

Language Access Plan

Ensuring meaningful access to TriMet programs and services for people with limited English proficiency.



September 18, 2019

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MESSAGE FROM THE GENERAL MANAGER

This year, TriMet turns 50!

We believe in a bright future for this region and are committed to being a leader in delivering safe, convenient, sustainable, and integrated mobility options necessary for our region to be recognized as one of the world's most livable places.

As we draw on our values of safety, inclusivity, equity, community and teamwork in all of our activities, our efforts to enhance our service to our Limited English Proficient (LEP) riders and all communities, align with the agency's mission to connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming to all.

Our updated Language Access Plan reflects our work and commitment to provide meaningful access to vital information and services for LEP stakeholders who use our services, facilities and programs, and whom we engage meaningfully.

Doug Kelsey
General Manager, TriMet

EXECUTIVE SUMMARY

On December 14, 2005, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency.” The Census definition of a Limited English Proficient (LEP) person is “...a person who speaks another language other than English at home and does not speak English well or not at all.”

As a public transit agency, the Tri-County Metropolitan Transportation District of Oregon (TriMet) serves a broad and diverse community. Providing simple access to information about our programs and services for all of our customers, has long been a priority for the agency. TriMet supports the goals of the DOT LEP Guidance and is committed to taking reasonable steps to provide meaningful access to LEP stakeholders who use our services, facilities, and programs, and who attend our meetings and events.

TriMet is committed to complying with the requirements of Title VI, Executive Order 13166, and DOT LEP Implementing Guidance. To prepare a useful Language Access Plan, TriMet conducted a LEP needs assessment as identified in Executive Order 13166. Key elements of the resulting Language Access Plan are as follows:

LEP Population Identification

LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. Of the LEP populations, the largest group is the Spanish-speakers (46.1%), followed distantly by Vietnamese (11%), Chinese (8.1%), Russian (5.4%), and Korean (2.7%).

Analysis also showed that most of the urban LEP populations located themselves along well-served transit corridors. Comparatively, Spanish-speakers were more widely dispersed than the other language groups – forming both urban and semi-rural communities.

Language Access Plan Activities

After an extensive review of the of the existing Language Access Plan (LAP), the associated guidelines, and the needs of LEP populations, the LAP Update Committee recommends a continuation of the original two- tiered approach to meeting the needs of LEP communities in the TriMet district.

Tier One: Successful Activities to Continue

Tier One retained existing programs and activities designed to meet the language needs of regional LEP populations such as: telephone interpreters in virtually any language; multilingual printed materials and multilingual information on the TriMet web site; and continuing development of partnerships with community organizations that serve LEP populations.

Tier Two: Activities to deepen our focus

Tier Two identified new areas to deepen our focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. These activities focus on four primary areas:

- 1. Language Assistance:** *How TriMet provides language assistance services by language.* This area relates to providing free language assistance for outreach documents and in-person services. It also guides the evaluation of which documents are vital for translation and the format(s) that most effectively communicate the messages contained in those documents.
- 2. Providing Notice of Language Assistance:** *How TriMet administers notice to LEP persons about the availability of language assistance.* This area provides guidance for providing notice of language assistance on outreach documents, on the system, and providing notice of the Title VI complaint process.
- 3. Monitoring and Updating the LAP:** *How TriMet monitors, evaluates, and updates the LAP.* This area provides guidance for monitoring and compliance of the LAP, maintaining definitions and standards for translation and interpretation services, and program research and administration.
- 4. Training Programs for Personnel:** *How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.* This area provides guidance for the development of curriculum and the incorporation of LAP information into the employee environment in order to prepare all front line and other relevant staff to effectively engage and respond to LEP customers.

As a result of the LEP needs assessment, the agency instituted the *Language Access Plan* dedicated to mitigating language barriers that could prevent LEP customers from accessing agency programs and services. Due to the large size and dispersed nature of the Spanish-speaking LEP population, this community continues to be a main focus of targeted outreach efforts. This outreach program is housed in the Public Affairs Division with the Director of Transit Equity, Inclusion, and Community Affairs Department responsible for the overall program. The Manager for Multicultural Programs is assigned to help develop the program and carry out the day-to-day tasks.

BACKGROUND

Legal Basis for Language Assistance Requirements

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations declared by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.
2. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Department of Transportation LEP Guidance

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1A “Title VI and Title VI Dependent Guidelines for FTA Recipients” on April 13, 2007, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

Language Access Plan Update Process

Building on the significant work that began in June 2005¹, a core group from the Transit Equity, Inclusion, and Community Affairs department took on the responsibility to update TriMet's LAP and Guidelines, to develop the 2019-2022 Implementation Schedule, and to update the Four Factor Analysis. Part of the update process included reconvening an inter-divisional workgroup in order to address federal requirements for assessing the needs and providing meaningful access to services to LEP populations, to restore agency commitment for its LEP program and to clarify staff roles and responsibilities.

In September 2018, staff members throughout the agency were selected in accordance with their position and were personally asked to participate. Specifically, the workgroup was to:

1. Complete a needs assessment of LEP persons in the district. The Four Factor Analysis (refer to Exhibit 2) assessment permitted staff to identify high concentrations and frequency of contact of LEP populations, to ascertain the nature and importance of TriMet services and programs as well as to determine if there were language barriers limiting the access of LEP persons to TriMet services.
2. Update the LAP and Implementation Schedule providing a framework for the provision of timely and reasonable language assistance to those with limited English proficiency who access TriMet's services and a method to evaluate and review the effectiveness of a LAP.
3. Report findings to management with recommendations and timelines for compliance with federal regulations.

Staff members from Transit Equity, Inclusion, and Community Affairs and Legal Services were tasked with developing a work plan and helping the inter-divisional workgroup complete the LAP update in a timely manner. To that end, a work plan with designated tasks and timelines was developed. This process allowed for a methodical, focused approach to the assessment; and defined deliverables, assigned tasks, and clarified roles and responsibilities. The following is a summary of the results from their work.

¹ Of note, TriMet received grant funding from the FTA Civil Rights Division to develop and implement a demonstration program for its LEP program. TriMet was the only transit authority in the nation to receive this grant funding.

LANGUAGE ACCESS PLAN

The Language Access Plan

After a review of the 2019 Four Factor Analysis and the programs 2019 LEP awareness survey, for the LEP populations and their needs, the LEP Workgroup recommended a two-tiered approach to meeting the needs of LEP populations in the TriMet district. *Tier One* retains successful programs and activities designed to meet the language needs of LEP populations. *Tier Two* outlines areas of focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services.

LEP Population Identification

LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. Thirteen languages meet the LEP threshold. The largest proportion consists of Spanish-speaking LEP individuals (3.8% of the total population and 46% of the LEP population), followed by Vietnamese (0.9% of the total population and 11% of the LEP population).

The percentage breakdown for the top five languages is as follows:

- Spanish – 46.1%*
- Vietnamese – 11.1%
- Chinese – 8.1%
- Russian – 5.4
- Korean – 2.7%

TriMet language access program work has focused on the Spanish-speaking LEP population as it continues to be the largest LEP community in the region followed by the other top four languages. This approach is envisioned to continue while exploring new ways to engage and more effectively serve other LEP communities.

LEP Activities

Tier One: Successful Activities to Continue

Tier One retains existing programs and activities designed to meet the language needs of regional LEP populations such as: telephone interpreters in virtually any language; multi-lingual printed materials and multi-lingual information on the TriMet web site; and continuing development of partnerships with community organizations that serve LEP populations. The following activities will continue:

1. Provide telephone interpreters via customer service at 503-238-RIDE to assist LEP customers.
2. Print *How to Ride* brochures in the thirteen languages that meet the LEP threshold.
3. Post PDF files of How to Ride brochure on TriMet website.

4. Feature key transit information and online [Trip Planner](#) in Spanish on TriMet's website.
5. *Transit Tracker by Phone* information in Spanish via 503-238-7433.
6. Place target language ads in publications serving targeted language populations to demonstrate TriMet's commitment to full information, share current service-related announcements.
7. MAX (light rail system) announcements in both Spanish and English.
8. Spanish-language interface for Ticket Vending Machine (TVM) transactions.
9. Establish and nourish partnerships and continue to work closely with community organizations that serve LEP populations.
10. Civil Rights notification and complaint process in all safe Harbor languages on TriMet website.
11. Civil Rights Notification in all TriMet vehicles and transit centers in top five languages.
12. Print multi-lingual Hop Fastpass brochure.
13. Provide printable program application information for the Income-Based Fare Reduction program in all 13 threshold languages on trimet.org/lowincome.
14. Identification of LEP language needs as new transit projects are being planned.

Tier Two: Activities to Deepen our Focus

Tier Two identified new areas to deepen our focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. These activities ensure continuity of our efforts by deepening our understanding of our commitment and responsibility. These activities focus on four primary areas:

- 1. Language Assistance:** *How TriMet provides language assistance services by language.* This area relates to providing free language assistance for outreach documents and in-person services. It also guides the evaluation of which documents are vital for translation and the format(s) that most effectively communicate the messages contained in those documents.
- 2. Providing Notice of Language Assistance:** *How TriMet provides notice to LEP persons about the availability of language assistance.* This area provides guidance for providing notice of language assistance on outreach documents, on the system, and providing notice of the Title VI complaint process.
- 3. Monitoring and Updating the LAP:** *How TriMet monitors, evaluates, and updates the LAP.* This area provides guidance for monitoring and compliance of the LAP, maintaining definitions and standards for translation and interpretation services, and program research and administration.

4. Training Programs for Personnel: *How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.* This area provides guidance for the development of curriculum and the incorporation of LAP information into the TriMet employee environment in order to prepare all front line and other relevant staff to effectively engage and respond to LEP customers.

Implementation Calendar

In consideration of implementation factors including available resources and costs, the LAP utilizes a staggered implementation schedule over several years. The following calendar illustrates LAP activities, tasks, and implementation years.

| LAP Update Schedule | Target Completion = X | | |
|---|-----------------------|--------|--------|
| Task | FY '20 | FY '21 | FY '22 |
| Language Assistance | | | |
| Create a standard LEP Handbill for use by outreach staff when providing notice of language assistance. | X | | |
| Engage LEP communities in identifying Vital Information and ensuring that it is communicated in language. | X | X | X |
| Add LEP Materials for partners to order via trimet.org/dc. | X | | |
| Conduct next round of LEP primary research survey and focus groups. | | | X |
| Incorporate Language code into Item Code footer for collateral. | X | | |
| Develop a tool that walks staff through the steps to take when determining which languages should be served when translating for a project. | X | | |
| Work with partners to include preferred language for listserve registration forms. | X | | |
| Create updated versions of How To Ride videos in identified languages. | X | | |
| Create file repository for translated documents and Creative Service request forms. | X | | |
| Providing Notice of Language Assistance | | | |
| Develop and launch Language Assistance brand. | | X | X |
| Update right to language assistance postings. | X | | |
| Update the Notice of Civil Rights Complaint Process postings. | X | | |
| Build out notice of meetings for different Customer Information Channels. | | X | |
| Identify a way to provide notice of language assistance when using mass emails. (i.e.: .gov) | | X | |
| Monitoring and Updating the LAP | | | |
| Build out LAP Program Team and staff roles. | X | | |

| | | | |
|---|---|---|---|
| Clarify/formalize proof reading and quality control for translations. | X | | |
| Clarify/formalize process for working with contracted interpreters and translators. | X | | |
| Annual LAP Reviews | X | X | X |
| Build out process for ensuring language assistance and/or translated information is provided when necessary. | X | X | |
| Create a LAP Advisory Committee that contains community members who can inform our efforts to engage and support LEP riders. | X | | |
| Build out a network of trusted individuals that are able to help review translated materials. | X | X | X |
| Training Programs for Personnel | | | |
| All frontline staff will be trained on how to use telephone interpretation. | | | X |
| Establish TriNET page for LEP resources that can be utilized by TriMet staff. | X | | |
| All relevant staff will be trained in process for requesting translation and interpretation services. | X | X | X |
| Incorporate LEP resources into onboarding and orientation process for relevant staff. | | | X |
| Revisit LAP Training needs for staff. | X | | |
| Update LAP trainings based off of needs assessment. | | X | |
| Develop LEP Resources slides for monitors in breakrooms. | X | | |
| Develop follow up training to LAP Training that is specific to different department staff and covers the resources available and how to use them. | | | X |
| Explore the creation of language based Employee Resource Groups. | X | | |
| Campaigns | | | |
| Hop Fastpass | X | X | X |
| Low Income Fare | X | X | X |
| Southwest Corridor | X | X | X |
| Division Transit Project | X | X | X |
| Administrative Citation Process | X | X | X |

PROGRESS SUMMARY

Major Milestones

In August 2018, TriMet's Transit Equity, Inclusion, and Community Affairs (TEICA) department formed a Language Access Plan Update Committee to assist in the task of updating the LAP to further the agency's effectiveness in providing meaningful access to LEP customers. The committee conducted outreach to LEP communities, convened meetings across TriMet divisions, updated LEP guidelines adopted in 2010, and developed an updated implementation timeline. Refer to Exhibit 1 for the full text of all Guidelines.

A 24-item survey instrument was translated into all 13 "safe harbor" languages. Surveys were distributed in-person at community meetings and events, direct email, and through targeted Facebook ads. The LEP engagement period started February 21, 2019 and ended May 17, 2019. A total of 962 surveys were collected. This represents one of the largest engagements of LEP persons in TriMet history. Refer to Exhibit 2 – 2019 Four Factor Analysis (Appendix A: Language Access Survey Report) to view the survey report.

Staff from the Transit Equity, Inclusion, and Community Affairs (TEICA) department distributed the surveys in-person by attending an immense number of community events and meetings. Through built partnerships with key organizations and established relationships with community leaders, TEICA staff received support from the following key organizations: Latino Network, Verde, El Programa Hispano, Centro Cultural, Consulado Mexicano, Immigrant & Refugee Community Organization (Slavic Advisory Board), and Asian Health and Services Center. Staff contacted other community organizations and public entities working with Spanish-speaking community members via telephone and via e-mail. TEICA staff shared the survey with key individual from the following organizations: Voz Worker Education Project, Consulado Mexicano, Mandos Mundo, Oregon Latino Action Agenda, Oregon Latino Health Coalition, OPAL, Educate Ya, American Friends Service Committee, Multnomah County Library, Multnomah County Health Department, Los Niños Cuentan, Gresham School District, Portland Public Schools ESL and Dual Language Immersion Programs, Hispanic Metropolitan Chamber of Commerce, Human Solutions, Central City Concern, Transition Projects, Virginia Garcia Clinic, Adelante Mujeres, Lara Media, Hispanic Pros, Rosewood Initiative, Archdiocese of Portland Ministerio Hispano, Portland ESL Network, et al.

TEICA staff made presentations and surveyed Spanish-speaking parents participating at Latino Network Juntos Aprendemos Programs at the following schools:

- Ventura Park Elementary
- Mill Park Elementary
- Shaver Elementary
- Cesar Chavez Elementary

- Glenfair Elementary
- Tualatin Elementary
- Harvey Scott Elementary
- Rigler Elementary
- Tigard Elementary
- Bridgeport Elementary

Staff also made presentations and surveyed participants in the Latino Network’s program Soñemos Juntos, Bienestar’s Equipo of Service Providers, El Programa Hispano Catolico, meetings at the Asian Health and Service Center and IRCO Senior Lunch as well as participants at a group gathering at the Baltazar Ortiz Center, Mill Park School Pantry, Madison High School Pantry, Shaver Food Pantry, and the Open Bible Harvest Share. Lastly, staff participated with the survey at Consulado Mexicano’s Ventatilla Financiera event, and at Cinco de Mayo in Portland.

Program Updates

- LEP outreach and language assistance has been provided to Vietnamese, Russian, Chinese, Korean, and Spanish-speaking LEP persons for issues related to fare changes, capital projects, and new service.
- In advance of migrating to an electronic fare (eFare) system, TriMet held discussion groups to assess potential impacts of such a change. One of these groups was held in Spanish, while two others were held in English with Spanish, Arabic, Somali, and Nepali interpretation.
- In early 2016, TriMet partnered with community-based organizations to conduct focus group meetings with Spanish, Vietnamese, Russian, and Nepalese speakers. Staff also hosted a booth at a community “Noche Latina” event. The purpose of this outreach was to help inform a vision for future bus service in the TriMet district. It included a questionnaire to get a better understanding of how participants use TriMet as well as their needs and priorities.
- As part of an effort to review practices surrounding enforcement of fare payment, TriMet partnered with several Community-Based Organizations to host listening sessions on the topic in summer 2016. Two of these listening sessions were held in Spanish, and another was in English with Vietnamese interpretation as most participants spoke Vietnamese.
- TriMet’s web page contains links to information in Spanish, Vietnamese, Russian, Chinese, and Korean. In addition, the landing page for Spanish now contains a Trip Planner in Spanish.

- Spanish speakers can also access TransitTracker (real-time arrival information) in Spanish by calling 503-238-7433 thereby accessing real time information on the next train or bus arrival. The Spanish “prompt” was moved to first place on the menu.
- All LEP customers can access language assistance by calling 503-238-7433. In the next year, customer service staff will explore the feasibility of having a dedicated telephone number for targeted languages to better serve LEP customers.
- TriMet provides notice to the public regarding its Title VI obligations and has notified the public regarding TriMet’s obligations to provide programs and services without regard to race, color or national origin. TriMet disseminates notice of its Title VI obligations and the right to file a Title VI complaint through the agency’s website, onboard notification on all transportation vehicles, transit centers, and TriMet’s downtown customer assistance office where passes and tickets are sold.
- TriMet has created a website in Spanish for Hop Fastpass, the electronic fare payment system. At myhopcard.com/es Spanish-speaking LEP’s can manage their electronic fares.
- The Division Transit Project includes targeted outreach, including project fact sheets and print advertisements for community events in Spanish, Vietnamese, Russian, and Chinese. A field office will open in late 2019, staffed by bi-lingual staff (English/Spanish) who will work closely with neighbors and businesses as construction begins.
- The Southwest Corridor Light Rail Project team includes bi-lingual staff who conduct outreach at community events. Project materials include fact sheets in Spanish, Swahili, and Arabic. Other outreach efforts include a webpage, survey, and social media targeted promotions in Spanish about the project’s Park & Ride and station access.
- TriMet has developed channel cards in Spanish for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance in Spanish, and the rules for riding. Planning is underway to develop similar channel cards in other targeted languages.
- In 2019, TriMet finalized updating the bilingual (Spanish/English) faceplates for Ticket Vending Machines to reflect Hop Fastpass and the electronic message interface.
- In 2018 TriMet established an administrative process to resolve fare citations and provided code enforcement personnel with a multilingual envelope (including the 13 languages that meet the LEP threshold) with the instruction to call 503-238-7433 to resolve the citation.
- TriMet established a Low Income Fare program and contracted with community organizations to extend its reach to culturally specific and LEP communities. All informational materials were created in either the top 5 languages or in all 13 threshold languages. Targeted media campaigns were conducted in Spanish, Russian, Vietnamese, and Chinese. In addition, TriMet hired an outreach staff

person that is able to communicate in Spanish, Russian, and Ukrainian adding strength to the LEP efforts.

- TriMet conducted multiple budget forums hosted by community-based organizations serving LEP communities through a Multicultural Contract in place that draws from a pool of agencies and community-based organizations serving communities of color and LEP communities.
- TriMet staff is working on updating TriMet's *How to Ride* videos and coordinating with non-profit organization to use in travel training session with LEP newcomers. These videos will be posted on TriMet's YouTube channel and shared through social media.
- TriMet contracted with Lara Media, C + C Consulting, and Asian Pacific Network of Oregon (APANO) to develop marketing concepts to promote Hop Fastpass in the Spanish speaking community and in the Vietnamese and Chinese community. The result of those efforts will be a greater investment on TV, Radio, and print ads in targeted languages in the coming years.
- Options to include Language Assistance notification signage are being explored on TriMet vehicles, bus stop signs, and transit centers.
- Multilingual channel cards on TriMet vehicles for Hop Fastpass will also be considered, as well as on bus benches and bus shelters.

Proposed Route Change 79 Clackamas/Oregon City



We recently proposed a couple changes — first, we want to reroute Line 79 to 82nd Drive, I-205 and Washington Street. This would provide a more direct trip and eliminate service on Strawberry Lane.

Second, we want to add a new route between Clackamas Town Center and Oregon City Transit Center via Thiessen, Webster, Arlington and McLoughlin (see map).

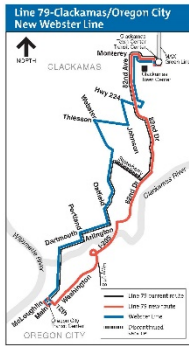
Before we finalize this plan, we want to know what you think. Weigh in at trimet.org/plan or call 503-238-7433, open 7:30 a.m. - 5:30 p.m., every day. Comments due by March 4.

Propuesta de cambio de ruta 79 Clackamas/Ciudad de Oregon

Recientemente propusimos un par de cambios: en primer lugar, queremos redirigir la ruta de la Línea 79 hacia 82nd Drive, I-205 y Washington Street. Esto facilitará un viaje más directo y eliminará el servicio en Strawberry Lane.

En segundo lugar, queremos agregar una ruta nueva entre el Clackamas Town Center y el Centro de Tránsito de la ciudad de Oregon hacia Thiessen, Webster, Arlington y McLoughlin (ver mapa).

Antes de terminar este plan, queremos saber lo que piensa. Envíe sus opiniones a trimet.org/plan o llámeme al 503-238-7433, abierto todos los días, de 7:30 a.m. a 5:30 p.m. Aceptaremos comentarios hasta el 4 de marzo.



TRIMET



"TriMet ha sido el mejor trabajo que he tenido. Se lo recomiendo a quien disfrute manejar, y esté buscando un cambio de carrera."

Gana más de \$60,000 al año con excelente beneficios, y disfruta del paisaje.

Evento de Contratación de Chofer de Autobús*

Jueves, Junio 20 • 2 a 6 PM

Sesión Informativa 2:30 a 3:30 PM

Sesión sobre Oportunidades Laborales 4 PM a 5 PM

Oregon Convention Center

777 NE Martin Luther King Jr. Blvd

**El puesto requiere dominio del inglés, ya que los exámenes y el entrenamiento se dan en inglés.*

TRIMET
trimet.org/driveforus

*Met es un empleador con igualdad de oportunidades, y con el compromiso de desarrollar una organización que valga y sea sensible a las necesidades de nuestro diverso comunidad. Incluyendo a los veteranos, los que son y los que no son con discapacidad.

Hop Fastpass®: tu tarjeta para viajar en TriMet, C-TRAN y Portland Streetcar.

- ✓ Simplemente toca el lector con tu tarjeta Hop o teléfono* para pagar tu pasaje
- ✓ Obtén pases automáticamente cuando usas tu tarjeta
- ✓ Recarga desde cualquier parte utilizando el sitio web o la aplicación

*Siempre con un lector para validar el pasaje. A través de la app TriMet, Oregon Trail y Streetcar Hop, o con una tarjeta virtual Hop en tu teléfono.

CTRAN • TRIMET • PORTLAND STREETCAR

Para saber más o obtener una tarjeta, visita myhopcard.com/es

1-844-694-6722

For language assistance, call the nearest interpreter. Lláme al número de ayuda lingüística.

hops es tu nueva tarjeta para viajar.



Service Alert

Stop Change

Beginning Sunday, March 3, new Line 31-Webster Rd, with service to Clackamas Town Center, will also serve this stop.



Для службы языковой поддержки 503-238-7433
Si necesita interprete, llame al 503-238-7433

TRIMET



trimet.org
503-238-RIDE (7433)

TRIMET

English • Español • Tiếng Việt • Русский
中文 • العربية • Română • 한국어 • 日本語
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Fares and how to ride
Tarifas y cómo viajar
Giá vé & cách đi xe Bus, MAX
Плата за проезд и как пользоваться
قيمة التذاكر و دليل المواصلات
Prețul călătoriei și cum să folosești sistemul de transport
요금과 탑승 방법
料金と乗車方法
Pamasahe at kung paano sumakay
ថ្លៃសំរាប់ប្រាក់ដំឡើងប្រាក់
Noolka Iyo sida loo raaco
Плата за проїзд та як користуватися
عنوان جلد چگونگی استفاده از وسایلتقلیه

Effective
Sept. 2, 2018

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Pentru soluționarea unei citații, vizitați trimet.org/citation sau sunați la nr. 503-238-7433.

لحل هذا الانتهاك، trimet.org/citation، أو اتصل برقم 503-238-7433 لتفضل بزيارة

ដើម្បីដោះស្រាយដីកាពារ: សូមចូលមើលគេហទំព័រ trimet.org/citation ឬហៅទៅសំព័ន្ធពីការសេន 503-238-7433។

مراجعة کنید یا با شماره 503-238-7433 تماس بگیرید. trimet.org/citation برای حل و فصل این احضاریه به

Si loo xalliyo ka so xigashadaani, booqo trimet.org/citation ama wac 503-238-7433.



This envelope contains a citation for not having a valid TriMet fare.

You may be eligible to avoid court and receive a reduced penalty by resolving this citation directly with TriMet. To take advantage, complete one of the options in the green box within the listed time. After 90 days, the yellow box contains your only option.

Here are your options to resolve this citation with TriMet

WITHIN 45 DAYS

A. Appeal your citation

You may be eligible for an appeal hearing to demonstrate that you had the correct fare. Appeals must be requested within **45 days** of receiving this citation. If the citation is not dismissed after the appeal, you can still resolve it in one of the ways below within **90 days** of issuance of the citation. Visit trimet.org/citation for details.

B. Pay a fine

- \$75 (1st offense)
- \$100 (2nd offense)
- \$150 (3rd offense)
- \$175 (4th offense and beyond)

Within **90 days** pay the reduced fine listed above.

Visit trimet.org/citation or call 503-238-RIDE (7433) for payment options. Note: Your citation will be available to pay online within 5-7 days.

C. Perform community service

- 4 hours (1st offense)
- 7 hours (2nd offense)
- 12 hours (3rd offense)
- 15 hours (4th offense and beyond)

Community service hours must be completed and approved by TriMet within **90 days**. See trimet.org/citation for details.

D. Enroll in our low-income fare or honored citizen programs

If you successfully sign up for our low-income fare or honored citizen program and load \$10 on your HOP card within **90 days**, your fine could be reduced to zero upon verification by TriMet. Visit trimet.org/citation or call 503-238-RIDE (7433) to see if you qualify and for additional details.

AFTER 90 DAYS

If you do not resolve this citation within 90 days

After **90 days**, you **must** resolve this citation in court by following the instructions on the enclosed citation. Your fine will likely increase. Once filed in court, the presumptive fine is \$175 and the maximum fine is \$250.

SOURCE: ORS 267.153; TriMet Code 29.35

190084-10M-2/19



"TriMet ha sido el mejor trabajo que he tenido. Se lo recomiendo a quien disfrute manejar, y esté buscando un cambio de carrera."

Gana más de \$60,000 al año con excelente beneficios, y disfruta del paisaje.

Evento de Contratación de Chofer de Autobús*

Jueves, Junio 20 - 2 a 6 PM

Sesión Informativa 2:30 a 3:30 PM

Sesión sobre Oportunidades Laborales 4 PM a 5 PM

Oregon Convention Center

777 NE Martin Luther King Jr. Blvd

*El puesto requiere dominio del inglés, ya que los exámenes y el entrenamiento se dan en inglés.



*This is an employer-sponsored position. We are not an equal opportunity employer. We are an equal opportunity employer. We are an equal opportunity employer. We are an equal opportunity employer.

EXHIBIT

1. LAP Guidelines
2. Four Factor Analysis

Exhibit 1: LAP Guidelines

Guidelines Index

| # | Guideline | Purpose |
|----------|---|---|
| 1 | Language Assistance | How TriMet provides language assistance services by language |
| 1A | Use of In-person Interpreter Services at Public Meetings | To provide, at no cost, in-person interpreter services upon request for public meetings, and important events. |
| 1B | Written Translation of Vital Documents | To implement a procedure to provide for written translation of vital documents. |
| 1C | Customer Information Channels | To provide information about TriMet services in multiple languages using the Four Factor Analysis to determine need. |
| 1D | Culturally-Responsive Outreach | To develop and implement culturally-competent outreach to increase awareness of and access to TriMet services and programs. |
| 2 | Providing Notice of Language Assistance | How TriMet provides notice to LEP persons about the availability of language assistance |
| 2A | Notice of Right To Language Assistance, Outreach Document | To provide notice of right to language assistance, at no cost, on non-vital yet important outreach documents. Examples may include project fact sheets, service planning open house notices, and other open house materials. |
| 2B | Notice of Right to Language Assistance on the System | To identify areas where TriMet can provide notice of “right to language assistance,” at no cost, to LEP persons. |
| 2C | Notice of Civil Rights Complaint Procedures | To provide information in multiple languages about TriMet’s complaint procedure. |
| 3 | Monitoring & Updating the LAP | How TriMet monitors, evaluates, and updates the LAP |
| 3A | Language Skills Competency Standards for Interpreters and Translators | To consistently apply competency standards for interpreters and translators. |
| 3B | Primary Research | To obtain feedback from Spanish-speaking persons on travel behaviors and patterns, fare payment, and demographics. Additional languages that meet the “safe harbor” threshold are accounted for to assess the ability to speak English. |
| 3C | LAP Monitoring & Compliance | To monitor the effectiveness of TriMet’s Language Access Plan on an ongoing basis. |
| 4 | Training Programs for Personnel | How TriMet trains employees to provide timely and reasonable language assistance to LEP populations. |
| 4A | Curriculum Development | To ensure that TriMet employees know their obligations to provide meaningful access to information and services for LEP persons. |
| 4B | Incorporate LAP Information Into Employee Environment | To establish a procedure to incorporate LEP Plan information into the employee environment. |

1A: Use on In-person Interpreter Services at Public Meetings

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To provide, at no cost, in-person professional interpreter services upon request for public meetings, and important events.

PRACTICE

Public meetings are an opportunity for the public to learn about, and at designated times, participate in the agency's decision-making process. Subject to application of the Four Factor Analysis, the agency will take reasonable steps to provide Limited English Proficiency (LEP) community members with the opportunity to participate in agency decisions in accordance with established agency procedures. These steps will include:

1. Provide notification that interpretive services are available for meetings on all promotional material; and
2. Provide such services when request is made 48 hours in advance of the meeting.
3. When possible, arrange phone translation at meetings when LEP needs are presented without prior notification less than 48 hours in advance.

RESPONSIBILITY

General Manager's Office, Legal Services, Community Affairs, Transportation Planning, and Communications & Marketing

APPROACH

In the future as in the past, this practice is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

Call-In Requests

All Outreach and Customer Service staff will be trained on how to use telephone interpretation services and other language assistance resources.

As determined after application of the Four Factor Analysis, when publicizing public meetings, the agency should provide the following information in the key languages:

“To request interpreter services for TriMet meetings, please call 503-238-7433 48 hours in advance of this meeting.”

Staff will immediately submit the request to the coordinating department, who will hire the appropriate interpreter for the meeting.

Prior to utilizing an interpreter:

1. The presenters should schedule a 15 minute briefing with the interpreter. This gives TriMet staff a chance to train the interpreter on specific terminology, procedure, and themes presented.
2. The presenters will discuss the presentation and check for any culturally relevant information as well as receive training on how to communicate effectively through an interpreter, ensuring successful use of the service.

Drop-Ins

To better assist LEP community members who come to public meetings and **have not requested an interpreter in advance:**

1. Staff should provide the guest with the LEP handbill developed by the TEICA division – provided in identified languages –that outlines procedures for receiving information in another language (verbal or written).
2. The handbill also will provide information on how to request interpreter services and how they can testify at public meetings.
3. Staff should prominently display the following sign at registration in the key languages:

“To access information from this meeting, please call (503) 238-7433.”

Targeted Public Meetings: When TriMet is hosting public meetings in a particular geographic area with a known, significant LEP population:

1. Meeting notices should be produced and distributed in the key language(s) encouraging area residents to: a) participate; and b) request interpreter services 48 hours in advance of the meeting.
2. TriMet will provide at least one qualified interpreter at these meetings who is fluent in the designated language(s).
4. The agency will prioritize the use of bilingual facilitators instead of using interpreters, when possible in informal settings. The use of family members or friends to act as interpreters when a qualified interpreter is unavailable is strongly discouraged.

