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 it's work, school, medical appointments, or connecting with family. Many of our riders bring the strength of speaking multiple languages, and it is our responsibility to ensure everyone can easily access and understand critical transit information.

While compliance with federal Title VI Civil Rights 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 strengthening our ability to provide clear, timely, and meaningful information in the many languages spoken across the our service area.

By removing language barriers, TriMet does not only comply with legal standards, we are 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 is 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, its implementing regulations and the U.S. Department of Transportation's implementing guidance on providing meaningful access for individuals with Limited English Proficiency, we are proud to share our 2025 Language Access Plan.

This Language Access Plan reflects a human-centered approach to public service. This plan is, by design, 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. We are committed to creating a system that welcomes all riders.

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 plan outlines updated goals, staff training, and agency-wide initiatives that reflect best and emerging 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 fairness across our service 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 limited English proficient. Each of these represented languages meets the federal Safe Harbor threshold of 5% of the population or 1,000 speakers. The ten most commonly spoken languages by 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 provides the opportunity for us to continue expanding public facing efforts and internal strategies for staff and resource development to support the language access program's overall efforts.

Sustaining Core Practices

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

- 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 provided at no cost to riders.
  - Providing language assistance at no cost to riders, for outreach documents and in-person services. It also guides the process for identifying vital documents for translation and the format(s) that most effectively communicate the messages contained in those documents.
- **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, maintaining definitions and standards for translation and interpretation services and 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 such as the Multicultural Children's Festival, Lunar New Year Celebrations and school districts' New Comer 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 more on general engagement, they complemented broader agency efforts that included multilingual staffing at over 40 community gatherings, translated surveys, and direct engagement in more than a dozen languages. In concert with internal standard operating procedure updates and increased community partnership efforts, these activities reaffirmed our continued commitment to language access, community responsiveness and meaningful access to our programs and services.

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 increase 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 threshold languages.
- Grew the enrollment partner network to over 40 organizations, extending support to speakers of 20+ additional languages, including Dari, Fijian, and Chuukese.
- Updated internal procedures and established new strategies for serving languages beyond the top Safe Harbor thresholds.
- Assigned multilingual staff to events, with 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, Meet Our Team, and Honored Citizen reduced fare brochures in multiple languages.
- Falcon devices and Braille for visually impaired people.

Leadership and Commitment

TriMet's Public Access & Innovation Division leads Language Access Plan implementation, working closely with departments across the agency by providing guidance and consultation on language access efforts and needs. In partnership with the Public Access & Innovation Division, the Public Affairs Division will continue to prioritize outreach to communities

speaking Safe Harbor languages and engage trusted community partners to support community-responsive engagement strategies.

The Language Access Plan is a living document with formal updates every three years guided by 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 the programs and 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 opinions on how our agency can improve meaningful access. This plan outlines the steps we will take to engage with various communities, address gaps in meaningful access, and create opportunities for community members to get involved, and create opportunities for community members and employees to contribute to these efforts. This plan also supports the goals of TriMet 2030 and will evolve 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 that speak languages other than English.
- **Provide Staff Training**: Ensure training is available for employees, particularly front line staff who interact directly with the riders and communities that speak languages other than English in a respectful and linguistically competent communication and language access strategies.
- **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

