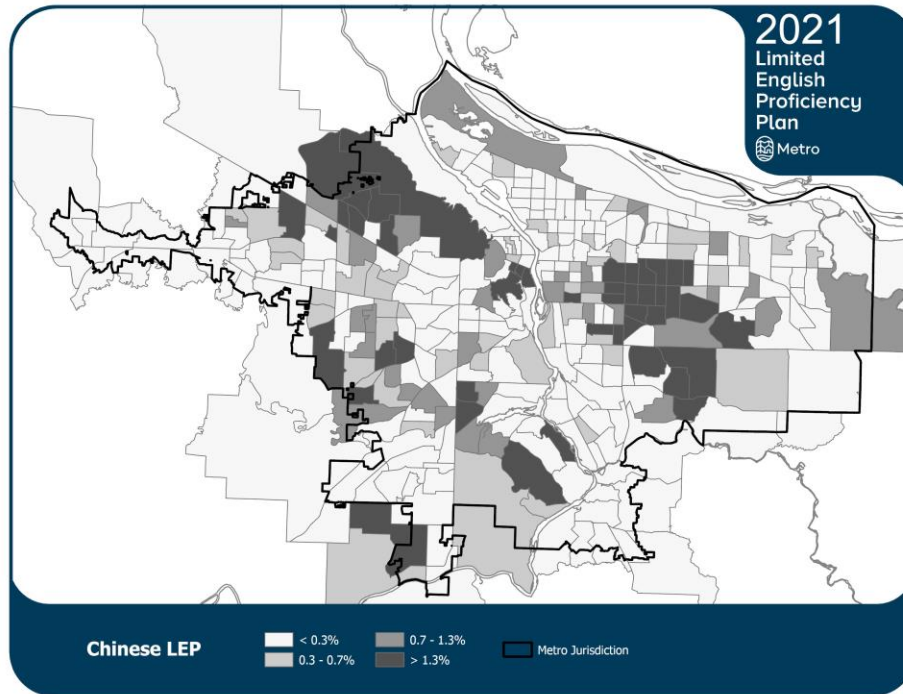
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001

Figure B2: Vietnamese LEP by census tract



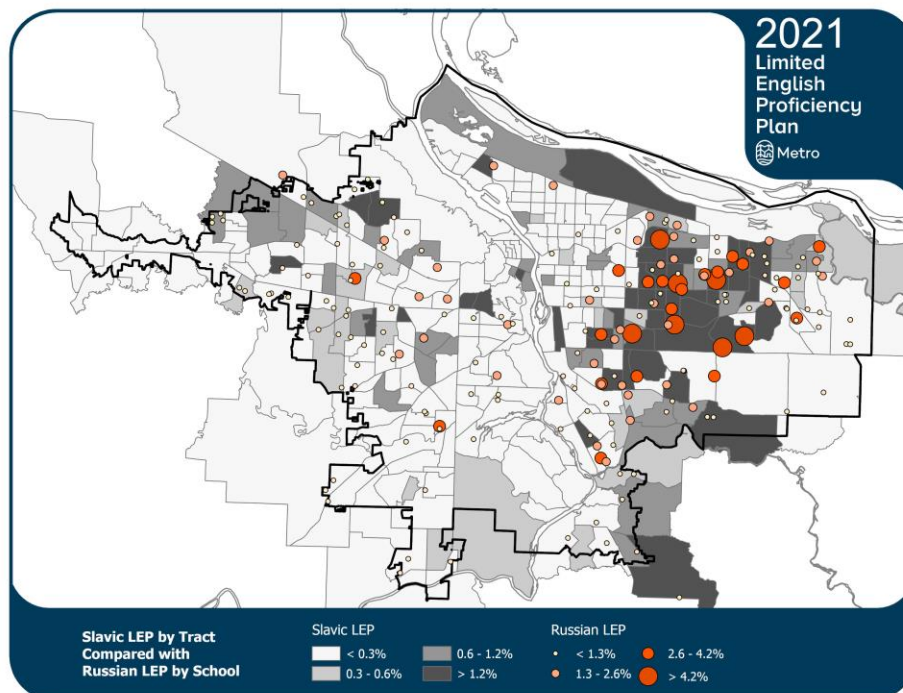
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001

Figure B3: Chinese LEP by census tract



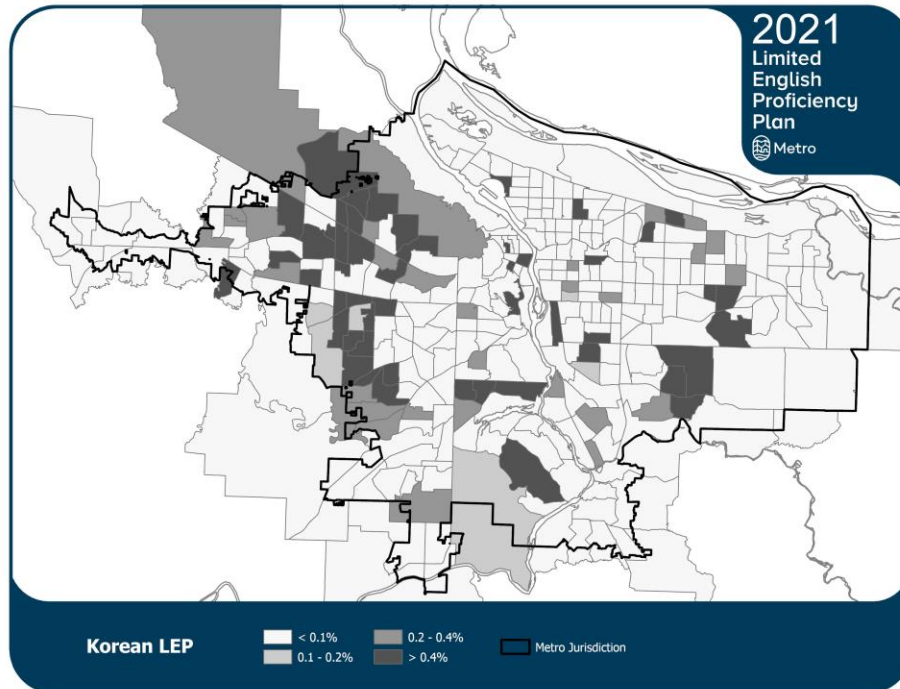
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001

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



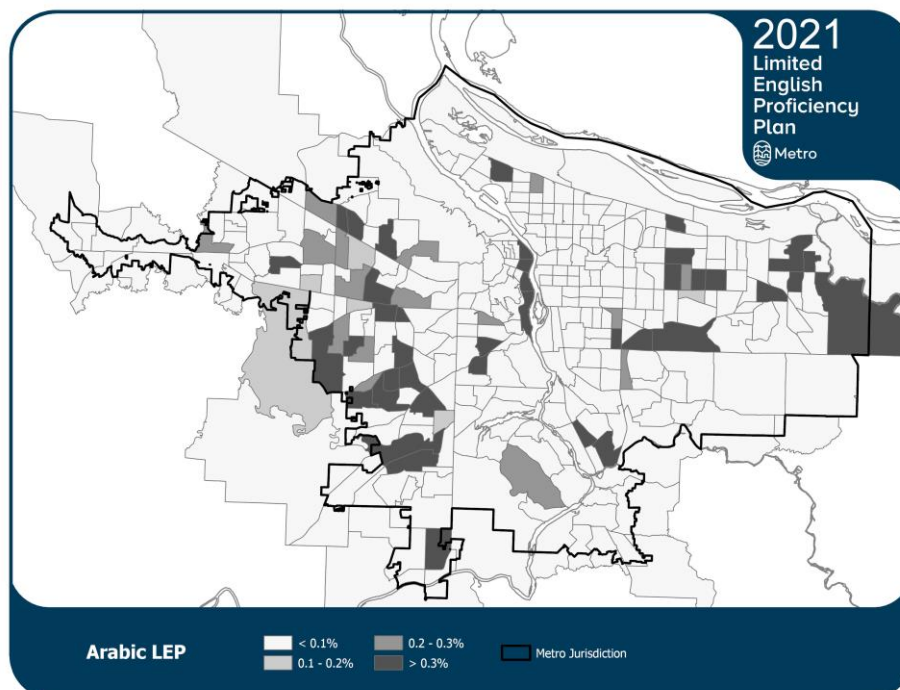
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

Figure B5: Korean LEP by census tract



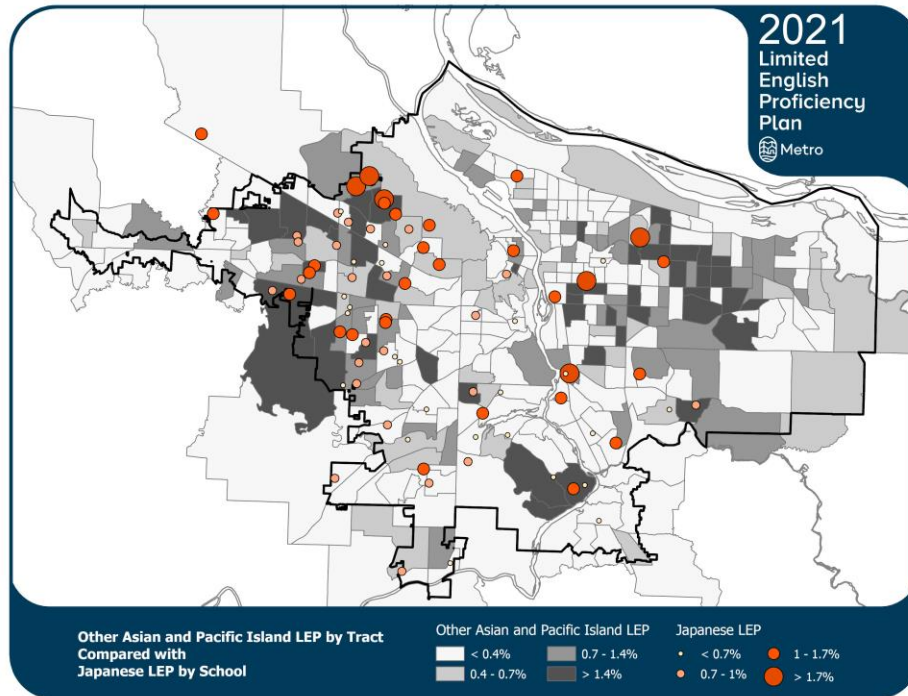
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001