1B: Written Translation of Vital Documents

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To implement a procedure to provide for written translation of vital documents.

PRACTICE

The agency will take reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to TriMet programs and services, with respect to identification and written translation of vital documents, as outlined in this Guidance.

RESPONSIBILITY

Marketing, Community Affairs, Customer Experience and Legal Services

APPROACH

This Guideline assumes that to be truly useful, translated materials must communicate clearly and in a culturally appropriate way with the audience. The documents must – to the greatest extent possible – preserve accuracy in meaning, and not be overly-burdened by legalistic terms and technical vocabulary.

In the future as in the past, the determination as to whether to provide a written translation of a vital document is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

Whether or not a document is deemed to be “vital” may depend on the importance of the program, information, encounter or service involved, and the consequence to the LEP person if the information is not accurate or timely. A “vital document” may include information which is critical or required to participate in or benefit from an agency program or activity. For instance, applications for bicycle parking should not generally be considered vital, whereas access to application forms to qualify for accessible transit services like LIFT could be considered vital.

Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights or services is an important part of “meaningful access,” as lack of awareness may effectively deny LEP individuals meaningful access. Where the agency is engaged in community outreach efforts in furtherance of its programs and activities, the needs of

populations frequently encountered or affected by the program or activity should be regularly assessed to determine whether certain critical outreach materials should be translated.

PROCEDURE

All requests for written translations of vital documents shall be submitted to The Multicultural Programs Manager for handling in accordance with the above Guideline. The Multicultural Programs Manager will chair a standing LAP Program Team. This committee will meet quarterly and be comprised of representatives from Capital Projects, Creative Services, Customer Service Customer Information, Operations, and Legal Services to identify agency vital documents and assess LEP written translation services under this Guideline.

Once a determination is made to translate and in what language(s), the requesting party will:

1. Submit request to Creative Services to have the information translated, designed and printed and/or posted to trimet.org.
2. Submit work product and Creative Service Request form to LAP Program Team.
3. LAP Program Team will review submissions quarterly to ensure quality and standards are met, and to provide feedback on any part of the publication process when applicable.

1C: Customer Information Channels

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To provide information about TriMet services in multiple languages using the Four Factor Analysis to determine need.

PRACTICE

TriMet's customer information will be made available to Limited English Proficiency (LEP) customers through the most effective communication channels per Title VI, Prohibition Against National Origin Discrimination Affecting LEP Persons. In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that LEP customers receive information in the language necessary to allow them meaningful access to programs and services, free of charge.

RESPONSIBILITY

Marketing and Customer Service

APPROACH

In the future as in the past, the determination of the most meaningful and effective communication channel is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

The Project Manager, in concert with the Multicultural Programs Manager, will make the final determination of what customer information will be translated based on the Four Factor Analysis and recommendation of LAP Program Team. Translations should be considered for these basic customer information materials:

1. Fares and How to Ride brochure including information about how to ride the system (bus, light rail, commuter rail and streetcar), fares, and basic riding rules.
2. Major service change Service Alerts.
3. Audio scripts for 238-7433 menu selection to help limited English customers in receiving needed customer service.
4. Audio scripts for ticket vending machines (TVM) to assist LEP customers in purchasing tickets and passes.

INFORMATION CHANNELS

The following information channels will be considered when determining which messages are to be prepared for LEP customers:

- Service alerts
- Print media-public notice and display ads
- Out-of-home media-transit ads, bus benches and shelters, bill boards
- Broadcast media-radio and TV
- Electronic media - website, social media, email, blogs, smart phone apps, etc.
- On street displays/posters
- In-person customer outreach
- Digital displays at MAX platforms and partner locations

1D: Culturally-Responsive Outreach

Proposed: 4/28/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

Develop and implement culturally-responsive outreach to increase awareness of, and access to, TriMet services and programs.

PRACTICE

Determine language needs of target audience to develop appropriate communication tools, approach and message.

RESPONSIBILITY

Multicultural Programs Manager, Marketing Department, PIOs, TEICA

APPROACH

The determination of the most meaningful, culturally-responsive outreach measures will be guided by the outcome of the Four Factor Analysis whereby there will be a review of:

1. The number and proportion of eligible Limited English Proficiency (LEP) constituents;
2. The frequency of LEP individuals' contacts with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

1. Develop culturally appropriate materials in the target language.
 - a. Print materials
 - b. Websites and/or webpages
 - c. Video and Audio
2. Test materials with key constituencies.
 - a. Utilize methods such as focus groups or peer review to test materials before going to production.
 - b. Use TriMet Staff and Community Partners in TEAC when other more comprehensive review and feedback processes are not possible.
 - c. Periodically host a focus group to review translated materials.
3. Establish relationships and partner with key community leaders and organizations of target audience.
4. Individual one on one meetings, telephone calls, and e-mail messages to target leadership.
5. Visit/participate in scheduled community events of target audience to promote message.

6. Target outreach to key gathering places such as churches, schools, community colleges, libraries, and social service and community activist organizations.
7. Promote message with community media—create earned media opportunities.
8. Use TriMet vehicles and properties to display message in target language on lines that run through areas with a high percent of residents who speak that language.
9. Develop print, radio, social media, and television ads in target language.
10. Use TriMet personnel that reflect target audience to promote message.
11. Work with culturally specific contractors to engage LEP communities.

2A: Notice of Right to Language Assistance, Outreach Documents

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To provide notice of right-to-language assistance, at no cost, on outreach documents. Examples may include project fact sheets, webpages, service planning open house notices, and other open house materials.

PRACTICE

TriMet produces hundreds of documents that may be of interest to Limited English Proficiency (LEP) community members. Documents should include a notice in all LEP population languages identified in the Four Factor Analysis alerting customers that the document is available to be translated upon request in accordance with this Guideline. TriMet will develop a collection of standardized language assistance notices on TriNet for use when creating new outreach materials and communications.

RESPONSIBILITY

Marketing & Outreach Services, Community Affairs, and Communications

APPROACH

In the future as in the past, this practice is guided by the outcome of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

1. The Project Manager, working with the Multicultural Programs Manager, will make the final determination if a document warrants including the Language Assistance notification.
2. Documents should include a box with following information translated into languages identified in the Four Factor Analysis – *“For Language Assistance call 503-238-7433.”*
3. Document name, date, and language code (if applicable) will be noted in the footer of the last page to aid the Customer Service Department in efficiently identifying the document.

4. When the LEP customer calls Customer Service, staff will work with the caller and (when necessary) on-call interpreters to determine whether a verbal or a written response is desired.
5. Customer Service staff will then submit the request to appropriate department for processing.
6. If translation is required, every effort will be made to provide a translated document within 10 working days of the request.

Example of format for Language Assistance notice in the identified Languages:

Spanish: Si necesita interprete, llame al 503-238-7433

Vietnamese: Nếu cần trợ giúp về thông dịch xin gọi 503-238-7433

Chinese (simplified): 如需语言帮助请致电 : 503-238-7433

Russian: Для службы языковой поддержки 503-238-7433

Korean: 언어 통역이 필요하시면, 503-238-7433 으로 전화 하시면 됩니다

2B: Notice of Right to Language Assistance on the System

Proposed: 3/10/2009

Adopted: 12/1/10

Updated: 2019

PURPOSE

Identify areas where TriMet can provide notice of “right to language assistance,” at no cost, to Limited English Proficiency (LEP) persons.

PRACTICE

Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons: In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that LEP customers receive the language assistance necessary to allow them meaningful access to programs and services, free of charge.

RESPONSIBILITY

Marketing & Outreach Services and Customer Experience

APPROACH

In the future as in the past, this practice is guided by the outcome of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

The agency will ensure that a translated notice of the right to language assistance is posted in an easily visible location at all relevant venues.

Based on the Four Factor Analysis and LAP Program Team recommendations, examples of LEP notification points to consider include venues likely to be patronized by a high volume of LEP customers looking for TriMet information:

1. TriMet customer service offices and ticket outlets
2. Signs and handouts available in vehicles and stations
3. Outreach documents
4. Agency website
5. Postings at Community-Based Organizations (CBOs) partnering with the agency made available to partners via trimet.org/dc
6. Notices in non-English community newspapers

7. Announcements on non-English radio stations
8. Information tables at local events

2C: Notice of Civil Rights Complaint Procedures

Proposed: 3/10/2009

Adopted: 2011

Updated: 2019

PURPOSE

Provide information in multiple languages about TriMet's complaint process.

PRACTICE

TriMet's complaint process will be made available to Limited English Proficiency (w) constituents upon request and in key public locations per Title VI.

RESPONSIBILITY

Marketing; Customer Experience; Legal Services; Transit Equity, Inclusion, and Community Affairs

APPROACH

In the future as in the past, the determination as to Title VI notice locations and specific messaging formats is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

Based on the LAP Program Team recommendations and the outcome of the Four Factor Analysis the following locations were identified as the best places to post information about TriMet's complaint process for LEP persons:

1. TriMet's external website in the language of key LEP communities.
2. The TriMet Ticket Office (TTO) in downtown Portland, Oregon, where significant numbers of LEP persons seek TriMet information.
3. Onboard notification on transportation vehicles and transit centers.
4. TriMet Lost and Found
5. TriMet Administrative Offices
6. IDP managed locations

3A: Language Skills Competency Standards for Interpreters and Translators

Proposed: 3/10/2009

Adopted: 12/1/10

Updated: 2019

PURPOSE

Consistently apply competency standards for interpreters and translators.

PRACTICE

Interpretation and translations arranged by TriMet will be performed by contracted vendors and/or individuals whose competency has been established based on contract awards through a request for proposal (RFP) process. .

RESPONSIBILITY

Members of the Source Evaluation Committee (SEC), Members were selected from the following departments: Marketing, Customer Services, ATP, Community Affairs, and Planning and Policies

APPROACH

This task will be accomplished using a combination of methods to provide reliability, flexibility, and cost savings:

1. Work with qualified and certified professional organizations offering services in the fields of interpreting and translation.
2. Utilize bilingual TriMet staff members to check the quality of work produced, when possible.
3. Evaluate and apply key elements from successful programs from state and local governments and healthcare providers.
4. When possible, use local translators and ask that the same individuals be assigned to our projects each time in order to build the contextual knowledge needed to accurately translate our materials.
5. Incorporate language into contracts requiring vendors to certify their proficiency in target languages.

PROCEDURE

1. Work with the contractors to ensure that all interpreters and translators working for TriMet meet the following standards:
 - a. Communicate fluently – verbally and in writing – in both English and the primary language of the Limited English Proficiency (LEP) individual.

- b. Demonstrate cultural understanding of the LEP customer served.
 - c. Accurately and impartially interpret and/or translate to and from such languages and English.
 - d. Demonstrate an understanding of the role and the ethics associated with being an interpreter or translator.
2. TriMet will conduct “spot checks” on translations and for limited interpreting services, bilingual TriMet staff may provide assistance.
 3. In the event that translation or interpretation services are not up to competency standards TriMet staff will:
 - a. Notify the vendor of their error and give a reasonable opportunity to fix the error.
 - b. Document the error.
 - c. If more than 2 errors are made for a given language then TriMet Staff will move to a secondary contractor.

3B: Primary Research

Proposed: 11/16/18

Updated: 2019

PURPOSE

To obtain feedback from Limited English Proficiency (LEP) riders on travel behaviors and patterns, fare payment, and demographics. When possible questions will ask about other languages spoken at home. For some projects additional languages that meet the “safe harbor” threshold identified by the Four Factor Analysis will be accounted for to assess the ability to speak and/or read English.

PRACTICE

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the Language Access Plan (LAP) or communication strategies.

RESPONSIBILITY

Research & Analysis, On-Board Survey Team

APPROACH

This practice will be carried out as part of the TriMet survey research program.

PROCEDURE

On-board surveys will be in tablet format in English and Spanish with safe harbor languages asked about English comprehension.

1. Add language question to research surveys conducted in a language other than English. Using wording from the U.S. Census Bureau, determine LEP status of those responding to TriMet surveys. Consistent with standard LEP survey practices, anyone answering either question *not well* or *not at all* is considered LEP.
 - Q1. How well do you speak English? Very well, well, not well, not at all
 - Q2. How well do you read English? Very well, well, not well, not at all
2. Add language preference question to research surveys conducted in English.
 - a. Is there a language other than English that you would prefer to take this survey in?

Telephone/mail/panel/surveys will be conducted in English and Spanish. In some surveys respondents will be asked about other languages spoken at home, if English is not their first language. They may also be asked how well they speak/read English.

Focus groups/intercept surveys/1-on-1 interviews/on-line surveys will be conducted in whatever languages are required to meet project plan purposes.

Results of research will be published on TriNet and on TriMet research page.

3C: Language Access Plan Monitoring and Compliance

Proposed: 11/16/2018

Updated: 2019

PURPOSE

Develop a process to monitor the effectiveness of TriMet's Language Access Plan (LAP) on an ongoing basis. Ensure compliance with Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, and Executive Order 13166.

PRACTICE

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the LAP. Updates to the LAP are reserved for FTA guidance memorandums or policy.

RESPONSIBILITY

Transit Equity, Inclusion, and Community Affairs; Research & Analysis; GIS & Location Based Services; Outreach Services, Multicultural Programs.

APPROACH

This approach will use a combination of qualitative and quantitative approaches to determine if the LAP is meeting the needs of the Limited English Proficiency (LEP) community. The use of federal and state regulations and policy will determine compliance. Results of the reviews will be posted on TriNet.org.

PROCEDURE

Regular LAP reviews will be conducted to make sure the LAP continues to include reasonable steps to ensure meaningful access to TriMet's programs and services for LEP communities. Monitoring the LAP program will take two forms:

1. **Ongoing Review:** This is an ongoing process conducted internally and externally throughout the year. Feedback solicited and received from: TriMet staff (front line and management/administration), LEP customers, and Community-Based Organizations (CBOs) serving the LEP populations. In this way, any **critical issues can be immediately addressed** and changes made to the Language Access Plan as needed.
 - a. Internal: Transit Equity, Inclusion, and Community Affairs staff will meet with TriMet colleagues quarterly to evaluate the quantity and quality of LEP activities encountered between TriMet staff and LEP customers. Staff will be asked to evaluate the effectiveness of LAP communication methods, materials, and messaging. Secret shoppers may be utilized to test our effectiveness at providing language assistance for different programs and services. Suggestions for improvements will be requested and acted upon as appropriate.

- i. **Front Line Surveys:** This will be a quantitative survey conducted among front-line staff to track any changes in quantity and quality of LEP customer encounters. Survey questions will include: awareness and use of TriMet's language assistance services; frequency of LEP customer encounters, how they communicate with LEP passengers; what the agency could do to help them.
 - b. **External:** Meet with LEP customers and CBO representatives to find out how well elements of the LAP communications are working. This part of the review will rely on the CBOs and Faith Based Organizations serving LEP populations.
 2. **Triennial Review:** The Language Access Plan will be reviewed on annual basis. Included in the review would be the results of any changes in demographics, types of services, or other needs. The annual review includes:
 - a. A Four Factor Analysis: to gather internal and external program data, analyze results, and report on the status of the program in light of updated information.
 - b. Community Consultations: Conducted with members of the LEP communities to determine how well the agency is working for them and to track any changes due to implementation of the LAP actions. The consultations will focus on:
 - i. Awareness of and use of TriMet's language assistance services
 - ii. Experiences with TriMet's fares/tickets, routes/schedules, and safety/security issues
 - iii. Understanding and evaluation of customer information materials – visual, auditory, and written
 - iv. Suggestions to make riding TriMet easier

The frequency of re-evaluation of the LAP will be based on agency staff review of whether "demographics, services, and needs" remain constant.

4A: Curriculum Development

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

The purpose of the training program is to ensure that TriMet employees know their obligations to provide *meaningful access* to information and services for LEP (Limited English Proficiency) persons.

RESPONSIBILITY

Operations Training – Bus Training Supervisors, Rail Training Supervisor; Manager, Fare Enforcement Administration, Maintenance Training Supervisors, Field Operations Training Supervisors; Dir, Safety Management Sys & Environmental Svcs.; Manager, Security and Emergency Management; Executive Director of Public Affairs; Multicultural Programs Manager; Program Manager, Learning and Development; Recruitment Supervisor; Chief Station Agent.

APPROACH

The approach taken with the training element of the Language Access Plan (LAP) may employ a combination of written materials, PowerPoint slide presentation, eLearning, and in-person question and answer sessions. Trainings are designed to give presenters the flexibility necessary to meet the informational needs unique to each workgroup. While the means of delivering information may vary from audience to audience, the core messages remain consistent throughout. Workgroups identified for training fall into these general categories:

1. Front line employees: Operators, Trainers, Customer Service Representatives, Public Affairs Representatives, Lost and Found, Maintenance
2. Finance & Administration Services
3. Management (all levels)
4. Support staff (Administrative staff)
5. Field Operations
6. Ride Guide & Ask Me Staff
7. Security and Fare Enforcement

The Training Subcommittee has developed LAP training curriculum, and works to maintain a LAP training curriculum, with guidance from the LAP Program Team. The LAP training for front line employees and other TriMet staff focuses on the many elements of the LAP program including:

- Summary of the agency's responsibilities under the DOT LEP Guidance

- LEP populations in the TriMet service district
- Summary of TriMet's LAP
- Summary of the Four Factor Analysis
- Description of the language services available to LEP customers and staff
- How staff and LEP customers can access these services
- How to work effectively with interpreters in-person and over the telephone
- How to communicate with LEP persons face-to-face, over the telephone, and in writing
- How to respond to civil rights complaints

4B: Incorporate LAP Information in Employee Environment

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

Establish a procedure to incorporate Language Access Plan (LAP) information into the employee environment.

RESPONSIBILITY

Operations Training, Director/Marketing, Multicultural Programs Manager, Director/Talent Management.

APPROACH

The approach taken with this element of the training program is to identify the various means of delivering information to TriMet employees. The most effective communication channels identified are varied in form: in-person training, employee meetings, written materials, and electronic delivery systems.

- Training sessions:
 - New Employee Orientation
 - Operator Training Program and Recertification
 - Field Operations Training Program
 - Management and professional development training and events such as “Lunch and Learns” and the “E3 Program”
- Meetings:
 - Division meetings
 - Administrative staff departmental meetings
 - Expanded Directors’ Exchange
 - Executive Team meetings
 - Quarterly Town Hall meetings
 - Employee Resource Group
- Written materials:
 - TriMet Employee Handbook
 - Employee posters or fliers for bulletin boards
 - Operator notices
- Electronic media:
 - TriMet’s internal website – **TriNET**
 - Employee weekly e-newsletter – **Expressline**
 - TV monitors in breakrooms
 - All employee emails

PROCEDURE

The procedure to incorporate the LAP information into new employee orientation, employee handbook, and TriNET will conform to existing procedures used to provide employee required information.

Exhibit 2: Four Factor Analysis



Four Factor Analysis

2019 Update

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Appendix B: Bus Operator Intercept Survey Report

Appendix C: Bus Operator and Field Operations Survey Findings

Appendix D: Bus Operator Survey Instrument

Appendix E: Road and Rail Supervisor Survey Instrument

Introduction

TriMet strives to provide meaningful access to programs and services for all community members, including those with limited English proficiency (LEP). Beyond compliance with relevant guidelines and regulations, this supports TriMet’s vision, mission, and values:

Vision

TriMet will be the leader in delivering safe, convenient, sustainable and integrated mobility options necessary for our region to be recognized as one of the world’s most livable places.

Mission

Connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming for all.

Values

Safety · Inclusivity · Equity · Community · Teamwork

TriMet last performed a Four Factor Analysis examining the language needs and services provided to LEP individuals in 2016. The Portland metropolitan region has seen dramatic population growth and demographic changes since that time, calling for an updated assessment.

Title VI Regulatory Background

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on persons with limited English proficiency (LEP) because such conduct constitutes national origin discrimination.
2. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Department of Transportation LEP Guidance

The U.S. Department of Transportation (DOT) LEP guidance states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” requiring recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

Four Factor Analysis

As per DOT and FTA guidance, there are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons:

- 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;
- 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; and
- 4) The resources available to the recipient for LEP assistance activities and the associated costs.

A description of the self-assessment undertaken in each of these areas follows.

Evaluation Methods and Data Sources

In accordance with FTA’s policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the TriMet service district area was done through an analysis of the following data sources:

- US Census Bureau, 2012-2016 5-year sample, American Community Service data
- Oregon Metro Regional Land Information System (RLIS)
- Oregon Department of Education Student Language of Origin data , 2017-2018
- Oregon Health Authority Public Health Women-Infant-Children program data, 2016-2018
- Oregon Judicial Department court language service request data, 2016-2019
- TriMet Geographic Information System
- Spring 2018 on-board rider survey
- Fall 2018 system-wide fare survey
- Summer 2018 operator survey regarding contact with LEP persons
- Fall 2018 road and rail supervisors survey regarding contact with LEP persons
- Call center language interpretation requests and views of translated webpage www.trimet.org
- 2019 TriMet language services survey

In addition to analyzing data, TriMet staff have become familiar with LEP populations in the TriMet service district by working with community organizations that serve these populations. TriMet regularly works with these organizations when conducting outreach concerning service changes or other matters, such as how to enroll in the Reduced Fare Program. TriMet turns to these organizations for assistance in identifying language translation needs and in planning the best ways to inform and involve people with limited English proficiency. Key organizations include the following:

| | |
|--|---|
| APANO | African Family Holistic Health Organization |
| Asian Health and Services Center | Bienestar |
| Catholic Charities | Centro Cultural |
| Immigrant & Refugee Community Organization | IRCO Africa House |
| IRCO Asian Family Center | Hacienda CDC/Baltazar Community Center |
| Latino Network | Portland ESL Network |

Factor 1: The number and proportion of LEP persons served or likely to be encountered by a TriMet program, activity or service

2012 - 2016 American Community Survey 5-Year Sample

The US Census Bureau collects data about the ability to speak English as well as the language spoken at home via the American Community Survey (ACS) and allows for the identification of LEP languages falling within the “Safe Harbor” thresholds. The thresholds are 5% of total population or 1,000 individuals, whichever is less. This data was retrieved for the TriMet district, which includes most of Clackamas, Multnomah, and Washington Counties.

For the initial piece of the Factor 1 Analysis, TriMet analyzed 2012-2016 5-year Census ACS data to identify LEP populations within the TriMet service district as well as those populations’ access to TriMet bus and rail service. The LEP population is defined as those who reported to the Census Bureau that they speak English “less than very well.”

DOT “safe harbor” guidance calls for written translations of vital documents for each language group that constitutes at least 5% or 1,000 LEP individuals, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered (i.e. the TriMet service area). Translations of other documents, if needed, can be provided orally. For TriMet’s purposes this means that the “safe harbor” threshold is 1,000 persons because this is much less than 5% of the population.

Failure to provide written translations under the safe harbor criteria does not mean there is non-compliance with LEP access requirements, but adherence to the safe harbor criteria will serve as strong evidence of compliance.

Population Figures. As shown in Table 1 on the next page, LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. The largest proportion consists of Spanish speaking LEP individuals (3.8% of the total population and 46% of the LEP population), followed by Vietnamese (0.9% of the total population and 11% of the LEP population). Eleven other languages meet the Safe Harbor threshold of 1,000 LEP individuals according to the ACS.

Table 1: Languages spoken by LEP persons age 5 and older in TriMet district

| Languages Spoken at Home | LEP Population Estimate | % of Total Population | % of LEP Population |
|-----------------------------------|-------------------------|-----------------------|---------------------|
| Spanish | 56,605 | 3.8% | 46.1% |
| Vietnamese | 13,598 | 0.9% | 11.1% |
| Chinese (Cantonese, Mandarin) | 9,892 | 0.7% | 8.1% |
| Russian | 6,656 | 0.5% | 5.4% |
| Korean | 3,259 | 0.2% | 2.7% |
| Ukrainian | 2,948 | 0.2% | 2.4% |
| Arabic | 2,336 | 0.2% | 1.9% |
| Tagalog | 2,095 | 0.1% | 1.7% |
| Japanese | 1,867 | 0.1% | 1.5% |
| Mon-Khmer, Cambodian | 1,658 | 0.1% | 1.3% |
| Persian/Farsi | 1,159 | 0.1% | 0.9% |
| Other (e.g., Romanian and Somali) | 20,799 | 0.1% | 16.9% |
| Total | 122,872 | 8.3% | |

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2012 - 2016 (5-Year Estimates).

LEP Maps. The ACS data was also plotted on a series of maps and overlaid with TriMet’s bus and rail service, provided on the following twelve pages:

- Figure 1: LEP populations greater than the region average of 8.3%.
- Figure 2: Distribution of concentrations of Spanish-speaking LEP populations
- Figure 3: Distribution of concentrations of Vietnamese-speaking LEP populations
- Figure 4: Distribution of concentrations of Chinese-speaking LEP populations
- Figure 5: Distribution of concentrations of Russian-speaking LEP populations
- Figure 6: Distribution of concentrations of Korean-speaking LEP populations
- Figure 7: Distribution of concentrations of Ukrainian-speaking LEP populations
- Figure 8: Distribution of concentrations of Arabic-speaking LEP populations
- Figure 9: Distribution of concentrations of Tagalog-speaking LEP populations
- Figure 10: Distribution of concentrations of Japanese-speaking LEP populations
- Figure 11: Distribution of concentrations of Mon-Khmer-speaking LEP populations
- Figure 12: Distribution of concentrations of Persian-speaking LEP populations
- Figure 13: Distribution of concentrations of Indo-European-speaking LEP populations

Limited English Proficient Population Distribution

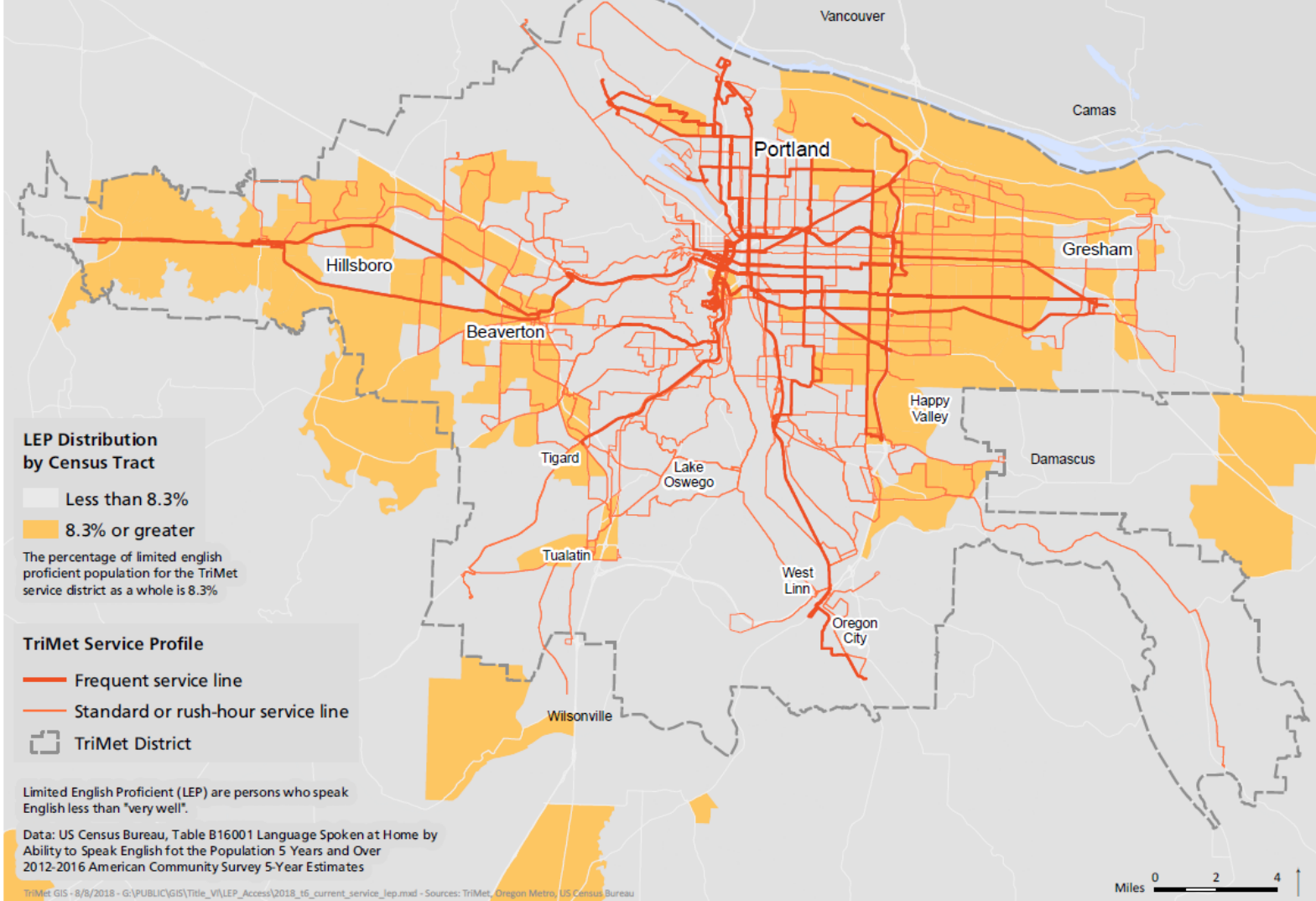


FIGURE 1: LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Spanish-speaking population distribution

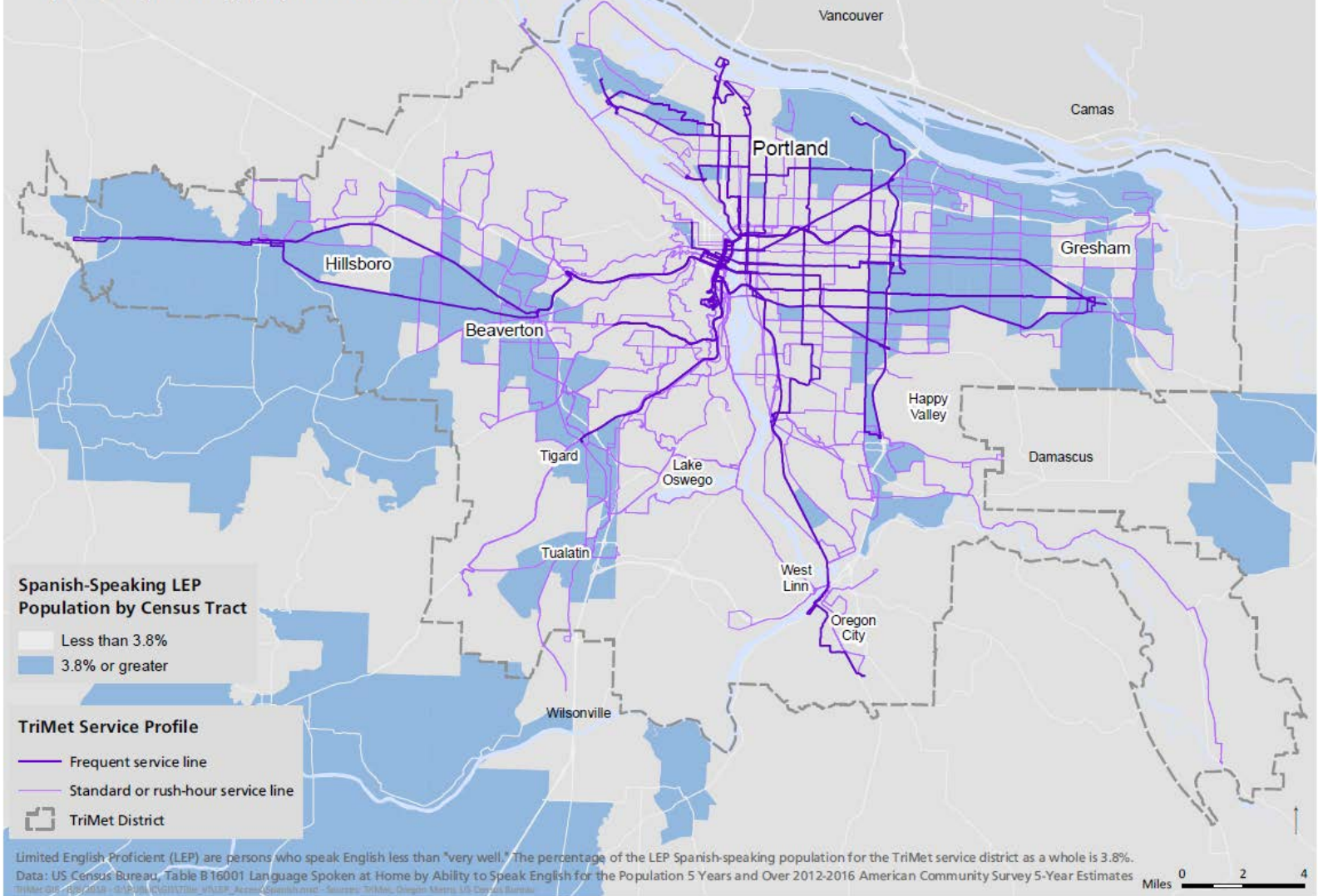


FIGURE 2: SPANISH-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Vietnamese-speaking population distribution

