

# Language Access Plan



Ensuring meaningful  
access to TriMet programs  
and services for all.

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## **Message from General Manager, Sam Desue Jr.**

Every day, thousands of people across our region rely on TriMet to get where they need to go, whether to work, school, medical appointments, or to connect with family. Many of our riders bring the strength of speaking multiple languages, and it is our responsibility to ensure that everyone can easily access and understand critical transit information.

While compliance with federal Title VI Civil Rights requirements is essential. This work also strengthens the safety, reliability, and accessibility of our transit system for all riders. Our updated Language Access Plan shows how TriMet is meeting federal requirements, such as Title VI of the Civil Rights Act, its implementing regulations and guidance from the Federal Transit Administration, while also improving our ability to provide clear, timely, and meaningful information in the many languages spoken across our service area.

By removing language barriers, TriMet is not only meeting legal standards, but also enhancing safety, building trust, and improving the everyday journey for everyone who uses our services.

I am proud of the work behind this plan and excited for what comes next as we continue to provide public transit service that is welcoming for all.

Sam Desue Jr.

General Manager, TriMet

## Introduction

TriMet is committed to ensuring that all individuals, regardless of their language, can access and benefit from our services. In compliance with Title VI of the Civil Rights Act of 1964 and the U.S. Department of Transportation’s guidance on providing meaningful access for individuals with Limited English Proficiency (LEP), we are proud to share our 2025 Language Access Plan.

This Language Access Plan reflects a human-centered approach to public service. This plan, by design, is centered in care for the multilingual communities we serve. By prioritizing clear communication and respect, we are working to reduce language barriers that can prevent individuals from fully using and benefiting from public transit. This plan is committed to contributing to creating a system that welcomes all riders.

While this plan focuses on language access for individuals with limited English proficiency under Title VI, it is important to note the American Sign Language (ASL) and communication access for riders who are deaf, deaf-blind or hard of hearing is addressed separately under the Americans with Disabilities Act (ADA) Section 504 of the Rehabilitation Act. Under these requirements, TriMet ensures effective communication through qualified ASL interpreters, Video Remote Interpreting (VRI), closed captioning, and other auxiliary aids. These obligations are tracked, funded and reported independently of Title VI. More information about TriMet’s ADA accessibility resources is available at [trimet.org/accessibility](https://trimet.org/accessibility).

For this plan, “Limited English Proficiency” refers to individuals identified by the U.S. Census Bureau as speaking English less than “very well.” These individuals may face challenges in understanding important information related to public transportation. We are committed to doing our part in reducing these barriers by offering meaningful access through translated materials, interpretation services, and community-informed strategies.

Since the last Language Access Plan update in 2019, we have made significant progress in expanding language services, strengthening internal collaboration, and engaging more meaningfully with multilingual communities. This 2025 updated plan outlines new goals, staff training, and agency-wide initiatives that reflect emerging best practices and federal compliance requirements.

In addition to being a regulatory obligation, this plan reflects our values. We are proud to serve a multilingual region. We recognize that thoughtful, people-first planning is key to building trust, improving service, and meeting the needs of all of our riders.

We look forward to implementing this plan in partnership with our community and staff and continuing to build a transit system that is safe, accessible, and responsive to the needs of all who depend on it.

# Executive Summary

## 2025 Language Access Plan Overview

We remain committed to providing meaningful access to transit services for people who speak languages other than English. In compliance with Title VI of the Civil Rights Act of 1964, the 2025 Language Access Plan outlines our agency's strategy for reducing language barriers and improving service equity across our district.

## Limited English Proficient Population Identification

According to 2019–2023 American Community Survey data, and the US 2020 Census, approximately 112,630 individuals (7.2%) in our service area identify as having limited English proficiency. Each of these languages meets the federal Safe Harbor threshold of 5% of the population or 1,000 speakers. The ten most commonly spoken languages among people with limited English proficiency are:

- Spanish (45.9%)
- Vietnamese (11.7%)
- Chinese – Mandarin/Cantonese (10.1%)
- Russian (4.8%)
- Korean
- Ukrainian
- Arabic
- Japanese
- Tagalog
- Farsi

## Language Access Plan Activities

Our Language Access Plan is built on two strategic pathways: sustaining core practices and expanding our customer focus. This approach allows us to expand both public-facing efforts and internal strategies for staff and resource development to support the overall program.

### Sustaining Core Practices

We will continue supporting proven programs that address language access needs across the region through:

- Phone interpretation services in 240+ languages
- Translated print and digital materials
- Multilingual website content
- Ongoing community partnerships with organizations serving communities that speak languages other than English

### Expanding Strategic Focus

The Language Access Plan identifies four areas for deeper investment:

- **Language Assistance Services:** Translation of vital documents, in-person interpretation, and multilingual digital tools, all at no cost to riders.
  - We will provide language assistance at no cost for outreach documents and in-person services. The plan also outlines how we identify vital documents for translation and determine the most effective formats for communication.
- **Notices to Multilingual Communities:** Clear signage, translated outreach materials and system-wide communication about available language assistance and Title VI rights.
  - Outlining guidance for providing notice of language assistance on outreach documents on the system and providing notice of the Title VI complaint process.
- **Monitoring and Evaluation:** Regular updates to the Language Access Plan based on best practices, demographic shifts, and community feedback.
  - Providing guidance for monitoring and compliance of the Language Access Plan, setting standards for translation and interpretation services, and tracking program research and administration.

- **Staff Training:** Annual training for frontline staff and other employees on respectful service delivery and language access procedures.
  - Outlining steps for incorporating language access training into staff development to ensure frontline and relevant personnel are equipped to assist individuals with limited English proficiency.

### **Annual Implementation Highlights**

From fiscal year 2024 through fiscal year 2025, we expanded our multilingual outreach through a robust calendar of community events and strategic partner collaborations. Over this period, the community engagement team participated in over 100 community events, including the Children’s Festival, Lunar New Year Celebrations and newcomer school districts events, reaching more than 81,000 attendees. These events provided opportunities to connect with riders, distribute multilingual educational materials, and share fare access resources and tools. While this subset of events focused mainly on general engagement it complemented broader agency efforts that included multilingual staffing at over 40 community gatherings, translated surveys and direct engagement in more than a dozen languages. Together with internal procedure updates and increased community partnerships, these activities reaffirm our continued commitment to language access and community responsiveness.

### **FY22–FY24 Implementation Highlights**

- Conducted a complete program evaluation of Access Transit services and developed strategic approaches to multilingual communication.
- Transitioned community partner funding from contracts to grant agreements to allow more flexibility and support.
- Released the Spanish version of the low-income fare application and drafted translations in other Safe Harbor languages.
- Expanded enrollment support and translated resources in all 10 Safe Harbor languages.
- Grew the enrollment partner network to over 40 organizations, extending support to speakers of more than 20 additional languages, including Dari, Fijian, and Chuukese.

- Updated internal procedures in our fare programs and established new strategies for serving languages beyond the top Safe Harbor thresholds.
- Assigned multilingual staff to at least 20 outreach events staffed in Spanish, Vietnamese, Russian, Farsi, Arabic, and Rohingya.
- Continued to align agency resources, staffing and outreach activities with evolving community needs across our service area.
- Printed materials that include Welcome Aboard ride guides, produced in 13 languages.
- Developed and printed Meet Our Team and Honored Citizen reduced fare brochures in multiple languages.
- Installed Falcon devices and Braille signage for riders who are blind or have low vision.

### **Leadership and Commitment**

TriMet's Public Access & Innovation Division leads the Language Access Plan implementation, working closely with departments across the agency to provide guidance and consultation on language access needs. In partnership with the Public Affairs Division, TriMet will continue to prioritize outreach to communities that speak Safe Harbor languages and engage trusted community partners to support community-responsive engagement strategies.

The Language Access Plan is a living document, updated every three years based on feedback, best practices and federal compliance guidance. The plan reflects our ongoing dedication to ensuring all riders can access services, understand their rights, and participate fully in our programs and utilize our services.

# 2025 Language Access Plan

We are committed to ensuring riders with limited English proficiency can access the information and services they need and share their feedback on how we can improve access. This plan outlines the steps we will take to engage with various communities, address gaps in access, create opportunities for community members to get involved and provide ways for both community members and employees to contribute. This plan advances TriMet 2030's goals and adapts as the region grows.

## Goals of the Language Access Plan

- **Prioritize Limited English Proficient Communities:** We will continue to prioritize communities with limited English proficiency by ensuring they have meaningful access to our programs and services.
- **Develop Intentional Standards and Tools for Staff:** The Language Access Program will develop and maintain resources, tools, guidelines, and protocols to ensure staff can provide consistent and effective assistance to communities and riders who speak languages other than English.
- **Provide Staff Training:** We will ensure training is available for employees, in particular front line staff who interact directly with the riders and communities that speak languages other than English. Training will focus on respectful communication, language access strategies and cultural competence.
- **Sustain and Grow Resources:** We will continue to invest in the programs and services necessary (staff, training, partnerships, funding, technology, etc.) to support language access initiatives and programs.
- **Research, Update and Implement Best Practices:** We will regularly review best practices and work to ensure our language access efforts align with emerging practices for communities that speak languages other than English.

## Updating the Language Access Plan

To ensure our Language Access Plan provides meaningful access communities that speak languages other than English and reflects the needs of hard-to-reach communities in our service area, we conducted comprehensive community and internal staff surveys in 2024– 2025. The data gathered from the surveys provided valuable insights that informed our plan’s goals, implementation strategies, and next steps.

### Community Survey Process

The community language access survey was developed in consultation with community partners and translated into 16 languages, including all our Safe Harbor languages and emerging languages. The survey yielded **3,347 responses**, making it one of the most significant initiatives to gather language access feedback in our history.

#### Key themes from community responses include:

- **Information Gaps:** Many respondents with limited English proficiency reported difficulty finding transit information in their native language, particularly regarding service alerts, fare programs, and how to ride.
- **Low Awareness of Language Services:** A majority of respondents were unaware TriMet offers interpretation services or translated materials. Respondents suggested adding more signage, outreach, and public messaging in community languages.
- **Preferred Communication Channels:** Riders expressed a preference for receiving information through printed materials, community-based organizations, ethnic radio stations, and social media content in their native language.
- **Barriers to Access:** Language barriers were reported to impact access to safety messages, customer service and fare payment systems. Community members requested more straightforward instructions and relevant materials.
- **Desire for Representation:** Many respondents who spoke languages other than English requested more multilingual staff and respectful outreach at events and transit centers.