Figure B6: Arabic LEP by census tract



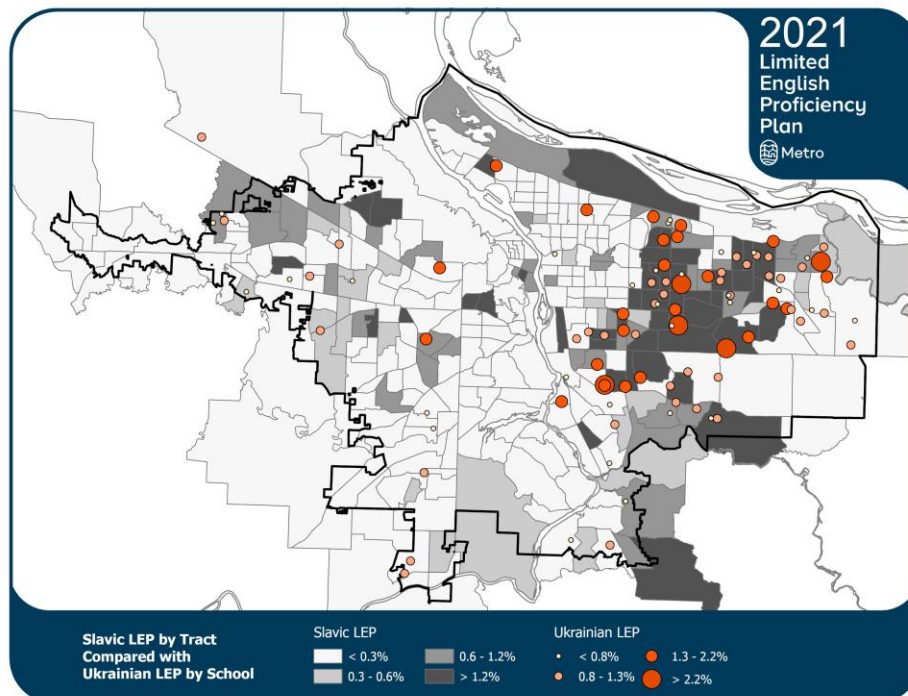
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001

Figure B7: Other Asian and Pacific Island LEP by census tract and Japanese LEP by school



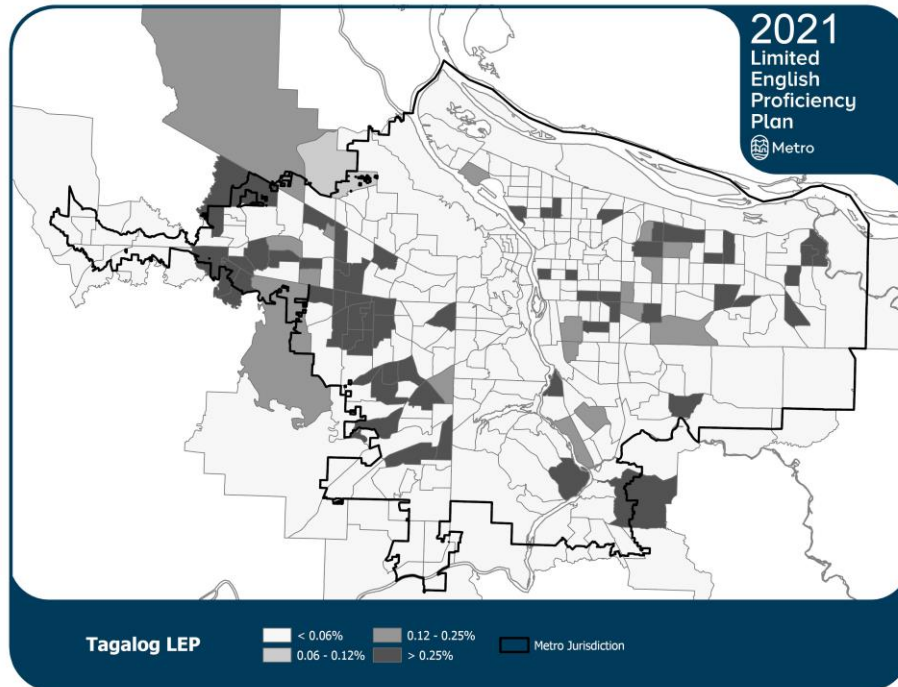
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

Figure B8: Slavic LEP by census tract and Ukrainian LEP by school



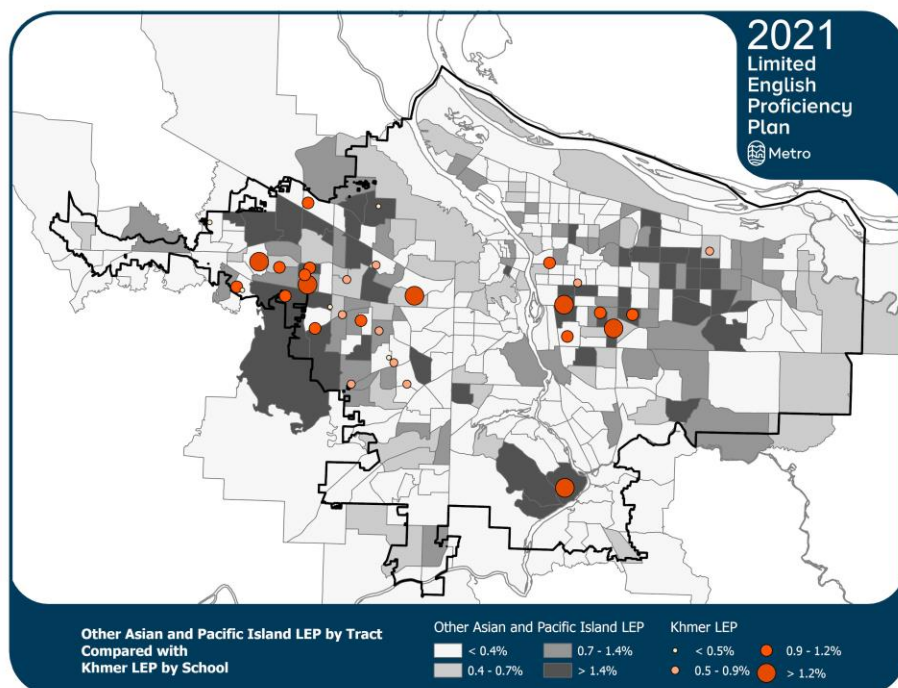
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

Figure B9: Tagalog LEP by census tract



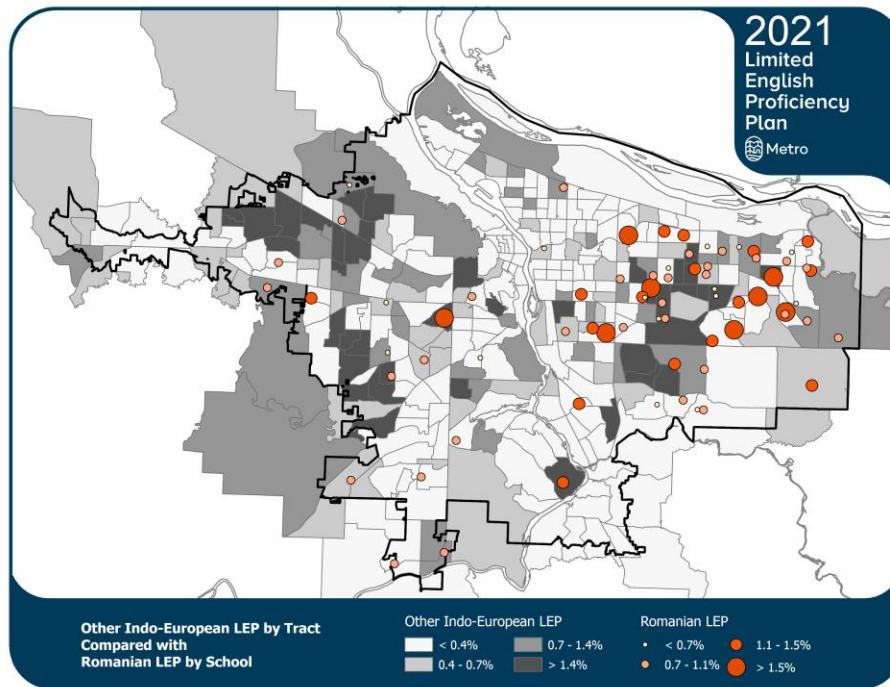
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001

Figure B10: Other Asian and Pacific Island LEP by census tract and Khmer LEP by school



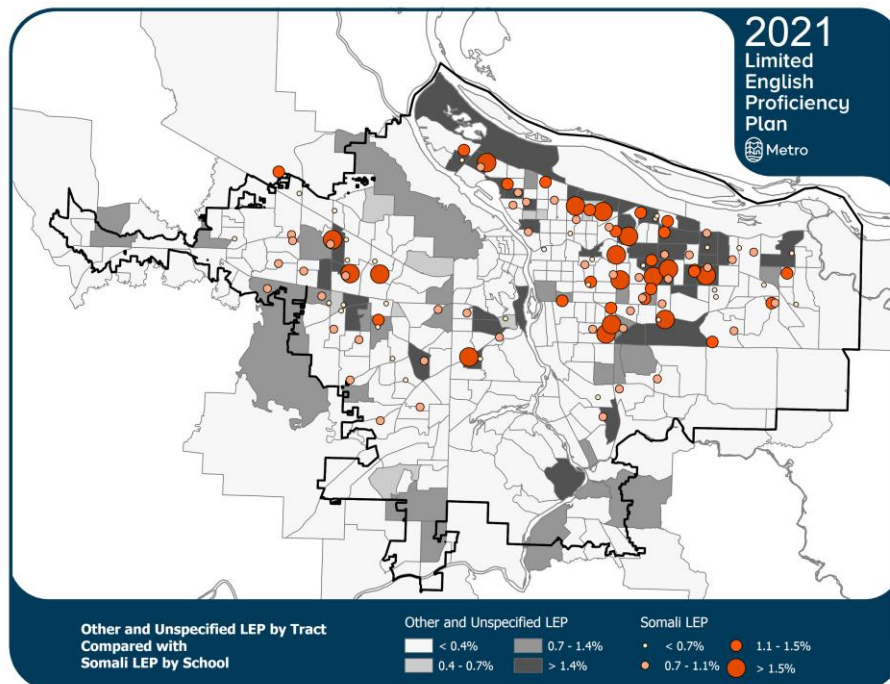
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