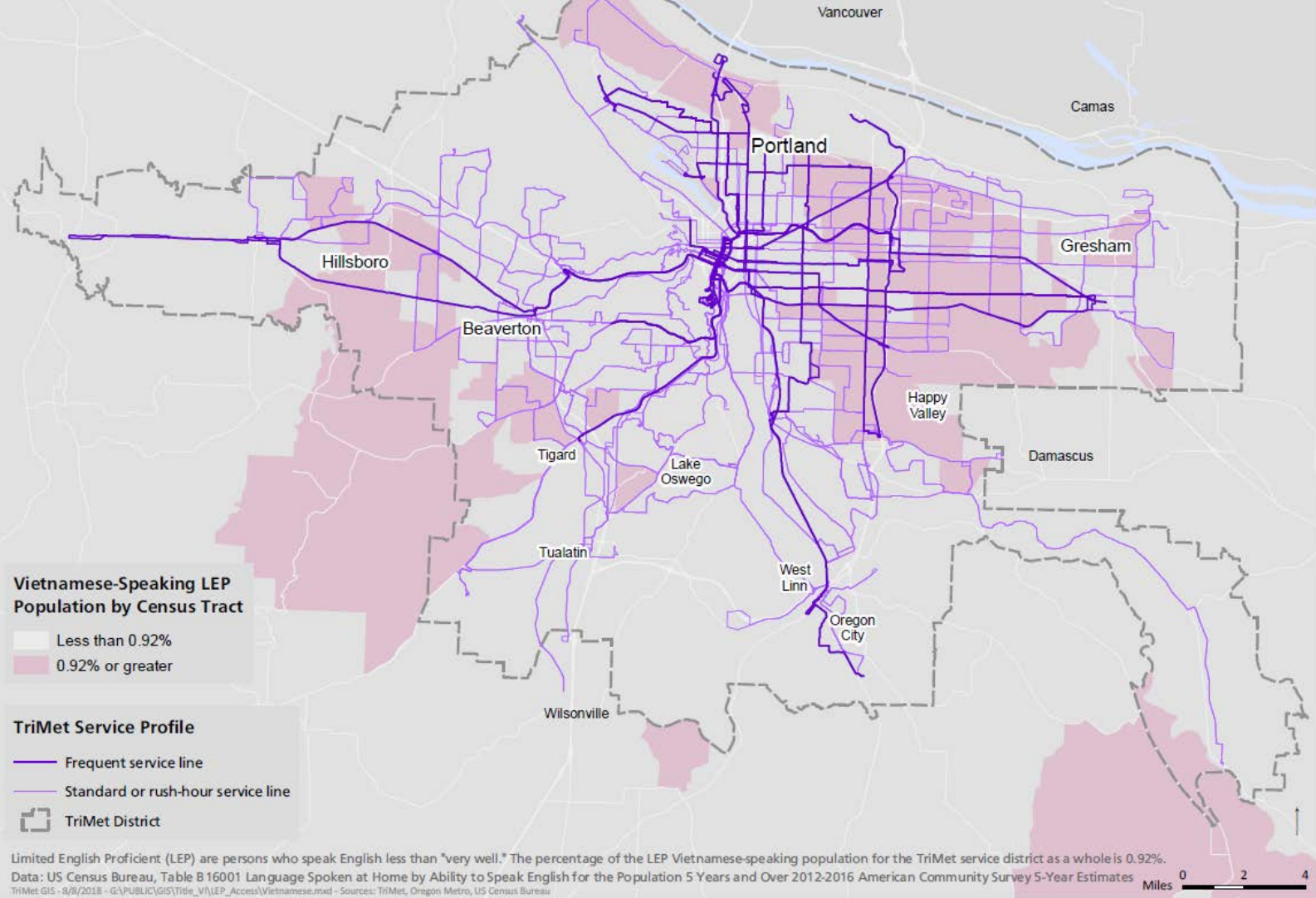


FIGURE 3: VIETNAMESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Chinese-speaking population distribution

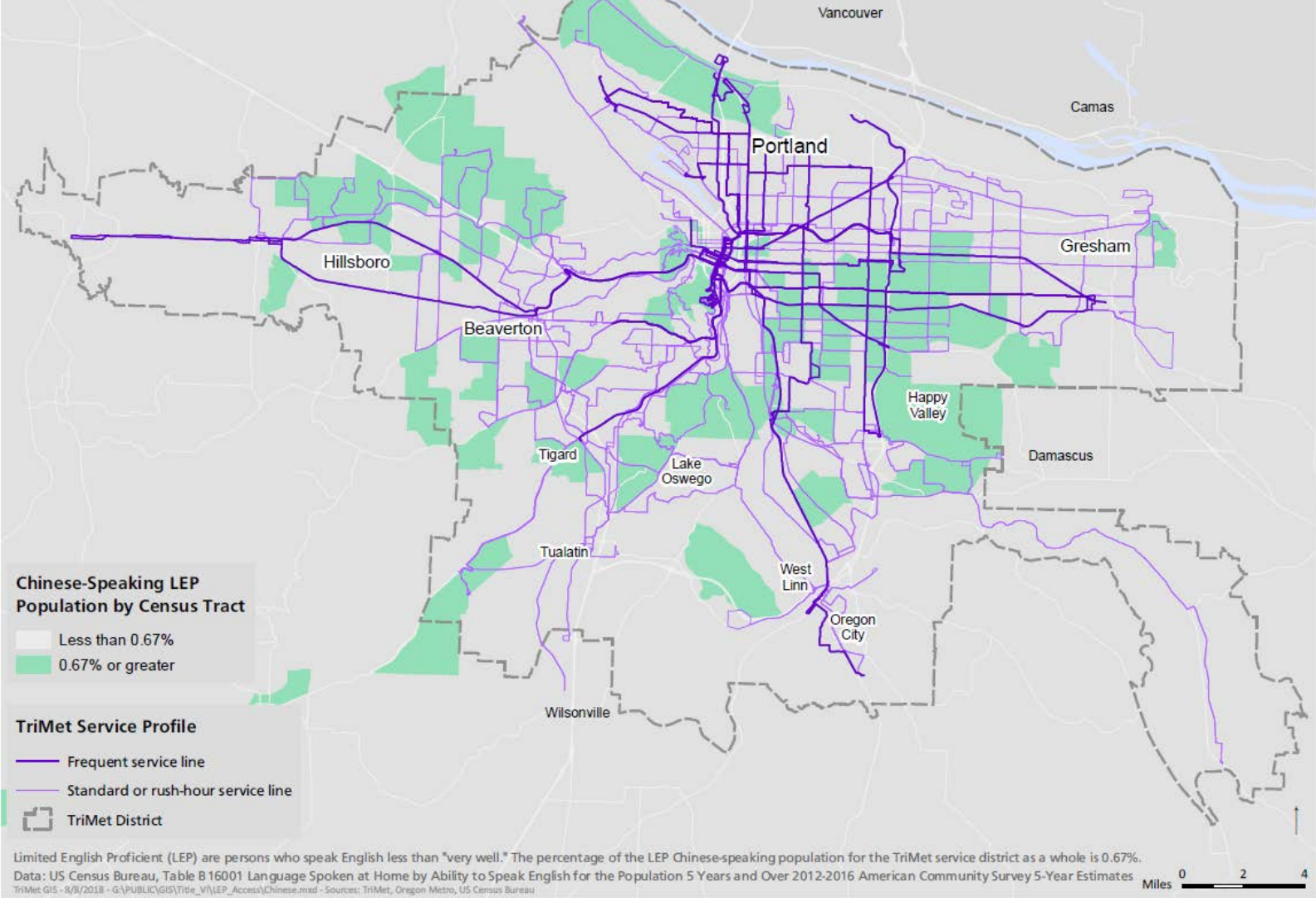


FIGURE 4: CHINESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Russian-speaking population distribution

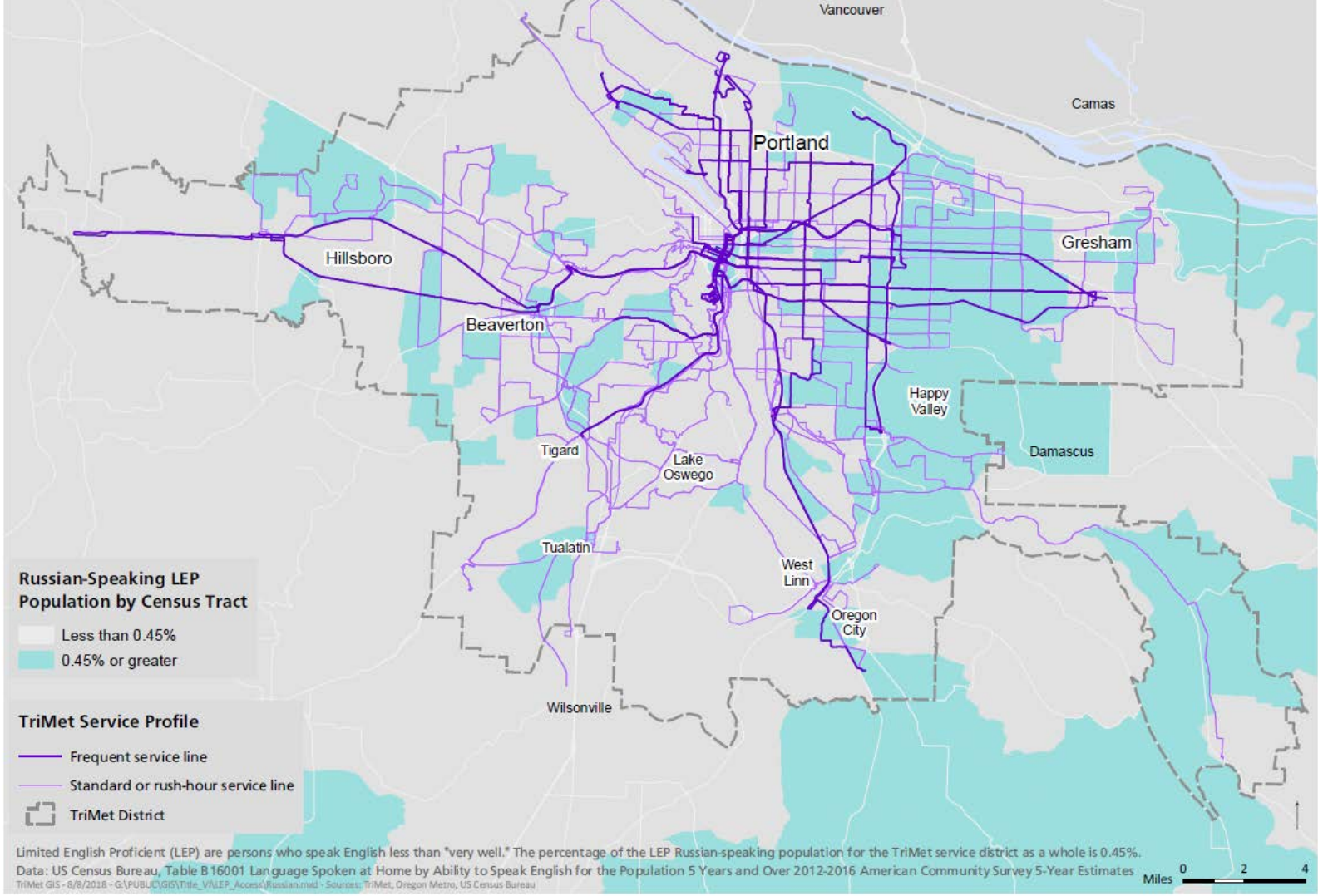


FIGURE 5: RUSSIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient

Korean-speaking population distribution

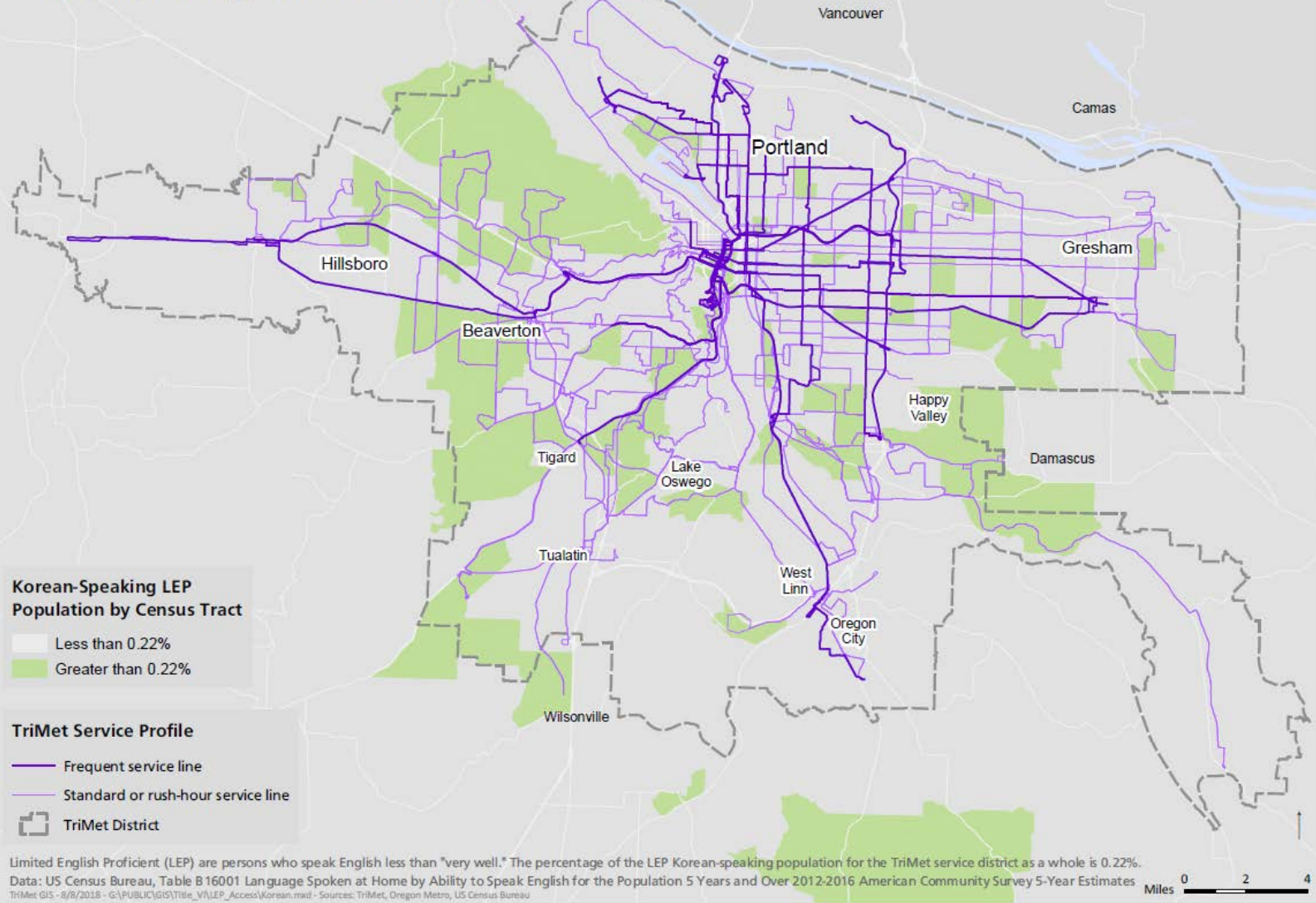


FIGURE 6: KOREAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Ukrainian-speaking population distribution