This feedback emphasized the importance of making language access more visible, proactive and tailored to hard-to-reach communities, especially in rapidly growing immigrant communities across our service area.

## Staff Survey Process

We also conducted an internal survey focusing on frontline and customer-facing employees to assess their experience with language access tools, services and procedures.

### Key findings from staff responses include:

- **Training Gaps:** Many front line employees were unsure how to access over-the-phone interpretation or how to access translated materials. Some had never received training on Title VI or language access protocols.
- **Need for Practical Guidance:** Staff requested clear, easy-to-use instructions and quick-reference tools to facilitate real-time interactions with riders who speak languages other than English.
- **Use of Bilingual Skills:** Bilingual staff reported being frequently asked to assist riders who speak other languages, but noted their language skills are often unofficially utilized, not formally recognized or compensated.
- **Support for Bilingual Staff:** There was overwhelming support for recruitment and retention of staff who reflect the communities in our service area. The data highlighted that bilingual staff utilize their language skills as part of their daily duties.

Together, the community and staff surveys reinforced the need for expanded training, clearer procedures and more consistent public communication. This feedback will inform the development of new tools, goals and accountability measures included in this plan, ensuring our language access work remains grounded in the lived experience of multilingual communities, compliance obligations and a human-centered approach.

## Language Access Plan Update Process

We recognize the importance of updating and improving our Language Access Plan to meet the linguistic needs of our riders and communities with limited English proficiency. The process to update the language access plan included:

- **Prioritizing Community Needs in Community Engagement:** Through a series of Meaningful Participation Outreach contracts, we collaborated with community-based organizations, faith-based communities and non-profit organizations that primarily serve multilingual populations. These partnerships mirror the range of languages spoken by the populations in our service area. Currently, over 40 community-based organizations and independent contractors are contracted through the Meaningful Participation Outreach contract.
- **Best Practices Research:** We will use best practices from the Federal Transportation Administration (FTA), Oregon Department of Transportation (ODOT) and other relevant agencies to guide the development, implementation and execution of the Language Access Plan.
- **Utilizing the International Association for Public Participation (IAP2) Standards and Community Engagement Spectrum:** This model guides our approach to engaging communities with limited English proficiency. We will move beyond informing and consulting to more engaging approaches, such as collaborating to create meaningful opportunities for people that speak languages other than English to help shape the commitments outlined in this plan.

## Three-year Language Access Implementation Plan

To guide the implementation of our Language Access Plan over the next three years, we have identified five strategic goals. These goals are outlined in the table below to highlight which goals will be addressed first and what we will build on over time. The three-year strategy outlines how different divisions across our agency will contribute to the long-term success and sustainability of language access efforts.

Table 1 outlines foundational efforts in year one, development work in year two and sustainability goals in year three. This phased approach ensures our language access efforts are realistic, actionable and aligned with the available resources while meeting our civil rights obligations and improving service for all.

Moreover, we have selected priority areas based on community needs, legal mandates, staff and community feedback and operational feasibility.

**Table 1:** 3-Year Implementation Plan

Priority Area	Key Activities	Timeline
Community Engagement	<ul style="list-style-type: none"> <li>• Establish the Language Access Advisory Committee.</li> <li>• Distribute community and rider surveys regularly across multiple languages and through multiple channels.</li> <li>• Host focus groups with riders with limited English proficiency in partnership with community organizations.</li> <li>• Design and distribute “I Speak” cards and posters at key TriMet service areas and partner sites.</li> <li>• Pilot new LEP rider growth strategies.</li> <li>• Develop and launch new LEP rider training.</li> </ul>	FY26-FY28
Staff Training	<ul style="list-style-type: none"> <li>• Develop and launch LEP training for all frontline and customer facing staff.</li> <li>• Update and deliver the annual Title VI and Language Access training.</li> </ul>	FY26-FY27
Translation & Interpretation	<ul style="list-style-type: none"> <li>• Identify and prioritize vital documents for translation.</li> <li>• Develop SOPs for translation vendors and Smartling workflows to ensure consistency and accountability.</li> <li>• Identify signage in priority areas for translation.</li> </ul>	FY26-FY28
Technology & Tools	<ul style="list-style-type: none"> <li>• Develop and distribute communication guides.</li> <li>• Monitor and update <i>trimet.org</i>.</li> <li>• Integrate software into translation options.</li> </ul>	FY26-FY28
Monitoring & Evaluation	<ul style="list-style-type: none"> <li>• Create and implement feedback loops for community, staff and vendors</li> <li>• Conduct reviews of language access activities, training and vendor performance.</li> <li>• Track and analyze language needs, requests and areas for improvement.</li> </ul>	FY26-FY28

# Priority Areas for Action

## Language Access Needs Survey:

- **Data Collection:** We will continue to update our language access surveys and engagement strategies to ensure the unique linguistic needs of people that speak languages other than English are accurately represented in program goals and commitments. The data collected will include analysis of U.S. Census data, American Community Survey data, local school district data, rider and community feedback and input from community-based organizations that work directly with multilingual communities.
- **Priority Languages:** Based on data and consultation with Public Affairs staff and community organizations, we will continue identifying priority languages for translation and interpretation services. We will ensure the most widely spoken languages are addressed while prioritizing Safe Harbor languages.

## Intentional Standards and Tools for Staff:

- **Language Access Tools:** The Language Access Program will create and maintain a comprehensive toolkit for staff. The toolkit will include items and information such as:
  - Language identification cards and posters for riders with limited English proficiency (e.g., “I Speak” cards and posters).
  - Guides for staff across the agency to help provide multilingual services or connect riders who speak languages other than English with interpreters when needed.
  - Digital tools that provide timely language assistance via phones or electronic devices.
  - Multilingual reader boards.
  - Updated standardized operating procedures and policies to support staff in engaging with riders who speak languages other than English.

## Staff Training and Development:

- **Language Access and Title VI Required Training:** All staff who interact with riders will receive annual training in community awareness, language access procedures, and best practices for working with riders who speak languages other than English.
- **Ongoing Training and Evaluation:** To ensure continued practice and proficiency we will implement updated trainings and evaluations as needed. Updates will incorporate and prioritize feedback from riders and communities that speak languages other than English.

## **Performance Measures:**

We will establish measurable performance goals related to the implementation and execution of language access services across our agency. These goals will prioritize:

- Notifying riders and communities that speak languages other than English of their Title VI Civil Rights and Language Access rights.
- Ensuring timeliness and effectiveness of language services upon request.
- Measuring customer satisfaction among riders who speak languages other than English.
- Expanding availability of translated materials to communities that speak languages other than English.
- Ensuring access to vital documents and information in multiple languages.

**Program Evaluation, Monitoring and Accountability:** The Language Access Program will develop a monitoring system to assess whether the goals and commitments outlined in the Language Access Plan are being met.

## **Resource Allocation and Program Sustainability:**

- **Budget Commitment:** We identify and allocate funding to support language access services including, but not limited to, interpretation services, translation of vital documents, information and program materials, staff training and access to relevant technology.
- **Staffing Resources:** Leadership will assign dedicated staff from various divisions to oversee the implementation of the Language Access Plan, liaise with respective department leadership, participate in the Language Access Advisory Committee and ensure the quality of translated materials.

## **Research and Best Practices**

We are committed to aligning our Language Access Plan with current research, community needs and best practices by using data, community feedback and partnerships to improve access for riders who navigate our system in languages other than English.

- **Staying Aligned with Industry Standards**

We will monitor federal and state guidelines, particularly from the Federal Transit Administration to ensure full compliance and alignment with evolving requirements for language access in public transportation. We will also study the policies of peer transit

systems to adopt proven approaches to translation, interpretation and equitable service delivery.

- **Ongoing Research and Community Input**

We will prioritize research that strengthens service for multilingual riders, including but is not limited to:

- Using data from the U.S. Census, American Community Survey and local school districts to assess language needs.
- Conducting surveys, focus groups and outreach to understand language preferences and rider experiences.
- Evaluate and review existing translation and outreach services to identify and address service gaps and cultural and linguistic accuracy.

Community feedback from riders who speak languages other than English, frontline staff, and community-based organizations is vital to shaping and refining our approach. This ensures our Language Access Plan goals and strategies remain relevant and responsive to the needs of riders who speak languages other than English.

### **Benchmarking and Collaboration:**

TriMet benchmarks its language access work against other leading transit agencies and collaborates with community-based-organizations (CBOs) to engage hard-to-reach populations. These community partnerships help tailor services to the specific needs of local communities and ensure the development of meaningful engagement strategies.

### **Innovation and Technology**

To improve multilingual access, we have invested in technologies to advance multilingual touch points for riders who speak languages other than English. Including:

- Multilingual websites
- AI powered translation tools
- Real-time voice and text translation
- Multilingual alerts and signage at stops and platforms

These tools help ensure riders receive timely and accessible information, regardless of language.

## **Transparency and Accountability**

To identify areas of improvement, we will share updates on the progress made towards language accessibility, community feedback, and service delivery. By setting clear accountability measures, we can evaluate how well language services meet the needs of the region's communities that speak languages other than English.

## **Plan Implementation**

Over the course of the plan period, we will implement research findings into actionable strategies, ensuring that identified language access approaches are integrated into operations to the greatest extent possible.

We are committed to providing meaningful access to our transit services for all people, including those who communicate in languages other than English. Updates to the Language Access Plan reflect our agency's dedication and commitment to improving meaningful communication, improving customer service and compliance with Title VI requirements and federal guidelines. By prioritizing communities that speak languages other than English, developing clear standards and tools and setting measurable goals, we will continue to meet the evolving needs of our riders while aligning with best practices for language access. The plan will be reviewed every three years and updated as needed to reflect changes in multilingual population trends, technological advancements and language access best practices.

# Four Factor Analysis

The Four Factor Analysis is the framework for understanding how to allocate language assistance resources. It helps TriMet identify community language needs, evaluate the frequency and importance of interactions with riders who speak languages other than English and assess current resources and gaps. Driven by data, community feedback and industry standards, the Four Factor Analysis ensures our approach is fair and practical by aligning our language access efforts with the needs of our multilingual riders.