Figure B11: Other Indo-European LEP by census tract and Romanian LEP by school



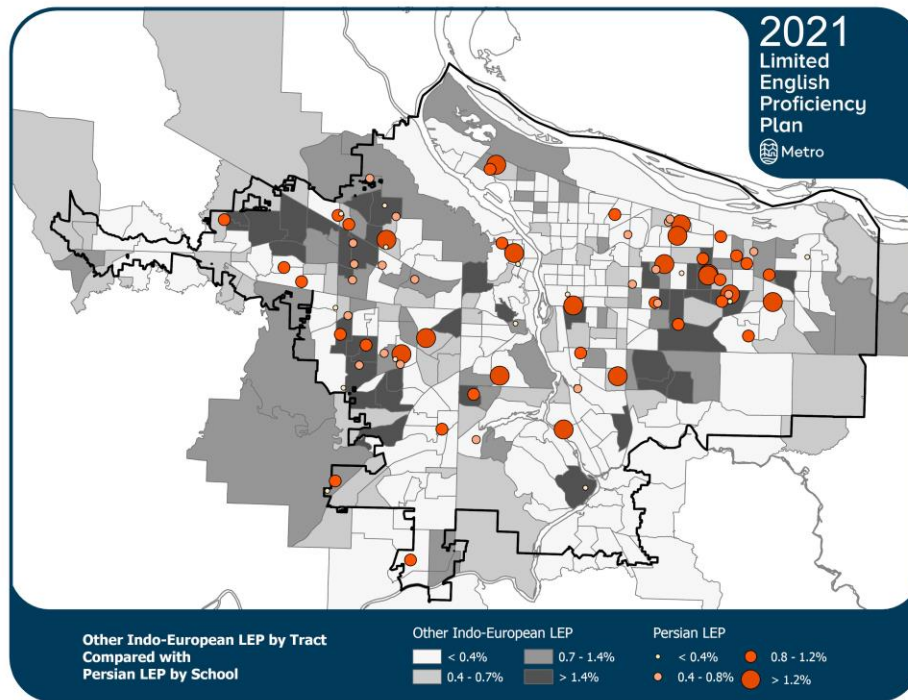
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

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



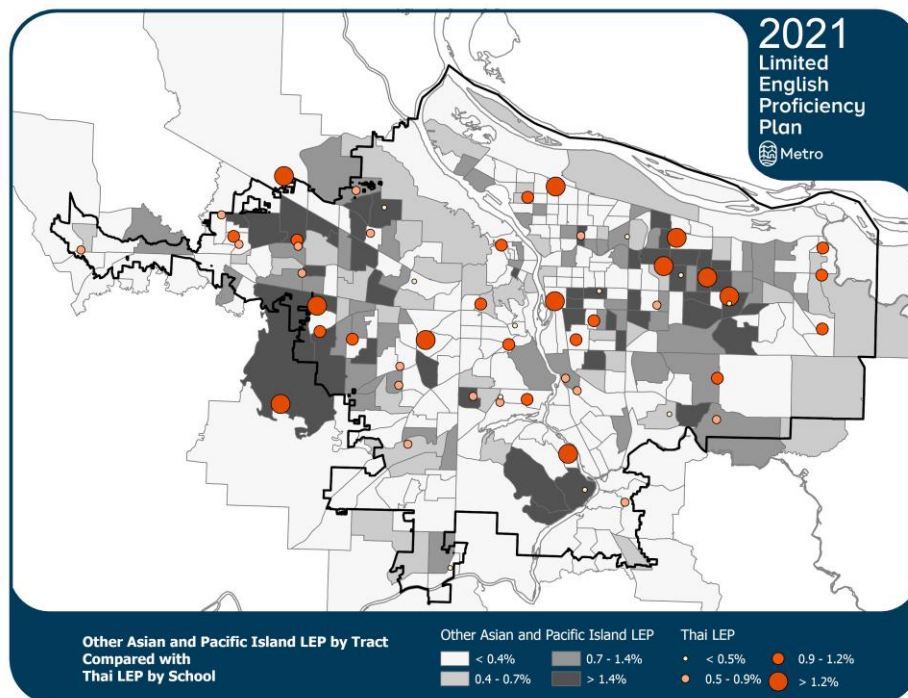
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

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



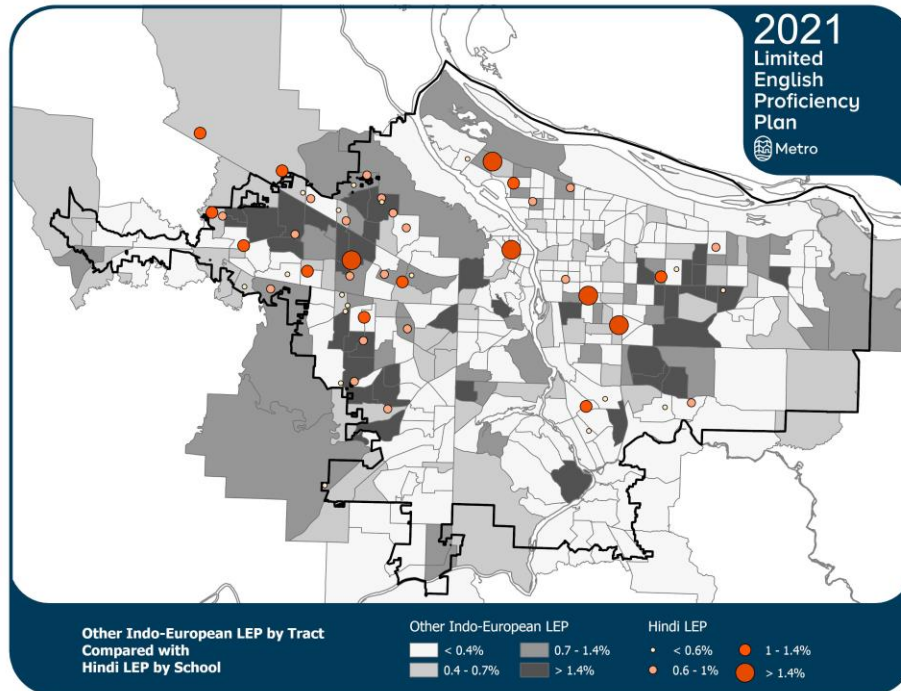
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

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



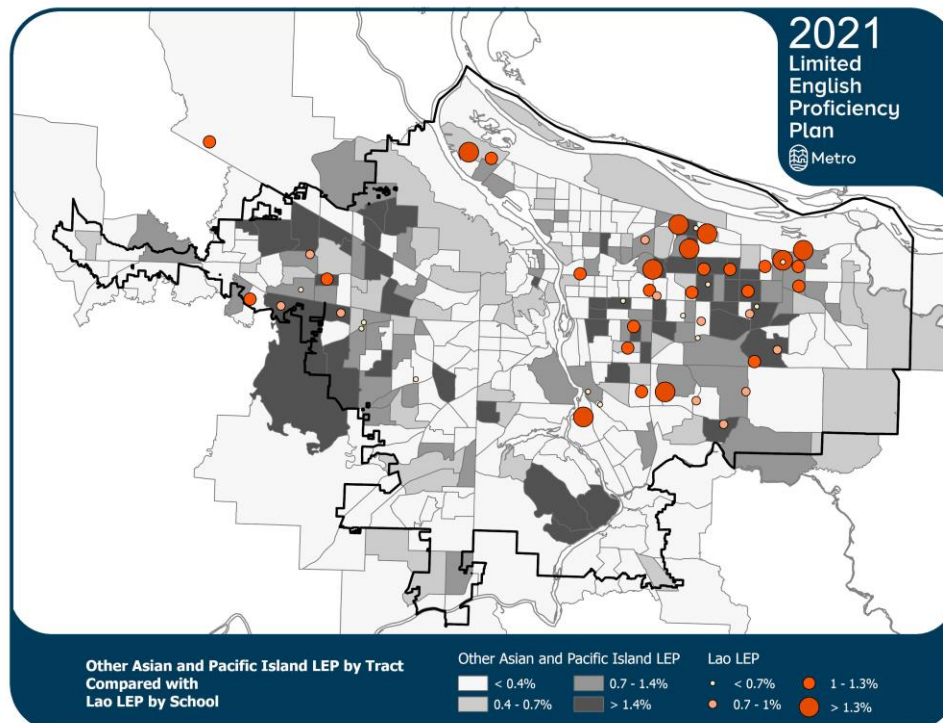
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

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



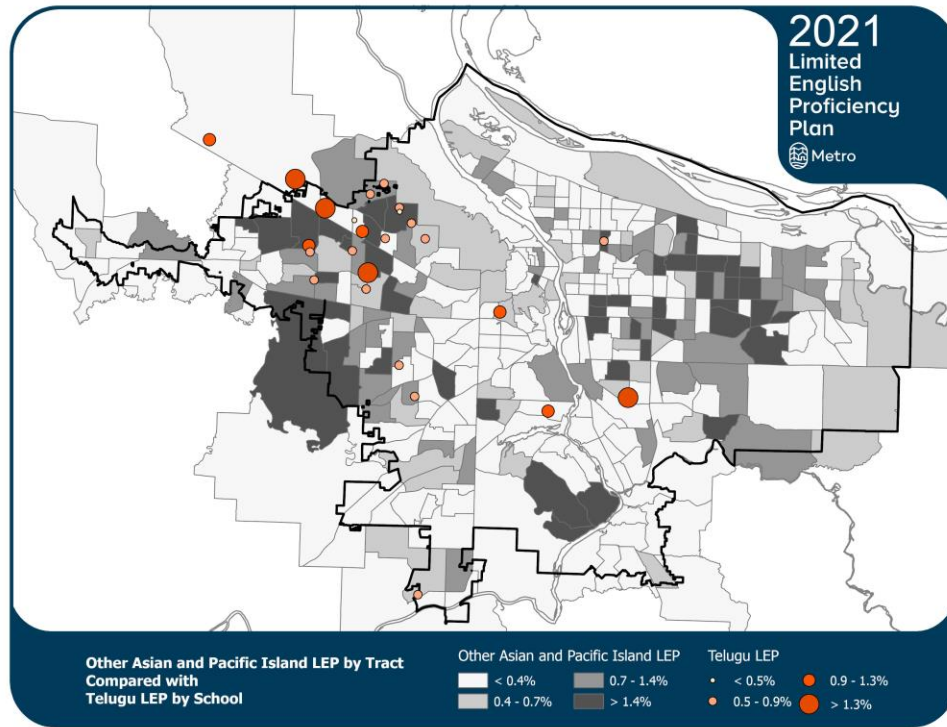
Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

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



Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

Figure B17: Other Asian and Pacific Island LEP by census tract and Telugu LEP by school



Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

APPENDIX C. FACTOR 1 METHODOLOGY

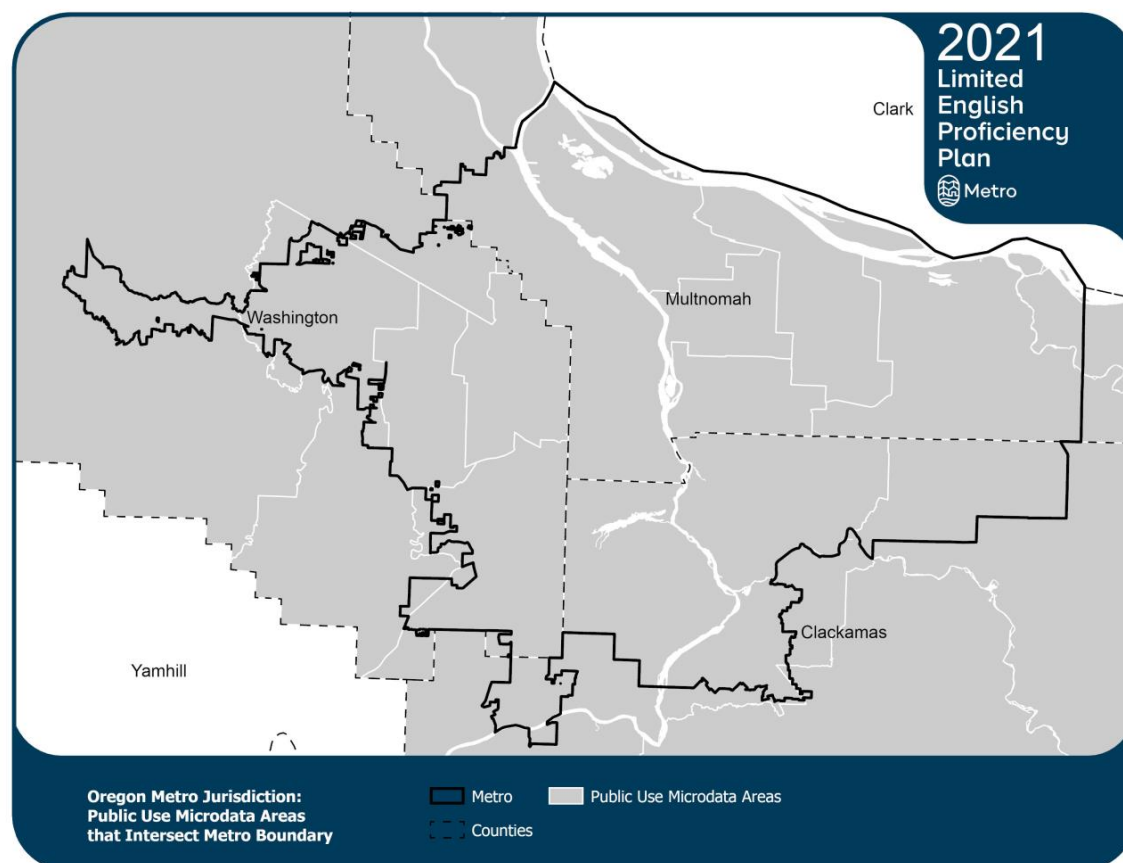
Methods: American Community Survey data analysis

2015-2019 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 Census data. In order to estimate the LEP populations within the jurisdictional boundary area, Metro staff collected and analyzed public use microdata area (PUMA) data, selecting all PUMAs that were either partly or completely within Metro's service area boundary. Because of this process, the entirety of Clackamas, Multnomah, and Washington counties are included in the LEP analysis. Approximately 93% of the three county population lives inside the Metro jurisdiction.

The estimated total counts of LEP population from table B16001 in the 2015-2019 ACS PUMA data were obtained by aggregating estimates from the PUMAs in the three county area of persons over age 5 that "speak English less than very well".

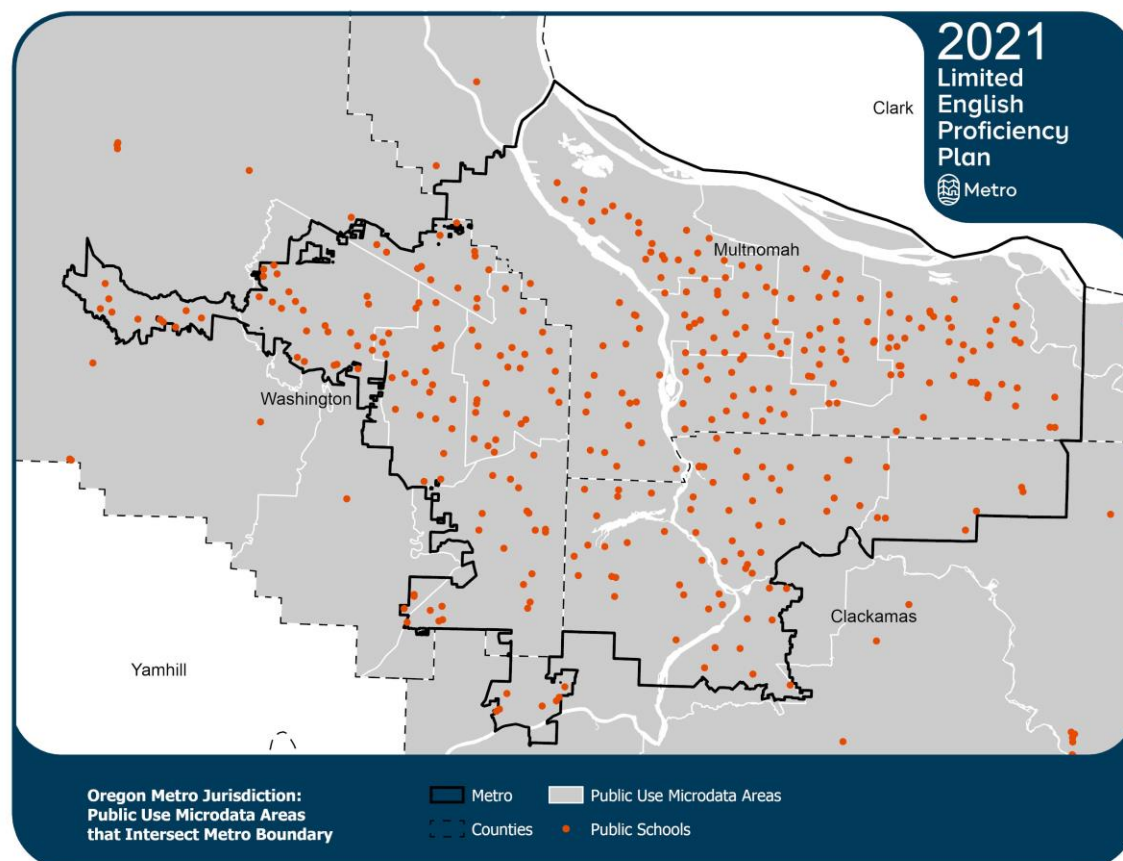
Figure C1: Public use microdata areas in Clackamas, Multnomah and Washington counties selected for analysis of 2015-2019 ACS data



Source: 2015-2019 ACS, U.S. Census public use microdata areas

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

Figure C2: Individual schools included in LEP Factor 1 analysis, as compared with PUMAs included in the analysis



Source: 2015-2019 ACS, U.S. Census tract data, Table C16001; 2018-2019 ODE, schools data (zero LEP not shown)

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 42 data lines, of which 29 are individual languages and 13 are either a language family, language group or aggregation either of multiple groups within a family or multiple families. For example: “Other Languages of Central, Eastern, and Southern Africa,” one of these 13 categories, aggregates every language, whether related or not related, into a single data line.

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

We chose to analyze data from ACS Table B16001: “Persons 5 Years and Older, by Language Spoken at Home, by English Proficiency.” This table contains the most detailed breakout of languages spoken in the ACS: 29 individual languages plus the 13 language groupings. Our first round of analysis, displayed in Table C1, focused on the 29 individual languages from these tables. The “language group” populations require a second round of analysis, for which we use enrollment data from the Oregon Department of Education, in order to disaggregate the group language data found in Table B16001; these analyses are displayed in Tables C2 and C3.

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

Population 5 Years and Over ²⁴	1,702,379					
	Speaks a language other than English at home	LEP	LEP Margin of Error	LEP as a percent of associated language population	LEP as a percent of population 5 years and over	LEP as a percent of total LEP population
Total Population	335,948	125,808				
Spanish	153,848	57,310	+/- 2,527	37.3%	3.4%	45.6%
Vietnamese	23,714	14,705	+/- 1,492	62%	0.9%	11.7%
Chinese	23,864	11,463	+/- 1,037	48.4%	0.7%	9.1%
Russian	15,736	6,447	+/- 880	41%	0.4%	5.1%
Korean	7,824	3,724	+/- 590	47.6%	0.2%	3.0%
Arabic	6,771	2,578	+/- 666	38.1%	0.2%	2.0%
Japanese	6,305	2,349	+/- 394	37.3%	0.1%	1.9%
Tagalog	8,230	2,124	+/- 444	25.8%	0.1%	1.7%
Khmer	2,750	1,526	+/- 395	55.5%	0.1%	1.2%
Persian	4,012	1,122	+/- 297	28%	0.1%	0.9%
Hindi	6,050	898	+/- 255	14.8%	0.1%	0.7%
Telugu	3,080	780	+/- 302	25.3%	0.05%	0.6%

Source: 2015-2019 ACS, U.S. Census tract data, Table B16001

²⁴ Aggregation of PUMAs intersecting Metro region, which includes entirety of Clackamas, Multnomah, and Washington counties. The Metro jurisdiction represents approximately 93% of the population 5 years and over in the three counties, and approximately 95-100% of individual LEP language groups.

Consult state and local sources of data

Further analysis: languages not routinely reported in the ACS

The 5-year ACS data aggregates many individual native language populations into the language groups, language families or aggregates of families to which they belong, and reports the group or aggregate estimate in lieu of separate rows for each constituent language. This results in 13 “other languages” categories in U.S. Census Table B16001. The categories are not equivalent in terms of linguistic family trees. For example, the “Other Indo-European Languages” category does not include estimated counts for “Other West Germanic Languages,” “Other Slavic Languages,” and “Other Indic Languages,” which are subsidiary to it linguistically. The grouped ACS language categories are:

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

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

Table C2: Individuals who speak one of a group of languages within a language family and *may* be subject to safe harbor provisions depending upon corroboration from other data sources, all language groups with at least 1,000 primary speakers who speak English less than very well

Population 5 Years and Over	1,702,379					
	Speaks a language other than English at home	LEP	LEP Margin of Error	LEP as a percent of associated language population	LEP as a percent of population 5 years and over	LEP as a percent of total LEP population

Total Population	335,948	125,808				
Other Slavic Languages	5,451	2,720	+ - 587	49.9%	0.2%	2.2%
Other Afro-Asiatic Languages	6,460	2,544	+ - 539	39.4%	0.1%	2%
Other Indo-European Languages	7,719	2,402	+ - 482	31.1%	0.1%	1.9%
Other Languages of Asia	4,647	2,181	+ - 784	46.9%	0.1%	1.7%
Tai-Kadai Languages	3,437	1,796	+ - 461	52.3%	0.1%	1.4%
Other Austronesian Languages	5,297	1,696	+ - 393	32%	0.1%	1.3%
Other Indic Languages	3,321	1,072	+ - 520	32.3%	0.1%	0.9%
Languages of Central, Eastern, and Southern Africa	1,319	647	+ - 443	49.1%	0.04%	0.5%

Source: 2015-2019 ACS, U.S. Census tract data, Table B16001

Oregon Department of Education (ODE) 2018-2019 Enrollment data

We used ODE enrollment data to estimate LEP populations for languages that are not reported in the 5-year ACS releases, but that belong to language groups or families which in aggregate do have LEP populations of greater than 1,000 in that data. Table C4 displays the raw data for prominent languages in the ODE data with estimates greater than or equal to 250 LEP students.