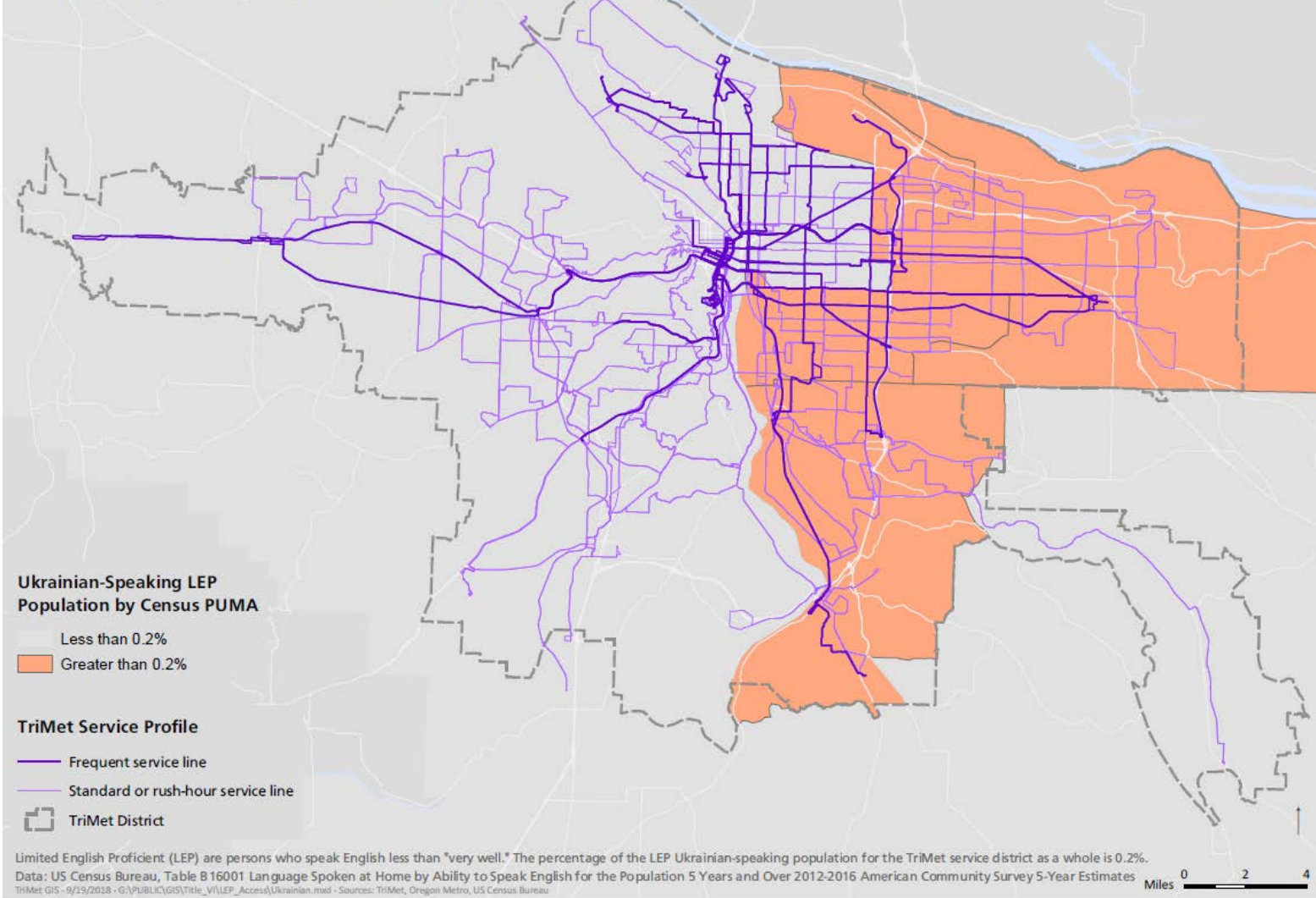


FIGURE 7: UKRAINIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient

Arabic-speaking population distribution

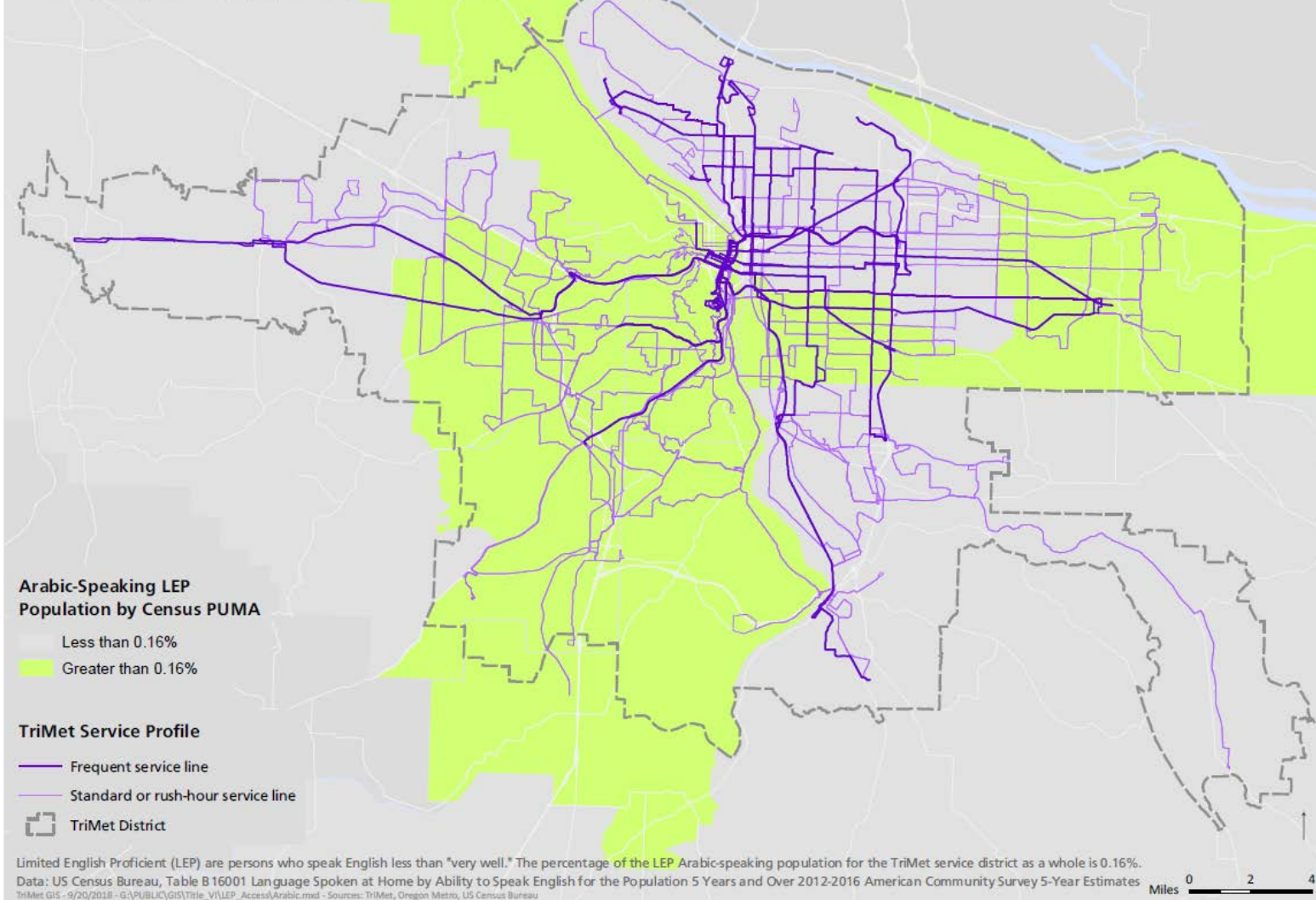


FIGURE 8: ARABIC-SPEAKING LEP POPULATION AND TRIMET DISTRICT

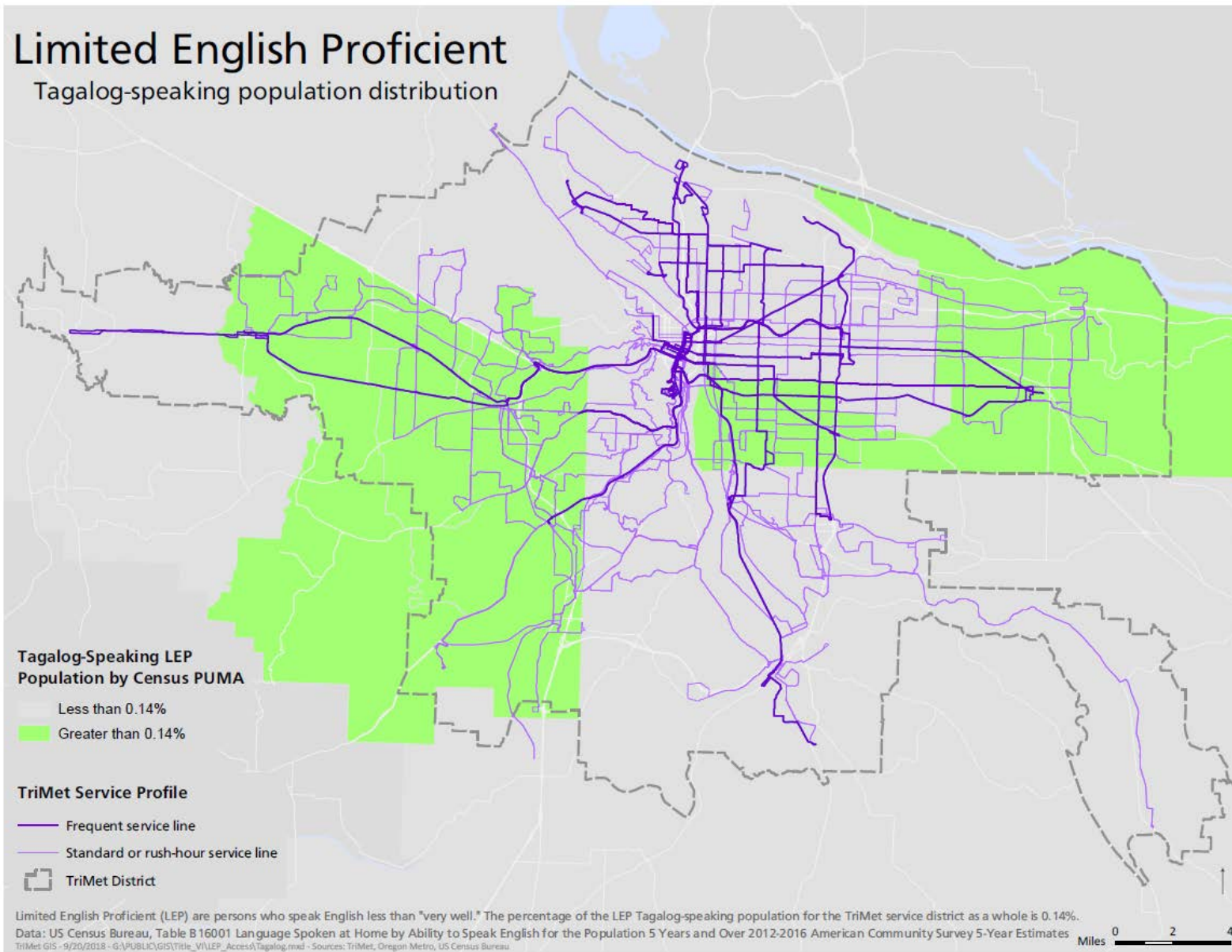


FIGURE 9: TAGALOG-SPEAKING LEP POPULATION AND TRIMET DISTRICT

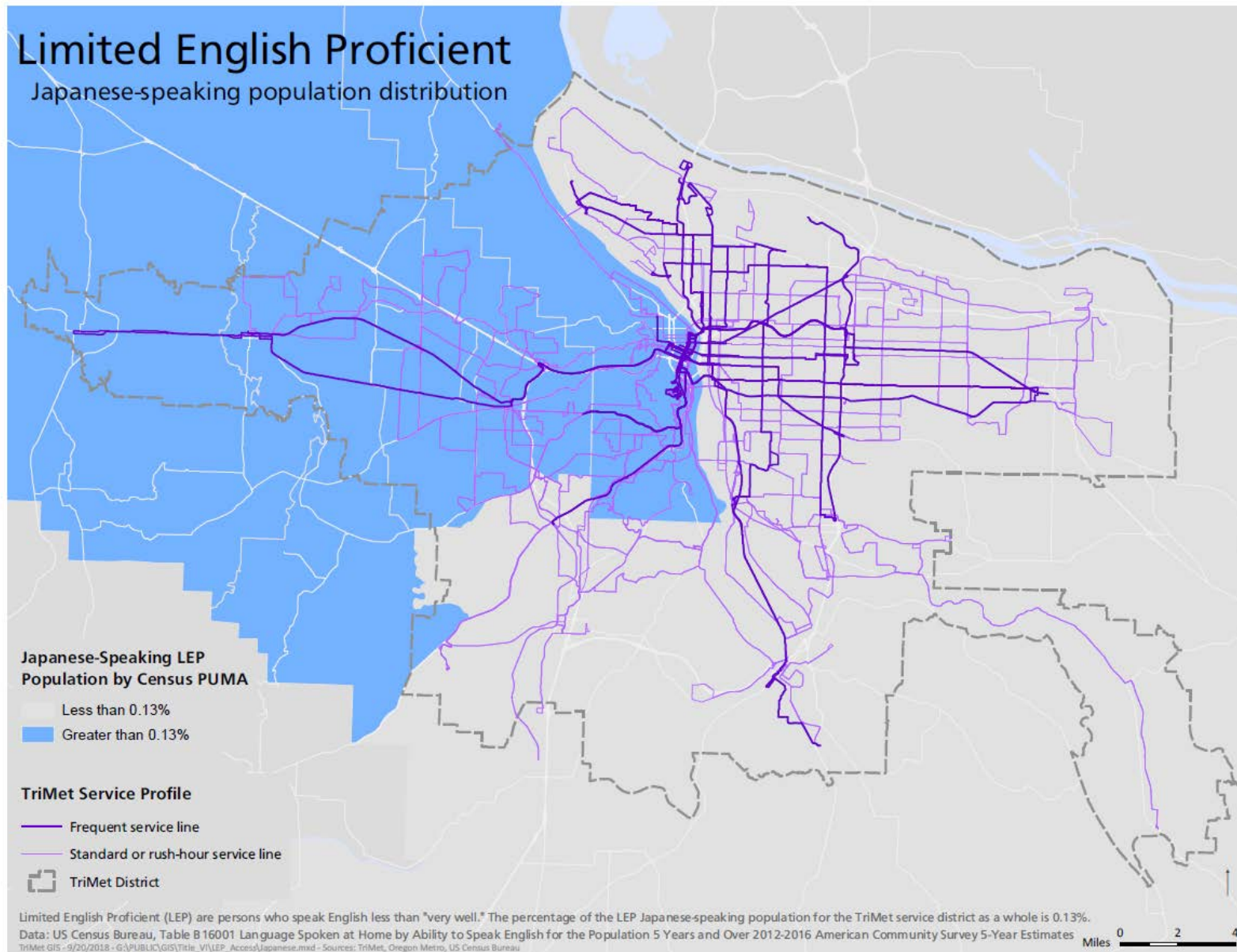


FIGURE 10: JAPANESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

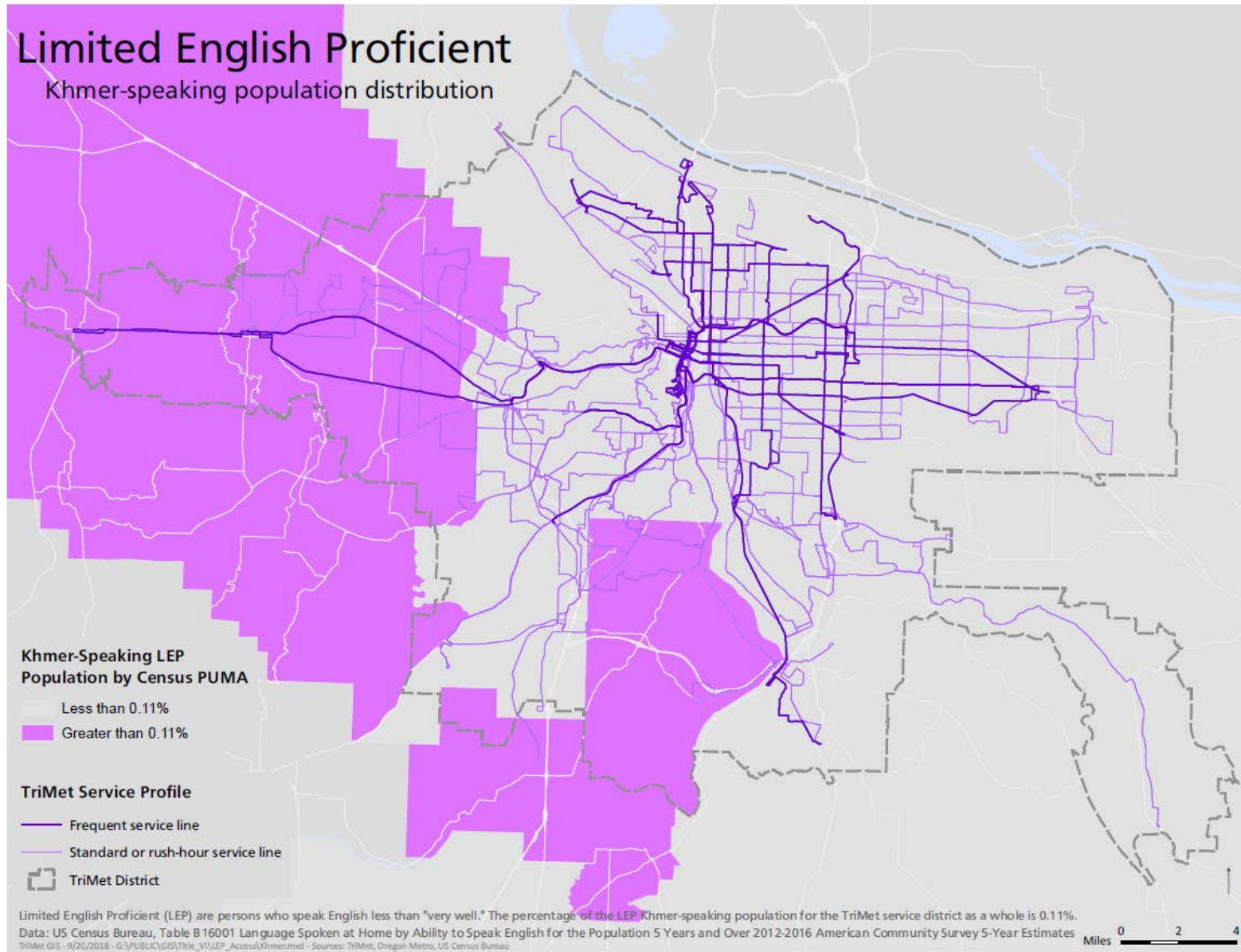


FIGURE 11: MON-KHMER-SPEAKING LEP POPULATION AND TRIMET DISTRICT

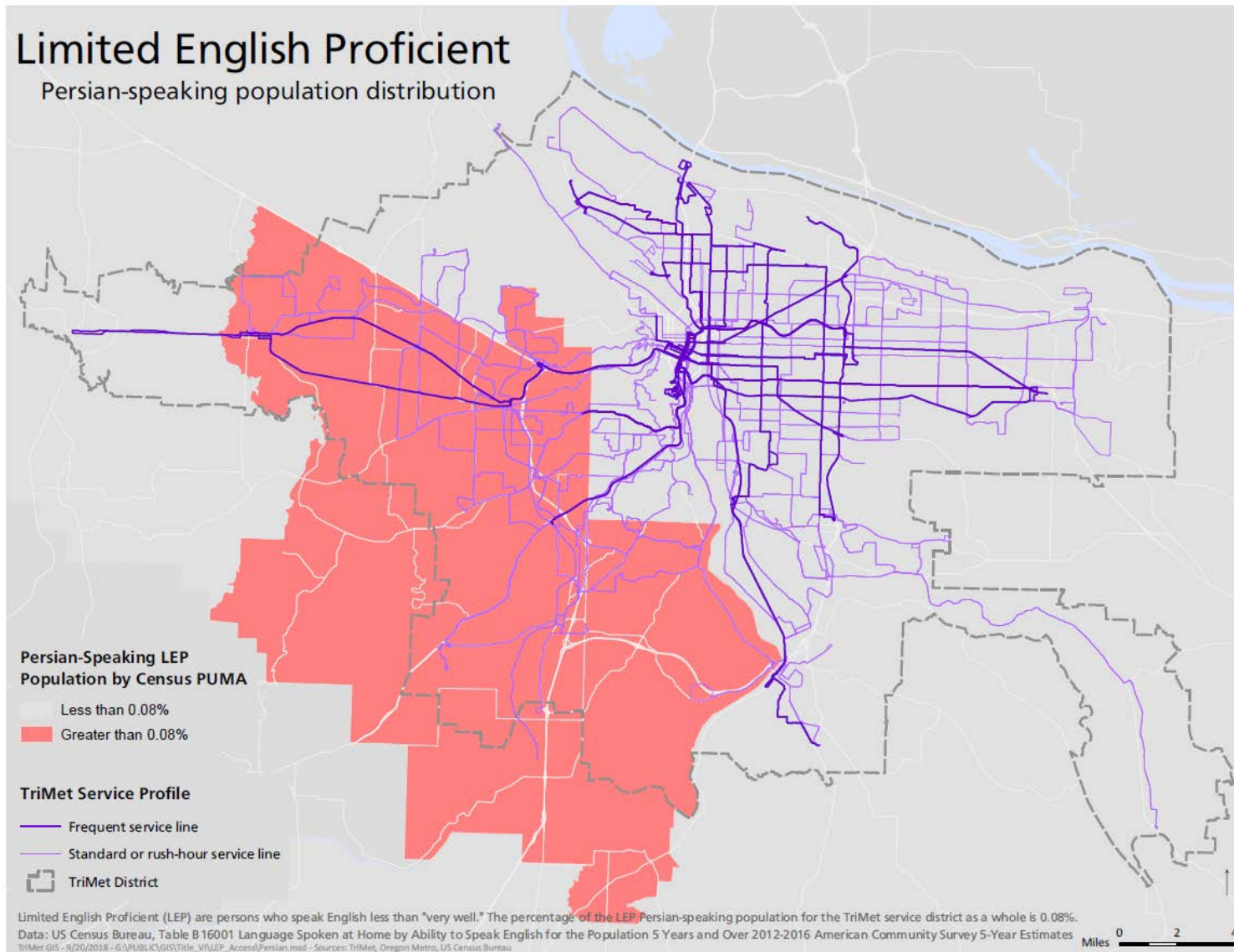


FIGURE 12: PERSIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

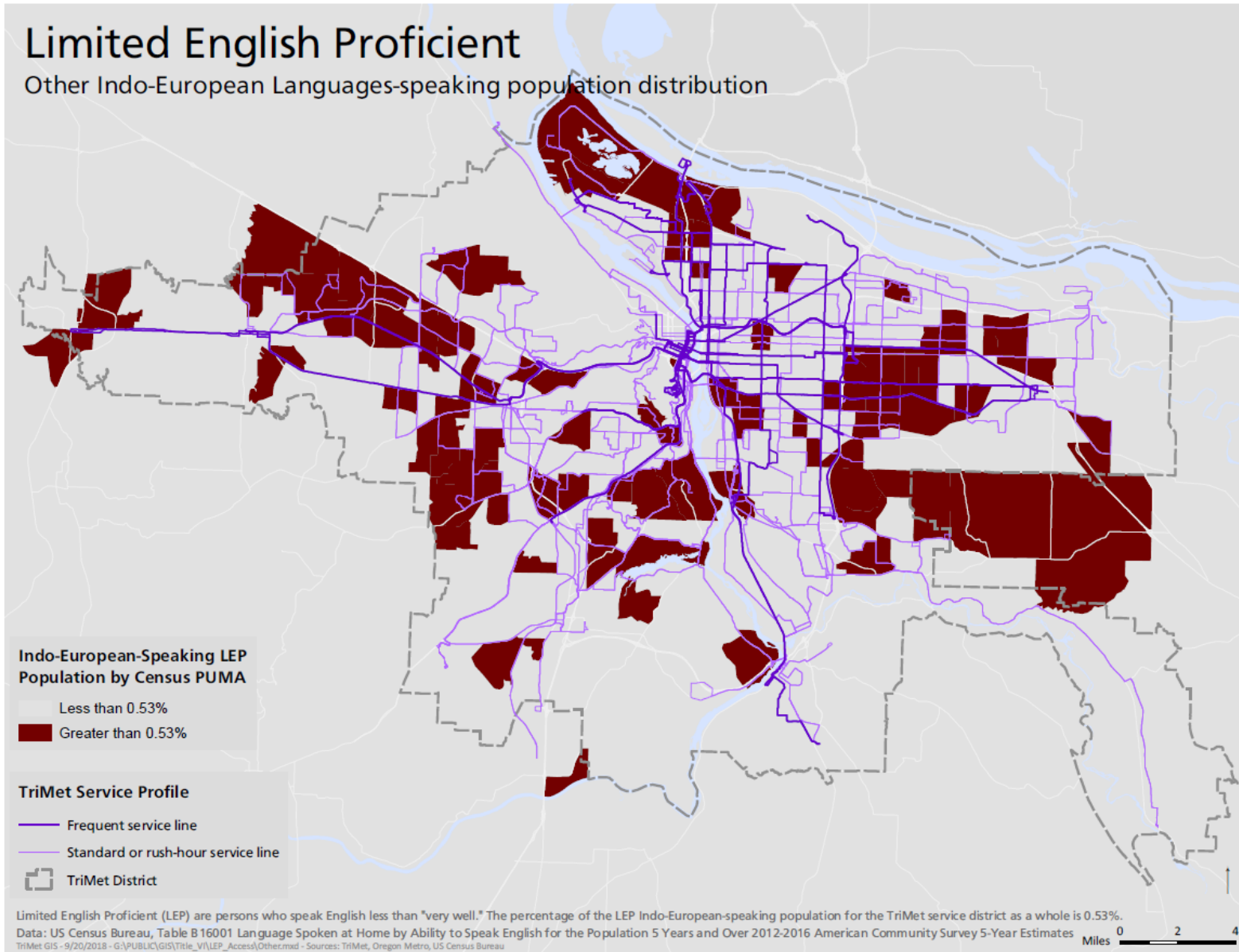


FIGURE 13: INDO-EUROPEAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Oregon Department of Education

In addition to considering the American Community Survey estimates, Factor 1 considered the most recent data on the Student Language of Origin from the Oregon Department of Education (ODE) for the 2017-2018 school years. The data includes statistics on the language spoken at home and enrollment in English as a Second Language (ESL) services by students ranging from kindergarten to high school. It is assumed that if children are identified as speaking a language other than English, then their parents or adult guardians are likely to speak the same language at home, especially for students receiving ESL services. While this data set does not identify the number of people above the school age that speak a language other than English, it can be a helpful complement to Census data.

Data was compiled from the following school districts serving students within the TriMet district boundaries: Beaverton, Centennial, David Douglas, Estacada, Forest Grove, Gladstone, Gresham-Barlow, Hillsboro, Lake Oswego, North Clackamas, Oregon City, Parkrose, Portland, Reynolds, Riverdale, Sherwood, Tigard, Tualatin, and West Linn-Wilsonville.

In total, 65,041 students have a language of origin besides English, 26,642 (41%) of whom received ESL services in 2017-2018. The top languages in terms of number of students are shown in Table 2.

**Table 2. Student Languages of Origin for School Districts within TriMet service district
2017 - 2018**

| Language | Number of Students | Pct Receiving ESL Services |
|------------|--------------------|----------------------------|
| Spanish | 37,174 | 45% |
| Vietnamese | 4,095 | 25% |
| Russian | 3,499 | 37% |
| Chinese | 2,842 | 27% |
| Arabic | 1,676 | 51% |
| Somali | 1,309 | 59% |
| Ukrainian | 952 | 36% |
| Korean | 884 | 26% |
| Romanian | 784 | 32% |
| Japanese | 794 | 37% |
| Chuukese | 646 | 61% |
| Tagalog | 491 | 33% |

The school districts with the highest concentration of ESL students were:

1. **Reynolds** (located in the northeast corner of the TriMet district): 29% of students receiving ESL services.
2. **David Douglas** (located in East Portland): 24% of students receiving ESL services.
3. **Centennial** (portions in East Portland, Gresham, Damascus, and Happy Valley): 21% of students receiving ESL services.
4. **Forest Grove** (located on western edge of TriMet district): 17% of students receiving ESL services).
5. **Hillsboro** (located in western Washington County): 17% of students receiving ESL services.

Oregon Health Authority

Data was compiled from participating Oregon Women, Infant, and Child (WIC) clinics from Washington, Clackamas and Multnomah counties. The date range was from January 1, 2016 to December 31, 2018. In total, there were 55 distinct languages spoken by clients frequenting the clinics. Utilizing the thirteen “safe harbor” languages in the TriMet service district, Table 3 shows a frequency count of unique clients by spoken language.

Table 3. Spoken Languages of WIC Clients within the Tri-County Area

| Language | 2016 | 2017 | 2018 |
|---------------------|------|------|------|
| Spanish | 8815 | 7859 | 7086 |
| Russian | 827 | 840 | 817 |
| Vietnamese | 465 | 423 | 383 |
| Chinese (Cantonese) | 363 | 353 | 332 |
| Chinese (Mandarin) | <30 | <30 | 31 |
| Arabic | 209 | 249 | 263 |
| Somali | 234 | 213 | 200 |
| Cambodian | <30 | <30 | <30 |
| Persian-Farsi | <30 | <30 | <30 |
| Japanese | <30 | <30 | <30 |
| Tagalog | <30 | <30 | <30 |
| Korean | <30 | <30 | <30 |
| Romanian | <30 | <30 | <30 |
| Ukrainian | <30 | <30 | <30 |

Oregon Judicial Department

Statewide court language service requests were also compiled from the Oregon Judicial Department. Of note, 60% of all Oregon LEP individuals reside in just five counties: Multnomah, Washington, Clackamas, Marion, and Lane (Oregon Department of Transportation 2012). The date range was from January 1, 2016 to January 1, 2019.

**Table 4. Court Languages Service Requests within the State of Oregon
2016 - 2019**

| Language | Number of Persons | Language | Number of Persons | Language | Number of Persons |
|------------|-------------------|---------------|-------------------|-----------|-------------------|
| Spanish | 27,699 | Chinese | 453 | Tagalog | 139 |
| Russian | 1,061 | Somali | 418 | Korean | 110 |
| Chuukese | 621 | Mam | 189 | Romanian | 97 |
| Vietnamese | 563 | Persian-Farsi | 151 | Laos | 84 |
| Arabic | 550 | Swahili | 143 | Ukrainian | 75 |

Synthesis

Overall, LEP populations are concentrated primarily in western and eastern suburban locations as well as north Portland.

The ODE and ACS data largely align, with a few exceptions. For one, and as was the case in the 2012 Four Factor update, Somali is identified as one of the top non-English languages spoken in the TriMet district through the ODE data. The recent ODE data indicates that 1,309 Somali-speaking students received ESL services (59% of the total). With the addition of parents or adult guardians to this figure pushes Somali over the “safe harbor” provision of 1,000 speakers who are LEP. This may be a case of population undercount by the ACS.

The Romanian language group met the “safe harbor” provision with a total of 1,862 as of the 2011-2015 ACS. Due to recent Census language category changes, Romanian was added to the Indo-European language category. Additionally, with the number of student speakers (784) and their parents or adult guardians we can consider the threshold to have been met.

Arabic also stands out as potentially having a higher LEP population according to the ODE, WIC, and court data as compared to the ACS. Finally, there may be a larger LEP population of Chuukese speakers than the ACS would indicate, given that the number of student speakers is over 600 and the number of court language service requests.

Factor 2: The frequency of contact with which LEP persons come in contact with a TriMet program, activity, or service

To conduct Factor 2, this assessment focused on information generated by agency personnel, technological systems and survey research. In the context of Factor 2, “relevant programs, activities and services provided” were defined as ridership, fares and customer information as these are the means by which people use or inquire about transit services and programs.

Call Center Data

Customers who call TriMet’s Customer Service line (503-238-RIDE) can request language interpretation for 235 different languages. For the period of January 1, 2014 to October 1, 2018, the call center received 10,382 requests for language assistance, which equates to approximately 179 requests per month, or 7-8 requests per day.

Table 5 shows the most commonly requested languages by number of requests. At 70% of requests, the majority language assistance requested is for Spanish. Although Russian-speakers comprise the fourth-highest LEP population in the TriMet service area, Russian language assistance is the second-most frequently requested at 14% of language assistance orders.

Table 5: Call Center language assistance requests
Jan 1, 2014 - Oct 1, 2018

| Language | Orders | Percent |
|---|--------|---------|
| Spanish | 7,245 | 70% |
| Russian | 1,432 | 14% |
| Arabic | 318 | 3% |
| Chinese - Cantonese | 328 | 3% |
| Vietnamese | 289 | 2% |
| Somali | 110 | 1% |
| Farsi | 74 | 1% |
| Chinese - Mandarin | 95 | 1% |
| Korean | 115 | 1% |
| Other | 376 | 4% |
| Total Language Assistance “Requests” | 10,382 | 100% |

Automated Information

Upon calling TriMet Customer Service, callers are asked if they want information in Spanish. From there, they can access Transit Tracker, fare information, or speak to a representative. The automated system logs which options were selected including how many callers requested information in Spanish.

From July 1, 2017 to June 30, 2018, there were a total of 253,103 instances logged of callers accessing Transit Tracker in Spanish, out of over 3 million total calls (or 7.2%). This represents a 73% increase in the proportion of callers selecting the Spanish language option since the last Four Factor Analysis in 2012. However, the actual volume of calls has decreased during that time for both English and Spanish speakers, likely due to more customers accessing information online, via text, and/or smart phone.

TriMet Website

TriMet's website provides basic How to Ride information in eleven languages besides English (Spanish, Vietnamese, Chinese, Russian, Korean, Japanese, Tagalog, Romanian, Somali, Arabic, Cambodian, and Persian). This includes information on fare payment, rules for riding, safety and security, accessibility, and agency contact information including interpretation services. All these pages also have TriMet's Title VI notice, complaint procedures, and complaint form in the relevant language. As TriMet has prioritized resources on serving the largest group in the LEP population, the Spanish web pages have more extensive content in addition to a Trip Planner in Spanish.

The following table shows the page views for the period June 1, 2013 to March 31, 2016. It should be noted that customers often translate other pages of the site using third party services, such as Google translate or Microsoft translator and these are not trackable. However, the translated page views give a good indication of the balance of demand for those languages provided.

Table 6. TriMet Website Translated Page View Summary
June 1, 2013 - March 31, 2016

| Language | Quantity | Percent |
|------------|----------|---------|
| Spanish | 23,651 | 53% |
| Chinese | 6,829 | 15% |
| Russian | 4,985 | 11% |
| Korean | 4,712 | 11% |
| Vietnamese | 4,597 | 10% |
| Total | 44,774 | 100% |

2008 On-board Rider Survey

TriMet conducted an on-board rider survey in spring 2018 for the purposes of collecting information about transfers, fare payment, and demographics. The full survey was available in both English and Spanish. Those who took the survey in Spanish and English were asked a question about their native language. Riders were asked to select their native language on a tablet, and then answer a question about English proficiency in their selected language. Results are shown in Table 7, generally reflecting the population distribution with the exception of the Arabic-speaking LEP persons comprising a greater percentage than expected. Survey results also indicate that 38% of riders speak English less than very well.

Table 7. LEP respondents to on-board survey, by native language
Spring 2018

| Language | Count | Percent |
|------------------|-------|---------|
| Spanish | 633 | 39% |
| Vietnamese | 127 | 8% |
| Chinese | 103 | 6% |
| Arabic | 67 | 4% |
| Russian | 65 | 4% |
| Japanese | 62 | 4% |
| Tagalog | 53 | 3% |
| Korean | 25 | 2% |
| Somali | 23 | 1% |
| Romanian | 19 | 1% |
| Persian-Farsi | 16 | <1% |
| Ukrainian | 16 | <1% |
| Cambodian, Khmer | 4 | <1% |
| Other | 430 | 26% |
| Total | 1643 | 100% |

2008 Bus Operator Survey

TriMet conducted a survey of bus operators¹ to further explore the frequency of contact with LEP persons. Since bus operators are often the first contact LEP passengers have with TriMet, this research was designed to find:

- How often and on which routes operators encounter LEP passengers
- How operators communicate with LEP passengers
- What ideas operators have to improve communication with LEP passengers

¹ MAX operators were not surveyed because they have less direct interaction with riders, as they operate the train in a closed compartment.

A total of 225 bus operators were surveyed at Center Street Garage during the summer 2018 schedule sign-up. Interviewing times were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented. As a group, these operators had driven 65 of the 80 bus routes in the TriMet system in the past year.

Overall, 80% of operators surveyed indicated that they had encountered LEP riders at least a couple of times a month over the past year. Approximately 60% said they had encountered LEP riders several times a week or more. In fact, only eight out of the sixty-five routes did operators say they had never encountered LEP riders over the past year.

The bus lines where operators reported the most frequent contact with LEP riders were:

- **Line 57-TV Hwy/Forest Grove** - Connects the Washington County cities of Forest Grove, Cornelius, Hillsboro, Aloha, and Beaverton, which is the area with the region's highest concentration of Spanish speakers. Additionally, there high concentrations of LEP persons speaking Persian, Khmer, Japanese and Tagalog.
- **Line 72-Killingsworth/82nd** - Travels between Clackamas Town Center and Swan Island, traveling north and south along 82nd Ave, which has a particularly high concentration of LEP persons speaking Vietnamese, Chinese, Ukrainian, and Russian.
- **Line 6-Martin Luther King Jr Blvd** - Connects Goose Hollow, Portland City Center, N/NE Portland, Jantzen Beach and Hayden Island, via Jefferson/Columbia, Grand/MLK, and Vancouver Way, the Line 6 serves areas with high concentrations of Vietnamese, Chinese, and Romanian speaking LEP populations.
- **Line 77-Broadway/Halsey** - Travels between Troutdale and downtown Portland, serving areas with high concentrations of Spanish, Vietnamese, Russian, Ukrainian, Arabic, and Tagalog speaking LEP populations.
- **Line 73-122nd Ave** - Travels between Parkrose/Sumner Transit Center and SE 94th & Foster, the Line 73 serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, Russian, Ukrainian, Chinese, and Romanian.

The Lines 57, 72, and 77 were all frequent mentions in the 2016, 2011, and 2005 iterations of the operator survey. The 2016 survey revealed Lines 20 and 4 as two additional bus lines where operators reported frequent contact with LEP riders.

- **Line 4-Division/Fessenden** - Once one of the longest routes in the TriMet system, the Line 4 traveled between St. Johns and Gresham via downtown Portland. The Line 4 was split fall of 2018. The Line 4-Fessenden serves areas with high concentrations of Spanish, Russian, and Korean. Whereas, the Line 2-Division serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, Russian, Ukrainian, Chinese, Arabic, Tagalog, Japanese, and Romanian.

- **Line 20-Burnside/Stark** - As the longest route in the TriMet system, the Line 20 serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, and Russian.

2018 Road and Rail Supervisors Survey

TriMet conducted a survey of road and rail supervisors. Similar to operators, road and rail supervisors can be one of the first contacts LEP passengers have with TriMet. This research was designed to find:

- How Road and Rail supervisors communicate with LEP passengers
- How often and where Road and Rail supervisors encounter LEP passengers
- What ideas Road and Rail supervisors have to improve communication with LEP passengers

Forty-two road and rail supervisors were surveyed at the Center Street Administration location in the fall of 2018. This represents more than half of the staff dedicated for these positions (63 total). As a group, these road and rail supervisors worked all 13 districts in the TriMet system in the past year. Road supervisors work the eight districts illustrated in Figure 14 as well as district 19 and 20 which are mobile units.

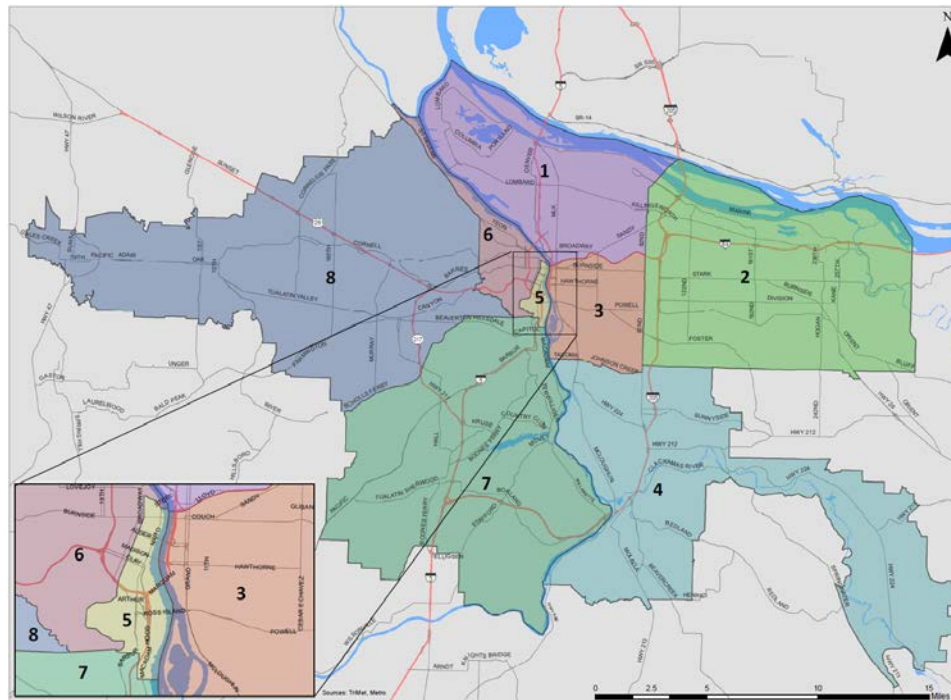


FIGURE 14: ROAD SUPERVISOR BOUNDARY AND TRIMET DISTRICT

The coverage area for rail supervisors are divided into three districts:

- Central coverage is bounded by Expo Center to the north (including the entire Yellow Line), PSU to the south (including the entire Transit Mall), Goose Hollow to the west and NE 82nd to the east (encompassing portions of the Blue Line, Green Line, and Red Line).
- Eastside coverage is bounded by Cleveland Ave. to the east, NE 82nd to the west, Portland Airport to the north and Clackamas Town Center to the south. Includes portions of the Blue, Green and Red Line.
- Westside coverage is bounded by Hatfield Government Center to the west and Washington Park to the east, encompassing portions of the Blue Line and Red Line.

Overall, 70% of road and rail supervisors surveyed indicated that they had encountered LEP riders at least a couple of times a month over the past year. Approximately 40% said they had encountered LEP riders several times a week or more. In fact, all road and rail supervisors said they encountered LEP riders in all districts over the past year.

Districts 5, 8, 6, and 9 were reported to be where road supervisors had the most frequent contact (i.e., asked for information several times a week or more) with LEP riders. Whereas, all 3 districts were comparable for rail supervisors at 43% for Central, 36% for Eastside, and 25% for Westside.

2018 Fare Survey

Finally, TriMet conducted a system-wide fare survey. A total of 267 out of 23,420 respondents were LEP. The heat map in Figure 15 illustrates the concentration of trips made by LEP riders.

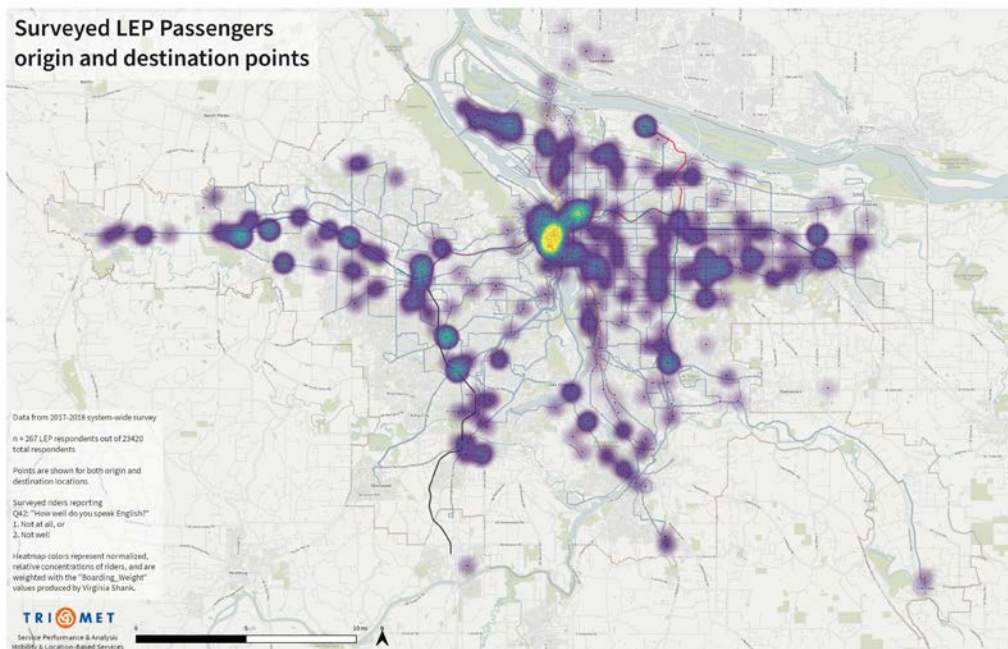


FIGURE 15: LEP CONCENTRATION OF RIDERS AND TRIMET DISTRICT

2019 Language Services Survey

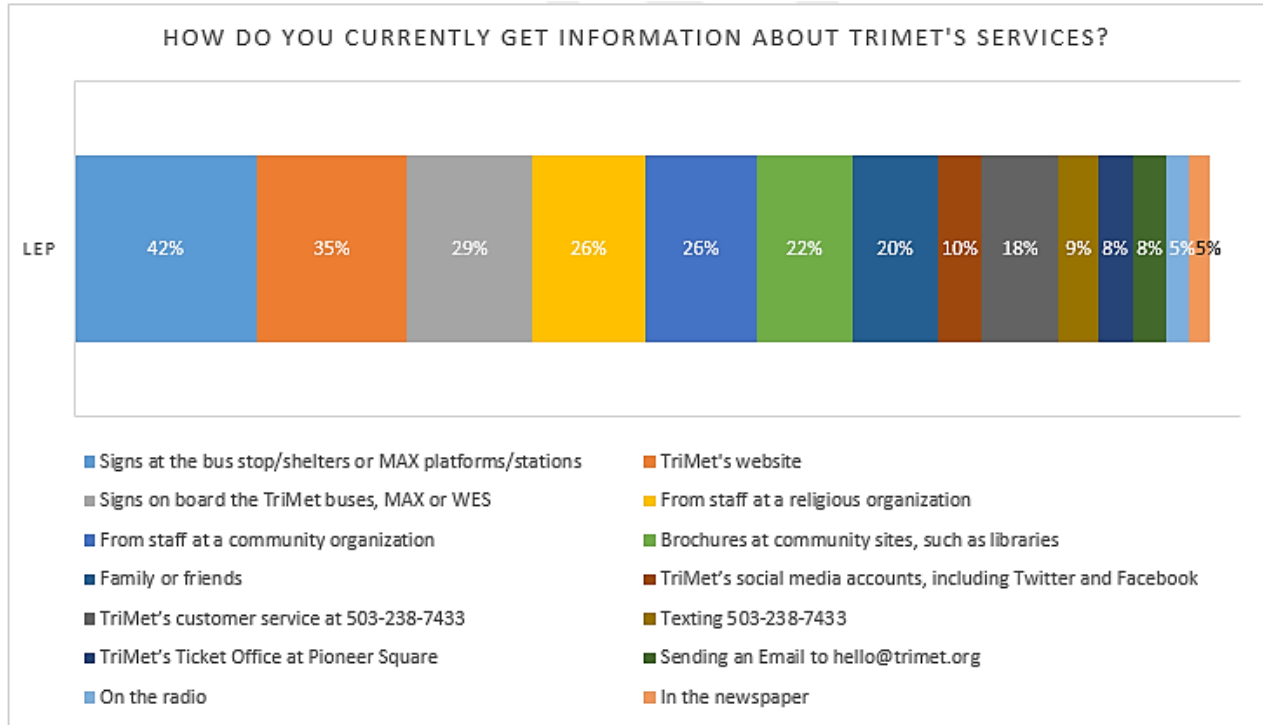


FIGURE 16: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES

Synthesis

The Factor 2 analysis confirmed much of what has been found previously: LEP persons have frequent contact with TriMet services and programs. One exception to this, however, is the TriMet website. But customer service language assistance data, automated calls (Transit Tracker), an on-board survey, as well as a survey of operators and road and rail supervisors indicate that LEP populations are commonly requesting information and riding TriMet vehicles.