In an effort to ensure our Language Access Plan provides meaningful access to our multilingual communities and reflects the needs of hard-to-reach communities in the 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 language access feedback efforts 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 the respondents were unaware TriMet offers interpretation 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 that spoke languages other than English asked for 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 that 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 and 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 Multicultural Services 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, 40 community-based organizations and culturally-specific vendors are contracted through the Multicultural 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, Community Engagement Spectrum:** This model guides our approach to engaging communities with limited English proficiency. We will move from informing and consulting to more engaging approaches such as collaborating to create meaningful opportunities for people that speak languages other than English to contribute to the development and implementation of 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	• Establish the Language Access Advisory Committee • Distribute community and rider surveys regularly across multiple languages and channels. • Host LEP focus groups in partnership with community organizations. • Design and distribute I-speak cards and posters at key TriMet service areas and partner sites • Pilot new LEP rider growth strategies • Develop and launch new LEP rider training	FY26-FY28
Staff Training	• Develop and launch LEP training for all frontline staff. • Develop and deliver training to project managers and frontline staff. • Implement a feedback loop system to capture and incorporate community and staff feedback. • Update and deliver the annual Title VI and Language Access training.	FY26-FY27
Translation & Interpretation	• Identify and prioritize vital documents for translation • Develop SOPs for translation vendors and Smartling workflows to ensure consistency and accountability. • Identify signage in priority areas for translation	FY26-FY28
Technology & Tools	• Develop and distribute communication guides • Monitor and update trimet.org • Integrate Smartling software into translation options	FY26-FY28
Monitoring & Evaluation	• Create feedback loops for community, staff and vendors • Conduct reviews of language access activities, training and vendor performance • Track and analyze language needs, requests and areas for improvement	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 communities with limited English proficiency are accurately reflected in program goals and commitments. The data collected will involve analyzing census data, American Community Survey data, school district data, community and rider feedback, and input from community-based organizations that work directly with multilingual communities.

- **Priority Languages:** Based on data and consultation with the Public Affairs Division staff and community organizations, we will continue to identify priority languages for translation and interpretation services and 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 such items and information as:

  - Language identification cards and posters for LEP riders to identify their preferred language i.e., I-speak cards and posters.

  - Guides for staff across the agency to help provide multilingual services or connect people who speak languages other than English with interpreters when needed.

  - Digital tools that offer 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 be provided access to annual training in community awareness and language access procedures and best practices for working 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. The updates to the training and staff development will incorporate and prioritize feedback from multilingual riders and community.

Performance Measures:

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

- Notice of Title VI Civil Rights and Language Access rights to multilingual riders and communities.

- Timeliness and effectiveness for providing language services upon request.

- Customer satisfaction among riders who speak languages other than English.

- Availability of translated materials to multilingual communities.

- 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 will work to identify and allocate funding to support language access services including, but not limited to, interpretation services, translation of vital documents, information and

program materials and 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 ensuring our Language Access Plan aligns with current research, community needs, and best practices, by utilizing 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 those from the Federal Transit Administration, to ensure full compliance and alignment with evolving requirements for language access in public transportation. We 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. This includes, but is not limited to:

  o Using data from the U.S. Census, American Community Survey, and local school districts to assess language needs.

  o Conducting surveys, focus groups, and outreach to understand language preferences and multilingual rider experiences.

  o 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 that speak languages other than English.

Benchmarking and Collaboration

TriMet benchmarks our language access work against other leading transit agencies and collaborates with 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 to meet these needs.

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, by investing in:

- 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

In an effort to identify areas of improvement, we will share updates on the progress made towards language accessibility, the feedback received, and service delivery. By setting clear accountability measures, we will have the ability to analyze how well language services are meeting the needs of the region's multilingual communities.

Plan Implementation

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

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

Four Factor Analysis

The Four Factor Analysis serves as the framework for understanding where and how to allocate language assistance resources. This analysis helps TriMet identify the language needs of our community, evaluate the frequency and importance of interactions with individuals that speak languages other than English, and evaluate current resources and areas of growth. Driven by data, community feedback, best practice and industry standards, the Four Factor Analysis ensures our approach is fair and practical by aligning our language access efforts with the needs of multilingual riders.

The Four Factor Analysis in this plan shares in detail and explains how the 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 multilingual outreach.

Factor 1

The number and proportion of persons who speak languages other than English 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 data identifies individuals who report speaking English "less than very well," classifying them as limited English proficient. Recognizing limited English proficient-language populations is essential for assessing the need for translated written materials, particularly for languages that meet Safe Harbor thresholds. According to guidance from the U.S. Department of Transportation (DOT), these thresholds are defined as 5% of the total population or 1,000 individuals—whichever is less.

This analysis utilized 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 calculated the estimated population of individuals with limited English proficiency within our service area and visually analyzed their access to TriMet's bus and rail services using geographic mapping.

Department of Transportation Safe Harbor guidance recommends written translation of vital documents for each limited English proficient language group that meets the threshold, 1,000 individuals in TriMet's case, as this is lower than 5% of the service area population. Oral interpretation may be used for other languages as needed. While not meeting the Safe Harbor threshold does not constitute non-compliance, adherence to these guidelines serves as strong evidence of compliance with federal language access requirements.