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

Student's native language	Student LEP	Number of suppressed student LEP observations **	Sum, mean of the range of possible suppressed LEP values ***	Final student LEP estimate
Spanish	16,100	113	565	16,665
Russian	617	184	920	1,537
Vietnamese	506	163	815	1,321
Chinese	343	152	760	1,103
Arabic	92	187	935	1,027
Somali *	264	103	515	779

Ukrainian *	89	95	475	564
Chuukese *	76	93	465	541
Tagalog	0	99	495	495
Japanese	112	76	380	492
Korean	57	72	360	417
Hmong	0	78	390	390
Romanian *	20	73	365	385
Persian	0	76	380	380
Amharic *	0	75	375	375
Swahili *	30	60	300	330
Thai *	0	58	290	290
Hindi	13	52	260	273
Lao *	0	50	250	250

* Indicates language that is not reported individually in Table B16001 of the ACS. Data are from Oregon Department of Education Title III (NCLB) rolling collection during the 2018-2019 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 ten LEP students per school site; for ten or fewer observations, a suppressed value is recorded. *** The range of possible suppressed values is one through nine, the mean of which is five. All suppressed values are naively assigned a value of five, knowing that this number may likely be an under- or over-representation of individual language populations.

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

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

ODE Language	Estimated LEP	Percent of "Other Slavic"
Belarusian	0	0%
Bulgarian	35	5.3%
Czech	45	6.8%
Macedonian	10	1.5%
Slovak	10	1.5%
Ukrainian	564	84.9%
SUM	664	

- Using this procedure we estimate that there are 564 Ukrainian speaking LEP students enrolled in Metro-area schools, as a subgroup of an estimated 664 LEP students enrolled who speak either Ukrainian or another of the languages which the Census Bureau aggregates along with Ukrainian in the category "Other Slavic Languages."
- 84.9% of "Other Slavic" LEP persons in the schools are Ukrainian speakers.

- In this procedure we assume that LEP Ukrainian speakers in the general population make up an identical proportion of all LEP “Other Slavic” speakers, which may not be a valid assumption – but the error is likely tolerable given the small populations of other languages within this group in the schools data.
 - Applying this percentage to the Census tracts estimate of “Other Slavic” LEP population produces the following: $84.9\% * 2,720 = 2,310$ Ukrainian-speaking LEP persons age 5 and older in the Metro service. The same method is applied to the margin of error.

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

Qualifications with this data:

- Schools are required to suppress observations of fewer than ten LEP speakers for confidentiality protection, though districts do report the suppressed numbers in aggregate with all district schools.
- ODE is not a 100% count of school-aged children who speak a language other than English at home and are LEP, for the following reasons:
 - ODE data includes public and charter schools, but does not include private or home-schooled students.
 - General enrollment data is collected on a single day of the school year, so students who are not in attendance may be missed unless they are recipients of aid programs for which schools must track their data throughout the year (such as the federal free- and reduced-price lunch program).

These limitations are important in interpreting any figures where school-based LEP populations are mapped and visually compared with tract-level Census language group counterparts.

Table C5: Estimated regional LEP speakers extrapolated from Metro-area LEP school students, showing top two dominant individual languages from each language group, with languages highlighted in yellow potentially exceeding 1,000 persons

ACS Language family / ODE language	Languages – 2018-2019 ODE Data	Estimate, number of native speakers LEP: ACS / Enrolled students, ODE	Percent of total enrolled LEP students within schools language family	Estimate: LEP speakers in Metro region (ODE percent * ACS language family estimate)	MOE: LEP speakers in Metro region (ODE percent * ACS language family MOE)
OTHER SLAVIC LANGUAGES					
ACS Total		2,720 +- 587			
ODE Total		664			
	Ukrainian	564	84.9%	2,310	+- 464
	Czech	45	6.8%	184	+- 40
Remaining Other Slavic		55	8.3%	225	
OTHER INDO-EUROPEAN LANGUAGES					

ACS Total		2,402	+ - 482		
ODE Total			630		
	Romanian	385	61.1%	1,468	+ - 295
	Kurdish	135	21.4%	515	+ - 103
Remaining Other Indo-European		110	17.5%	419	
OTHER AFRO-ASIATIC LANGUAGES					
ACS Total		2,544	+ - 539		
ODE Total			1,749		
	Somali	779	44.5%	1,133	+ - 240
	Amharic	375	21.4%	545	+ - 115
Remaining Other Afro-Asiatic		595	34%	865	
TAI-KADAI LANGUAGES					
ACS Total		1,796	+ - 461		
ODE Total			540		
	Thai	290	53.7%	965	+ - 248
	Lao	250	46.3%	831	+ - 213
Remaining Tai-Kadai		0	0%	0	

Limited English Proficiency Plan focus groups

Lara Media Services

December 2021

Metro respects civil rights

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

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

If any person believes they have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age, or disability, they have the right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit oregonmetro.gov/civilrights or call 503-797-1536.

Metro provides services or accommodations upon request to persons with disabilities and people who need an interpreter at public meetings. If you need a sign language interpreter, communication aid or language assistance, call 503-797-1700 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. For up-to-date public transportation information, visit TriMet's website at trimet.org.

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

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

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

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INTRODUCTION

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

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

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

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

Objective

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

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

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

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

Methodology

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

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

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

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

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

Focus group participants were from the Portland Metro Area and have limited English proficiency or understand the needs of those who have limited English proficiency. With over 100 people showing interest in participating, LMS screened and confirmed 48 participants. Forty-four attended and participated in the conversations. Each focus group included nine to 12 participants from all three Portland Metro region counties: Clackamas,

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

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

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

RESEARCH

Participant Description

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

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

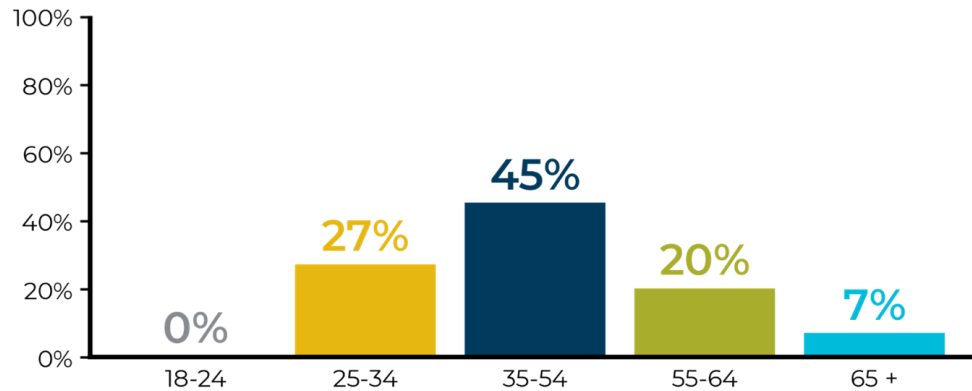


Figure 2: Gender - LEP Survey
Which of the following best represents your gender?

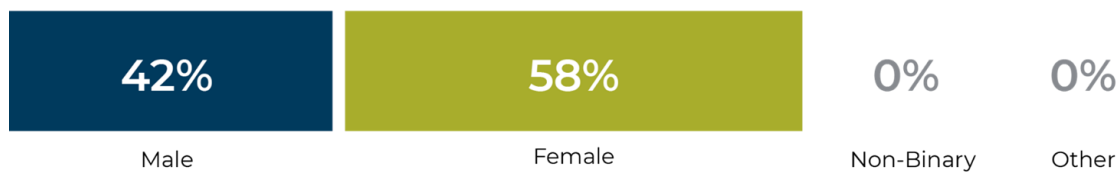


Figure 3: Race/Ethnicity - LEP Survey
When asked about your racial or ethnic identity, how do you identify?

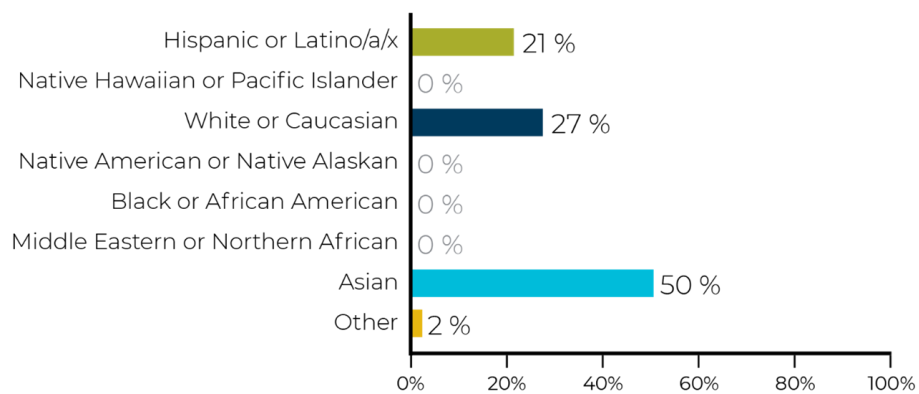


Figure 4: Household Income - LEP Survey
In 2020, What was your household income?

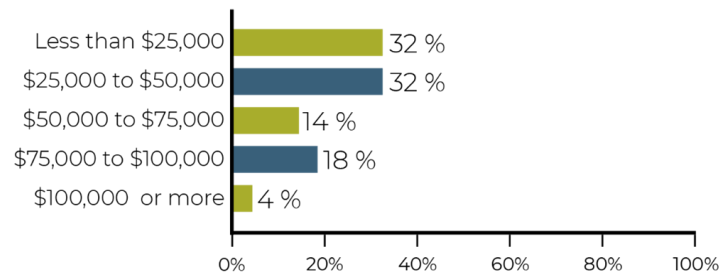
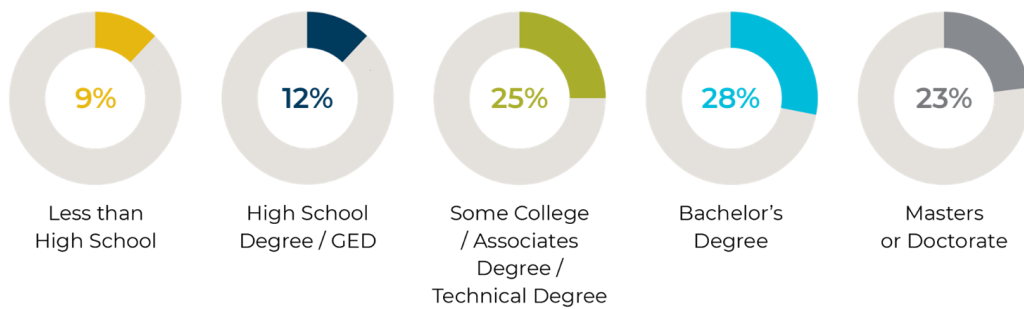


Figure 5: Level of Education - LEP Survey
What is your highest level of education?