The data shows that Spanish speaking LEP persons continue to have the most frequent contact with TriMet services. This is not surprising given that this population represents the largest portion of the LEP population, and that TriMet places a particular emphasis on providing access for Spanish speakers.

Another important finding to note is the different ways that different language speakers choose to access TriMet information, according to the data. Russian speakers more commonly call TriMet customer service than any other group besides Spanish speakers (by a significant margin), yet they comprise just the fourth-highest LEP population. On the other hand, TriMet receives relatively few requests for language assistance via phone by Vietnamese and Chinese speakers even though they comprise the second and third highest LEP populations, respectively. The implication is that there is no “one size fits all” approach to providing meaningful language assistance. Moreover, there is great importance to understand how LEP populations currently get information about TriMet’s services to help determine the allocation of agency resources. As noted in Figure 16, the top two categories where non-English speakers currently receive information is “Signs at bus stop/shelters or MAX platforms/stations” as well as “TriMet’s website”.

Factor 3: The importance to LEP persons of your program, activities, and services

TriMet has held roundtable discussions, focus groups, and other outreach events over the past several years with the goal of engaging LEP populations as to how they use TriMet and what suggestions they have for improvement. Most recently, the Transit Equity, Inclusion, and Community Affairs department administered a Language Services Survey to all 13 language groups within the TriMet service district. Additionally, bus operator as well as road and rail supervisor were surveyed to solicit information from more informal engagement with LEP riders, i.e. day-to-day interactions on-board. A summary of these various efforts is provided below, going back to 2005.

2019 Language Services Survey

The Language Services Survey full report can be accessed in the 2019 Language Access Plan. A total of 962 responses, representing 9 out of the 13 safe harbor languages, were received through various engagement efforts. One question asked in the survey that is relevant to Factor 3 is shown in Figure 16. Survey respondents indicated a high importance ranking across all question-type categories. Alternatively stated, LEP populations find it very important to important on being able to get their questions answered in their language.

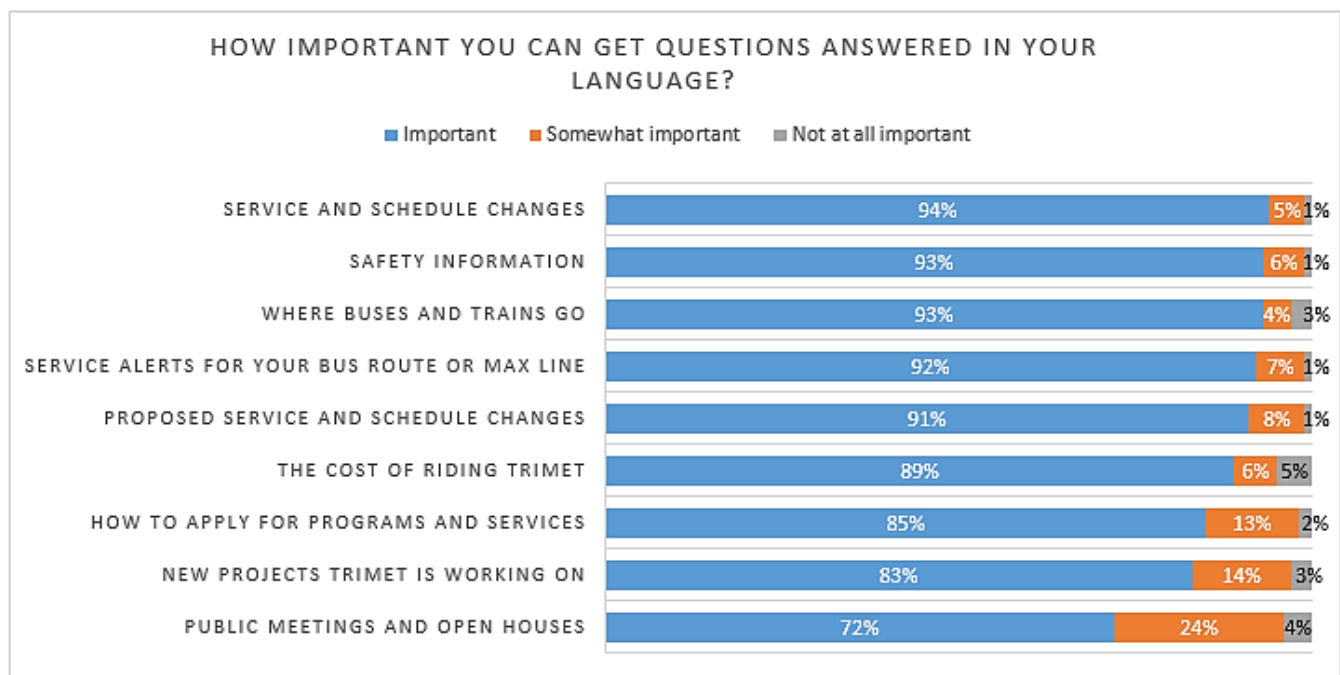


FIGURE 17: HOW IMPORTANT YOU CAN GET QUESTIONS ANSWERED IN YOUR LANGUAGE

2018 Bus Operator Survey

The results of the bus operator survey described under Factor 2 are also useful to inform Factor 3. Operators were asked about the types of questions they are commonly asked by LEP riders. Their top responses to this open-ended question were:

- How to get to their destination or building (86% of operators mentioned this).
- Which bus to take or which bus stop to use (57% of operators mentioned this).
- Questions about fares (22% of operators mentioned this).

This is consistent with findings from operator surveys conducted in 2005, 2011, and 2016.

2018 Road and Rail Supervisors Survey

The results of the road and rail supervisors survey described under Factor 2 are also useful to inform Factor 3. Road and rail supervisors were asked about the types of questions they are commonly asked by LEP riders. Their top responses to this open-ended question were:

- How to get to their destination or building (85% of operators mentioned this).
- Which bus to take or which bus stop to use (68% of operators mentioned this).
- Questions about fares (45% of operators mentioned this).

2017 Service Enhancement Plans – Washington County

TriMet contracted with JLA Public Involvement to work in partnership with community based organizations serving minority, low-income earning, and/or limited English proficiency communities to hold community meetings to discuss transit service priorities in each of the following areas of Washington County:

- Cornelius/Forest Grove
- Aloha/Beaverton
- Tigard/Tualatin/SW Portland

The meetings included five bilingual discussion groups in the following languages: Spanish, Korean, Cantonese, Somali, and Swahili. A total of 123 community members participated in the meetings. Of the participants, 102 community members submitted surveys that provided additional comments on transit improvements and demographic data.

Of relevance to Factor 3, we learned the following:

- 45% of participants were regular or frequent TriMet riders, and 8% were non-riders.
- The most common reasons given for taking TriMet were for shopping, visiting family/friends, school, and medical appointments/hospital visits.
- One-quarter of participants did not have a vehicle in the household and 44% said they usually don't have a car available.
- 59% of participants said they earned an income of \$29,999 or less in 2016.

- Riders with language barriers may have difficulty communicating with bus operators or may not be able to understand on-board announcements, which can have impacts on their travel.

2016 Service Enhancement Plans

In early 2016, TriMet partnered with community-based organizations to conduct focus group meetings with Spanish, Vietnamese, Russian, and Nepalese speakers. Staff also hosted a booth at a community “Noche Latina” event. The purpose of this outreach was to help inform a vision for future bus service in the TriMet district. It included a questionnaire to get a better understanding of how participants use TriMet as well as their needs and priorities. A total of 156 individuals participated.

Of relevance to Factor 3, we learned the following:

- 64% of participants were regular or frequent TriMet riders, and only 3% were non-riders.
- The most common reasons given for taking TriMet were for work, shopping, school, and medical appointments/hospital visits.
- One-fifth of participants did not have a vehicle in the household.
- Participants sought better access to industrial employment areas as well as extended and weekend hours to support early/late/weekend shifts.
- Riders with language barriers may have difficulty asking others to move out of priority seating, or may not be able to understand on-board announcements, which can have impacts on their travel.

2016 Fare Enforcement

As part of an effort to review practices surrounding enforcement of fare payment, TriMet partnered with several CBOs to host listening sessions on the topic in summer 2016. Two of these listening sessions were held in Spanish, and another was in English with Vietnamese interpretation as most participants spoke Vietnamese. A total of 58 persons participated between these three events, most of whom spoke limited English.

Of relevance to Factor 3, we learned the following:

- Upon first arrival in the U.S./Portland for immigrant and refugee populations, TriMet is relied upon heavily to meet transportation needs. However, navigating the TriMet system and understanding the rules for riding (including fare payment) are made difficult by language barriers.
- Some voiced concerns about discrimination against Hispanic/Latino riders, with participants suggesting more training and more information for the community in Spanish.

2015 Electronic Fare

In advance of migrating to an electronic fare (eFare) system, TriMet held discussion groups to assess potential impacts of such a change. One of these groups was held in Spanish, while two others were held in English with Spanish, Arabic, Somali, and Nepali interpretation. A total of 41 LEP persons participated in these discussions.

Of relevance to Factor 3, we learned the following:

- LEP participants voiced some concerns about language barriers to registration of smart cards under the new system.
- Some were concerned about law enforcement/immigration implications of the associated database holding customer information.
- As with non-LEP community members, many LEP participants were looking forward to using the new eFare system, with some concerns about logistics.

2011 Spanish Focus Groups

Four focus groups were conducted in Spanish and held at locations in Clackamas, Washington, and Multnomah counties. The sessions were hosted by community organization and organized by an independent contractor. A moderator facilitated the groups and participants spoke in Spanish while staff from TriMet observed and listened to the interactions through the use of a simultaneous interpreter. Most participants (as was the case in 2005) said they were dependent and relied on transit for almost all their travel in the region. In addition, there was limited knowledge of language assistance that could be accessed by calling 503-238-7433 (RIDE). Most participants showed a high level of awareness of the informational channel cards in Spanish found in TriMet’s bus and rail vehicles. Other findings were similar to those identified in 2005. LEP customers who are new to the area and/or don’t understand English well, or have limited literacy in their own language rely heavily on family, friends and trusted community organizations to help them find their way.

2008 Spanish-speaking Community Leaders Gathering

In 2008, the LEP program convened key community leaders working with Spanish speaking LEP constituents to review TriMet information pieces, icons and technology offerings to determine usefulness to LEP populations. This group was facilitated by TriMet’s LEP outreach coordinator. The group consisted of 21 participants representing the following organizations: Latino Network, Victory Outreach Community Services, Centro Cultural of Washington County, Ministerio Hispano St. Anthony Church, Santos Futbol Club, El Programa Hispano, Proyecto Unica, Multnomah County Library-Latino Outreach, MEChA, Padres Hispanos Escuelas Públicas de Portland, Instituto de los Mexicanos en el Exterior (IME), Centro Baltazar Ortiz, Hacienda CDC, and Multnomah County Sun Schools. As a result of the input and continued involvement of the group as “community advisors”, major improvements were made to printed materials, web content, and customer service telephone assistance.

2005 Community Roundtables

Four roundtables were initially conducted in 2005– two in Spanish, one in Russian, and one in Vietnamese. Discussions were led by a member of each community and interpreters were available for TriMet staff. Results from these LEP community roundtables indicated that:

- TriMet programs and services were very important to LEP community members as most said they were transit dependent² and relied on transit for almost all of their travel in the region (work, school, visiting, shopping, etc.)

² Transit Dependent: I don’t have a car available to use, or I can’t drive / don’t know how to drive

- The primary frustrations LEP customers experienced using TriMet were consistent with those experienced by other TriMet riders such as: late buses, pass-ups, concerns for personal safety, rude employees, fares, confusion over zones boundaries, and transfers. However, language barriers inhibited satisfactory resolution of LEP customer issues.
- Most participants were unaware of the language services TriMet has to offer. Thus, few had ever made use of those services.
- Many LEP customers were new to the country and/or don't understand English well, they relied heavily on family, friends and trusted community organizations to help them adapt and find their way.

Synthesis

A consistent finding from these efforts has been that there are many LEP persons who rely on TriMet to meet their transportation needs, especially those who do not have other means of transportation. This includes a significant number of LEP customers who rely on TriMet's LIFT Paratransit service, which serves those who are unable to fully utilize fixed route transit.

Concerns and feedback from LEP riders largely mirrors that of non-LEP populations, with the exception of language barrier issues. Such barriers can effectively compound frustrations with the TriMet system as LEP riders may not always receive explanations for operational problems in their language of origin, and may feel limited in terms of providing feedback to TriMet. This highlights the importance of continually striving to make LEP riders aware of available language assistance services and to translate important communications.

Factor 4: The resources available to TriMet and costs to provide LEP assistance

To conduct Factor 4, TriMet assessed the resources available for LEP assistance, the cost of providing those resources, and awareness of our bus operators of these resources.

Resources and Costs

TriMet reviewed the language assistance services it has provided since the last Four Factor update in 2012 and the associated costs for each. Figures are shown in Table 8.

Table 8. LEP Spending FY 13-19*

| Item | Total |
|--------------------------|------------------|
| Telephone Interpretation | \$268,613 |
| In-person Interpretation | \$88,210 |
| Brochures/literature | \$48,633 |
| Customer surveys | \$30,523 |
| Document Translation | \$12,989 |
| Channel Cards | \$7,656 |
| Newspaper Ads | \$6,925 |
| Civil Rights Signage | \$745 |
| Total | \$464,294 |

** Not including staff labor*

TriMet provides a variety of resources to support the needs of LEP customers. Telephone interpretation in 235 languages is available upon request when customers call TriMet customer service. In-person interpretation is provided upon request for community engagement, and TriMet also holds special focus group or other outreach events with the intent of engaging LEP individuals, as discussed under Factor 3. Beyond translation of vital documents, TriMet works to provide materials in multiple languages for programs or projects when significant LEP populations are potentially impacted. One example of this is the development of Service Enhancement Plans by subarea of the TriMet district, for which fact sheets were translated into languages that had high LEP populations in each subarea.

In all, the cost of providing these resources is approximately \$464,294 since July 2012, with the largest portion coming from telephone interpretation services (about 58% of the total). With document translation, costs incurred include both the translation and additional production of printed materials. TriMet also commonly advertises in non-English newspapers in an effort to reach LEP persons.

What is not accounted for in Table 6 is the staff costs incurred in working to provide access to LEP individuals. Various staff from Operations, Policy & Planning, Transit Equity, Inclusion, & Community Affairs, Customer Information Services, Creative Services, Communications, and Engineering & Construction are often involved in these efforts, as TriMet strives to find creative ways to address the diverse customer base it serves, in particular LEP riders.

Additionally, many staff have skills that serve as a non-quantifiable resource for LEP riders. Of the 225 bus operators surveyed, 36% indicated that they spoke a language besides English. The majority of this group speaks Spanish, with Chinese and Japanese as the next two most common languages spoken. About 32% of multilingual operators say they use the non-English language they speak at least several times a week. Of the 42 road and rail supervisors surveyed, 50% indicated that they spoke a language besides English. The majority of this group speaks Spanish, with Arabic as the next most common language spoken. About 33% of multilingual operators say they use the non-English language they speak at least once per day or more.

Awareness of Resources

When operators were asked if they were aware of any materials, services, or tools that TriMet uses to communicate with LEP riders, only 38% said they were. The most common service mentioned was telephone language interpretation, followed by the TriMet website and channel cards in Spanish. Thirty-seven percent of operators said they felt equipped to communicate with LEP riders and 26% noted that it depends on the language spoken by the passenger (89% indicated they were equipped to communicate with passengers that spoke Spanish). The remaining 36% noted they did not feel equipped to communicate with LEP passengers.

When road and rail supervisors were asked if they were aware of any materials, services, or tools that TriMet uses to communicate with LEP riders, more than three-quarters (76%) said they were. The most common service mentioned was telephone language interpretation, followed by the TriMet brochures (non-specific) and employees/passengers who speak another language. Most road and rail supervisors (77%) said they felt equipped to communicate with LEP riders and less than one-third said they did not.

Equally as important in understanding staff awareness of resources are LEP population’s awareness of TriMet’s services for non-English language services. Figure 17 illustrates the level of awareness for LEP populations. The highest percentage of awareness is “Signs in Spanish on TriMet vehicles and at TriMet stations” at 45% followed by “Materials/brochures in your language” at 31 percent.

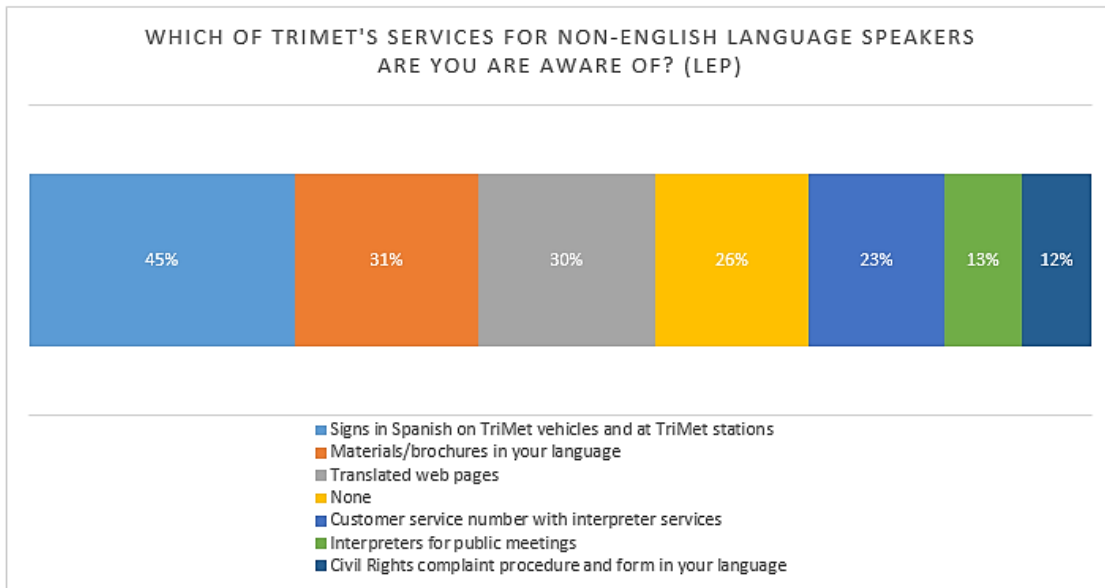


FIGURE 17: HOW IMPORTANT YOU CAN GET QUESTIONS ANSWERED IN YOUR LANGUAGE

Conclusions

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with Limited English Proficiency. This updated Four Factor Analysis will guide TriMet efforts to retain successful program and activities designed to meet the language needs of LEP populations, and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services.

The following conclusions are drawn from this Four Factor Analysis:

1. A significant number of LEP individuals live in the TriMet service district, and at least 13 languages meet the "safe harbor" threshold of at least 1,000 LEP persons (Spanish, Vietnamese, Chinese, Russian, Korean, Ukrainian, Japanese, Tagalog, Romanian, Arabic, Mon-Khmer Cambodian, Persian/Farsi, and Somali).
2. TriMet is an important service for many LEP persons, as evidenced by relatively high rates of transit dependence, high ridership frequency, and the variety of transit trips taken.
3. Various LEP populations access information in different ways, so engagement and communications should be adapted based on what is most effective for each language or culture.
4. For LEP customers, resolving customer concerns can be hindered by the language barriers between them and agency personnel.
5. TriMet uses considerable resources to provide language assistance, but should work to increase awareness of available resources among riders and front-line staff.
6. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.
7. Initiating, maintaining, and strengthening relationships with community organizations that serve LEP populations is important because they provide help to new arrivals as they adapt and find their way in the region.

Appendix A: Language Access Survey Report

Language Access Plan

2019 LANGUAGE ACCESS SURVEY REPORT

Transit Equity, Inclusion, and Community Affairs Department
TRIMET | 1800 SW 1ST AVENUE | PORTLAND, OR 97201

Executive Summary

Limited English Proficiency is a diverse category that spans across different linguistic and cultural groups. Although there are common barriers in terms of accessing information about the system, there are also specific concerns that are unique to each of the language groups surveyed. Based on what was learned through this process, staff would like to emphasize there is not a one size fits all approach when it comes to engaging communities of various LEP backgrounds. In order to have effective and clear communication and access, it is important to take these issues into account when choosing and designing outreach methods.

Key Findings

1. TriMet is an important service for many LEP persons.
2. Various LEP populations access information in different ways, so engagement and communications should be adapted based on what is most effective for each language or culture.
3. Almost all LEP respondents indicated they speak, read, and understand English less than very well. This leads to potential barriers for language groups to access service and program related materials.
4. For LEP customers, resolving customer concerns can be hindered by the language barriers between them and agency personnel.
5. TriMet should work to increase awareness of available language access resources among LEP riders. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.
6. Initiating, maintaining, and strengthening relationships with community organizations that serve LEP populations is important to expand upon efforts to ensure TriMet is providing meaningful access to its' programs and services.
7. Most LEP communities find information about the system on the system. Further engagement opportunities should explore what information they gather and how they interpret it.
8. Digital respondents wanted more info in digital format, in person respondents wanted more information on the system and at CBOs.
9. Safety and security – a call for more security. Low knowledge of what to do in case of an emergency.
10. Driver interaction was highly important to customer satisfaction. Many request were made for more courteous and/or bilingual drivers.

Acknowledgements

TriMet staff would like to thank the various community organizations that serve LEP populations throughout the Tri-County area. Without their support, the vast number of survey responses would not have been achieved. The information collected and insight gained will undoubtedly improve TriMet's ability to serve LEP populations as well as increase their access to TriMet's services and programs. Key organizations include the following:

| | |
|--|---|
| Asian Pacific American Network of Oregon | African Family Holistic Health Organization |
| Asian Health and Services Center | Bienestar |
| Catholic Charities | Centro Cultural |
| Consulado Mexicano | El Programa Hispano Catolico |
| Hacienda CDC/Baltazar Community Center | Immigrant & Refugee Community Organization |
| Latino Network | Portland ESL Network |
| Verde | |

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Attachment 1: Language Services Survey Instrument

I. Background

Dating back to 2005, TriMet has held roundtable discussions, focus groups, and other outreach events with the goal of engaging Limited English Proficiency (LEP) populations as to how they use TriMet and what suggestions they have for improvement. Most recently, the Transit Equity, Inclusion, and Community Affairs department administered a Language Services Survey to “safe harbor¹” language groups within the TriMet service district. The main goal of this survey was to support the update of TriMet’s Language Access Plan. This plan demonstrates TriMet’s commitment to make our transit system accessible and welcoming to all.

This report documents the survey results, key findings, staff recommendations for the agency at large as well as the lessons learned throughout the survey administration process.

II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). TriMet is committed to full compliance with the Circular, Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with limited English proficiency, or LEP.

III. Survey Instrument Design

Martin González led the development of the survey instrument and survey methodology with assistance from Nathan Jones, Mariya Klimenko, John Gardner, Wendy Serrano, and Carl Green Jr. This core workgroup contributed to reviewing and editing drafts of the survey instrument, survey approach, survey administration, and survey collection.

IV. Methodology

A 24-item survey instrument was translated into all 13 “safe harbor” languages. Surveys were distributed in-person, direct email, and through targeted Facebook ads. The LEP engagement period started February 21, 2019 and ended May 17, 2019. A total of 962 surveys were collected. Staff from the Transit Equity, Inclusion, and Community Affairs (TEICA) department distributed the surveys in-

¹ Language groups that meet the Department of Transportation definition of LEP “Safe Harbor” thresholds. The thresholds are 5 percent of total population or 1,000 individuals, whichever is less.

person by attending an immense number of community events and meetings. Through built partnerships with key organizations and established relationships with community leaders, TEICA staff received support from the following key organizations: Latino Network, Verde, El Programa Hispano, Centro Cultural, Consulado Mexicano, Immigrant & Refugee Community Organization (Slavic Advisory Board), and Asian Health and Services Center. Staff contacted other community organizations and public entities working with Spanish speaking folks via telephone and via e-mail. TEICA staff shared the survey with key individual from the following organizations: Voz Worker Education Project, Consulado Mexicano, Mandos Mundo, Oregon Latino Action Agenda, Oregon Latino Health Coalition, OPAL, Educate Ya, American Friends Service Committee, Multnomah County Library, Multnomah County Health Department, Los Niños Cuentan, Gresham School District, Portland Public Schools ESL and Dual Language Immersion Programs, Hispanic Metropolitan Chamber of Commerce, Human Solutions, Central City Concern, Transition Projects, Virginia Garcia Clinic, Adelante Mujeres, Lara Media, Hispanic Pros, Rosewood Initiative, Archdiocese of Portland Ministerio Hispano, Portland ESL Network, etc.

TEICA staff made presentations and surveyed Spanish-speaking parents participating at Latino Network Juntos Aprendemos Programs at the following schools:

- Ventura Park Elementary
- Mill Park Elementary
- Shaver Elementary
- Cesar Chavez Elementary
- Glenfair Elementary
- Tualatin Elementary
- Harvey Scott Elementary
- Rigler Elementary
- Tigard Elementary
- Bridgeport Elementary

Staff also made presentations and surveyed participants in the Latino Network's program Soñemos Juntos, Bienestar's Equipo of Service Providers, El Programa Hispano Catolico, meetings at the Asian Health and Service Center and IRCO Senior Lunch as well as participants at a group gathering at the Baltazar Ortiz Center, Mill Park School Pantry, Madison High School Pantry, Shaver Food Pantry, and the Open Bible Harvest Share. Lastly staff participated with the survey at Consulado Mexicano's Ventatilla Financiera event, and at Cinco de Mayo in Portland.

V. Survey Results and Findings

A. Demographics

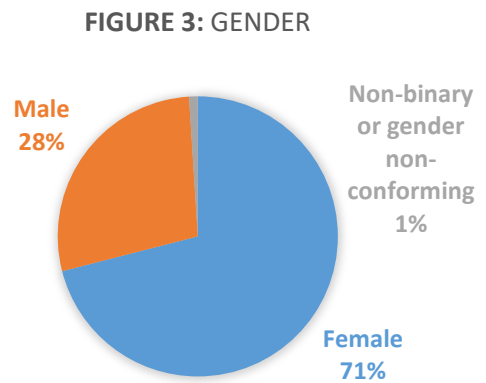
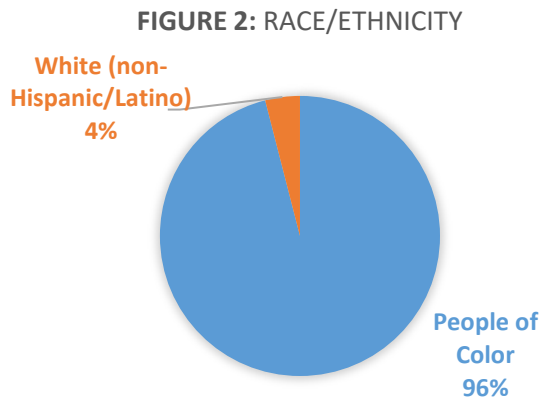
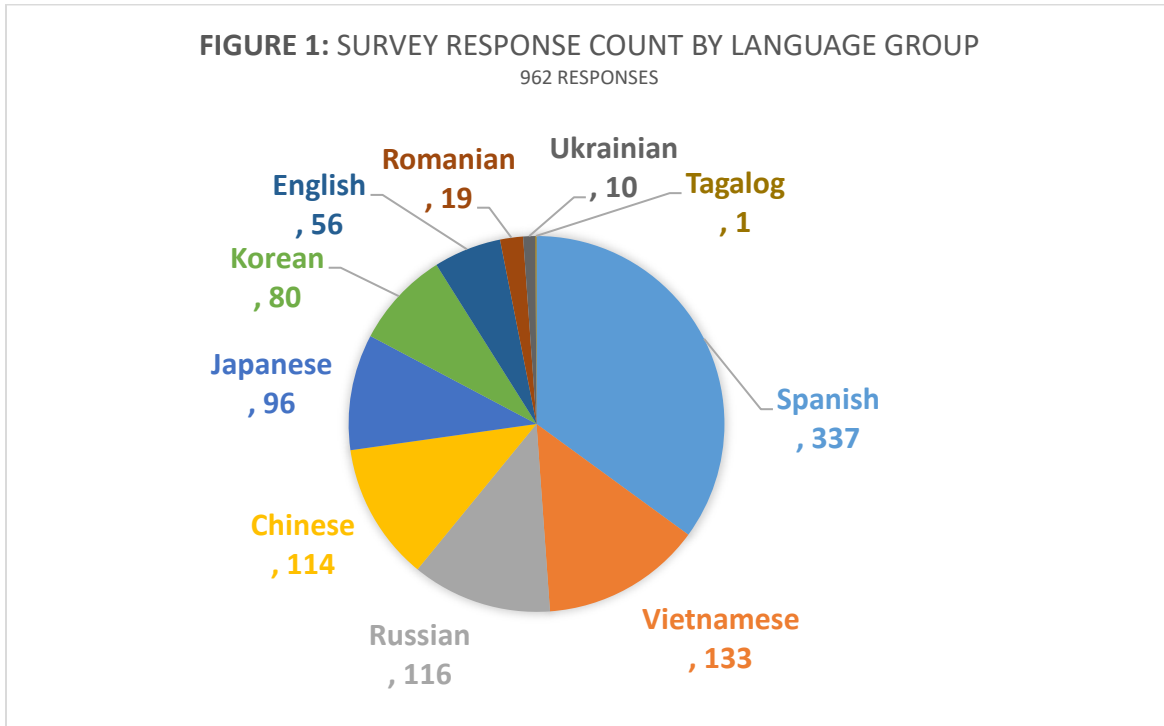


FIGURE 4: LEP POPULATION BY SERVICE ENHANCEMENT PLAN AREAS

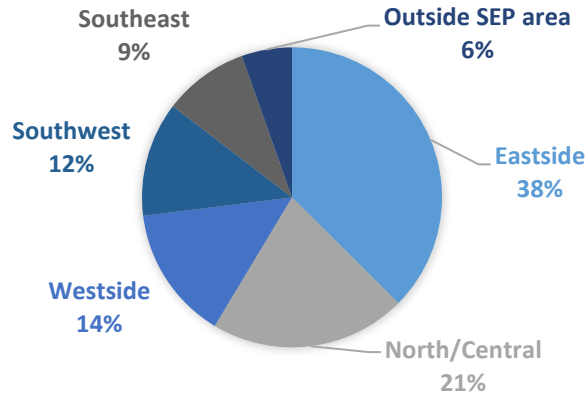


FIGURE 5: TRANSIT RIDER STATUS

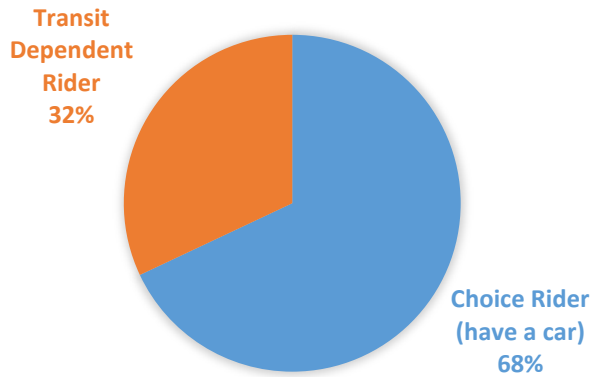
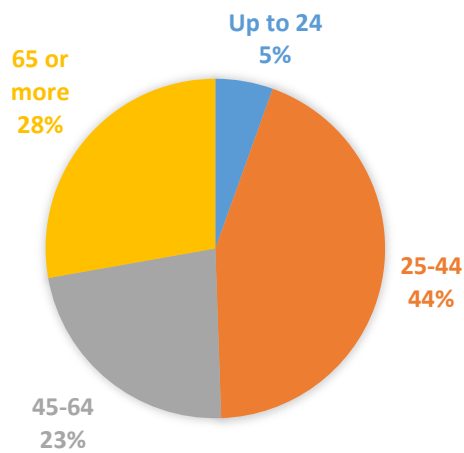