The Four Factor Analysis in this plan explains how findings inform TriMet's overall Language Access Plan including the development of translation services for vital documents, translation and interpretation priorities, staff training, vendor coordination and meaningful outreach.

## Factor 1

**The number and proportion of people who speak languages other than English who are served or likely to be encountered by a TriMet program, activity or service.**

### **2019- 2023 American Community Survey 5-Year Sample:**

The U.S. Census Bureau collects data on individual's English-speaking ability and language spoken at home through the American Community Survey (ACS). ACS identifies individuals who report speaking English "less than very well," classifying them as people with limited English proficiency. Recognizing these populations is essential for assessing the need for translated materials, particularly in languages that meet Safe Harbor thresholds. According to U.S. Department of Transportation (DOT) guidance, Safe Harbor thresholds are defined as 5% of the total population or 1,000 individuals - whichever is less.

This analysis used 2019–2023 ACS 5-year data for the TriMet service district, which includes most of Clackamas, Multnomah and Washington counties. For the initial phase of the Factor 1 Analysis, TriMet estimated the population of people with limited English proficiency within our service area and mapped their geographic access to TriMet bus and rail services.

Safe Harbor guidance recommends written translation of vital documents for each language group with 1,000 individuals with limited English proficiency (TriMet's lower threshold). Oral interpretation may be

used for other languages as needed. While not meeting the Safe Harbor threshold does not indicate non-compliance, following these guidelines demonstrates compliance with federal requirements.

### Population Figure

As shown in Table 1, American Community Survey (ACS) data indicates that people with limited English proficient (LEP) individuals make up approximately 7.2% of the total population aged five years and older within the TriMet district – an estimated 112,630 individuals out of 1,568,872. Spanish speakers account for the largest share of this group (3.3% of the total population and 46% of the LEP population), followed by Vietnamese speakers (0.8% of the total population and 11% of the LEP population). Ten languages meet the Safe Harbor threshold with the TriMet service area of 1,000 individuals with limited English proficiency.

**Table 1:** Languages spoken by LEP persons age 5 and older

<b>Languages Spoken at Home</b>	<b>LEP Population Estimate</b>	<b>% of Total Population</b>	<b>% of LEP Population</b>
Spanish	51,401	3.3%	45.9%
Vietnamese	13,144	0.8%	11.7%
Chinese (Cantonese, Mandarin)	11,293	0.7%	10.1%
Russian	5,387	0.3%	4.8%
Korean	3,325	0.2%	3.0%
Ukrainian	2,761	0.2%	2.5%
Arabic	2,485	0.2%	2.2%
Japanese	1,766	0.1%	1.6%
Tagalog	1,628	0.1%	1.5%
Persian/Farsi	1,234	0.1%	1.1%
Other (e.g., Romanian and Somali)	17,557	1.1%	15.7%
<b>Total TriMet LEP Population</b>	<b>112,630</b>	<b>7.2%</b>	

Source(s): TriMet GIS, Metro Regional Land Information System, and US Census Bureau (Tables B16001 and C16001, 2024)

## **Population Mapping and TriMet Service Coverage**

To better understand how TriMet's bus and rail services align with the needs of communities that speak languages other than English, population data by language category was plotted across a series of maps. These maps overlay TriMet's transit network with the geographic distribution of populations with limited English proficiency within the service district. These visualizations support the Factor 1 analysis by identifying areas with high concentrations of specific populations with limited English proficiency and assessing their proximity to TriMet's services.

The figures below, presented on the subsequent pages, illustrate these spatial relationships:

**Figure 1:** LEP Populations Distribution

**Figure 2:** Distribution of Spanish-Speaking LEP Populations

**Figure 3:** Distribution of Vietnamese-Speaking LEP Populations

**Figure 4:** Distribution of Chinese-Speaking LEP Populations

**Figure 5:** Distribution of Russian-Speaking LEP Populations

**Figure 6:** Distribution of Korean-Speaking LEP Populations

**Figure 7:** Distribution of Ukrainian-Speaking LEP Populations

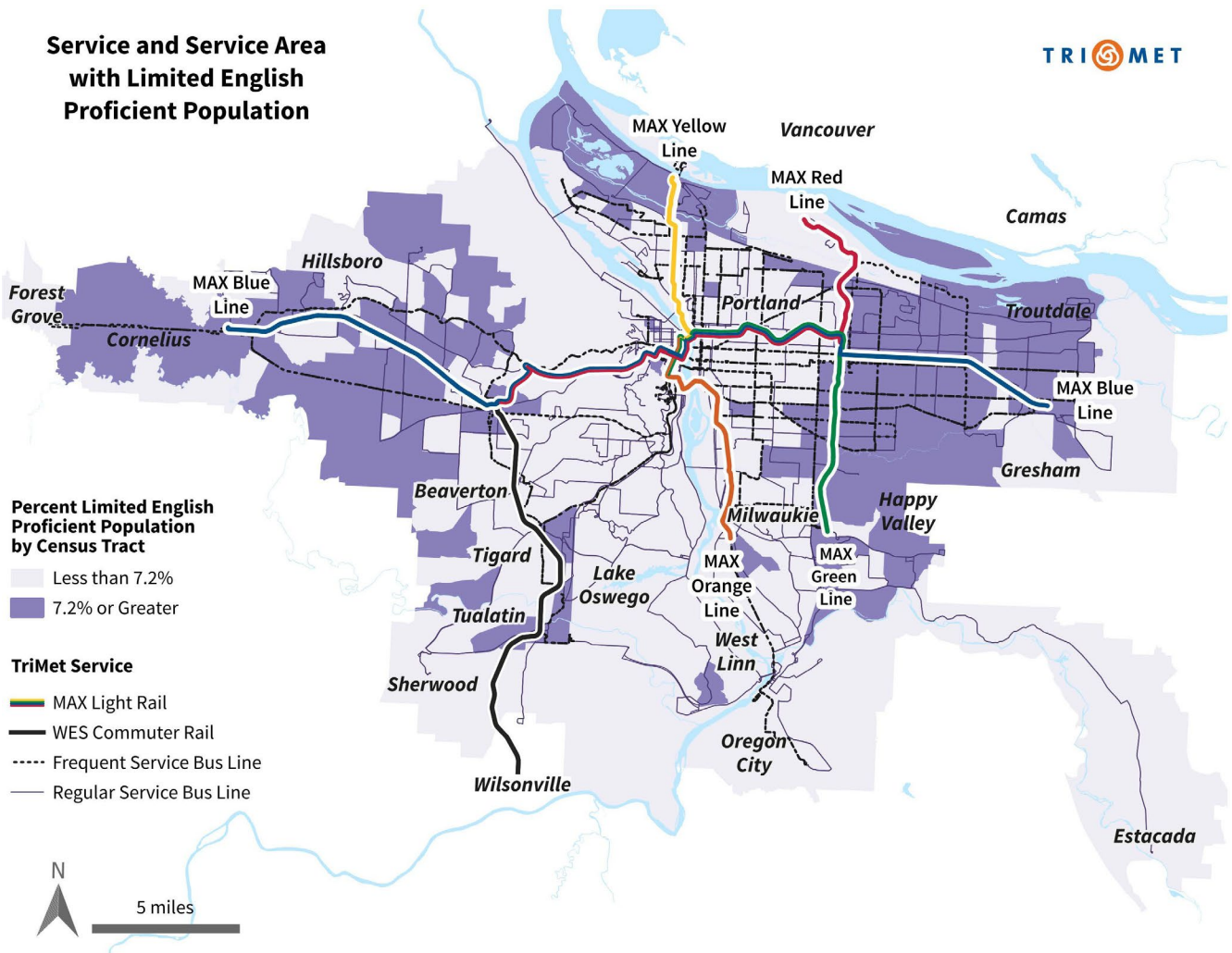
**Figure 8:** Distribution of Arabic-Speaking LEP Populations

**Figure 9:** Distribution of Japanese-Speaking LEP Populations

**Figure 10:** Distribution of Tagalog-Speaking LEP Populations

**Figure 11:** Distribution of Persian-Speaking LEP Populations

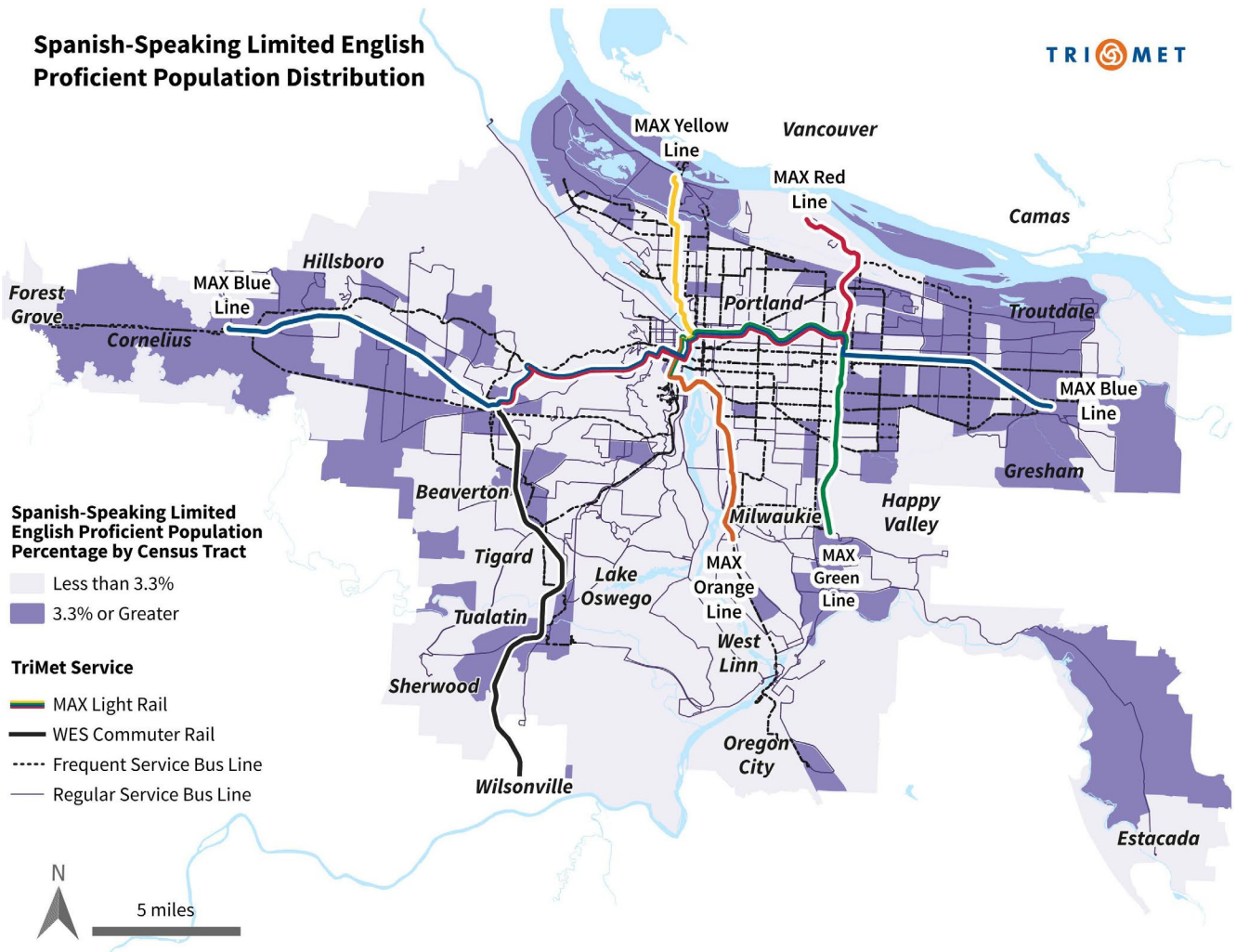
**Figure 1: LEP Populations Distribution**