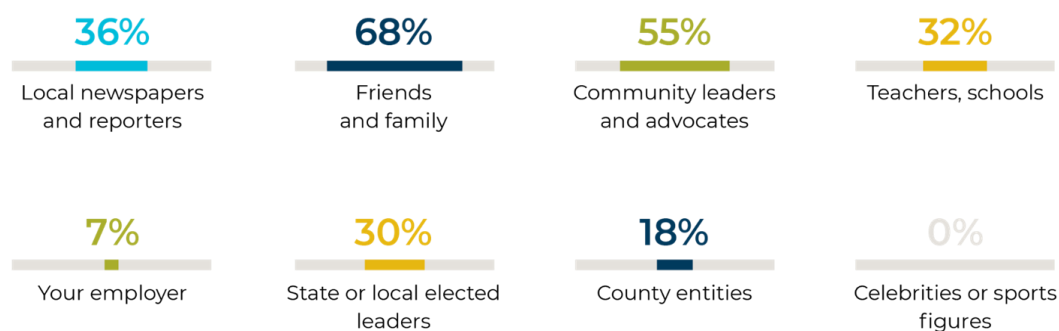
FINDINGS - GENERAL INSIGHTS

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

Government Involvement

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

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



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

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

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

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

Translation

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

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

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

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

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

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

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

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

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

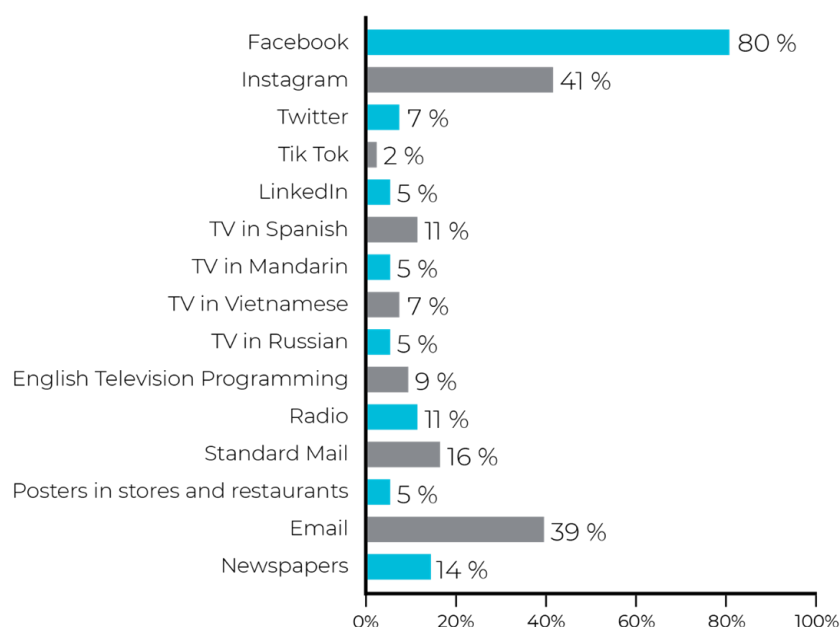
Many also suggested incorporating signage in different languages, especially in hospitals, parks, and other public places, to help people navigate their communities better.

Media Use

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

Figure 7: Media Preferences - LEP Survey

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



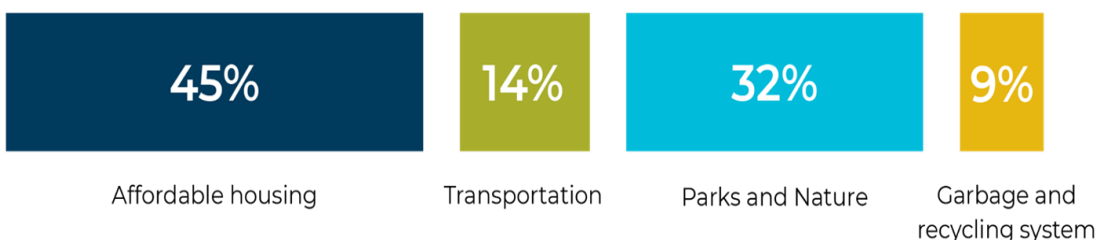
Affordable Housing

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

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

Figure 8: Community Interests - LEP Survey

Which area is most interesting to you and your community?



Transportation

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

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

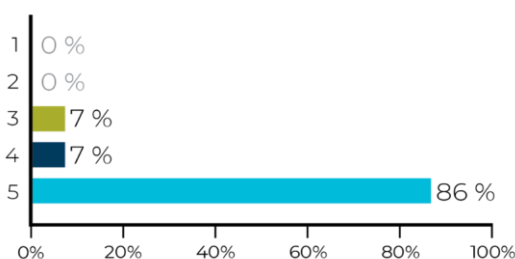


Figure 9.2: Community Transportation Priorities - LEP Survey
Make sure that communities that have had less investment in transportation in the past are served better now and into the future?

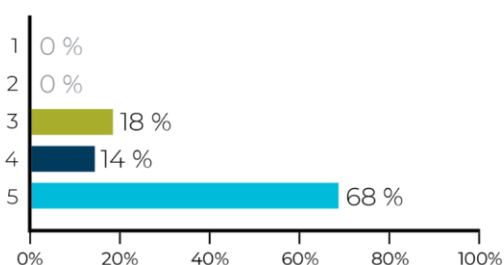


Figure 9.3: Community Transportation Priorities - LEP Survey
Expand the bus and max system?

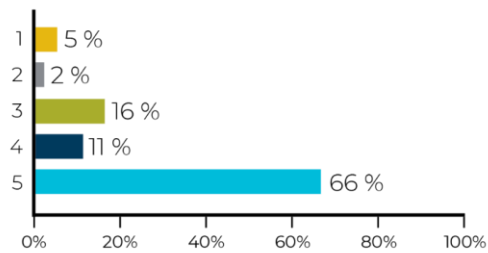
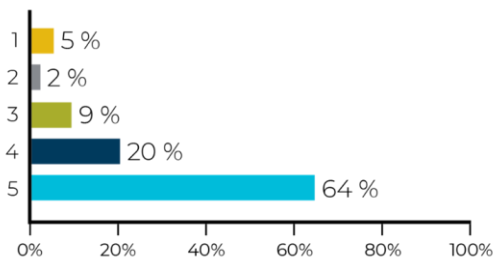
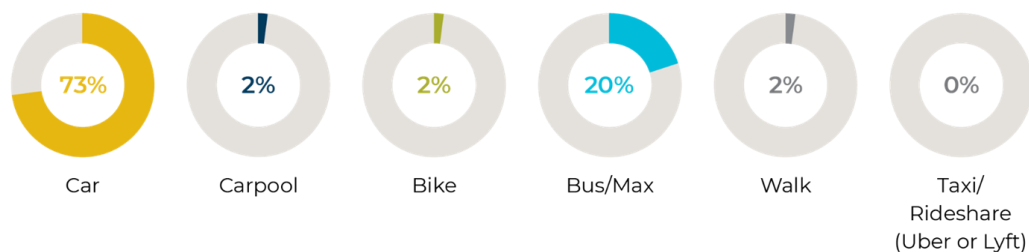


Figure 9.4: Community Transportation Priorities - LEP Survey
Reduce the impacts our cars, buses, and trucks have on climate



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

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



Public Transportation

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

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

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

Roads

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

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

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

Bicycle Paths

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

Sidewalks/Walkways

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

COVID 19 Impact

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

Garbage and Recycling

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

Parks and Nature

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

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

Community Concerns

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

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

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

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

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

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

FINDINGS – BY FOCUS GROUP

Results from Vietnamese focus group

Government Involvement

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

Translation

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

Media Use

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

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

Affordable Housing

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

Transportation

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

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

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

COVID-19 Impacts on transportation

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

Garbage and Recycling

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

Parks and Nature:

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

Barriers/Community Concerns:

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

Results from Mandarin focus group

Government Involvement

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

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

Media Use

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

Affordable Housing

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

Transportation

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

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

COVID-19 Impacts on transportation

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

Garbage and Recycling

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

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

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

Parks and Nature

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

Results from Spanish focus group

Government Involvement

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

Translation

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

Media Use

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

Affordable Housing

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

Transportation

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

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

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

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

Garbage and Recycling

Latino/a/x participants were very interested to learn more about recycling since they see it as a great way to care for the environment. They also shared stories about reusing and reducing waste to save money and the planet. Participants agreed that there needs to be more easily accessible information on recycling and separating trash, either in the mail or online.

Parks and Nature

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

Results from Russian focus group

Government Involvement

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

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

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

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

Translation

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

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

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

Media Use

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

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

Affordable Housing

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

Transportation

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

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

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

COVID-19 Impacts on Transportation

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

Garbage and Recycling

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

Parks and Nature

The participants expressed an interest related to parks and nature development. The need for signs and notices to include Russian translations was brought up, particularly in parks, and the abundance of homeless camps in parks and nature areas needed to be addressed. Several participants expressed interest in understanding Metro's responsibilities with Parks and Nature and wanted more information.

Barriers/Community Concerns

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

SURVEY RESULTS BY LANGUAGE GROUPS

Asian/Other: (23 ppl)

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

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

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

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

Which area is most interesting to you and your community?

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

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

Fewer deaths and severe injuries on our roads

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

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

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

Mandarin

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

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

Vietnamese

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

What is the primary way you get around?

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

Hispanic: (9 ppl)

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

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

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

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

Which area is most interesting to you and your community?

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

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

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

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

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

What is the primary way you get around?

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

White/Caucasian/Slavic: (12 ppl)

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

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

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

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

Which area is most interesting to you and your community?

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

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

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

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

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

What is the primary way you get around?

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

CLOSING REMARKS

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

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

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

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

RECOMMENDATIONS

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

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

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

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

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

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

Acknowledgment

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

APPENDIX E. PUBLIC ENGAGEMENT AND NON-DISCRIMINATION CERTIFICATION CHECKLIST FACTOR 1 METHODOLOGY, 2018 REGIONAL TRANSPORTATION PLAN

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

2018 Regional Transportation Plan call for projects

Background and purpose

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

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

Instructions

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

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

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

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

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

Project sponsors should keep referenced records on file in case of a request for information. Records should be retained until the related local transportation system plan, subarea plan or strategy, modal plan or strategy or transit service plan is superseded – or the submitted projects have been completed – plus six years. Retained records do not have to be submitted unless requested by Metro, state regulators or federal regulators.

For plans currently in development

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

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

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

A. Checklist

- ☐ At the beginning of the agency's transportation system, topical modal, subarea or transit service plan, a public engagement plan was developed to encourage broad-based, early and continuing opportunity for public involvement.