FIGURE 6: AGE DISTRIBUTION BY LANGUAGES COMBINED



B. LEP Assessment

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

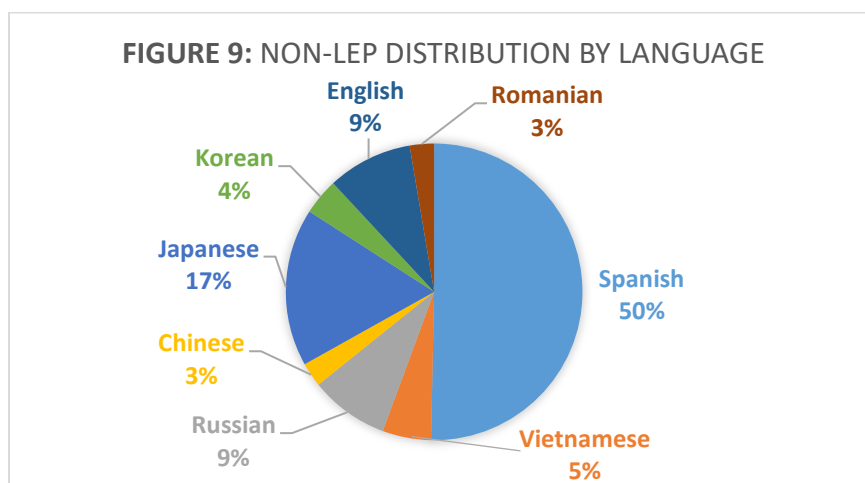
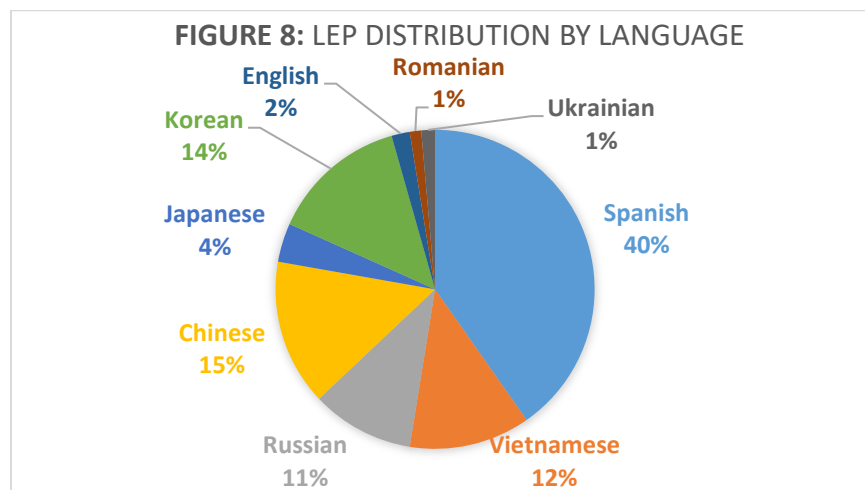
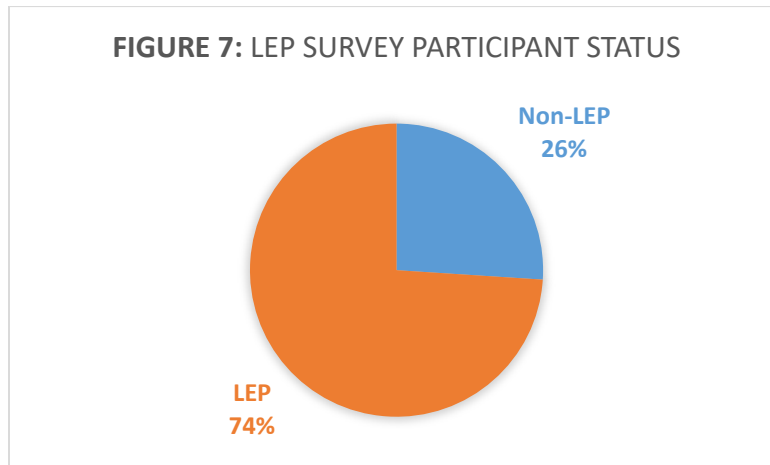


FIGURE 10: HOW WELL DO YOU READ ENGLISH? (LEP)

Very Well Less Than Very Well

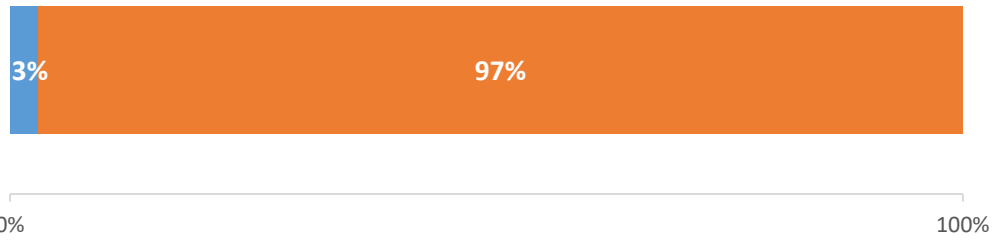


FIGURE 11: HOW WELL DO YOU SPEAK ENGLISH? (LEP)

Very Well Less Than Very Well

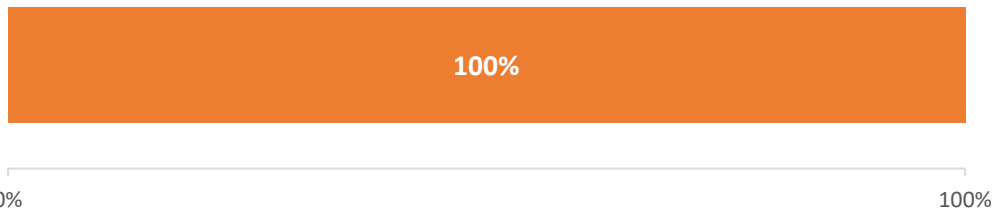
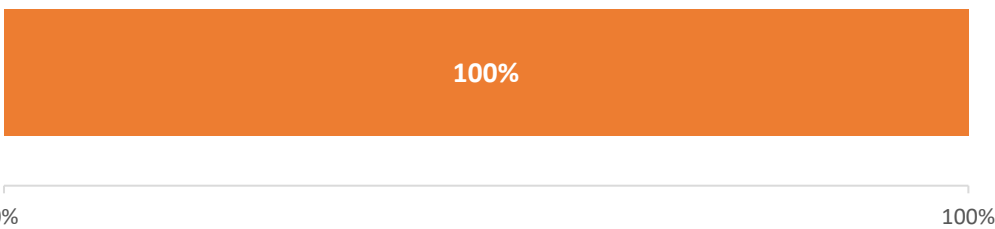


FIGURE 12: HOW WELL DO YOU UNDERSTAND ENGLISH? (LEP)

Very Well Less Than Very Well



C. Information Access and Language Services Awareness

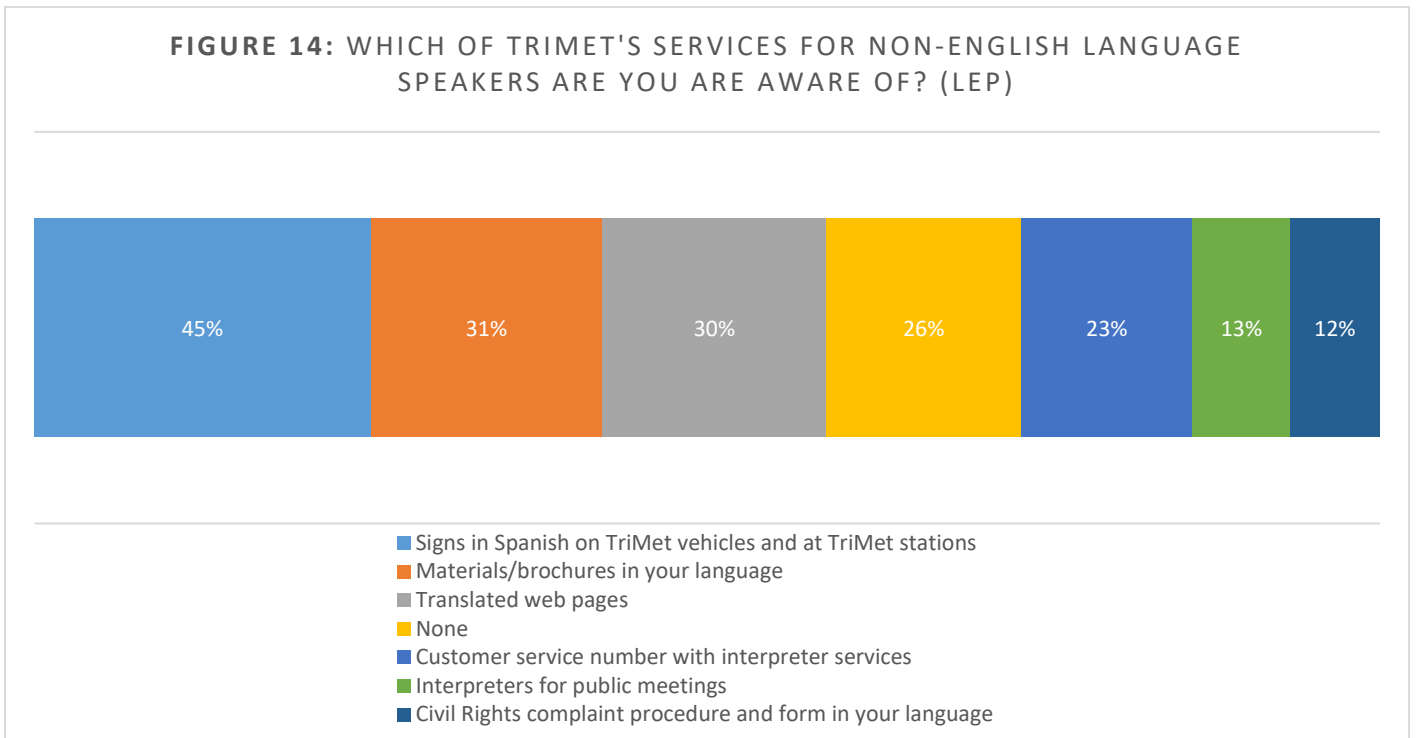
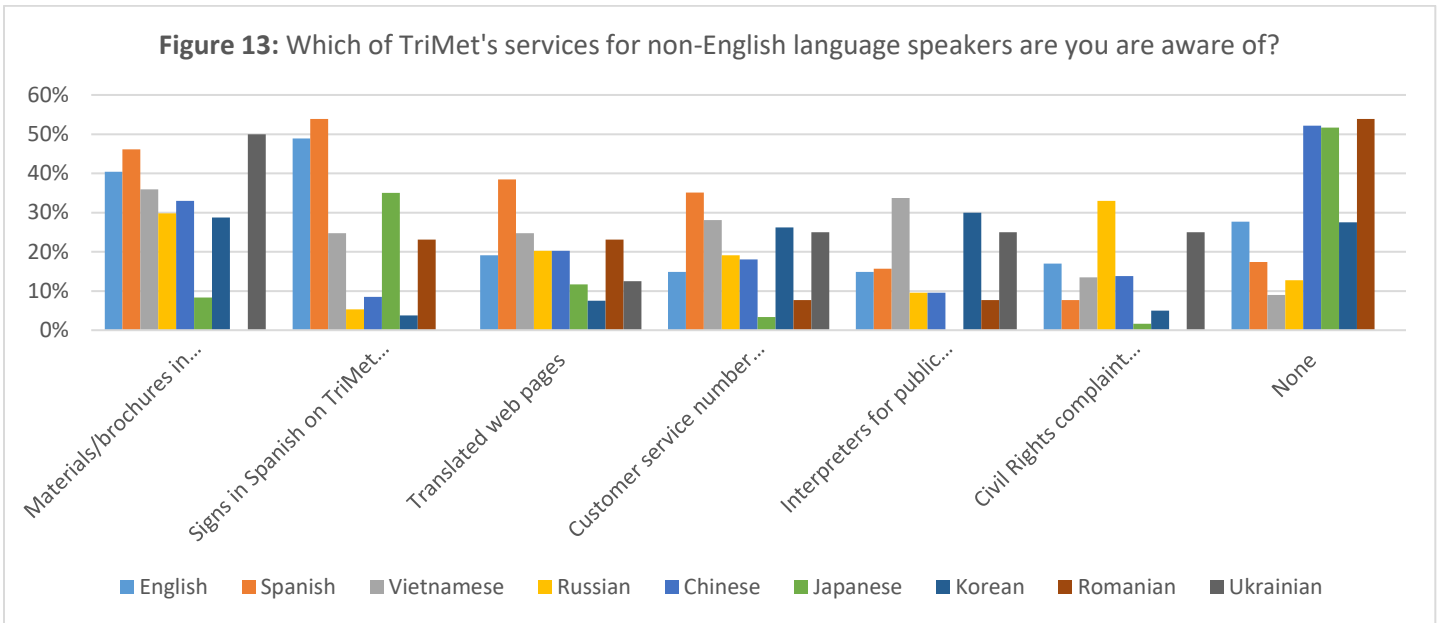


FIGURE 15: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES?

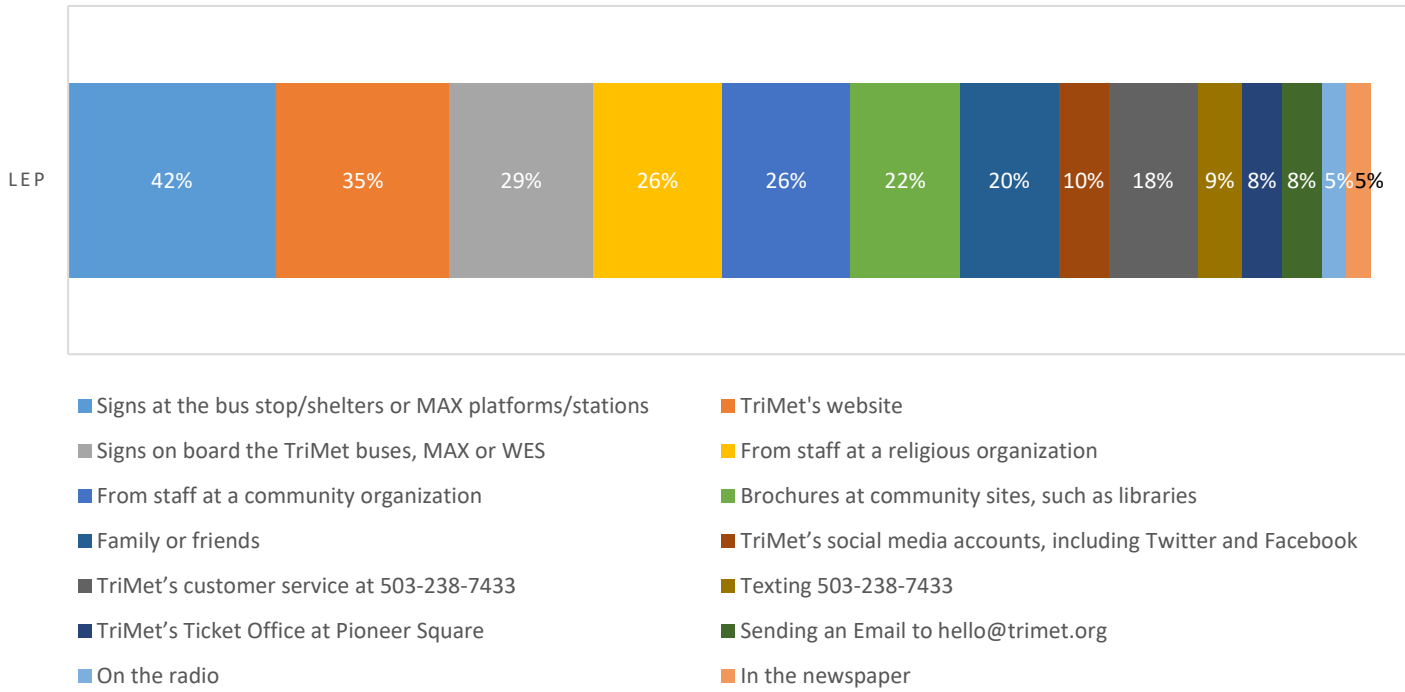
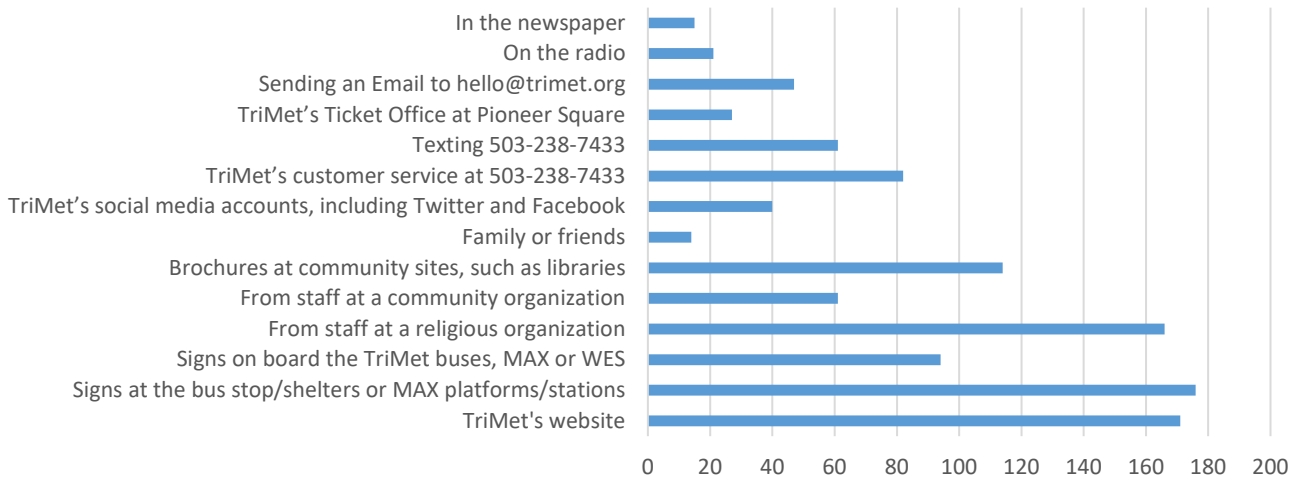