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

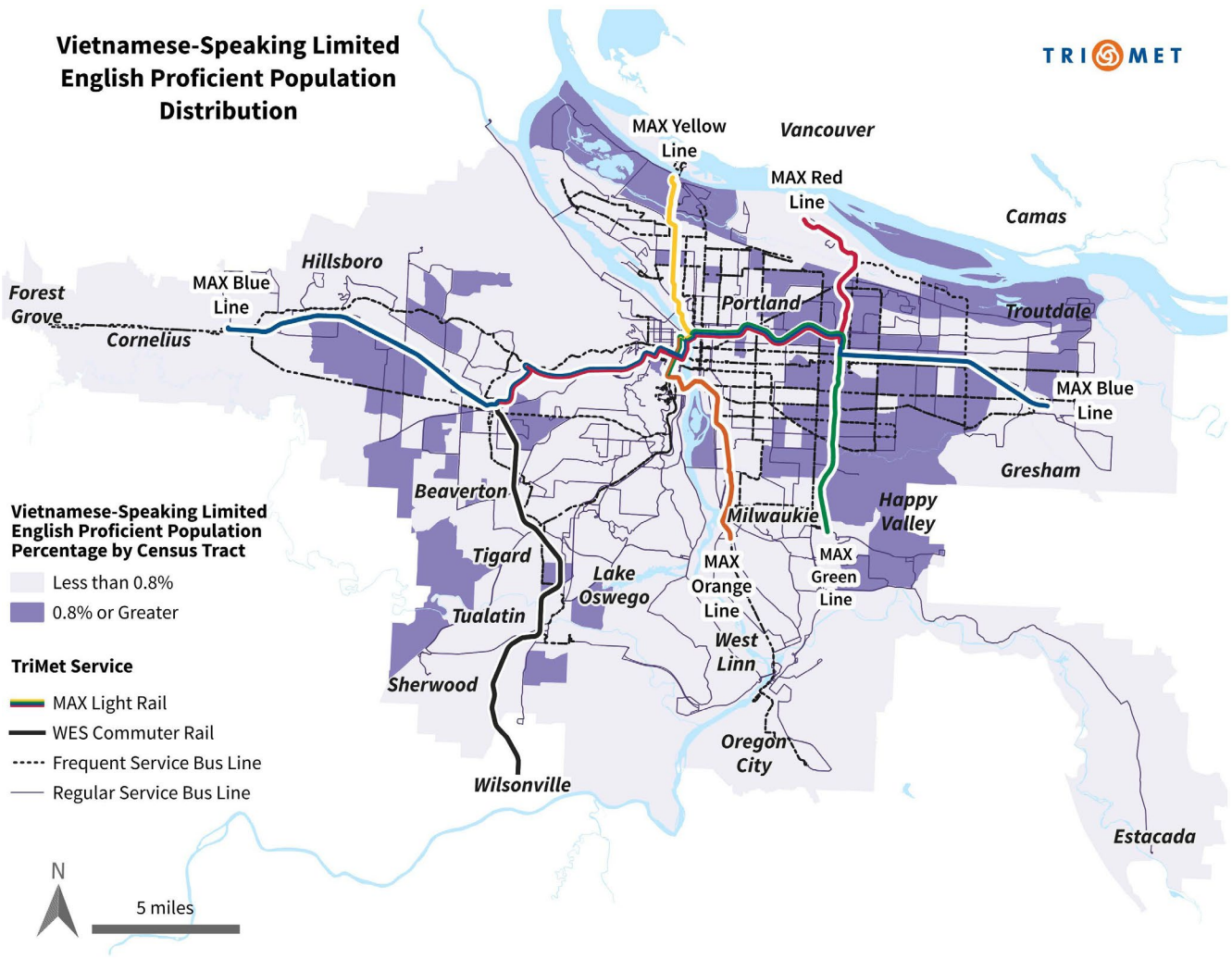
**Figure 2: Distribution of Spanish-Speaking LEP Populations**



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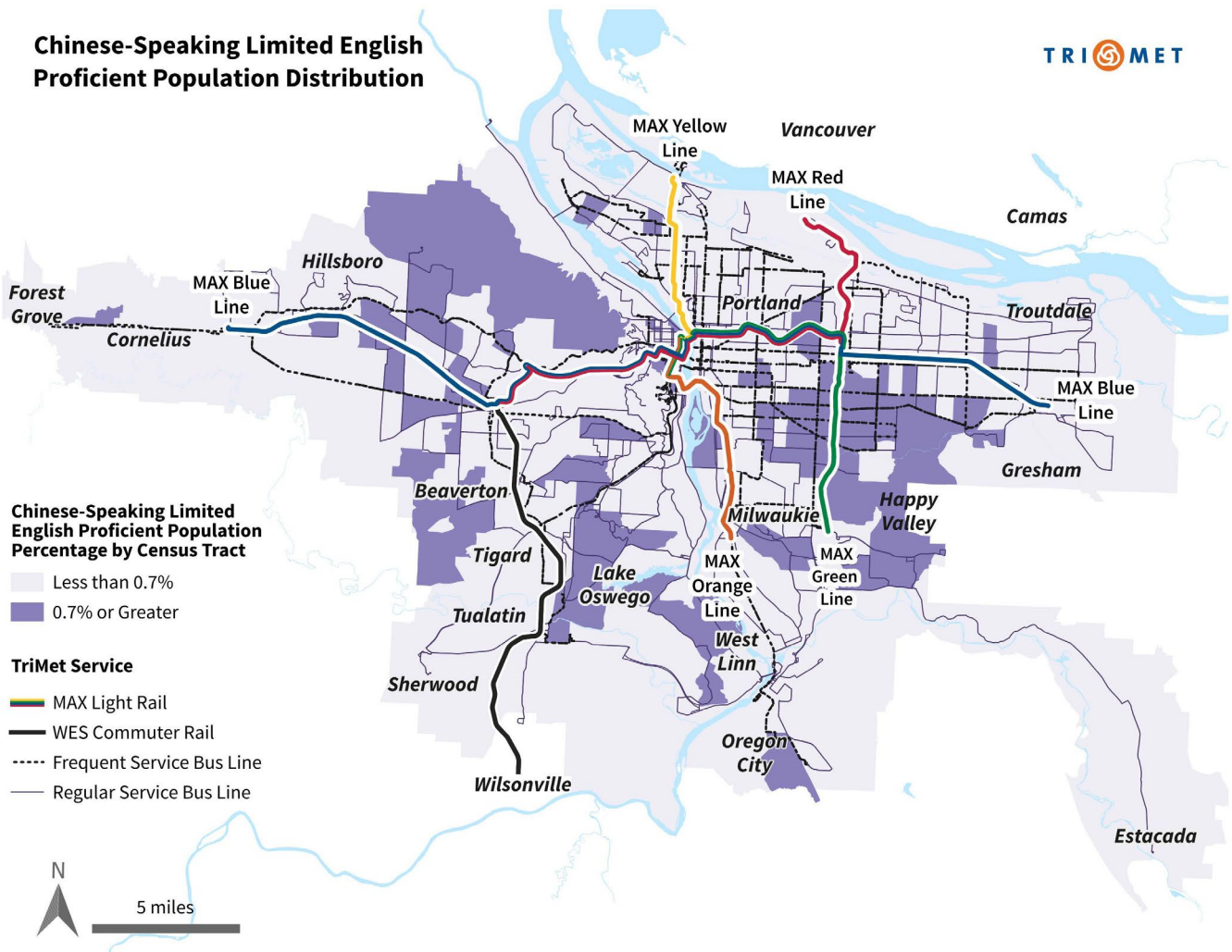
**Figure 3: Distribution of Vietnamese-Speaking LEP Populations**