Retained records: public engagement plan and/or procedures

- ☐ During the development of the agency's transportation system, topical, modal, subarea or transit service plan, a jurisdiction-wide demographic analysis was completed to understand the locations of communities of color, people with limited English proficiency, people with low income and, to the extent reasonably practicable, people with disabilities, older adults and youth in order to include them in engagement opportunities.

Retained records: summary of or maps illustrating jurisdiction-wide demographic analysis

- ☐ Throughout process, public notices were published and requests for input were sent in advance of the project start, engagement activity or input opportunity.

Retained records: dated copies of notices (may be included in retained public engagement reports)

- ☐ Throughout the process, public documents included a statement of non-discrimination (Metro can provide a sample).

Retained records: public documents, including meeting agendas and reports

- ☐ Throughout the process, timely and accessible forums for public input were provided.

Retained records: descriptions of opportunities for ongoing engagement, descriptions of opportunities for input at key milestones, public meeting records, online and community survey results (may be included in retained public engagement reports)

- ❑ Throughout the process, appropriate interested and affected groups were identified, and contact information was maintained, in order to share plan information; updates were provided for key decision points; and opportunities to engage and comment were provided.

Retained records: *list of interested and affected parties, dated copies of communications and notices sent, descriptions of efforts to engage the public, including strategies used to attract interest and obtain initial input, summary of key findings; for announcements sent by mail or email, documented number of persons/groups on mailing list (may be included in retained public engagement reports)*

- ❑ Throughout the process, focused efforts were made to engage historically marginalized populations, including people of color, people with limited English proficiency and people with low income, as well as people with disabilities, older adults and youth. Meetings or events were held in accessible locations with access to transit. Language assistance was provided, as needed, such as translation of key materials, use of a telephone language line service to respond to questions or take input in different languages, and interpretation at meetings or events.

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

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

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

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

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

B. Summary of non-discriminatory engagement

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

C. Certification statement

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

As attested by:

(agency manager signature)

(name and title)

(date)

D. Project documentation for projects not from currently adopted plan

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

Attach a list of projects that have not emerged from a currently adopted (at the time of the call for projects) plan, showing the project number (assigned by the project submission system), name and cost. This will allow Metro to verify the adoption of and project inclusion in the local transportation system plan, subarea plan or strategy, topical plan or strategy, modal plan or strategy, or transit service plan ahead of the Regional Transportation Plan adoption.

Project number	Project name	Project cost

Form B. Public engagement and non-discrimination certification for projects submitted to the 10-year regional transportation investment strategy (2018-27 implementation)

2018 Regional Transportation Plan call for projects

Background and purpose

Use of this checklist is intended to ensure sponsors of projects seeking inclusion in the 2018 RTP 10-year investment strategy (implementation in the 2018-27 timeframe):

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

Use this form (Form E) to certify each project submitted for the 10-year investment strategy (2018-27 implementation).

See also **Form A, Public engagement and non-discrimination certification checklist for transportation system, subarea, topical, modal, and transit service plan or strategy development** for certification of projects not anticipated to be included in the 2018 RTP 10-year investment strategy (implementation in the 2018-27 timeframe) and to seek state or federal funding may be done through a certification of the related local transportation system, subarea, topical,

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

The completed checklist will aid Metro in its review and evaluation of projects.

Instructions For projects submitted to Metro for consideration for the 2018 RTP 10-year investment strategy, applicants must complete this certification, comprising the project development checklist (section A), summary of non-discriminatory engagement (section B) and certification statement (section C).

Project sponsors should keep referenced records on file in case of a request for information. Records should be retained until the submitted projects have been completed or removed from the Regional Transportation Plan, plus six years. Retained records do not have to be submitted unless requested by Metro, state regulators or federal regulators.

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

A. Checklist

This part of the checklist is provided in past tense for projects that have completed project development. Parenthetical notes in future tense are provided for applicants that have not completed project development to attest to ongoing and future activities.

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

- ❑ Throughout project development, focused efforts were made to engage historically marginalized populations, including people of color, people with limited English proficiency and people with low income, as well as people with disabilities, older adults and youth. Meetings or events were held in accessible locations with access to transit. Language assistance was provided, as needed, such as translation of key materials, use of a telephone language line service to respond to questions or take input in different languages, and interpretation at meetings or events.

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

- ❑ Throughout – and with an analysis at the end of – project development, consideration was (shall be) given to potential inequitable impacts of the project for people of color, people with limited English proficiency and people with low income compared to those for other residents, as identified through engagement activities.

Retained records: *description of identified populations and information about and analysis of potential inequitable impacts of the project for them in relation to other residents (may be included in retained public engagement reports)*

- ❑ There was a finding of inequitable impact for people of color, people with limited English proficiency or people with low income compared to those for other residents.
Submitted records: for a finding of inequitable impact*, attach analysis, finding and documentation justifying the project and showing there is no less discriminatory alternative.

*This form uses the term “inequitable impact” to encompass FHWA guidance on disproportionately high and adverse human health or environmental effects and a “benefits and burdens” analysis (see [FHWA Order 6640.23A](#) and the [FHWA Environmental Justice Resource Guide](#)) as well as FTA guidance on disparate impacts on minority populations and disproportionate burdens on low-income populations (see [FTA Circular 4702.1B](#)).

- ❑ Public comments were (shall be) considered throughout project development, and comments received on the staff recommendation were (shall be) compiled, summarized and responded to, as appropriate.

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

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

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

B. Summary of non-discriminatory engagement

Attach a summary (1-2 pages) of the key elements of:

- if project development completed, the public engagement process for this project, including outreach to communities of color, people with limited English proficiency and people with low income
- if project development not completed, the public engagement plan for this project *or* agency public engagement practice, including outreach to communities of color, people with limited English proficiency and people with low income.

C. Certification statement

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

As attested by:

(agency manager signature)

(name and title)

(date)

APPENDIX F. EXAMPLE OF PUBLIC NOTICE WITH TRANSLATION

Tell us what you think | 30-day comment period

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

April 17 through May 18, 2020
oregonmetro.gov/mtip2021-24



Submit comments April 17 through May 18, 2020: online at oregonmetro.gov/mtip2021-24 | by mail to Metro Planning - MTIP, 600 NE Grand Ave., Portland, OR 97232 | by email to transportation@oregonmetro.gov | by phone at 503-797-1750 or TDD 503-797-1804.

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

Esta es una notificación de su oportunidad para comentar sobre las prioridades de transporte en la región. Para recibir una traducción de la notificación pública completa en español, llame al 503-797-1888.

Đây là thông báo về cơ hội của quý vị được trình bày ý kiến đối với các ưu tiên về chuyên chở trong vùng. Muốn nhận được bản dịch đầy đủ của thông báo bằng Tiếng Việt, xin gọi số 503-797-1888.

本公告旨在通知您利用這個機會評議在您所在社區經營危險廢棄物設施的申請。 要獲取完整的繁體中文翻譯版公告，請撥打503-797-1888。

Настоящим уведомляем, что у вас есть возможность оставить свой отзыв относительно приоритетов транспортного развития в вашем регионе. Русскую версию настоящего оповещения можно запросить по номеру 503-797-1888.

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

APPENDIX G. POSTED CIVIL RIGHTS NOTICE (18X24)



Metro

Hello Kamusta

こんにちは。Hola

Xin chào مرحباً

Здравствуйте

Bună! សម្បជញ្ញី

ស្អាស្អា Nyob zoo

Haye سلام 你好

नमस्कार Вітаю

Metro respects civil rights

Metro fully complies with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act and other statutes that ban discrimination. If any person believes they have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age or disability, they have the right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit oregonmetro.gov/civilrights or call 503-797-1790. Metro provides services or accommodations upon request to persons with disabilities and people who need an interpreter at public meetings. If you need a sign language interpreter, communication aid or language assistance, call 503-797-1790 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. Individuals with service animals are welcome at Metro facilities, even where pets are generally prohibited. For up-to-date public transportation information, visit Trimet's website at trimet.org

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

Повідомлення Metro про заборону дискримінації | Ukrainian
Metro з повагою ставиться до громадянських прав. Для отримання інформації про програму Metro із захисту громадянських прав або форми скарги про дискримінацію відвідайте сайт oregonmetro.gov/civilrights або зателефонуйте за номером 503-797-1790. Якщо вам потрібен перекладач на зборах, для задоволення вашого запиту зателефонуйте за номером 503-797-1790 з 8.00 до 17.00 у робочі дні за п'ять робочих днів до зборів.

Metro的不歧视公告 | Chinese
Metro尊重民權•欲瞭解Metro民權計畫的詳情•或獲取歧視投訴表•請瀏覽網站 oregonmetro.gov/civilrights 或撥打 503-797-1790 • 如果您需要口譯方可以參加公共會議•請在會議召開前5個營業日撥打503-797-1790 (工作日上午8點至下午5點) •以便我們滿足您的要求•

Ogeysiiska takooris la'aanta ee Metro | Somali
Metro waxay ixtiraamtaa xuquuqda madaniga. Haddii aad u baahan gargaar ah luqadda, wac 503-797-1790 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) 5 maalmo shaqa ka hor kullanka. Haddii aad u baahan tahay turjubaan si aad uga qaybqaadatid kullaan dadweyne, wac 503-797-1790 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) shan maalmo shaqa ka hor kullanka si loo tixgaliyo codashadaada.

Metro의 차별 금지 관련 통지서 | Korean
Metro 는 시민권을 존중합니다. Metro의 시민권 프로그램에 대한 정보 또는 차별 항의서 양식을 얻으려면, oregonmetro.gov/civilrights 당선의 언어 지원이 필요한 경우, 회의에 앞서 5 영업일 (오후 5시 주중에 오전 8시) 503-797-1790을 호출합니다. 또는 차별에 대한 불만을 신고 할 수.

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

Paunawa ng Metro sa kawalan ng diskriminasyon | Tagalog
Iginagalang ng Metro ang mga karapatang sibil. Para sa impormasyon tungkol sa programa ng Metro sa mga karapatang sibil, o upang makakuha ng porma ng reklamo sa diskriminasyon, bisitahin ang oregonmetro.gov/civilrights o tumawag sa 503-797-1790. Kung kailangan ninyo ng interpreter ng wika sa isang pampublikong pulong, tumawag sa 503-797-1790 (8 a.m. hanggang 5 p.m. Lunes hanggang Biyernes) lima araw ng trabaho bago ang pulong upang mapagbigyan ang inyong kahilingan.

Notificación de no discriminación de Metro | Spanish
Metro respeta los derechos civiles. Para obtener información sobre el programa de derechos civiles de Metro o para obtener un formulario de reclamo por discriminación, ingrese a oregonmetro.gov/civilrights o llame al 503-797-1790. Si necesita asistencia con el idioma, llame al 503-797-1790 (de 8:00 a. m. a 5:00 p. m. los días de semana) 7 días laborales antes de la asamblea.