Figure 16: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES? SPANISH



**Figure 17: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES?
VIETNAMESE**

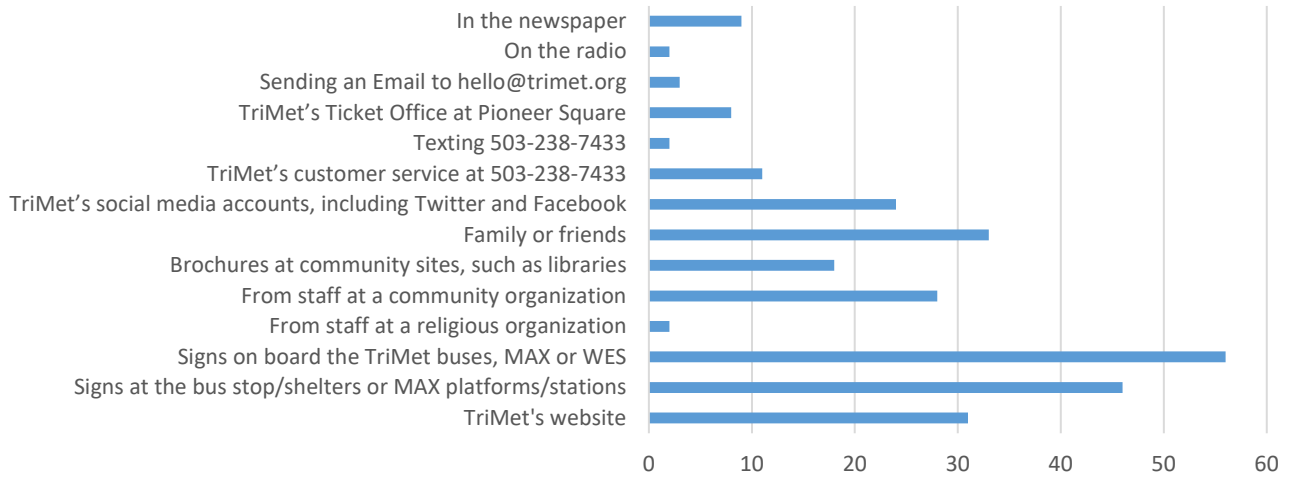


Figure 18: RUSSIAN

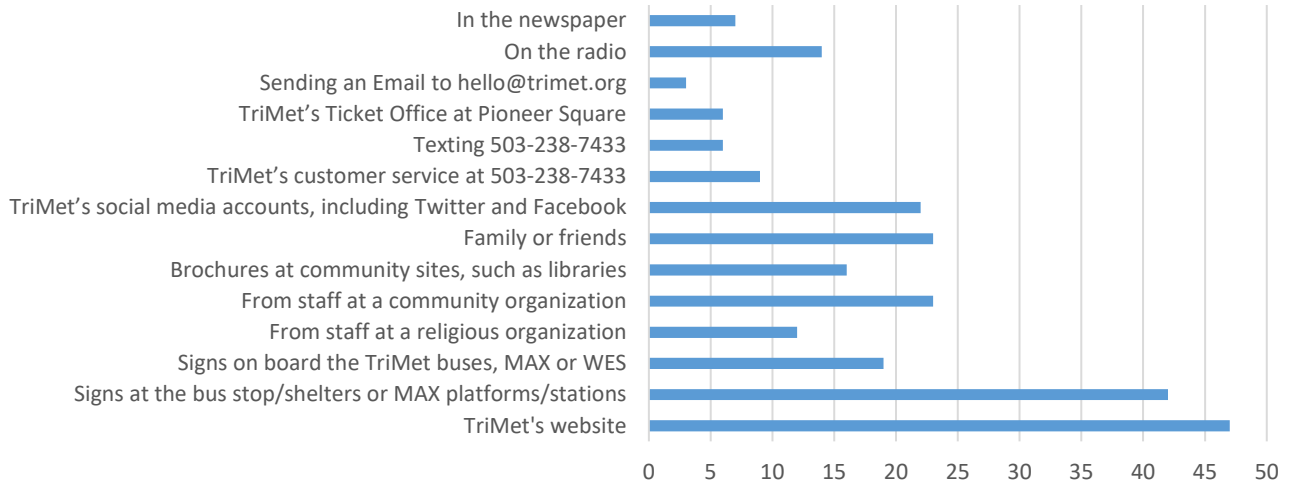


Figure 19: CHINESE

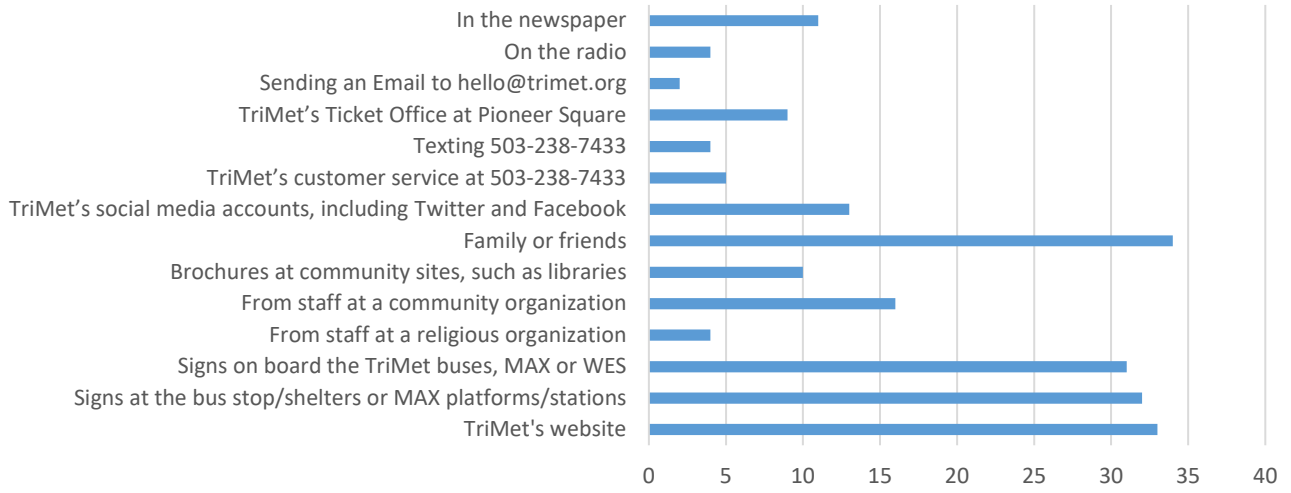


Figure 20: JAPANESE

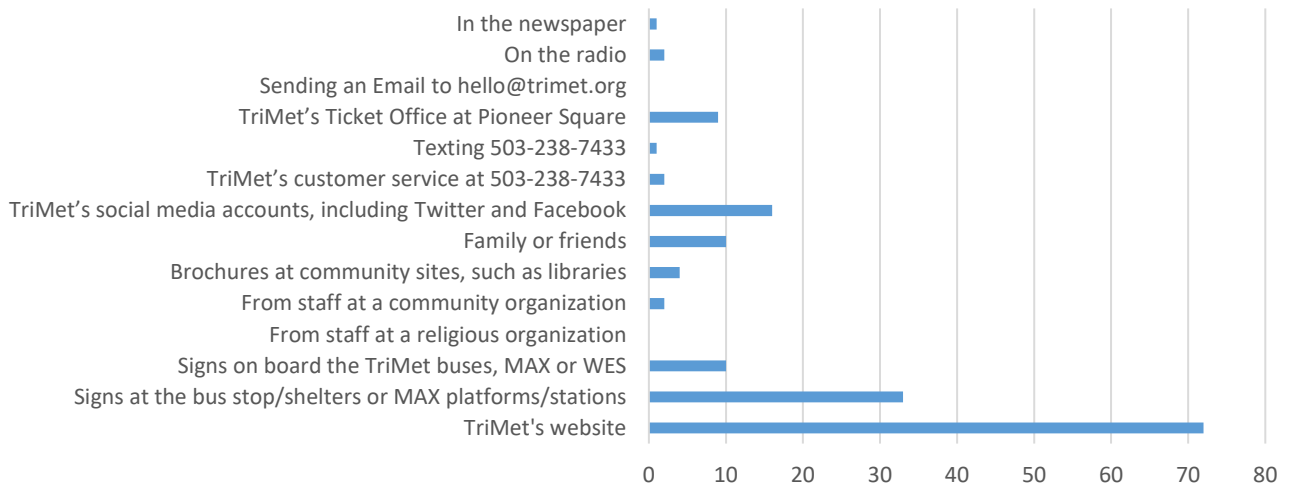


Figure 21: KOREAN

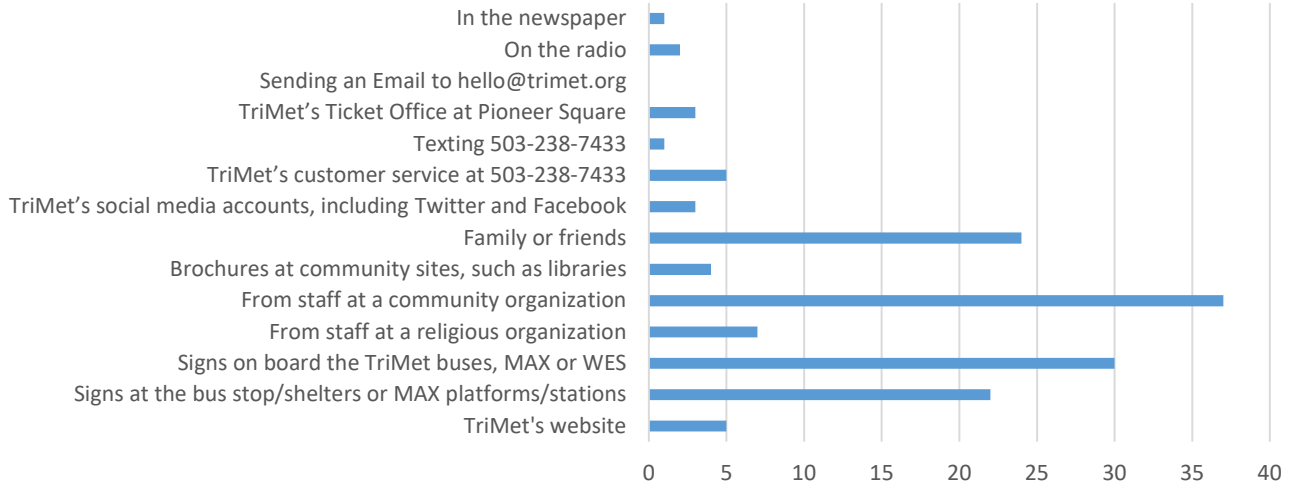


Figure 22: ROMANIAN

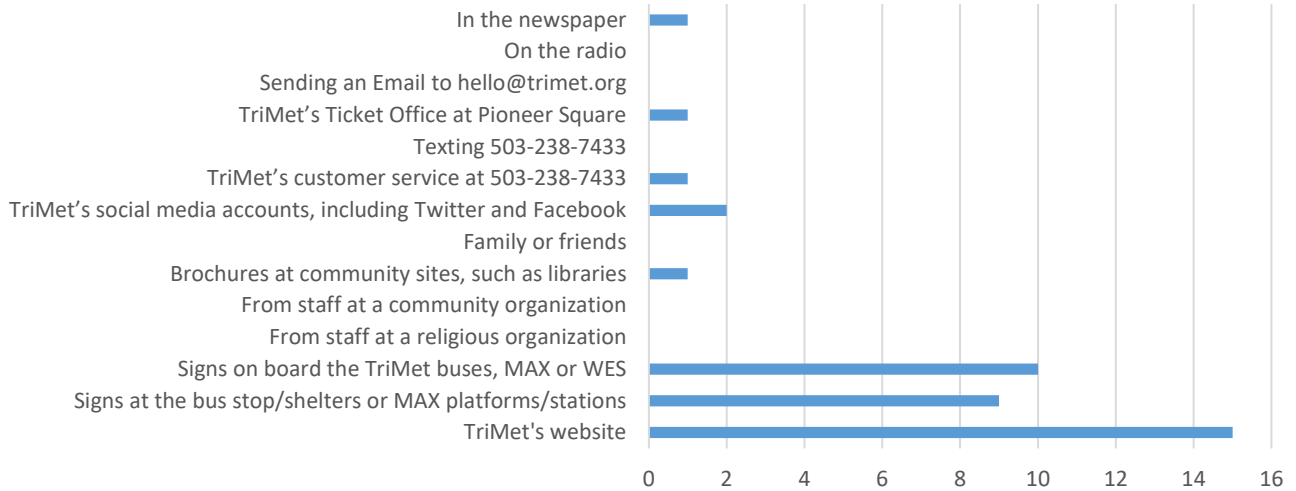


Figure 23: UKRAINIAN

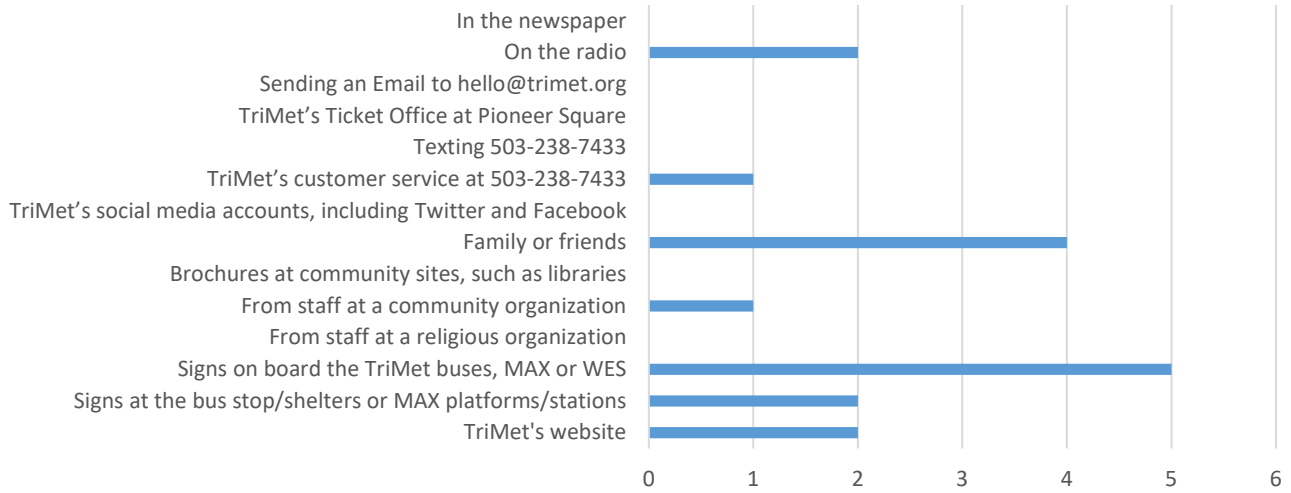
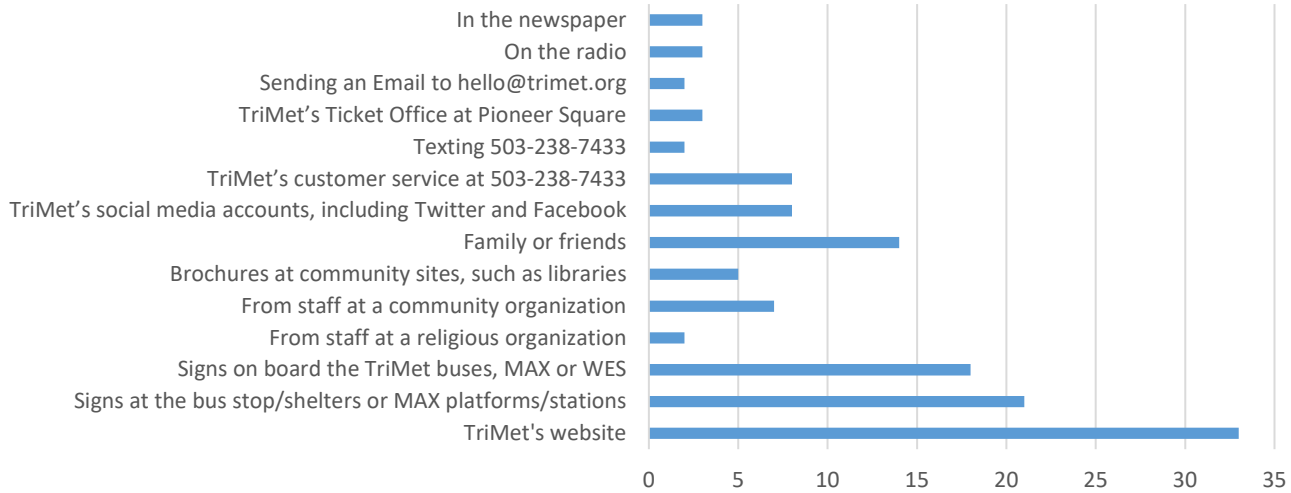
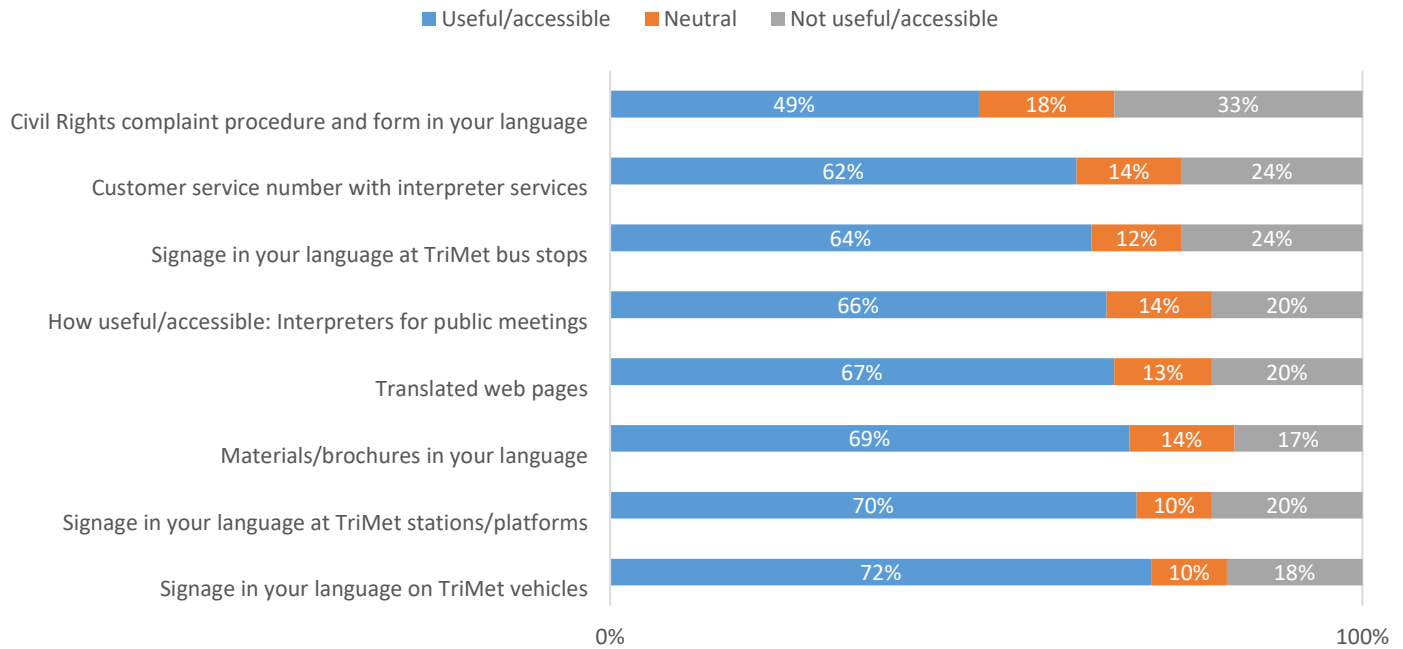


Figure 24: ENGLISH



D. Usefulness/Accessibility

Figure 25: How useful/accessible are TriMet's language access services?



E. Language Services Image Favorability

Participants were asked to select which of the images below best communicated that TriMet language services are available. A total of 558 responses were received.

Figure 26



(24%)



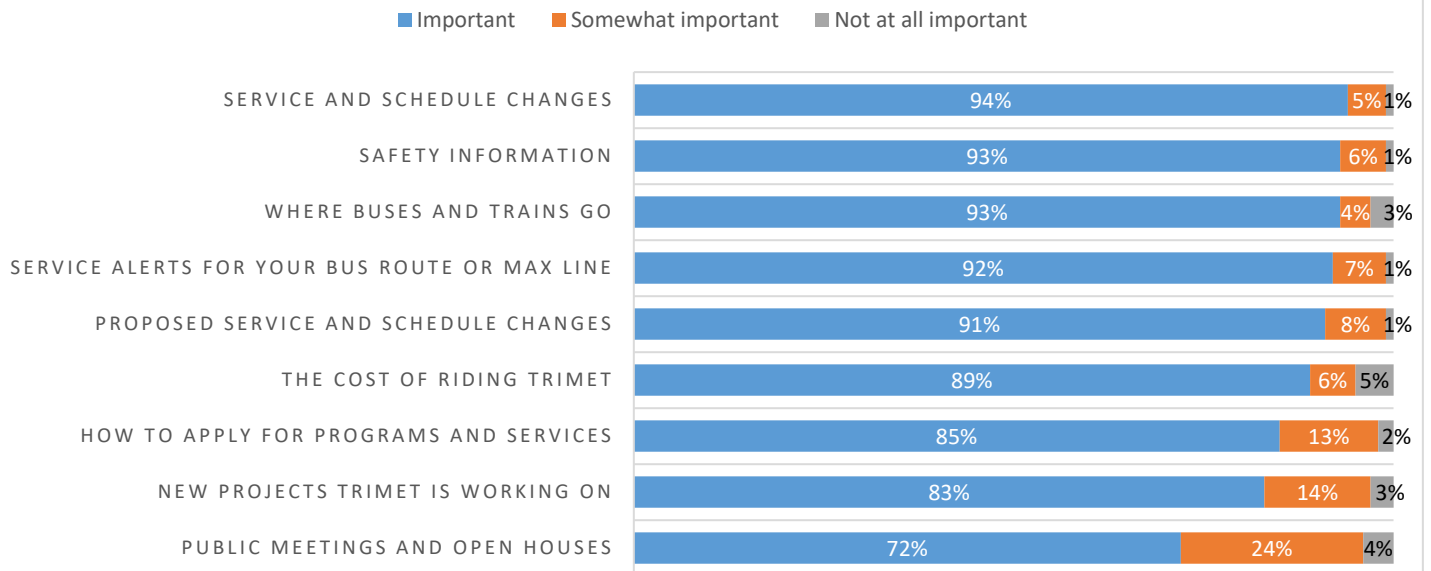
(8%)



(68%)

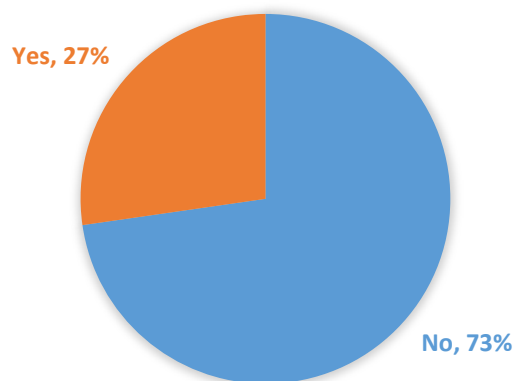
F. Receipt of TriMet Information in Native Language by Level of Importance

FIGURE 27: LEVEL OF IMPORTANCE OF RECEIVING ANSWERS (IN YOUR LANGUAGE) TO YOUR QUESTIONS IN THE FOLLOWING AREAS

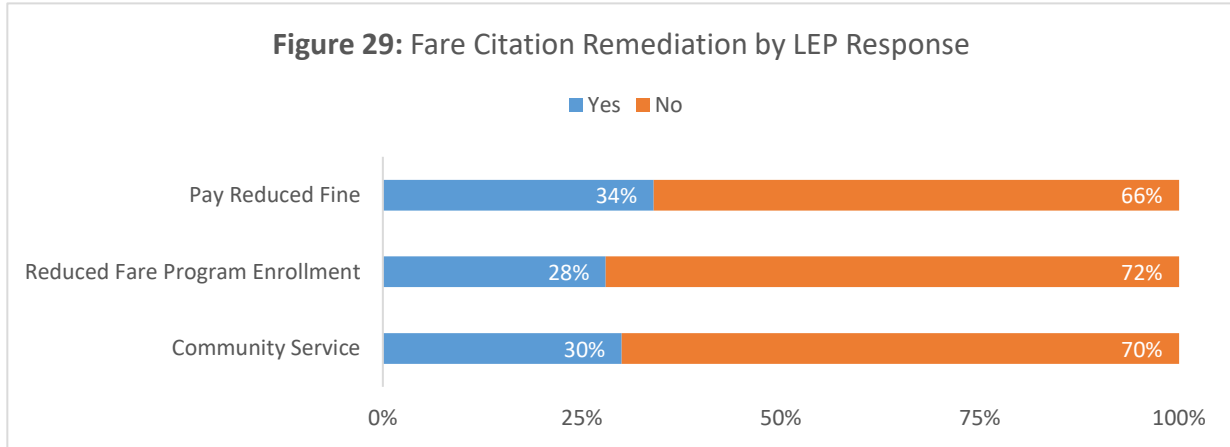


G. Onboard Vehicle Emergency Awareness

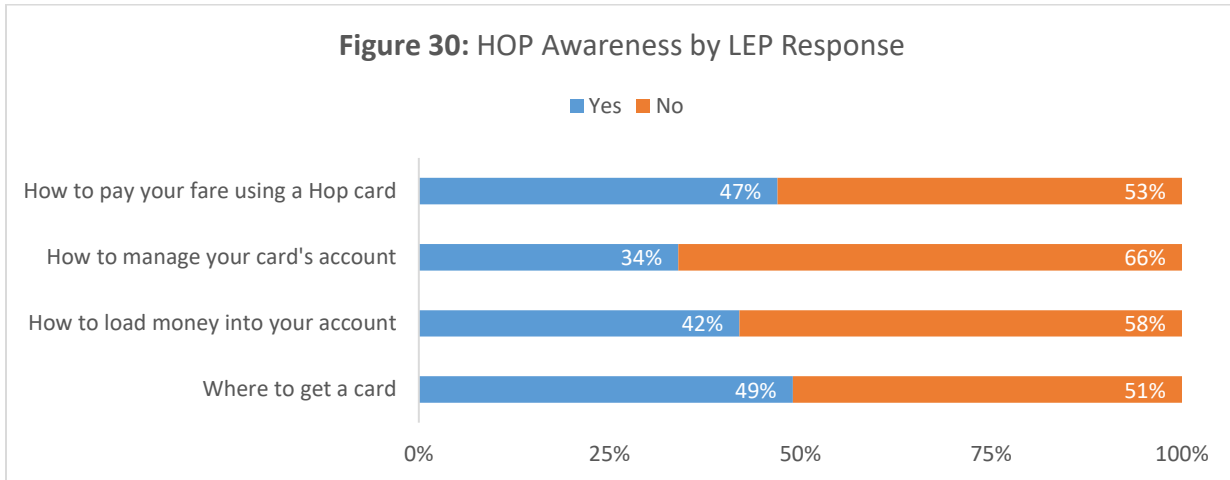
FIGURE 28: DO YOU KNOW WHAT TO DO IN CASE OF AN EMERGENCY WHILE ONBOARD A TRIMET VEHICLE? (LEP)



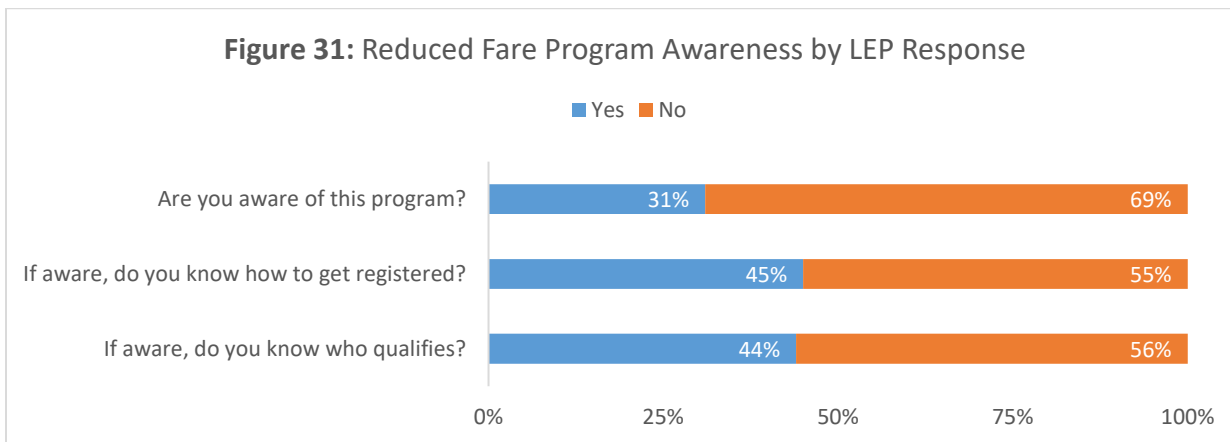
H. Administrative Citation Awareness



I. HOP Program Awareness



J. Reduced Fare Program Awareness



VI. Summary of Findings

Staff from the Department of Transit Equity, Inclusion, and Community Affairs launched a Language Access Services survey on February 21, 2019. The survey period ended on May 17, 2019. Surveys were distributed via in-person, direct email, and through targeted Facebook ads. Specifically, staff attended over 30 community partner events and engaged with over 900 event attendees. The type of events ranged from parent classes at various elementary schools, luncheons, advisory board meetings, low-income housing, food pantries, culturally-specific events, and places of worship.

The intention behind the surveys were to further understand the best ways to engage and inform limited English proficient populations about TriMet's programs and services, to gauge LEP populations awareness and accessibility of TriMet's current language access services, how and where they currently obtain information about these services as well as what is the best methods for receiving information.

Overall, there was a low to moderate awareness across all TriMet language services for non-English language speakers as in indicated in Figure 13. Alternatively stated, almost all language service category had less than 50% awareness for each language group with the exception of Spanish indicating that 54% have an awareness of "Signs in Spanish on TriMet vehicles and at TriMet stations". Furthermore, there is substantial differences between language groups awareness of TriMet's services. For instance, Romanian, Japanese, and Korean had a relatively high percentage of responses indicating they were not aware of any services that TriMet provides. Moreover, all language groups' awareness of "TriMet's translated web pages" and "Customer service number with interpreter services" were below 30% with the exception of Spanish at 38% for web pages and 35% for interpreter services.

As shown in Figure 14, the aggregation of LEP responses for the question "Which of TriMet's services for non-English language speakers are you aware of?" indicated that 45% were aware of "Signs in Spanish on TriMet vehicles and at TriMet stations", 31% were aware of "Materials/brochures in your language", and 30% were aware of "Translated web pages". The remaining categories were below 30 percent.

When asked, "How do you currently get information about TriMet's services", the top categories as shown in Figure 16 were "Signs at the bus stop/shelters or MAX platforms/stations", "TriMet's website", and "Signs on board TriMet vehicles". A subsequent question was asked how useful are TriMet's language access services?" Figure 26 depicts that the most useful and accessible was "Signage in your language on TriMet vehicles" and "Signage in your language at TriMet stations/platforms". Respondents were also asked, "How important you can get questions answered in your language". As noted in Figure 28, it is significantly important to receive answers across all questions, such as service and schedule changes, safety information, where buses and trains go, and service alerts.

Survey respondents were asked about their awareness of onboard vehicle emergency procedures as well as TriMet programs, such as administrative citation process, the new electronic fare system called Hop Fastpass™, and the new reduced fare program. As indicated in Figures 29-34, LEP respondents had a moderately low awareness of these programs or what to do if they had to respond to an emergency onboard a TriMet vehicle.

Lastly, the Language Access Survey provided participants with the opportunity to give response through several open-ended questions. There was an overwhelming amount of feedback across various languages and communities requesting more digital interaction in their language. The most popular platforms were

social media (Facebook), email, web applications and websites as mediums that can help those communities stay up to date with TriMet's service and programs in their own primary language. Another popular theme amongst languages was having materials and presentations available in community based organization. This was particularly true with senior populations from the Korean community.

TriMet staff also identified three major common themes when asked about ways to improve safety on the system: 1) increase operator training, particularly in learning how to interact with limited English proficient customers; 2) increase security on the system by having more staff presence and; 3) increase surveillance on the system. When asked how to make customers feel more welcomed on the system feedback requested that correct translations were highly important as well as seeing more diverse and bilingual TriMet staff.

VII. Recommendations

Develop and implement the initiatives below with a high degree of public involvement to ensure that TriMet is providing the needed information in areas where it is accessible to various language groups.

Initiatives should include:

- Language Assistance brand and awareness campaign that focuses on TriMet infrastructure (On-board and at stations). This could involve the deployment of language specific "Ask Me" staff in addition to signage.
- Create resource and information hubs at CBO locations. Resource select partners through the Multicultural Outreach Contract or other opportunity.
- Improve digital engagement and information sharing. Continue to explore and invest in targeted social media promotions and information sharing.
- Identify what information people are looking for and in what places they look through further public involvement.
- Use the available spaces on the TriMet system to create information that LEP people can access in their language.
- Develop and test materials with target audiences before mass distribution.
- Build out staff training regarding how to serve LEP riders and the resources available.
- Focus on educational campaigns for fare administration, LIF, and Hop to create better market saturation for programs.
- Conduct more frequent and targeted surveys to explore the effectiveness of information strategies in achieving increased awareness of issues such as safety and security, Hop, and the Low Income Fare.
- Hire more bilingual and/or bicultural staff.
- Institute more regularly scheduled and ongoing focus groups and other opportunities for LEP community members to provide more in-depth feedback.
- Formalize an external Community Advisory Committee and allocate resources to support it.

Attachment 1: Language Services Survey Template



As part of our commitment to access, equity, and inclusion, TriMet is conducting a survey to help update our Language Access Plan.

This plan outlines how TriMet will address the needs of riders whose primary language is not English. TriMet is committed to a public transportation system where all are welcome. Your participation will help us achieve this goal.

1. How do you currently get information about TriMet’s services?

- TriMet’s Customer Service at 503-238-7433
- TriMet’s website
- TriMet’s Ticket Office at Pioneer Square
- Sending an email to **hello@trimet.org**
- Texting 503-238-7433
- TriMet’s social media accounts, including Twitter and Facebook
- Signs at the bus stop/shelters or MAX platforms/stations
- Signs on board the TriMet buses, MAX or WES
- On the radio
- In the newspaper
- Brochures at community sites, such as libraries
- From staff at a community organization
- Family or friends
- From staff at a religious organization
- Other (please specify) _____

2. What are the best ways for TriMet to share information with you?

3. Which of TriMet’s services for non-English Language speakers are you aware of? Check all that apply.

- Customer service number with interpreter services
- Translated web pages
- Interpreters for public meetings
- Materials/brochures in your language
- Signage in Spanish on TriMet vehicles and at TriMet stations
- Civil Rights complaint procedure and form in your language
- Other (please specify) _____

4. On a scale of 1 to 5, with 5 being the highest, rank how useful/accessible these services are to you.

| | | | | | |
|--|---|---|---|---|---|
| Customer service number with interpreter services | 1 | 2 | 3 | 4 | 5 |
| Translated web pages | 1 | 2 | 3 | 4 | 5 |
| Interpreters for public meetings | 1 | 2 | 3 | 4 | 5 |
| Materials/brochures in your language | 1 | 2 | 3 | 4 | 5 |
| Signage in your language on TriMet vehicles | 1 | 2 | 3 | 4 | 5 |
| Signage in your language at TriMet stations/platforms | 1 | 2 | 3 | 4 | 5 |
| Signage in your language at TriMet bus stops | 1 | 2 | 3 | 4 | 5 |
| Civil rights complaint procedure and form in your language | 1 | 2 | 3 | 4 | 5 |

5. In addition to providing services in your language, what else can TriMet do to make you feel welcome and included?

6. TriMet is looking for an image that to communicates that languages services are available. Which of the images below communicates that most clearly?



7. How important it is that you can get information or answers to questions about each of the following from TriMet in your primary language?

| | Not at all | Somewhat Important | Important | Very Important |
|---|-----------------------|-----------------------|-----------------------|-----------------------|
| The cost of riding TriMet | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Where buses and trains go | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Service and schedule changes | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Proposed service and schedule changes | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Service alerts for your bus route or MAX line | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| New projects TriMet is working on | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Safety information | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Public meetings and open houses | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| How to apply for programs and services | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

8. How can TriMet improve your safety while onboard our buses and trains?

9. Do you know what to do in case of an emergency while onboard a TriMet vehicle? Yes No

10. Fare is required to ride TriMet vehicles. If you receive a citation for riding without fare, do you know about the following options to resolve it?

Community Service Yes No Pay Reduced Fine Yes No
Enroll in a Reduced Fare Program Yes No Request an Appeal Hearing Yes No

11. We recently launched a new electronic fare system called Hop Fastpass. Do you know the following?

Where to get a card Yes No How to manage your card's account Yes No
How to load money into your card Yes No How to pay your fare using a Hop card Yes No

12. Since July 2018, TriMet began offering a reduced fare program for riders with lower incomes. This program lowers fares by 50% to 72%.

Are you aware of this program? Yes No Do you know how to get registered? Yes No
Do you know who qualifies (eligibility requirements)? Yes No

13. What is your primary language?

English Українськи (Ukrainian) Română (Romanian)
 Español (Spanish) عربي (Arabic) Somali (Somali)
 Tiếng Việt (Vietnamese) Tagalog (Tagalog) Other (please specify) _____
 中文 (Chinese) 日本語 (Japanese)
 Русский (Russian) ខ្មែរ (Mon-Khmer, Cambodian)
 한국어 (Korean) فارسی (Persian-Farsi)

14. How well do you read, speak, or understand English?

| | Very Well | Well | Not Well | Not at All |
|------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Read | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Write | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Understand | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

15. How many people are in your household (including you)? 1 2 3 4 or more

16. What was your total annual household income before taxes in 2018? (check one)

Under \$18,209 \$37,650 to \$44,129 \$63,570 or more
 \$18,210 to \$24,689 \$44,130 to \$50,609 Don't know
 \$24,690 to \$31,169 \$50,610 to \$57,089
 \$31,170 to \$37,649 \$57,090 to \$63,569

17. How often do you ride TriMet?

Every day About once a week Once a month
 A few times a week A few times a month Less than once a month

18. Do you normally have access to car at your place of residence? Yes No

19. How many working vehicles do you have access to? 1 2 3 4 or more

20. What is your zip code? _____

21. Are you:

African American/Black Caucasian/White Multi-racial/bi-racial
 Asian/Pacific Islander (non-Hispanic/Latino) Other (please specify) _____
 Alaska Native/American Indian Hispanic/Latino

22. How old are you?

Under 18 35-44 65+
 18-24 45-54
 25-34 55-64

23. What is your gender?

Male Non-binary or Other (please specify) _____
 Female Gender non-conforming

24. If you would like to receive periodic updates on TriMet's Language Access Plan or if you would like to participate in future surveys, please provide your email address below.

Email Address

Thank you for completing this survey.

Appendix B: Bus Operator Intercept Survey Report



TRIMET LIMITED ENGLISH PROFICIENCY RESEARCH

BUS OPERATOR INTERVIEWS

FALL 2016 & FALL 2018

SUMMARY

Background & Methodology

As part of TriMet's effort to evaluate access to transit for all members of the community, intercept surveys were conducted with bus operators. Since bus operators are often the first contact Limited English Proficiency (LEP) passengers have with TriMet, this research was designed to find:

- Learn how operators communicate with LEP passengers
- Solicit their ideas for better ways to communicate with LEP passengers

To this end, TriMet's Marketing Information Department conducted a total of 190 operator interviews at Center Street Garage during the fall 2016 schedule sign-up. Another survey was conducted by TriMet's Transit Equity, Inclusion, and Community Affairs department during the fall 2018 schedule sign-up with 225 operators. Results from 2016 and 2018 are compared below, along with some subgroup analysis. Included in this report are findings from 2005 when the survey was first conducted as well as the second survey in 2011

The interviewing times for each survey periods were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented.

Respondent Profiles

- Twenty-five percent of 2018 respondents had been employed with TriMet up to two years, 49% between two and five years, and 26% over five years. Operators from 2016 had less length of service (4.1 average) than those in 2018 (4.6 average).
- Over two-thirds (72%) of 2018 respondents were full-time operators and the rest (28%) were part-time. Full-time operator status resides with those operators working two or more years at TriMet.
- Most (58%) of the 2018 respondents worked at Center Street garage followed by Powell (23%) and then Merlo (19%).

Findings

- Operators were asked which routes they had driven in the past year, where they had most often encountered LEP passengers asking for information and how often.

Operators encountered LEP passengers on about 59% of the bus routes in the system. Routes most often mentioned in both 2016 and 2018 were:

- Line 57- Forest Grove. This route serves Forest Grove, the area with the region's highest concentration of Spanish speakers.¹
- Line 12- Barbur. This is a long route with one end in Sherwood, another area with a large Spanish speaking population.¹
- Line 4-Division, has one end of the route in Gresham, an area with a high concentration of Spanish speakers, as well as Russian, Ukrainian, Tagalog, and Vietnamese.¹
- Line 72-Killingsworth/82nd was a top mention in 2011 and 2016. This route has one end in Gresham, again an area with a high concentration of Spanish speakers, as well as Romanian, Vietnamese and Chinese.¹ The Green Line MAX, which opened in 2010, connects to Line 72.
- Line 6 – Martin Luther King Jr Blvd. This route serves Hayden Island and North Portland, an area with a high concentration of Chinese, Vietnamese speakers, as well as Romanians.
- Line 77 – Broadway/Halsey. On one end, this route serves outer NE Portland, Fairview, Wood Village and Troutdale, which has moderate concentrations of Tagalog, Ukrainian, Russian, and Arabic speaking populations.
- Line 73 – 122nd Ave. This route runs between Parkrose/Sumner Transit Center and SE 94th & Foster, serving a high concentration of Spanish speakers, as well as Ukrainian, Vietnamese, Russian and Chinese.
- Line 76 – Beaverton/Tualatin. This route runs between Tualatin, Tigard, Washington Square and Beaverton, serving a high concentration of Spanish, Tagalog, and Persian speakers.
- Line 99 – Macadam/McLoughlin. On one end, this route serves Oregon City, an area with a high concentration of Ukrainian and Russian speakers.

As for the number of times LEP passengers asked for information, there was a great range depending upon the route. For some routes information requests were only once a week, for others it was as high as 20 times/day.

- Three questions were asked to assess how difficult communicating with LEP passengers was for operators.
 1. The first question asked in general how easy or difficult it was to communicate with LEP passengers. Nearly one-half of the operators interviewed said it was difficult; either *very* (12%) or *somewhat* (33%) difficult.
 - Among the operators who spoke another language, slightly less indicated it was difficult (44%).
 - 2011 operators found it less difficult (59%) than those in 2005 (66%).
 - Among the 2011 operators with up to 1 year length of service, only 45% said it was difficult.

¹ 2012-2016 American Community Survey 5-year Estimates

2. Next a question was asked to find out how difficult communicating with LEP passengers was when *compared to other operator job issues*. In this case responses came in as being less difficult, on average 3.9 on a 10-point scale where 10 was very difficult. This question was not asked in 2016 or 2018.

- 2011 operators found it more difficult than those in 2005, an average of 4.2 and 3.7 respectively.
- Those who spoke another language found it less difficult, an average of 3.6.

3. The third question was open-ended and a different version of the question was asked in 2005 and 2011. This question was not asked in 2016 or 2018.

a. 2005. Operators were asked about the most difficult issues they faced in their job. Only three percent mentioned communicating with LEP passengers as one of the most difficult issues they faced.²

b. 2011. Operators were asked about the most difficult *communication* issues they faced in their job. For this the top mention was language problems in general, 27%.

- Operators were asked what types of questions were most often asked by LEP passengers. In this open-ended question, the top responses were *how to get to a destination* (73%), *which bus to take* (45%) & *fares* (17%). Similar responses were present across all surveys.
- When asked how they communicate with LEP passengers, operators mentioned a variety of strategies including *using hand gestures/sign language* (25%), using English/no other language (25%), *getting them to write down an address* (13%), depends on how well they speak English (9%), non-verbal communication (8%), phrases/key words (6%), listen closely (6%), *ask other passengers* (4%), and *speaking slowly* (2%).
 - There are stark differences compared to 2011 including: *asking other passengers for help* (41%), *using hand gestures/sign language* (29%), *getting them to write down an address* (14%), *pointing to fare signs* (13%), *speaking slowly* (12%), *alerting them to their stop* (12%), *using diagrams or maps* (11%), and *listening closely* (11%).
- Operators were asked if they felt equipped to communicate with passengers who speak limited or no English. Only 37 percent of the 2018 Operators surveyed said yes compared to 56 percent in 2016. The introduction of the “Depends” category in 2018 may have impacted the response selection (i.e., there was no “Depends” category to select in 2016).
- Less than half (38%) of the 2018 operators compared to 50 percent in 2016 were aware of different materials, services or tools TriMet uses to communicate with LEP passengers. This was significantly higher in 2005 and 2011 (92% vs. 74%, respectively).

Unaided Materials/services/tools cited included:

- *Language translation at 238-RIDE* (37%). 2016 had the highest mention (48%). There were lower mentions in 2005 than 2011 (5% vs. 17%, respectively).
- *Channel cards in Spanish* (20%). It was slightly higher in 2016 at 27%. There were lower mentions in 2011 (17%).
- *Website* (16%). It was higher in 2016 at 21%. There were lower mentions in 2005 and 2011 (4% vs. 10%, respectively).
- *Bus/MAX announcements in Spanish* (10%). Lower mentions in 2005, 2011, and 2016 (4%, 11%, and 9%, respectively). During the time between 2005 and 2011 Automatic

² The top six most difficult issues given by 10% or more of the operators were: passengers (38%), traffic (31%), schedules (20%), fare issues (16%), other drivers (12%), and safety/security/danger (10%).

Stop Announcements were installed on all buses which included Spanish language instructions.

- *How to Ride* brochure (8%). It was higher in 2016 at 17%. For 2005 respondents this was a higher mention than in 2011 (34% vs. 10%). Between 2005 and 2011 literature racks on the buses were removed which contained these brochures.

Aided (Read from a list) Materials/services/tools cited included:

- *Bus/MAX announcements in Spanish* (80%).
- *Channel cards in Spanish* (67%).
- *How to Ride* brochure (80%).
- *Website* (27%).
- *Language translation at 238-RIDE* (25%).
- *How to Ride* brochure (22%).
- *Hop multilingual brochure* (19%).