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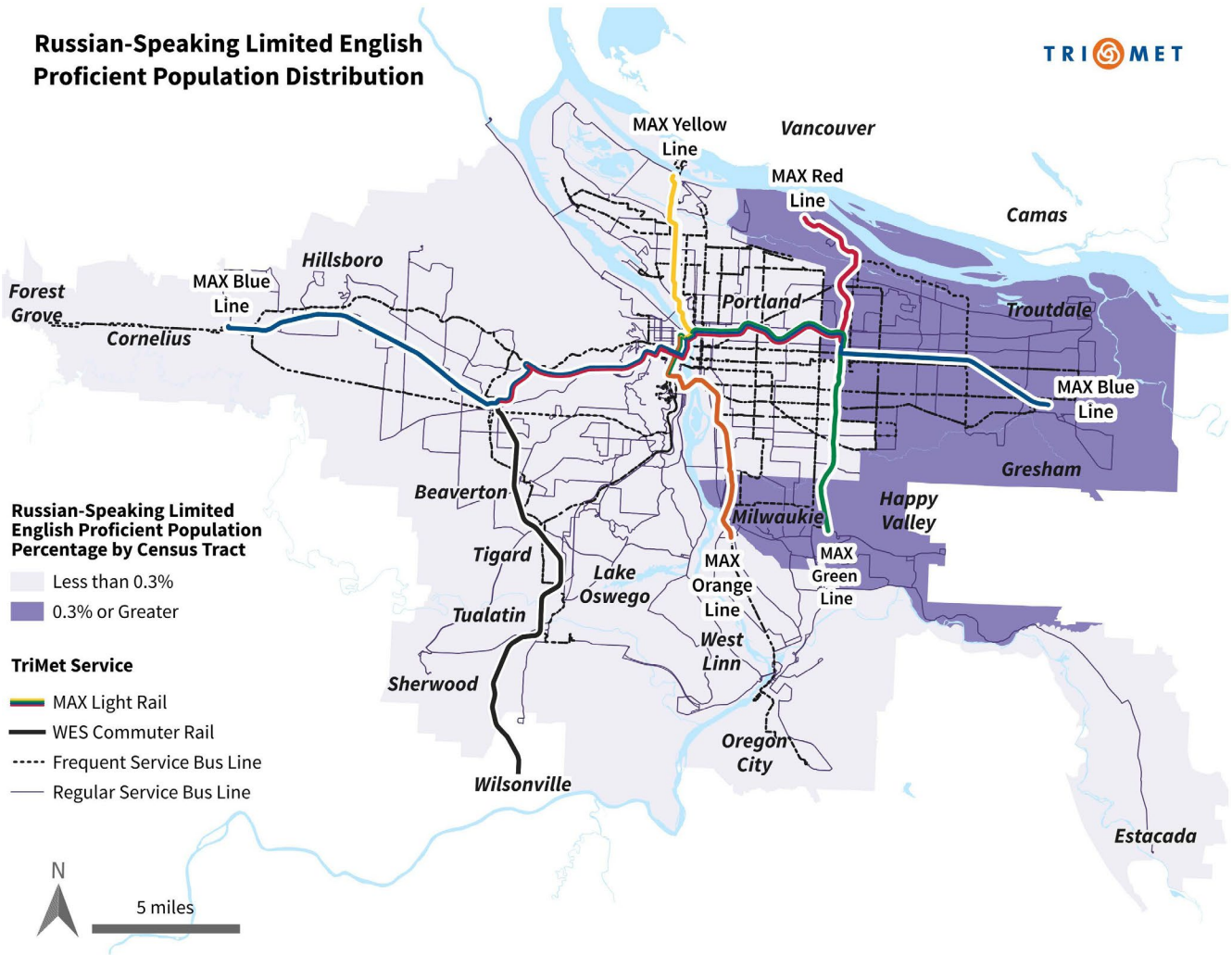
**Figure 4: Distribution of Chinese-Speaking LEP Populations**



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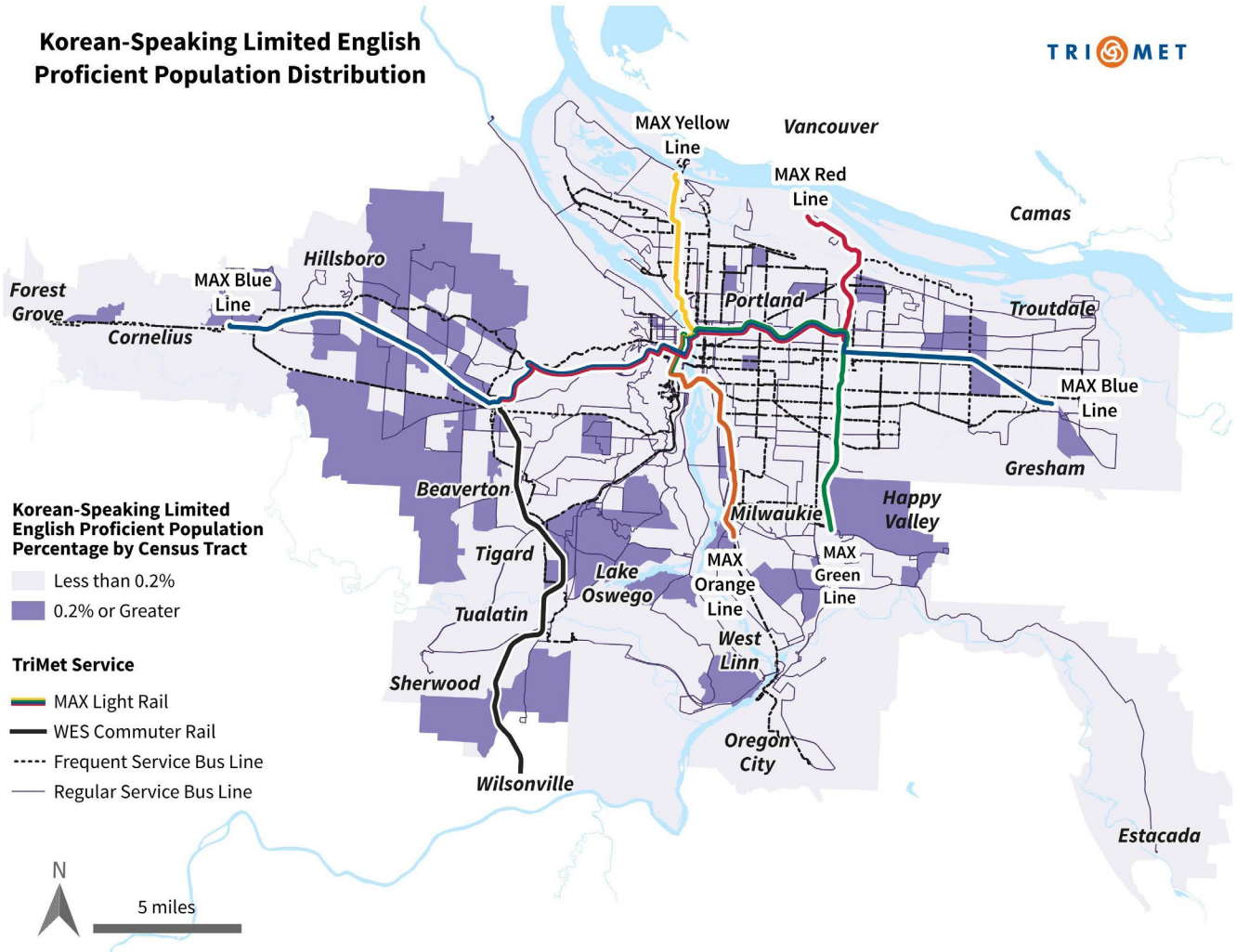
**Figure 5: Distribution of Russian-Speaking LEP Populations**



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

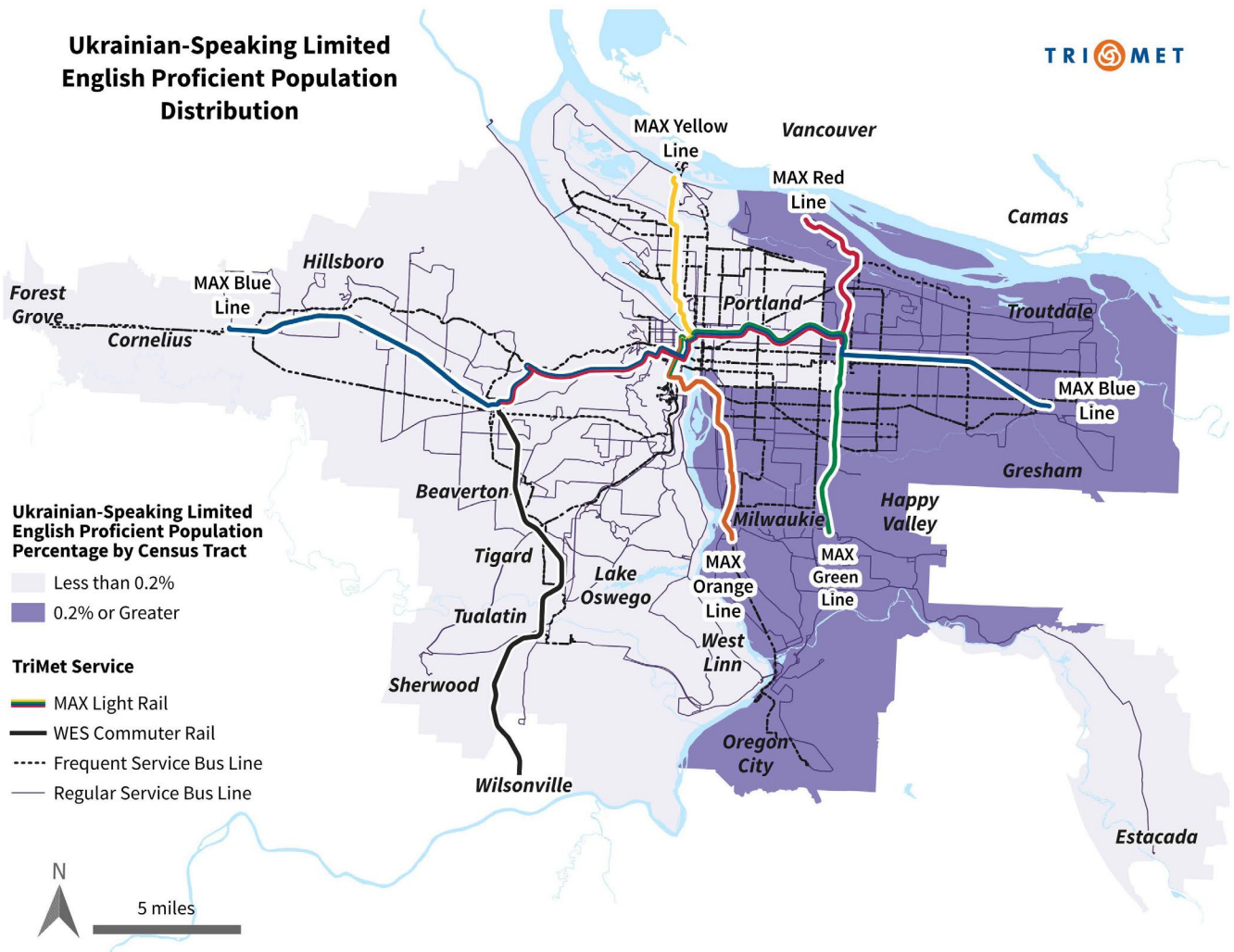
**Figure 6: Distribution of Korean-Speaking LEP Populations**