Population Figure

As shown in Table 1, according to the American Community Survey (ACS), 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 a total population of 1,568,872. Spanish speakers account for the largest share of this group (3.3% of the total population and 46% of the limited English proficient population), followed by Vietnamese speakers (0.8% of the total population and 11% of the limited English proficient population). According to ACS data, ten languages meet the Safe Harbor threshold of 1,000 individuals with limited English proficiency within the TriMet service area.

Table 1: Languages spoken by LEP personas age 5 and older

Languages Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
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%
Total TriMet LEP Population	112,630	7.2%	

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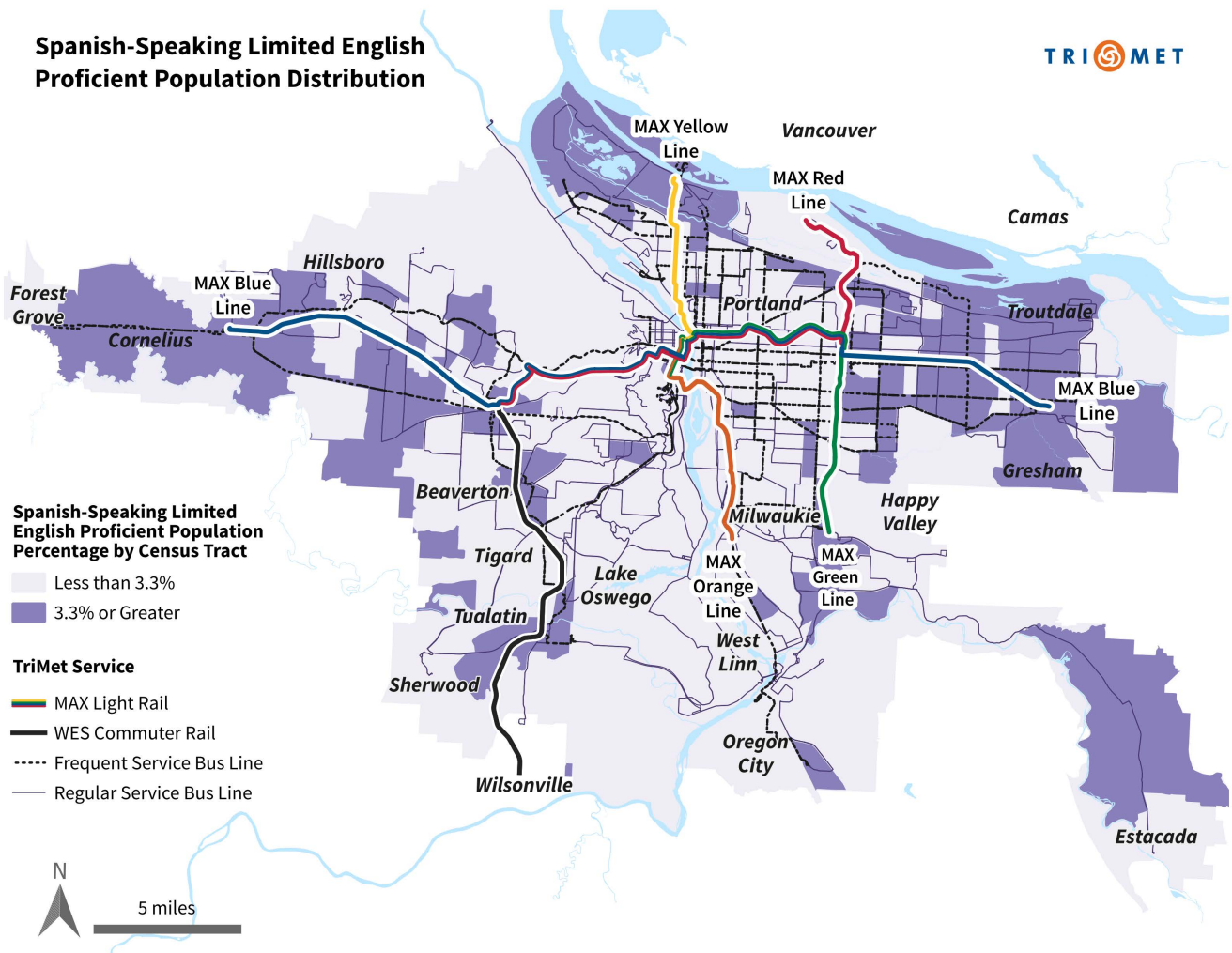- **Figure 11:** Distribution of Persian-Speaking LEP Populations