Discontinued Tools

- *Paddle with translations* (49%) for 2011. This was a high visibility item for operators as it stayed on the bus near the driver's seat. It was discontinued before 2005, but 80% of those in 2005 mentioned it.
- *Farebox Spanish* (16%) in 2011. 2005 had higher mentions (22%). This item which gave basic words in Spanish was discontinued after 2005. A shorter one pager developed in 2011 by Operations Training staff was not referenced.
- When asked if TriMet could do something to help operators communicate with LEP passengers, 58% answered Yes, and offered a number of suggestions such as *language classes at TriMet* (32%), *brochures/schedules/maps in other languages* (24%), and *announcements/signage* (6%). In 2018, language classes were offered as part of the E3 Program.
 - In 2011, when asked if TriMet could do something to help operators communicate with LEP passengers, 62% answered Yes, and offered a number of suggestions such as *language classes at TriMet* (36%), *list of phrases with translations* (16%), *translators on the bus or available so operators could phone TriMet* (11%), and *brochures/schedules/maps in other languages* (8%). After 2005, tuition reimbursement from TriMet was discontinued due to budget cuts.
- More than two-thirds (68%) of the operators interviewed mentioned they had not received any training on how to communicate with LEP passengers. This was lower in 2016 (54%).

Of those asked if they would like to receive training, 78% mentioned yes.

- Overall 36% of the operators interviewed speak another language at some level, either fluently or some words. There were 38% in 2016.

Among those who said they spoke another language, most spoke *Spanish or some Spanish* (68%) followed by *German/some German* (8%), and *French/some French* (4%). In 2018, Operators employed with TriMet more than five years had the highest concentration of those who spoke some level of Spanish — 94%. Whereas in 2016, Operators employed with TriMet between one to five years had the highest concentration of those who spoke some level of Spanish — 82%. Compared to 2005 and 2011, Operators employed with TriMet up to one year had the highest concentration of those who spoke some level of Spanish — 89% in 2005 and 86%, respectively.

Conclusions and Recommendations

Operators in this project indicated varying degrees of difficulty communicating with LEP passengers. Factors contributing to their difficulties include the route driven and the proportion of LEP passengers encountered, operator experience, ability to speak at least *a few words* of a foreign language, and awareness and use of TriMet foreign language materials.

Based on the results of this work, it is shown that LEP training, knowledge of TriMet LEP materials and tools, and knowledge of another language, especially Spanish, makes it easier for operators to communicate with LEP passengers. Therefore it is recommended that TriMet take the following steps to assist operators and, ultimately, LEP customers:

1. Offer a dedicated training class on how to communicate with LEP customers and have all front-line employees attend.
2. Offer incentives to increase second language proficiency in TriMet's operator force.
3. Operators are most aware of materials when they are used as part of their daily routine. Farebox Spanish, paddles with translations, How To Ride brochures in racks on vehicles are no longer being used. Work with operators to design new language assistance materials to that will be more practical and useful in their interactions with LEP customer. The reintroduction of paddles with translations should be considered as this was the most frequented tool for operators in 2011.
4. Work with a panel of LEP customers to design new language assistance materials, which will be of most use to them while riding TriMet vehicles.
5. Have more written translated placards/stickers/channel cards in the top 5 LEP language groups.
6. Testing translation phone applications
7. Hire bilingual staff

Appendix C: Bus Operator and Field Operations Survey Findings

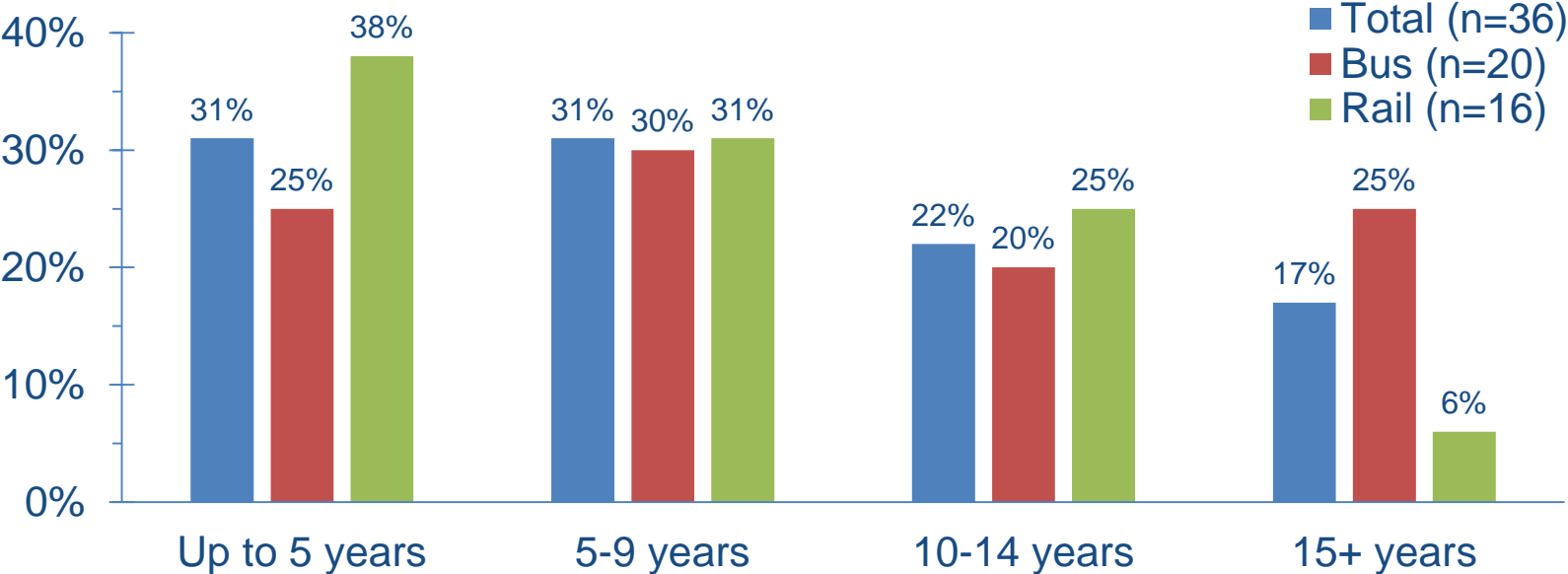
TriMet LEP Research

Bus and Field Operations Intercept Survey Results 2018-2019

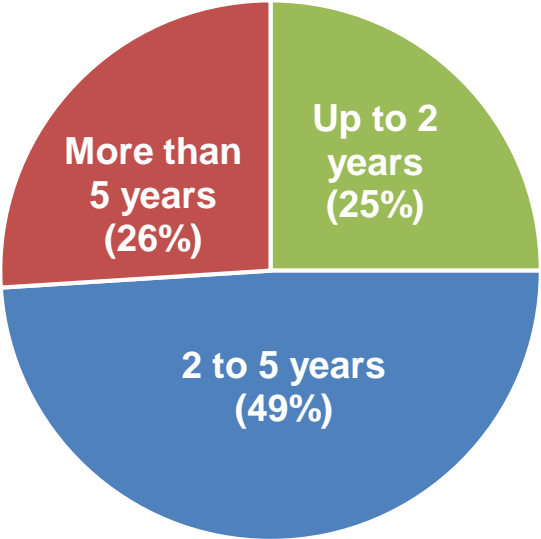
Research and Administration Subcommittee

Respondent Profiles - 2018 Road and Rail Supervisors

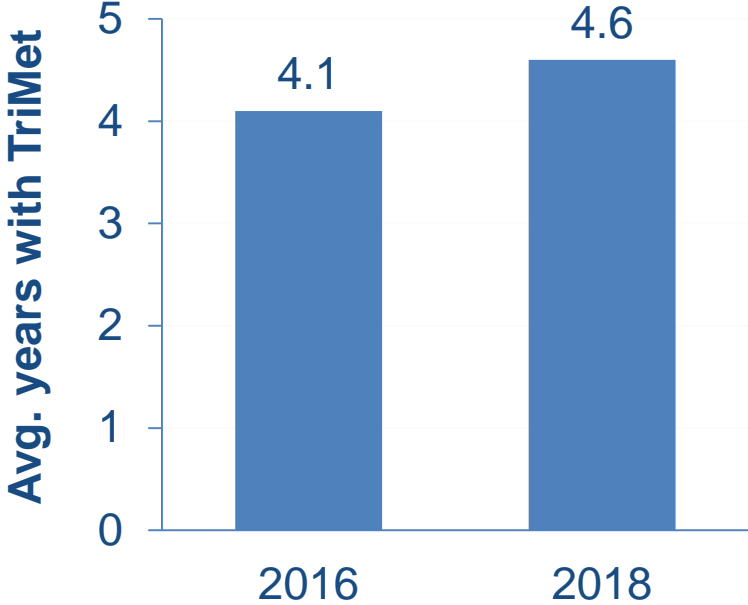
Time with TriMet



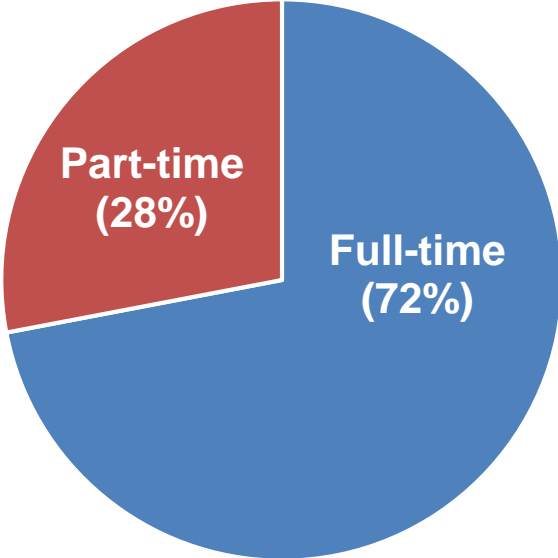
Respondent Profiles – Bus Operators



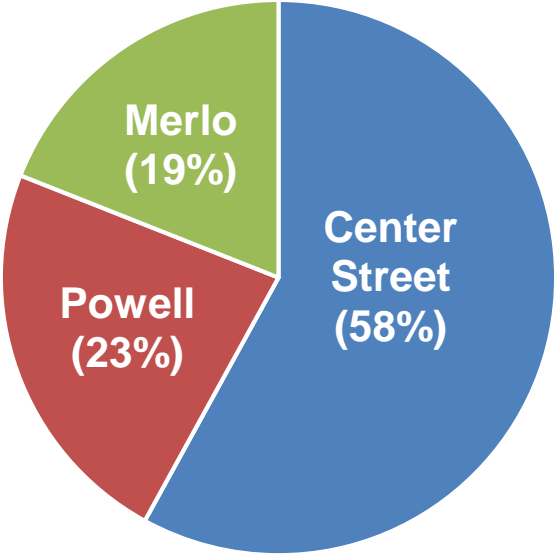
Time with TriMet (2018 survey)



Respondent Profiles - 2018 Bus Operators (n=225)

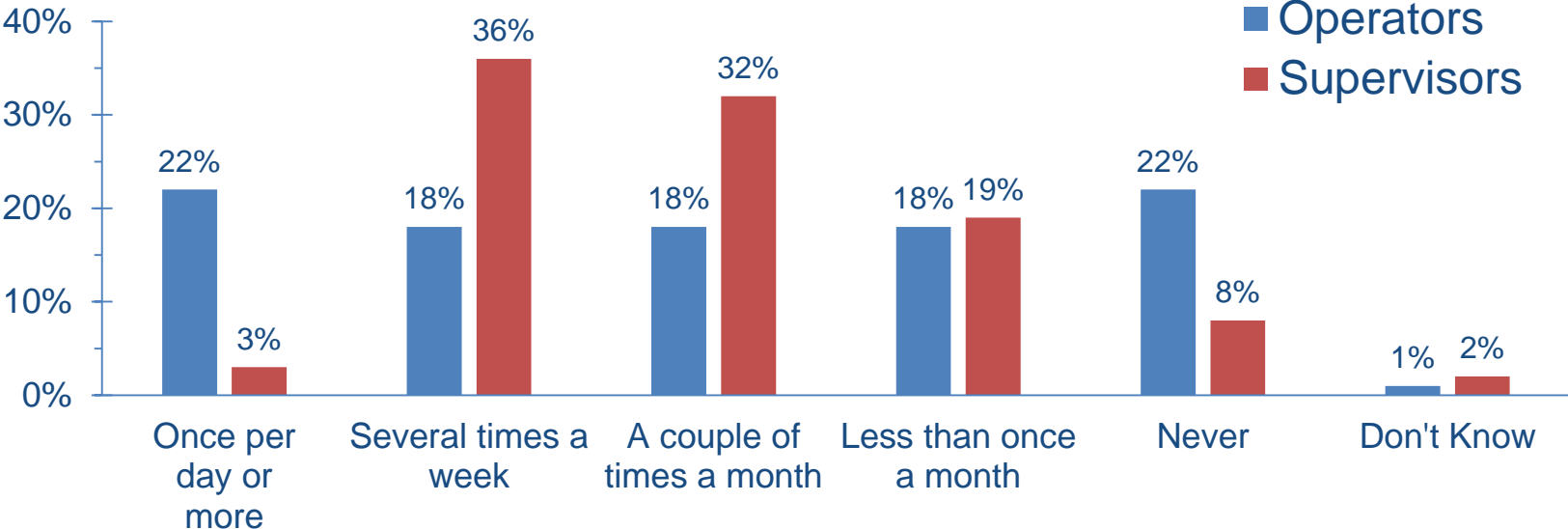


Schedules



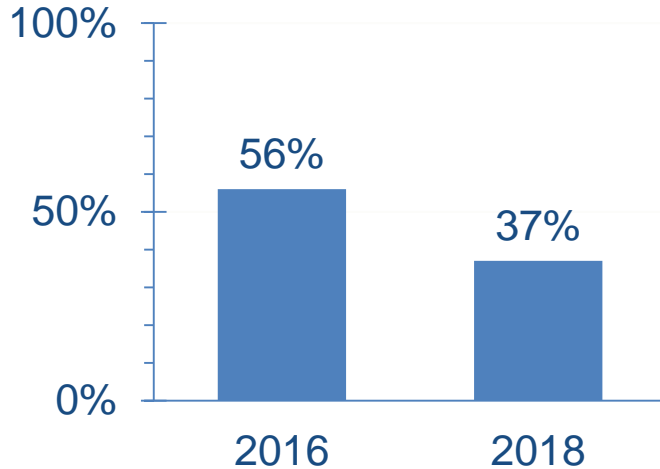
Home Garage

2018 average results: How often do LEP passengers ask you for information?

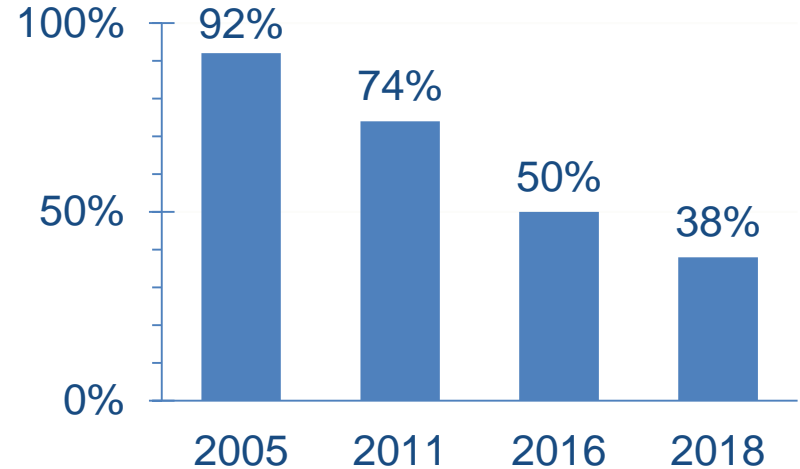


Key Findings - Operators

Felt equipped to communicate with LEP Passengers

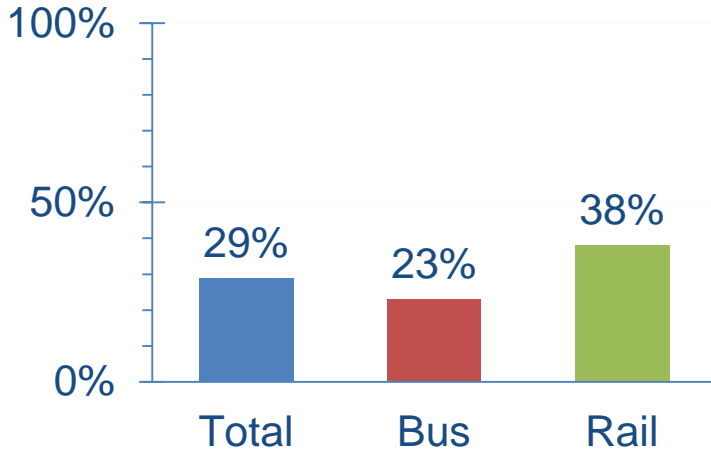


Aware of TriMet's materials, services and tools for communicating with LEP persons

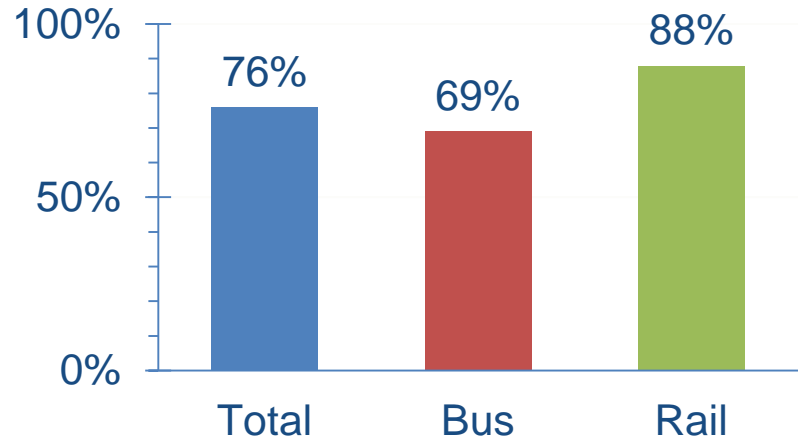


Key Findings – Supervisors (2018)

Felt equipped to communicate with LEP Passengers

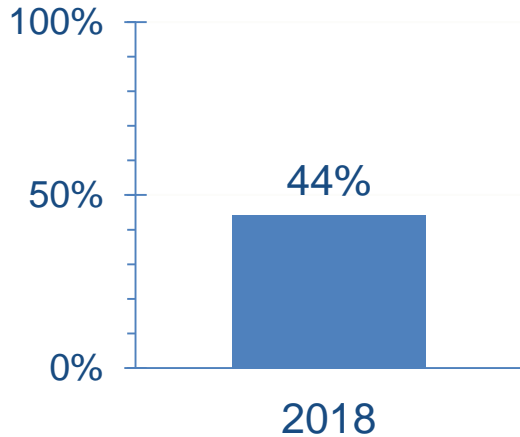


Aware of TriMet's materials, services and tools for communicating with LEP persons

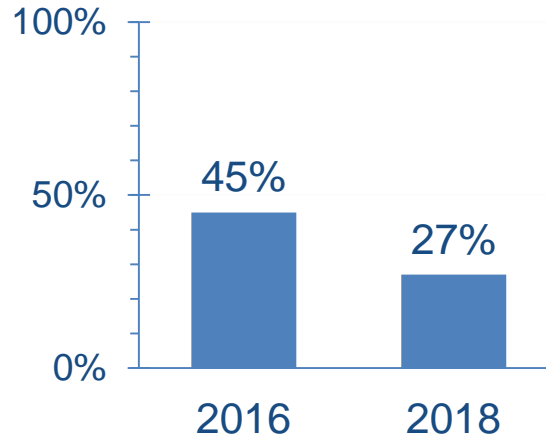


Key Findings – Operators

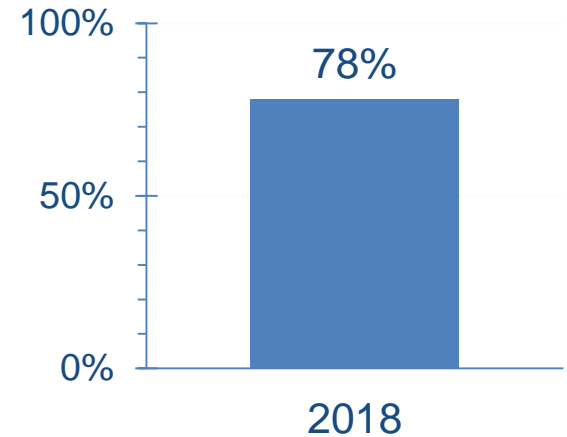
Find it difficult to communicate with LEP passengers



Had received training on how to communicate with LEP passengers

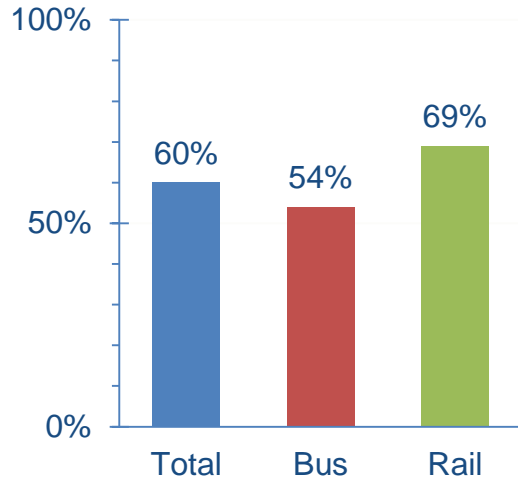


Would like to receive training on communicating with LEP passengers

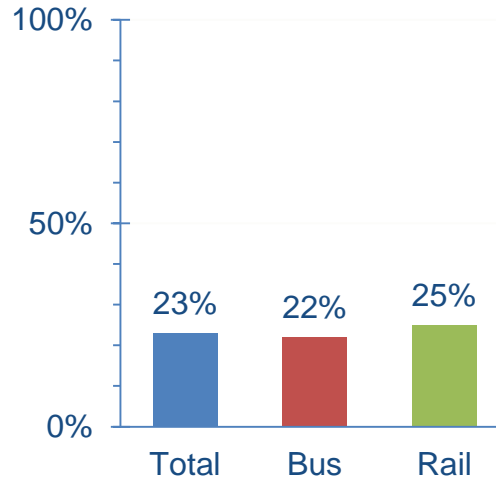


Key Findings – Supervisors (2018)

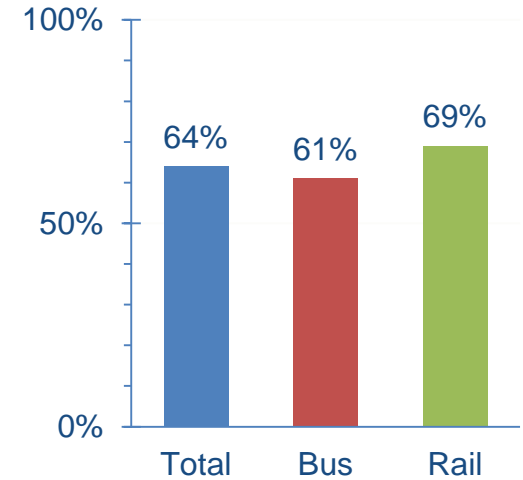
Find it difficult to communicate with LEP passengers



Had received training on how to communicate with LEP passengers



Would like to receive training on communicating with LEP passengers



Appendix D: Bus Operator Survey Instrument

**TriMet
Operator Intercept Survey – LEP
July 2018**

Hello, I am conducting a short survey about your experiences with passengers who speak limited English. We are asking these questions to inform our Title VI reporting. Can I ask you a few questions?

Yes → Thank you. Your answers are confidential and will only be used when combined with the answers of others.

No → Thank, terminate and tally: _____

No → Thank, took survey before

Incomplete → End survey

First I'm going to ask you about the last three routes you have driven in the last year. If you've driven less than three routes, tell me only about the route or routes you have driven. If you drive extra-board, tell me about the routes you have driven most frequently.

1a. What route are you currently driving? (drop down list of bus routes)

1b. On that route, about how often do you have passengers who speak limited or no English who asked you for information? Would you say....

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

1c. Did you drive another route in the last year?

1. Yes (continue)
2. No (skip to Q4)

2a. What is that route? (drop down list of bus routes)

2b. On that route, about how often did you have passengers who speak limited or no English who asked you for information?

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

2c. Did you drive another route in the last year?

1. Yes (continue)
2. No (skip to Q4)

3a. What is that route? (drop down list of bus routes)

3b. On that route, about how often did you have passengers who speak limited or no English who asked you for information?

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

4. What types of questions do you get asked the most from limited-English-speaking passengers? (Do not read list, check all that apply)

1. Fares
2. How to get to their destination/building
3. Which bus to take/which bus stop
4. Other (specify) _____
5. Don't get asked

5. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English-speaking passengers?

1. Yes (continue to Q6a)
2. No (skip to Q6b)
3. Don't know (skip to Q6b)

6a. What are those materials, services or tools? (Do not read list, check all that apply) - Unaided

1. How to Ride brochure
2. Hop multilingual brochure
3. Language interpretation at 238-RIDE
4. Website
5. Bus/MAX announcements in Spanish
6. Channel cards in Spanish (overhead signs onboard bus/MAX)
7. Other (specify) _____

6b. Are you aware of... (Read list for those not mentioned) - Aided

1. How to Ride brochure
2. Hop multilingual brochure
3. Language interpretation at 238-RIDE
4. Website
5. Bus/MAX announcements in Spanish
6. Channel cards in Spanish (overhead signs onboard bus/MAX)

7. In general, how difficult or easy is it for you to communicate with limited English speaking passengers? Would you say:

1. Very difficult
2. Somewhat difficult
3. Somewhat easy
4. Very easy
5. I don't communicate (don't read)

8a. Do you feel equipped to communicate with passengers who speak limited or no English?

1. Yes (continue to Q8b)
2. Depends (continue to Q8b)
3. No
4. Don't know

8b. In what language or languages do you feel equipped to communicate with passengers who speak limited or no English and how? _____

9. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?

1. Yes (continue)
2. No (skip to Q11a)
3. Don't know (skip to Q11a)

10a. What can TriMet do to better prepare you to assist passengers who speak limited or no English? _____

10b. Do you have any suggestions on how TriMet can better assist passengers who speak limited or no English?

1. Yes (specify)

2. No (skip to Q11a)
3. Don't know (skip to Q11a)

11a. Have you had any training on how to communicate with limited-English-speaking passengers?

1. Yes (continue to Q11b)
2. No (continue to Q11c)
3. Don't know (continue to Q11c)

11b. What was the training and who delivered the training or course?

11c. Would you like to receive training?

1. Yes
2. No
3. Don't know

12. When you need to communicate with limited English speaking passengers, how do you it?

(Do not read list; check all that apply)

1. Alert them to their stop
2. Use diagrams or maps
3. Point to fare signage
4. How to Ride brochure
5. Ask other passengers for help
6. Farebox Spanish
7. I don't communicate (explain:_____)
8. Other (specify:___)

13. There is a Federal Transit Administration guideline that states transit agencies shall work to improve access to services for persons with limited English proficiency. Before today, were you aware of that?

1. Yes
2. No
3. Don't know

Now I'd like to ask a few questions about you. No identifying information will be asked such as your name or badge number.

14. How many other languages do you speak besides English? (Enter a number; if the number is 0, then questions 15a and 15b will be skipped; otherwise questions 15a and 15b will be repeated based on the number of other languages spoken)

15a. What is that language? (Do not read list, select one)

1. Spanish
2. Russian
3. Vietnamese
4. Chinese
5. Korean
6. Romanian
7. Japanese
8. Tagalog
9. Mon-Khmer/Cambodian
10. Somali
11. Arabic
12. Ukrainian
13. Persian
14. Other (specify): _____

(If speak more than one language, ask for both...)

15b. About how often do you use (restore from Q15a) in your job at TriMet?

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

16. How long have you been driving for TriMet? (drop down list of years – up to 40)

17. Do you drive full-time or part-time?

1. Full-time
2. Part-time

18. Do you currently drive extra-board?

1. No
2. Yes

19. What garage do you currently drive from?

1. Center
2. Merlo
3. Powell

Those are all the questions I have. Thank you for taking part in this survey.

Space for comments (*if needed*) _____

Tablet records: Surveyor tablet #, time of day, day of week

Appendix E: Road and Rail Supervisor Survey Instrument



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Introduction

As part of TriMet's effort to evaluate access to transit for all members of the community, the Limited English Proficiency (LEP) workgroup would like to conduct intercept surveys with Road and Rail Supervisors, on a volunteer basis, in the next few weeks. Since Road/Rail Supervisors may come in contact with LEP passengers, this research is designed to find:

- How Road and Rail Supervisors communicate with LEP passengers
- Solicit your ideas for better ways to communicate with LEP passengers

All the responses you give are completely confidential. This survey doesn't track who you are or your email address.

Please respond by November 27.

* 1. First, are you a bus or rail supervisor?

Bus

Rail



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Everyone ---- these questions are combined bus/rail to simplify.

In the next pages you will be asked about up to three districts where you have worked in the last year.

* 2. What is the main district you currently work in?

* 3. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Second district

* 4. Did you work in another district in the last year?

Yes

No



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Second district

* 5. What is the next district where you worked the most often in the last year?

* 6. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Third district

* 7. Did you work in another district in the last year?

Yes

No



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Third district

* 8. What is the next district where you worked the most often in the last year?

* 9. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

10. What types of questions do you get asked the most from limited-English-speaking passengers?(Check all that apply.)

- Fares
- How to get to their destination/building
- Which bus to take/which bus stop
- Don't get asked
- Other (please specify)

* 11. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know

12. If yes, what are those materials, services or tools?



Road and Rail Supervisors
Limited English Proficient Passenger Survey

13. Below are ways that TriMet communicates with limited-English-speaking passengers. Check all that you are aware of.

- Fares and How to Ride brochure
- TeleLanguage Card
- TriMet Respects Civil Rights brochure
- Hop multilingual brochure
- Language translation at 238-RIDE
- Website

* 14. In general, how difficult or easy is it for you to communicate with limited English speaking passengers?

- Very difficult
- Somewhat difficult
- Somewhat easy
- Very easy
- I don't communicate

* 15. Do you personally feel equipped to communicate with passengers who speak limited or no English?

- Yes
- Depends on the language
- No
- Don't know

* 16. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

17. What can TriMet do to better prepare you to assist passengers who speak limited or no English?

* 18. Do you have any suggestions on how TriMet can better assist passengers who speak limited or no English?

- Yes
- No
- Don't know

19. *If yes*, what suggestions do you have?



Road and Rail Supervisors
Limited English Proficient Passenger Survey

* 20. Have you had any training on how to communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know

21. If yes, what was the training and who delivered the training or course?

* 22. Would you like to receive training?

- Yes
- No
- Don't know

23. When you need to communicate with limited English speaking passengers, how do you it?(Check all that apply.)

- Use diagrams or maps
- Point to fare signage
- How to Ride brochure
- TeleLanguage Card
- Ask other people for help
- I don't communicate
- Other (please specify)



Road and Rail Supervisors
Limited English Proficient Passenger Survey

About you

Now we'd like to ask a few questions about you. No identifying information will be asked such as your name or badge number.

24. How many other languages do you speak besides English?

25. If you speak another language, what language (s)? (Check all that apply.)

- | | | |
|---|--|------------------------------------|
| <input type="checkbox"/> Spanish | <input type="checkbox"/> Romanian | <input type="checkbox"/> Arabic |
| <input type="checkbox"/> Russian | <input type="checkbox"/> Japanese | <input type="checkbox"/> Ukrainian |
| <input type="checkbox"/> Vietnamese | <input type="checkbox"/> Tagalog | <input type="checkbox"/> Persian |
| <input type="checkbox"/> Chinese | <input type="checkbox"/> Mon-Khmer/Cambodian | |
| <input type="checkbox"/> Korean | <input type="checkbox"/> Somali | |
| <input type="checkbox"/> Other (please specify) | | |

26. If you speak another language, about how often do you use that language in your job at TriMet?
Answer for the other language that you speak most often in the job.

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know

27. How long have you been a supervisor for TriMet?

- Up to 5 years
- 5 - 9 years
- 10 - 14 years
- 15 years or more

28. Do you currently work an auxillary shift?

- Yes
- No

29. Do you currently, or have you ever, worked a code enforcement shift?

- Yes
- No



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Thank you!

Those are all the questions. Thank you for taking this survey.

30. Comments?