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

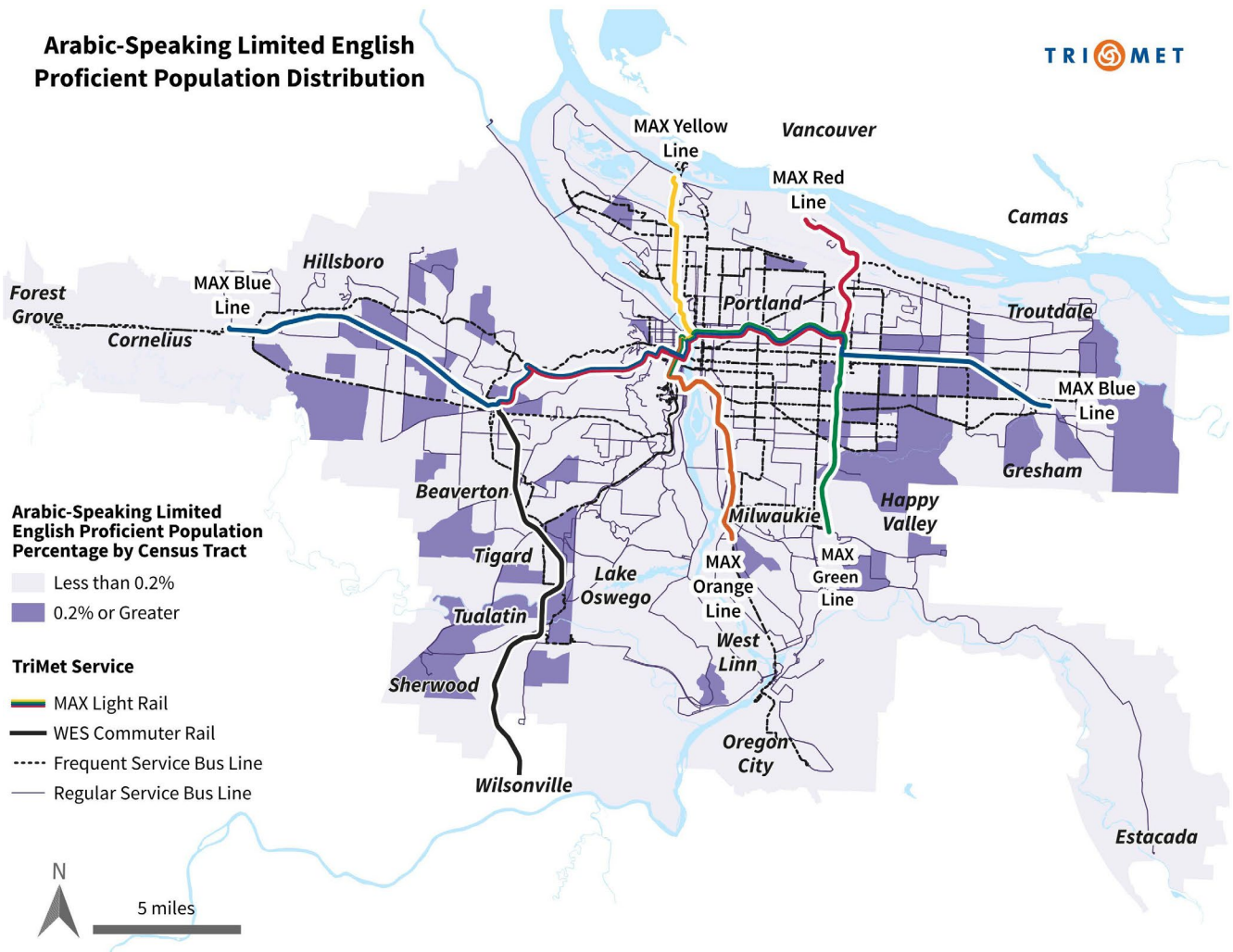
**Figure 7: Distribution of Ukrainian-Speaking LEP Populations**



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

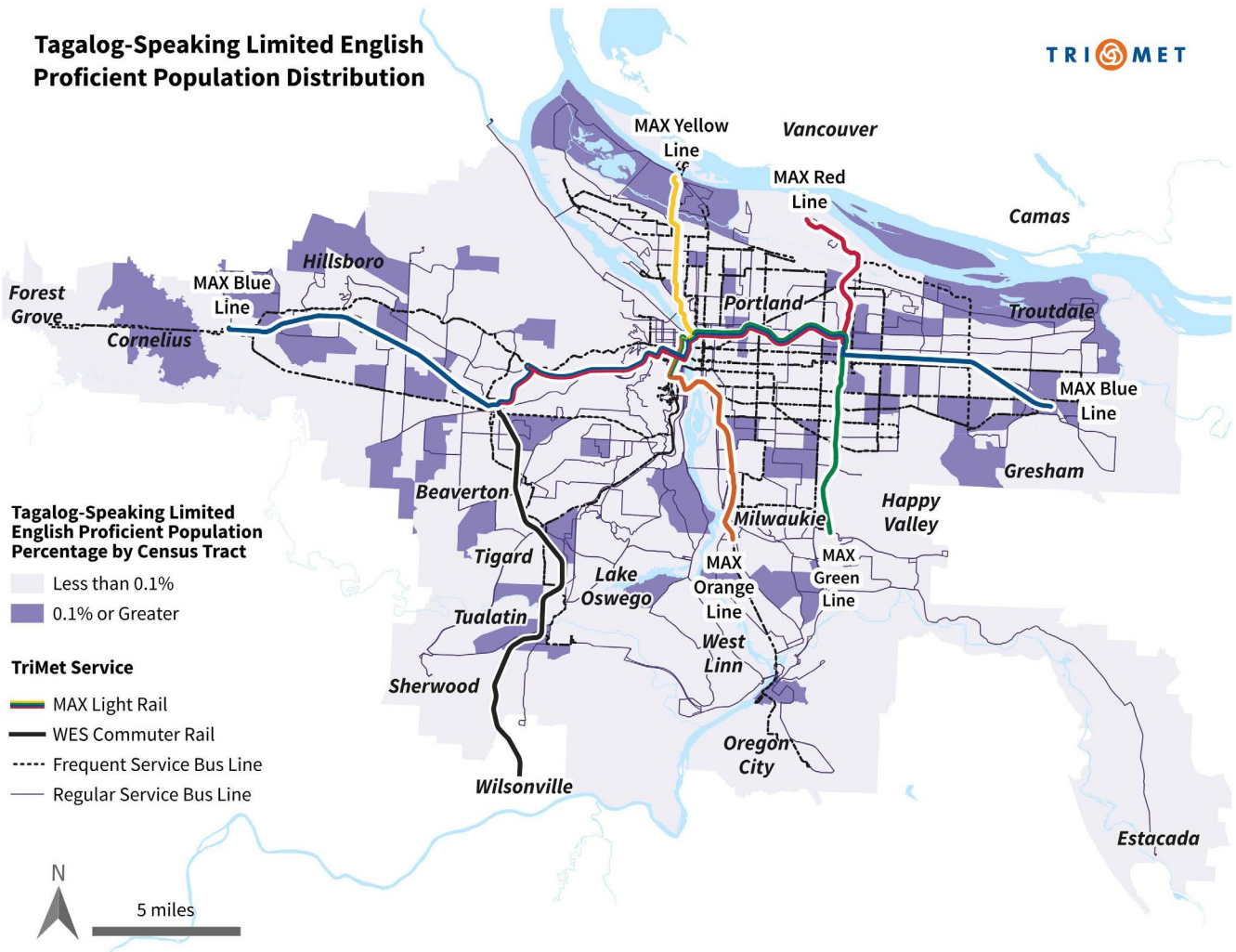
**Figure 8: Distribution of Arabic-Speaking LEP Populations**



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

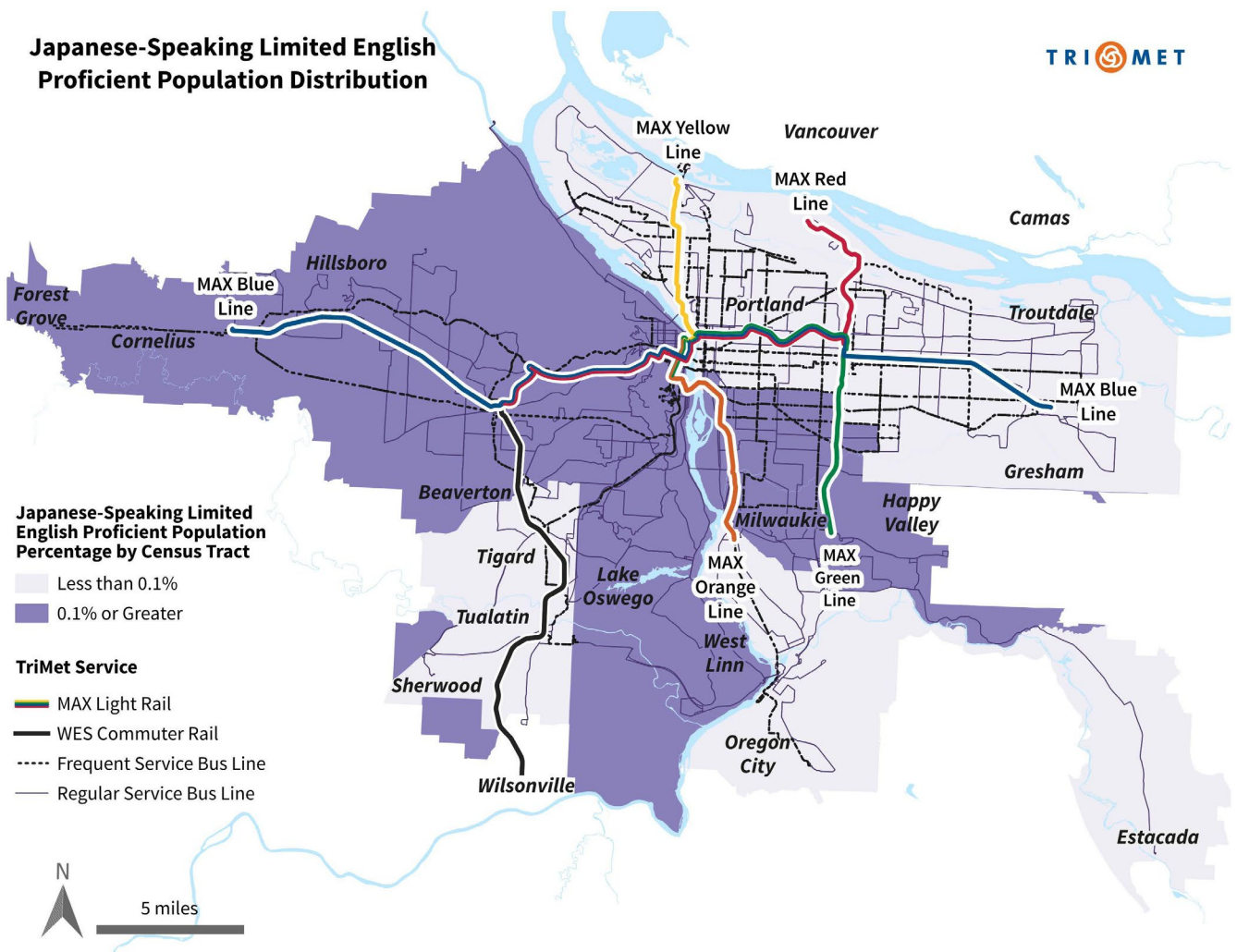
**Figure 9: Distribution of Tagalog-Speaking LEP Populations**