Figure 1: LEP Populations Distribution
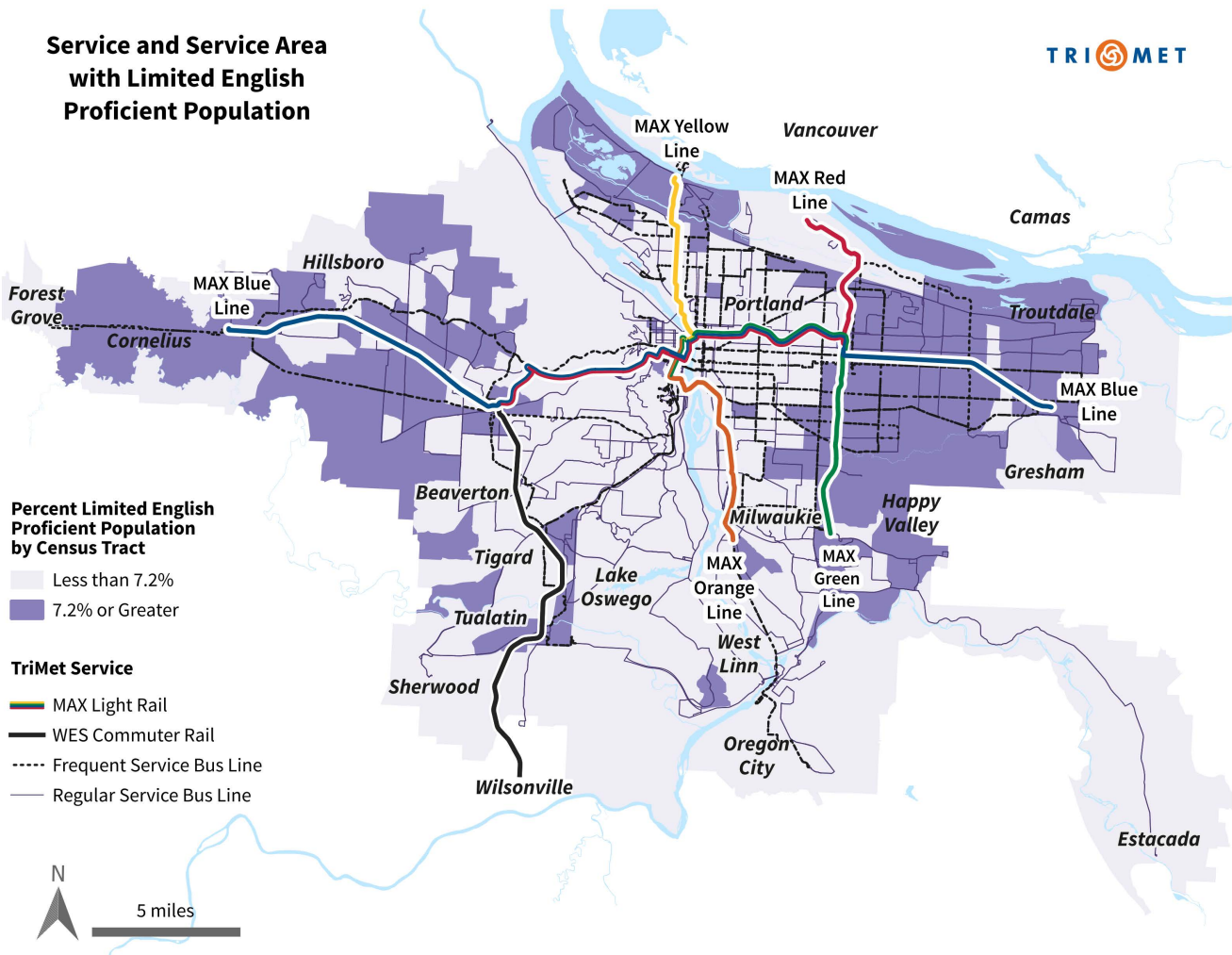
Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