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

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

Metro txoj kev ntux ntxaug dawm ntawv ceeb toom | Hmong
Metro tributes cai. Rau cov lus qhia txog Metro txoj cai kev pab, los yog kom sau ib dai dawm ntawv tsis txaus siab, mus saib oregonmetro.gov/civilrights. Yog hais tias koj xav tau los kev pab, hu rau 503-797-1790 (8 teev sawv ntawv txog 5 teev tsaus ntuj weekdays) 5 hnub ua hauj lwjw ua ntej ntawm lub rooj sib tham.

សេចក្តីជូនដំណឹងអំពីការមិនរើសអើងរបស់ Metro | Khmer Cambodian
Metro គោរពសិទ្ធិប្រជាជន។ ដំណឹងអំពីប្រព័ន្ធគោលដៅរបស់ Metro, ឬស្វែងរកទម្រង់ប្រតិបត្តិការ oregonmetro.gov/civilrights ។ ប្រសិនបើ អ្នកត្រូវការការបកប្រែសម្រាប់ការប្រជុំប្រជាជន, ឬ ទូរស័ព្ទទៅលេខ 503-797-1790 (ពីម៉ោង ៨ ព្រឹក រហូតដល់ម៉ោង ៥ ល្ងាច ថ្ងៃច័ន្ទ-ព្រហស្បតិ៍) ប្រមាណ ៥ ថ្ងៃមុនការប្រជុំប្រជាជន។

मेट्रो मानविक अफेकिरहरुको सम्मान गर्दछ | Nepali
आफ्नो अफेकिरहरु बाह्य पाउनुहुन्छ। बाह्यलाई होमने र बाह्यलाई मेट्रो कार्यालयहरुमा सहभागी हुन तथा नगिनुहुन गर्नु मद्दत गर्ने अन्य व्यवस्थाहरु पनि अगुवाई गर्दछ। मेट्रोले सबै समीप रित-वेदमान बाह्यहरुको मान सम्मान गर्दछ। बाह्यलाई सरकारी अधिकार तथा होमने बाह्यले भने आफ्नो अनुभवलाई समावेशित गर्नेको लागि 503-797-1790 (बिहान ८ देखि बिहान ५ बजेसम्म बाह्य दिन) बैकको बीच व्यवसायिक दिन अगुवाई गर्ने गर्दछ। वेदमानको पराम पुराना गर्नुको लागि या मेट्रोको मानविक अफेकिर कार्यालयको बारेमा जानकारीको लागि, oregonmetro.gov/civilrights मा जानुहुन्छ या 503-797-1790 मा फोन गर्नुहुन्छ।

Metro 尊重每個人的基本權利 | Laotian
Metro 尊重每個人的基本權利。關於 Metro 的公民權利計劃，或獲取歧視投訴表，請瀏覽網站 oregonmetro.gov/civilrights 或撥打 503-797-1790。如果您需要口譯方可以參加公共會議，請在會議召開前5個營業日撥打503-797-1790 (工作日上午8點至下午5點) 以便我們滿足您的要求。

إشعار بعدم التمييز من Metro | Arabic
تحتّم Metro الحقوق المدنية. للمزيد من المعلومات حول برنامج Metro لحقوق المدنية أو لإيداع شكوى ضد التمييز، يُرجى زيارة الموقع الإلكتروني oregonmetro.gov/civilrights أو كنت بحاجة إلى مساعدة في اللغة، يجب عليك الاتصال مقدّمًا برقم الهاتف 503-797-1790 (من الساعة ٨ صباحًا حتى الساعة ٥ مساءً، أيام الاثنين إلى الجمعة) قبل سبعة (٧) أيام عمل من موعد الاجتماع.

مترو به حقوق مدني احترام مي گزارد | Persian
از حقوق خود آگاه باشید شما حق دارید از خدمات مترجم شفاهی و سایر تسهیلاتی که جهت شرکت در برنامه ها و تصمیمات مترو به شما کمک می کنند استفاده کنید. مترو تمامی قوانین مربوط به عدم تبعیض فدرال را رعایت می کند. اگر در یک جلسه عمومی نیاز به یک مترجم شفاهی داشتید، پنج روز قبل از برگزاری جلسه باخبرگری به درخواست تان، با شماره 503-797-1790 (از 8 صبح تا 5 بعد از ظهر طی روز های هفته) تماس بگیرید. برای اطلاعات در مورد برنامه حقوق مدني مترو می برای دریافت فرم تبعیض، به وبسایت oregonmetro.gov/civilrights مراجعه کنید یا با شماره 503-797-1790 تماس بگیرید.

Limited English proficiency plan | March 2022

5

APPENDIX H. CIVIL RIGHTS NOTICE, METRO COUNCIL AND COMMITTEE AGENDAS

Metro respects civil rights

Metro fully complies with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act and other statutes that ban discrimination. If any person believes they have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age or disability, they have the right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit oregonmetro.gov/civilrights or call 503-797-1790. Metro provides services or accommodations upon request to persons with disabilities and people who need an interpreter at public meetings. If you need a sign language interpreter, communication aid or language assistance, call 503-797-1790 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. Individuals with service animals are welcome at Metro facilities, even where pets are generally prohibited. For up-to-date public transportation information, visit TriMet's website at trimet.org

Thông báo về sự Metro không kỳ thị của

Metro tôn trọng dân quyền. Muốn biết thêm thông tin về chương trình dân quyền của Metro, hoặc muốn lấy đơn khiếu nại về sự kỳ thị, xin xem trong www.oregonmetro.gov/civilrights. Nếu quý vị cần thông dịch viên ra dấu bằng tay, trợ giúp về tiếp xúc hay ngôn ngữ, xin gọi số 503-797-1700 (từ 8 giờ sáng đến 5 giờ chiều vào những ngày thường) trước buổi họp 5 ngày làm việc.

Повідомлення Metro про заборону дискримінації

Metro з повагою ставиться до громадянських прав. Для отримання інформації про програму Metro із захисту громадянських прав або форми скарги про дискримінацію відвідайте сайт www.oregonmetro.gov/civilrights. або Якщо вам потрібен перекладач на зборах, для задоволення вашого запиту зателефонуйте за номером 503-797-1700 з 8.00 до 17.00 у робочі дні за п'ять робочих днів до зборів.

Metro 的不歧視公告

尊重民權。欲瞭解Metro民權計畫的詳情，或獲取歧視投訴表，請瀏覽網站 www.oregonmetro.gov/civilrights。如果您需要口譯方可參加公共會議，請在會議召開前5個營業日撥打503-797-1700（工作日上午8點至下午5點），以便我們滿足您的要求。

Ogeysiiska takooris la'aanta ee Metro

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

Metro의 차별 금지 관련 통지서

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

Metro의差別禁止通知

Metroでは公民権を尊重しています。Metroの公民権プログラムに関する情報について、または差別苦情フォームを入手するには、www.oregonmetro.gov/civilrights。までお電話ください。公開会議で言語通訳を必要とされる方は、Metroがご要請に対応できるよう、公開会議の5営業日前までに503-797-1700（平日午前8時～午後5時）までお電話ください。

សេចក្តីជូនដំណឹងអំពីការមិនរើសអើងរបស់ Metro
ការគោរពសិទ្ធិពលរដ្ឋរបស់ ។ សំរាប់ព័ត៌មានអំពីកម្មវិធីសិទ្ធិពលរដ្ឋរបស់ Metro ឬដើម្បីទទួលបានការប្រកាសស្តីពីការមិនរើសអើងសូមចូលទស្សនាគេហទំព័រ www.oregonmetro.gov/civilrights។
បើលោកអ្នកត្រូវការអ្នកបកប្រែភាសានៅពេលអង្គប្រជុំសាធារណៈ សូមទូរស័ព្ទមកលេខ 503-797-1700 (ម៉ោង 8 ព្រឹកដល់ម៉ោង 5 ល្ងាច ថ្ងៃធ្វើការ) ប្រាំពីរថ្ងៃ ថ្ងៃធ្វើការ មុនថ្ងៃប្រជុំដើម្បីអាចឲ្យគេសម្រួលតាមសំណើរបស់លោកអ្នក។

إشعار بعدم التمييز من Metro

تحتزم Metro الحقوق المدنية. للمزيد من المعلومات حول برنامج Metro للحقوق المدنية أو لإيداع شكوى ضد التمييز، يرجى زيارة الموقع الإلكتروني www.oregonmetro.gov/civilrights. إن كنت بحاجة إلى مساعدة في اللغة، يجب عليك الاتصال مقدماً برقم الهاتف 503-797-1700 (من الساعة 8 صباحاً حتى الساعة 5 مساءً، أيام الاثنين إلى الجمعة) قبل خمسة (5) أيام عمل من موعد الاجتماع.

Paunawa ng Metro sa kawalan ng diskriminasyon

Iginagalang ng Metro ang mga karapatang sibil. Para sa impormasyon tungkol sa programa ng Metro sa mga karapatang sibil, o upang makakuha ng porma ng reklamo sa diskriminasyon, bisitahin ang www.oregonmetro.gov/civilrights. Kung kailangan ninyo ng interpreter ng wika sa isang pampublikong pulong, tumawag sa 503-797-1700 (8 a.m. hanggang 5 p.m. Lunes hanggang Biyernes) lima araw ng trabaho bago ang pulong upang mapagbigyan ang inyong kahilingan.

Notificación de no discriminación de Metro

Metro respeta los derechos civiles. Para obtener información sobre el programa de derechos civiles de Metro o para obtener un formulario de reclamo por discriminación, ingrese a www.oregonmetro.gov/civilrights. Si necesita asistencia con el idioma, llame al 503-797-1700 (de 8:00 a. m. a 5:00 p. m. los días de semana) 5 días laborales antes de la asamblea.

Уведомление о недопущении дискриминации от Metro

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

Avizul Metro privind nediscriminarea

Metro respectă drepturile civile. Pentru informații cu privire la programul Metro pentru drepturi civile sau pentru a obține un formular de reclamație împotriva discriminării, vizitați www.oregonmetro.gov/civilrights. Dacă aveți nevoie de un interpret de limbă la o ședință publică, sunați la 503-797-1700 (între orele 8 și 5, în timpul zilelor lucrătoare) cu cinci zile lucrătoare înainte de ședință, pentru a putea să vă răspunde în mod favorabil la cerere.

Metro txog kev ntxub ntxaug daim ntawv ceeb toom

Metro tributes cai. Rau cov lus qhia txog Metro txoj cai kev pab, los yog kom sau ib daim ntawv tsis txaus siab, mus saib www.oregonmetro.gov/civilrights. Yog hais tias koj xav tau lus kev pab, hu rau 503-797-1700 (8 teev sawv ntxov txog 5 teev tsaus ntuj weekdays) 5 hnuv ua hauj lwm ua ntej ntawm lub rooj sib tham.

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

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

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

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

oregonmetro.gov/news

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