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

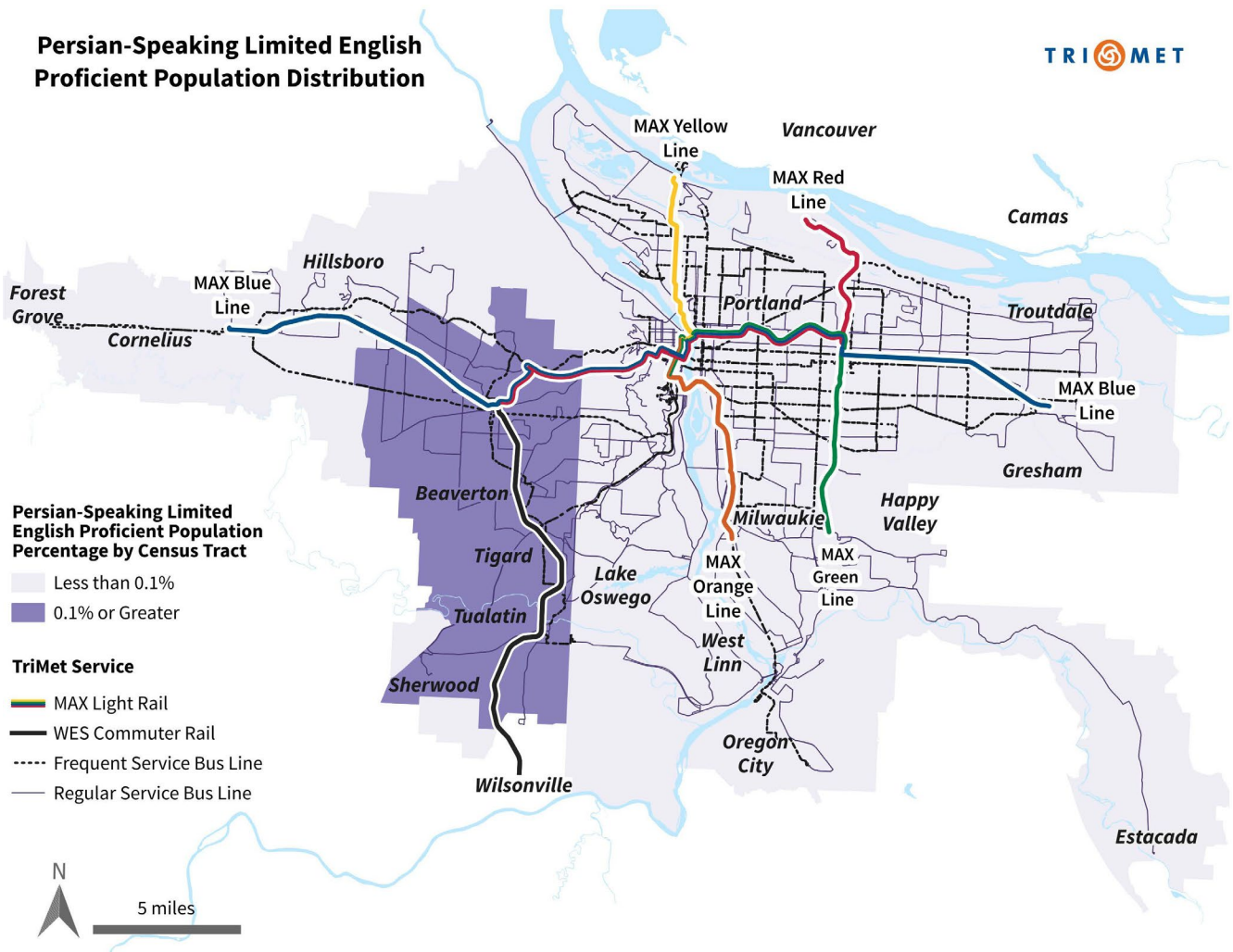
**Figure 10: Distribution of Japanese-Speaking LEP Populations**



A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

**Figure 11: Distribution of Persian-Speaking LEP Populations**



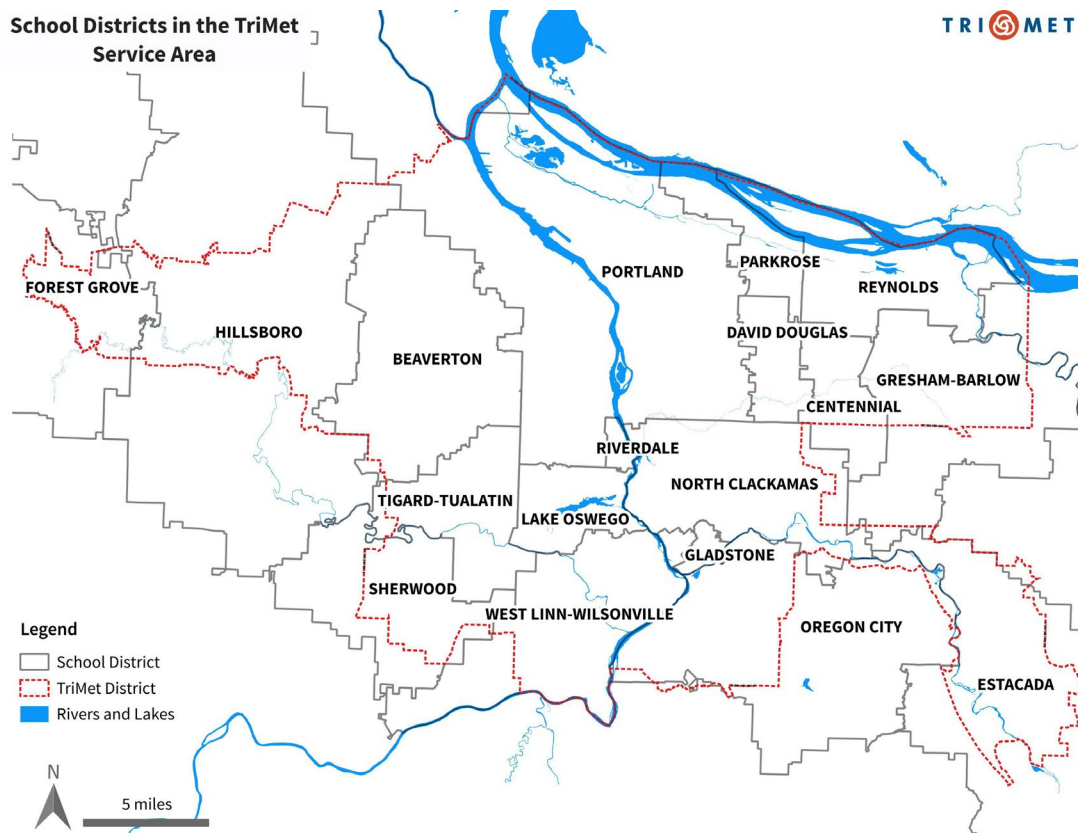
A person with Limited English Proficiency (LEP) is someone who does not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Map Data Sources: Metro RLIS, TriMet, US Census Bureau, Table B16001 and C16001 Language Spoken at Home for the Population 5 Years and Over 2019-2023 American Community Survey 5-Year Estimates

## Oregon Education Department

In addition to American Community Survey (ACS) data, which includes individuals aged five and older, Factor 1 also considers the population of English Language Learners (ELL) within school districts in TriMet's service area. ELL students are defined as students with limited English proficiency. This data is included based on the assumption if a child speaks a language other than English at home, their parents or guardians likely do as well. Data was collected from the following K-12 school districts within TriMet's service district: 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. Figure 12 shows the locations of these districts within our service area.

**Figure 12:** School Districts within the TriMet Service Area



## **Oregon Education Department (cont.)**

Data from the Oregon Department of Education (*At-a-glance district profiles, 2023*) indicate that the TriMet region supports a high population of ELL. This dataset specifically reports on ever ELL, a category that includes both current and former ELL, providing a comprehensive view of students with ELL backgrounds.

The school districts located in the eastern portion of TriMet's service area—Reynolds, David Douglas, and Centennial—report the highest proportions of ELL relative to their total student populations with rates of 45%, 43% and 42%, respectively. Districts in the central and western portions of the region—Hillsboro, Portland, and Beaverton—demonstrate the greatest linguistic differences, with students in these districts speaking 158, 133 and 98 unique languages, respectively (Oregon Department of Education, 2023, *At-a-glance district profiles*).

According to the Oregon Department of Education (*English learners in Oregon, 2023*), TriMet's district includes eight of the ten school districts with the highest number of current ELL students in Oregon: Beaverton, Portland, Hillsboro, Reynolds, David Douglas, North Clackamas, Gresham-Barlow and Tigard-Tualatin. Additionally, three school districts in TriMet's region—Reynolds, Centennial, and David Douglas—rank among the top ten districts in Oregon with the highest percentage of current ELL students relative to their total student populations (Oregon Department of Education, 2023, *English learners in Oregon*).

Although specific data on the languages spoken within each school district in the TriMet region were not readily available, Table 2 presents statewide data from Oregon Department of Education (*English learners in Oregon, 2023*), that identifies the most commonly spoken languages among current ELL students. Given the high concentrations of ELL in TriMet-area districts, it is reasonable to assume that the regional linguistic patterns reflect statewide trends.