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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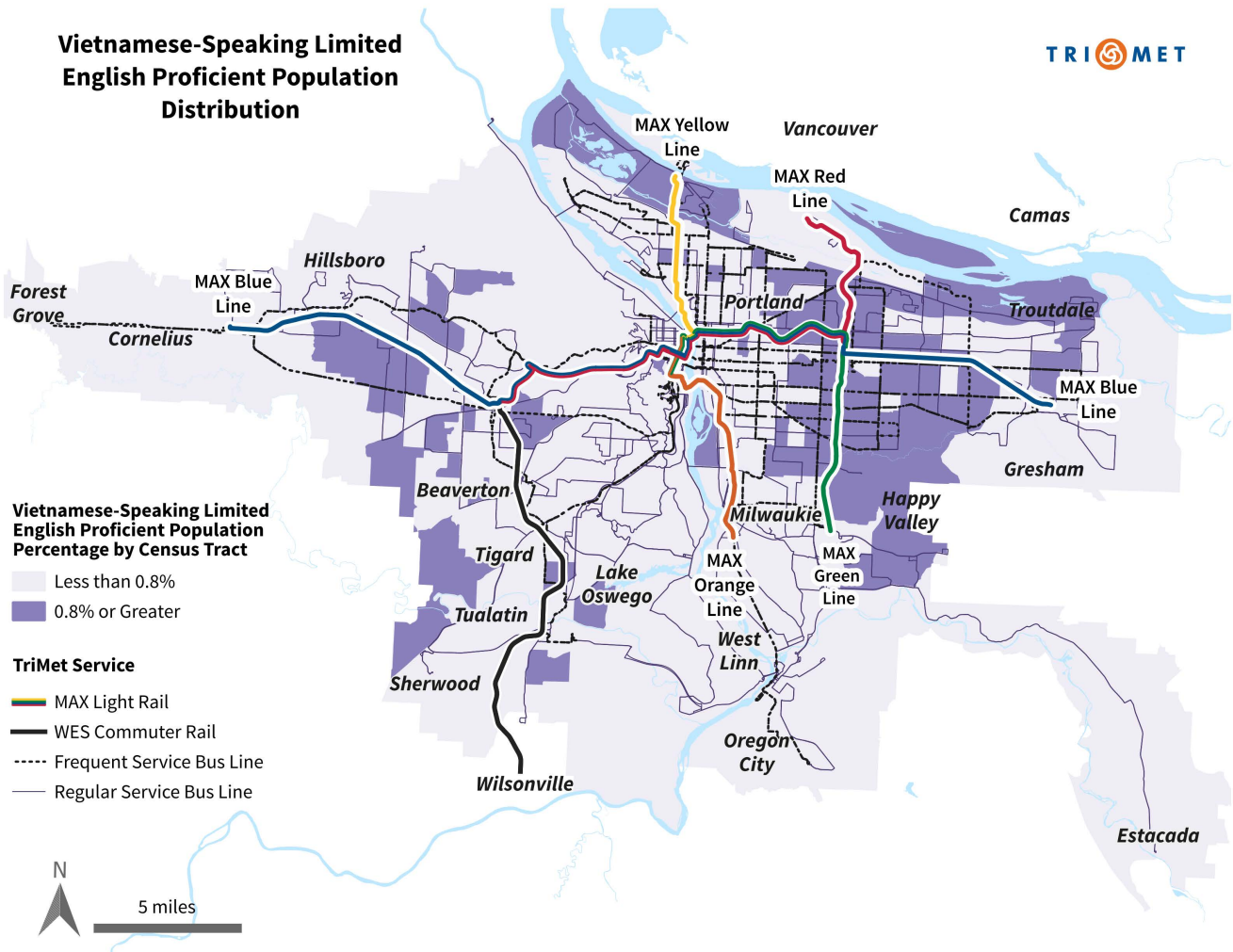
Figure 3: Distribution of Vietnamese-Speaking LEP Populations

Vietnamese-Speaking Limited English Proficient Population Distribution

Vietnamese-Speaking Limited English Proficient Population Percentage by Census Tract
- Less than 0.8%
- 0.8% or Greater

TriMet Service
- MAX Light Rail
- WES Commuter Rail
- Frequent Service Bus Line
- Regular Service Bus Line

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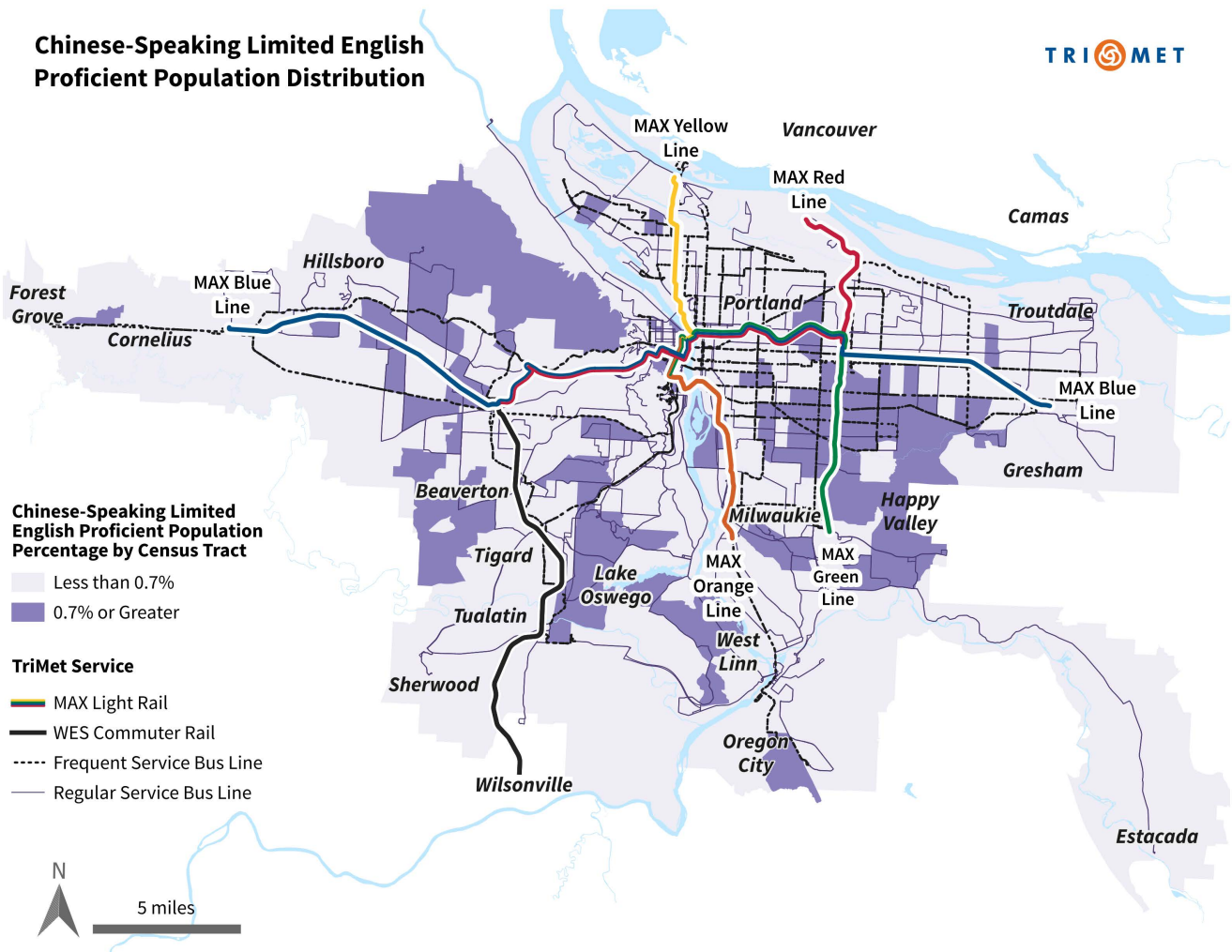
Figure 4: Distribution of Chinese-Speaking LEP Populations

Chinese-Speaking Limited English Proficient Population Distribution

TRIMET

MAX Yellow Line
Vancouver
MAX Red Line
Camas
Hillsboro
Forest Grove
MAX Blue Line
Cornelius
Troutdale
Portland
MAX Blue Line
Gresham