According to the report, Spanish is the most widely spoken language among ELL students in Oregon, followed by Russian, Chinese and Vietnamese. These languages likely represent a significant portion of the ELL population within the TriMet region as well.

**Table 2:** Percentage of most common home languages among Oregon current English Language Learners 2022-2023

Language	Percentage of Current English Language Learners speaking this Language
Spanish	76.0%
Russian	2.6%
Chinese	2.0%
Vietnamese	2.0%
Arabic	1.4%
Chuukese	1.3%
Ukrainian	1.2%
Somali	1.0%

Source: Oregon Department of Education (English learners in Oregon, 2023)

### **Oregon Judicial Department**

Factor 1 also considers top languages requested in courts through the Oregon Judicial Department (OJD) as an additional indicator of Limited English Proficiency population distribution within TriMet’s district. To ensure compliance with federal and state language access requirements, the OJD must provide comprehensive language services across Oregon courts. According to the OJD (2022), 57% of all individuals with limited English proficient in the state reside in Multnomah, Washington and Clackamas counties.

The language services provided through the judicial department are an indicator for the language needs of communities with limited English proficiency in a region.

Table 3 from the OJD (2022) highlights the top languages requested for each county in TriMet for 2020. Additionally, Table 4 provides data on the number of court interpreter requests by language category

for the year 2022. These data sets reveal that Spanish, Russian and Vietnamese are among the most commonly requested languages for interpretation services. Notably, Chuukese, Arabic and Somali also appear within the top five languages requested, indicating a growing need for services in these language communities. This data helps to identify trends in language demand within the judicial system, further informing the distribution of populations with limited English proficiency and languages spoken in TriMet’s service district.

**Table 3:** 2020 Top Five Languages Requested in Court by County within TriMet

Clackamas	Multnomah	Washington
Spanish	Spanish	Spanish
Russian	Russian	ASL
Chuukese	Chuukese	Somali
Vietnamese	ASL	Arabic
Mixteco	Somali	Chuukese

Source: Oregon Judicial Department (2022)

**Table 4:** 2022 Court Interpreter Requests by Language Category for Counties within TriMet

Language Category	Clackamas	Multnomah	Washington
Spanish	1,471	4,352	5,509
Russian and Vietnamese	269	702	155
Indigenous languages from Mexico, Central, and South America	27	156	282
Languages Other Than Spanish	340	1,827	1,135
American Sign Language	33	324	91

Source: Oregon Judicial Department (2023)

## Health Share Oregon

Health Share Oregon is a Coordinated Care Organization (CCO) serving Multnomah, Clackamas and Washington counties. As part of the Oregon Health Plan (Oregon Medicaid), CCOs provide comprehensive health coverage for low-income individuals and families.

According to Health Share Oregon (2023), approximately 15% of Health Share members speak a primary language other than English. This includes around 13,000 members identified as having Limited English Proficient (LEP). In 2022, members with limited in their English proficiency accounted for nearly 40,000 visits to healthcare providers. Additionally, 13% of all member visits required interpretive services to support communication needs (Health Share of Oregon, 2023). The most common primary non-English languages among Health Share members are listed in Table 5.

Table 5: 2023 Percentage of Total Health Share Oregon Members in Multnomah, Clackamas, and Washington Counties with Primary Language Other Than English

Language	Percent of Health Share Members
Spanish	9.8%
Russian	1.3%
Vietnamese	1.1%
Chinese	1.0%
Arabic	0.3%
Somali	0.3%
Other	2.6%

Source: Health Share Oregon (2023)

## Synthesis

Data from the American Community Survey (ACS), local school districts, the Oregon Judicial Department and Health Share Oregon collectively illustrate a concentrated and large multilingual population with limited English proficiency within TriMet's service area - particularly in the eastern, central, and western sectors. Across all datasets, Spanish consistently emerges as the most commonly spoken language among individuals with limited English proficiency. Russian, Chinese and

Vietnamese are also frequently reported among the top languages across multiple sources.

According to ACS estimates, there are ten languages within TriMet's service district that meet the U.S. Department of Transportation's Safe Harbor threshold of 1,000 or more individuals with limited English proficiency: Spanish, Vietnamese, Chinese, Russian, Korean, Ukrainian, Arabic, Japanese, Tagalog and Persian (includes Farsi and Dari). While the ACS serves as a foundational data source for identifying and estimating populations with limited English proficiency geographically, it presents limitations in its ability to disaggregate less common languages. This results in the underrepresentation of certain linguistic groups.

In contrast, local data from school districts, courts and healthcare systems provide more granular insight. These sources highlight Somali and Chuukese as among the top languages spoken by English language learner (ELL) students and among the most frequently requested for interpretation services. Despite this, these languages do not meet the ACS Safe Harbor threshold because they are grouped into broader language categories, such as "Amharic, Somali or other Afro-Asiatic languages" or "Ilocano, Samoan, Hawaiian or other Austronesian languages," making it difficult to estimate their populations precisely.

Given the frequency with which Somali and Chuukese appear in local datasets, it is reasonable to infer that these languages have a more significant presence in TriMet's service district than ACS data alone would suggest. As such, they should be considered in language access planning and translation services.

## **Factor 2**

### **The Frequency with which people with limited English proficiency come into contact with TriMet services.**

TriMet maintains frequent contact with people who speak languages other than English through various customer-facing programs and services. The presence of more than 112,630 individuals with limited English proficiency (7.2%) in our service area along with the widespread distribution of Spanish, Vietnamese, Chinese, Russian and Korean-speaking communities among others, indicates regular interaction with multilingual customers across our transit system.

#### **Points of Contact Include:**

- TriMet Customer Service Line (503-238-RIDE): Frequent use of over-the-phone interpreters.
- TransitTracker by Phone: A Spanish option is presented first in the menu system.
- In-person Services: Staff frequently engage with customers who speak languages other than English at transit centers, outreach events, fare enforcement interactions and community meetings.
- Website Engagement: Visits to translated webpages and use of online Trip Planners in Spanish and other Safe Harbor languages.
- Community Engagement: TriMet's ongoing partnerships with organizations through our Meaningful Participation Services contracts that include community-based organizations such as Latino Network, IRCO and APANO yield consistent interaction with communities that speak languages other than English.

The survey feedback from frontline employees, operators and TriMet's own outreach activities confirm that Spanish-speaking riders have the highest frequency of contact followed by Vietnamese, Chinese and Russian-speaking riders.

### **Factor 3**

#### **The Nature and Importance of TriMet Services to linguistically diverse people's lives.**

Public transit plays a critical role in the daily lives of people with limited English proficiency, providing access to:

- Employment
- Education
- Healthcare
- Housing and social services
- Civic participation opportunities

People who speak languages other than English often rely on transit due to lower car ownership rates and affordability concerns. Therefore, ensuring meaningful access to TriMet's services is vital for improving access and opportunity.

#### **Key Programs Critical to Populations with Limited English Proficiency:**

- Hop Fastpass® and income-based access to Honored Citizen Reduced Fare Program
- Service alerts and route changes
- Title VI Complaint Process
- Safety and emergency communications
- Transit project planning (e.g., 82<sup>nd</sup> Avenue Transit Project, TV Highway Project)

TriMet recognizes that providing timely and understandable information to populations who speak languages other than English prevents missed opportunities, inability to access essential services and decreased trust in our agency.

## **Factor 4**

### **The resources available to the recipient and associated costs.**

TriMet continues to invest in infrastructure, staff and partnerships to support meaningful language access. While cost is a consideration, we recognize that ensuring compliance with Title IV and improving access for riders with limited English proficiency are agency-wide priorities that require sustained investments. We have demonstrated an ongoing commitment through hiring of staff and creating a sustainable Language Access Program infrastructure. We have dedicated resources across several departments to implement the Language Access Program. Below are examples of the roles and responsibilities departments have to ensure meaningful access for people who speak languages other than English. Additionally, we contract with community-based organizations, vendors and other service providers to meet the language needs of riders.

- The Language Access Program Manager leads strategic planning, compliance and agency- wide coordination and consultation.
- The Community Engagement Team supports community-specific outreach and maintains ongoing relationships with over 40 community-based organizations.
- Creative Services, Customer Experience and Communications Departments produce multilingual materials and oversee translation workflows.
- Operations, Training and Marketing teams support language access through service design, staff education and advertisements.
- Bilingual staff includes speakers of Spanish, Vietnamese, Mandarin, Cantonese, Russian and Ukrainian provide valuable contributions.

### **Technology and Vendor Support**

We utilize a tiered approach to translation that maximizes quality while managing costs.

- Professional translation vendors are contracted for highly visible, safety critical and community-responsive materials.
- Over-the-phone interpretation services support over 240 languages via the customer service line.
- In-person interpretation is available for public meetings and community events when requested or anticipated based on community demographics and geographical location of projects.

- Multilingual channel cards and signage on board vehicles and at transit centers
- A centralized language request tracking system is under development to improve efficiency and identify cost-saving opportunities.

### **Budget Considerations**

We have allocated budgets in programs across multiple departments to support language access including:

- Translation and interpretation services
- Development of multilingual digital tools and signage
- Development of training for respectful and community-responsive service delivery
- Technology solutions for real-time service alerts and multilingual customer support

### **Balancing Cost and Compliance**

We will continue to evaluate language needs using the Four Factor Analysis framework and adjusting our strategies as needed to reflect the trends in multilingual communities. By prioritizing translation of vital documents for Safe Harbor language populations, we strive to provide cost-effective and meaningful access.

To provide transparency and compliance, we are also developing:

- A self-assessment and reporting tool aligned with Federal Transit Administration's Title VI requirements.
- A quarterly review process for language access activities, quality and accuracy of translated information.
- Feedback loops through community partners and multilingual rider surveys.

## Conclusion

Based on the Four Factor Analysis using current population data we confirm the continued need to:

- Prioritize Spanish, Vietnamese, Chinese, Russian and Korean across all services and materials.
- Monitor and evaluate contact with emerging language groups who speak languages other than English.
- Expand community partnerships to engage linguistically diverse riders.
- Ensure consistent training for staff, accurate translations and visibility of language assistance services.

This analysis reaffirms that our language access plan must remain innovative and responsive to the evolving demographics of the region. Regular updates and monitoring will be essential to uphold meaningful access for riders across all of our programs and services.