Chinese-Speaking Limited English Proficient Population Percentage by Census Tract
Less than 0.7%
0.7% or Greater

TriMet Service
MAX Light Rail
WES Commuter Rail
Frequent Service Bus Line
Regular Service Bus Line

Beaverton
Tigard
Lake Oswego
Milwaukie
Happy Valley
MAX Orange Line
MAX Green Line
Tualatin
West Linn
Sherwood
Oregon City
Wilsonville
Estacada

N
5 miles

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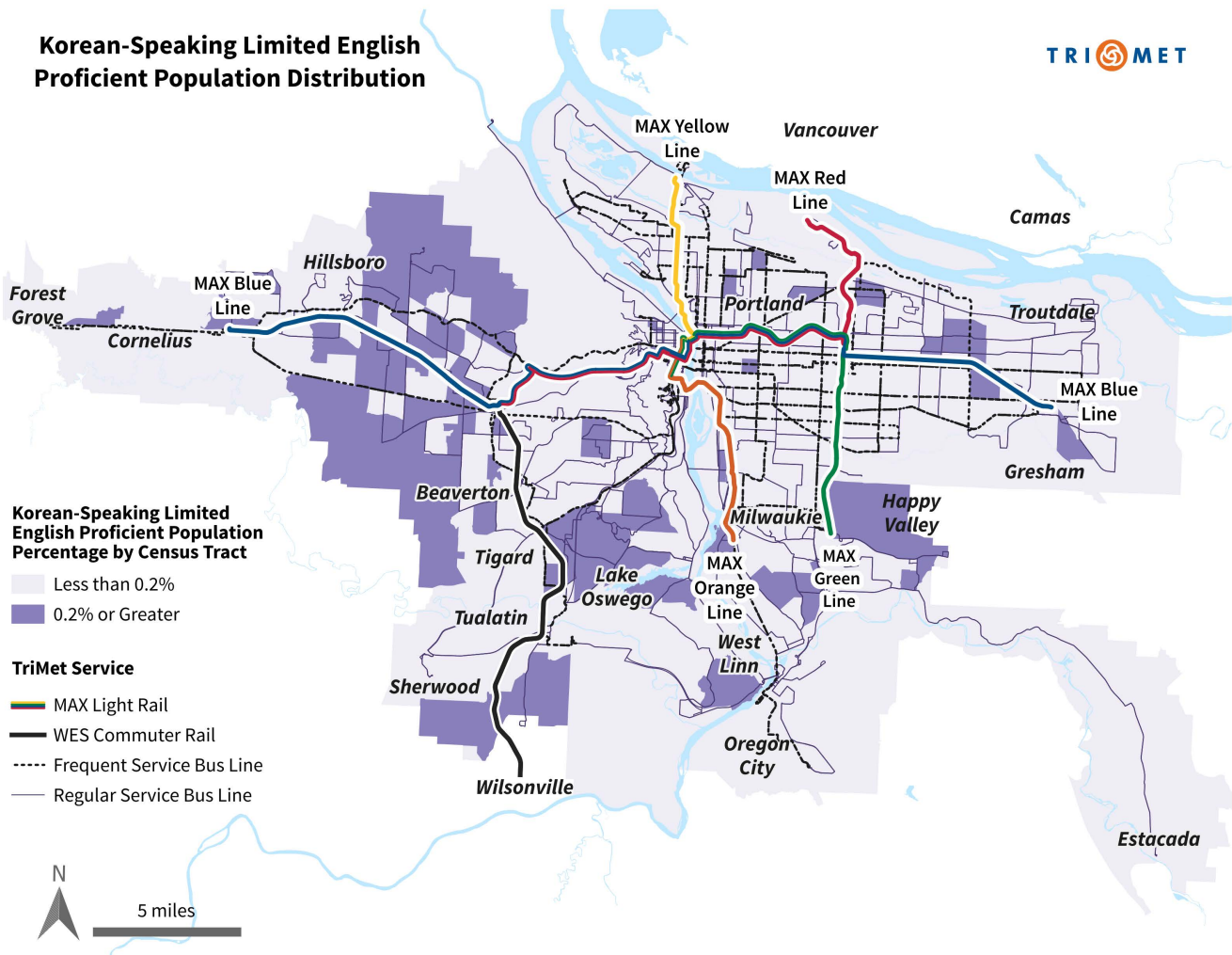
Figure 5: Distribution of Russian-Speaking LEP Populations
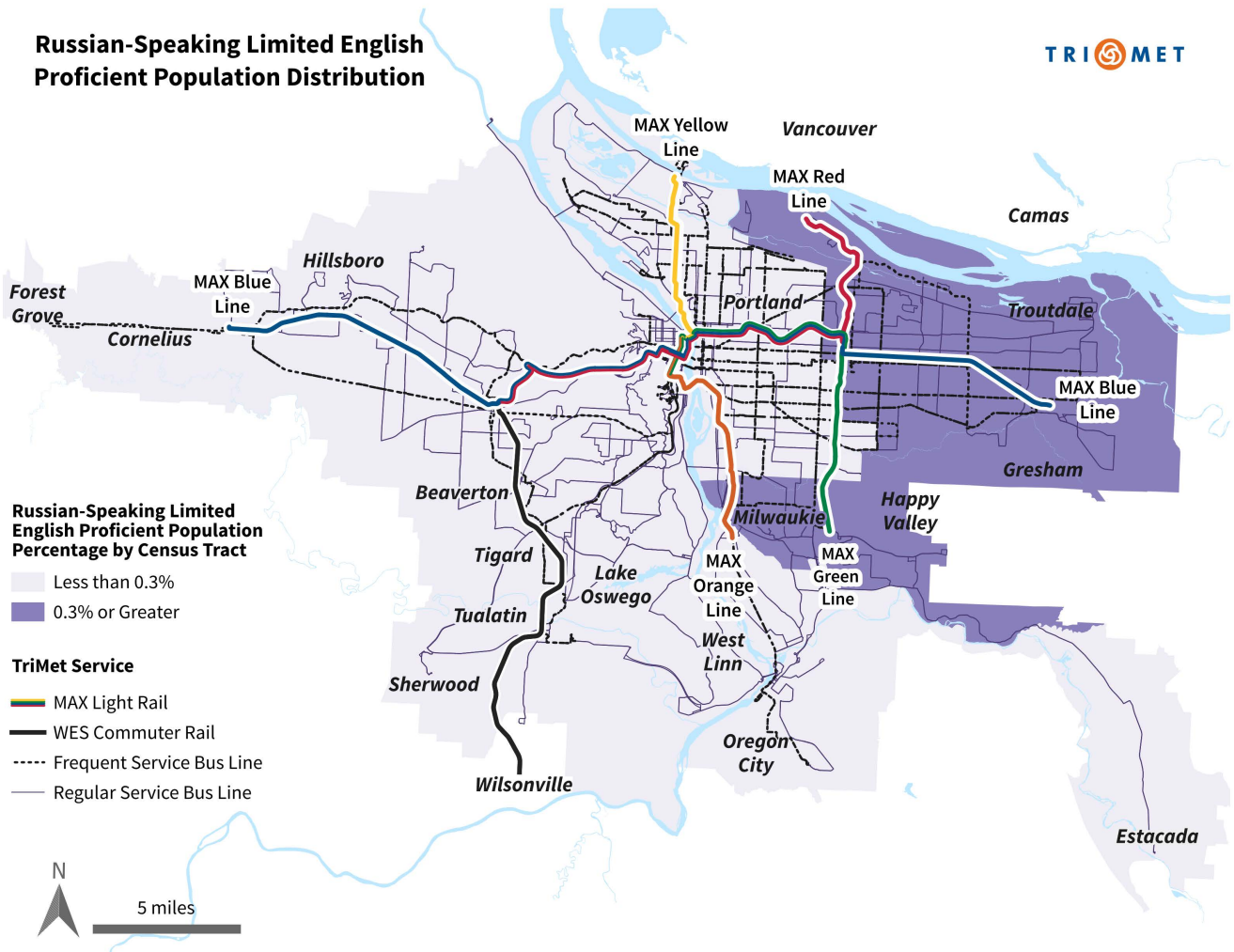
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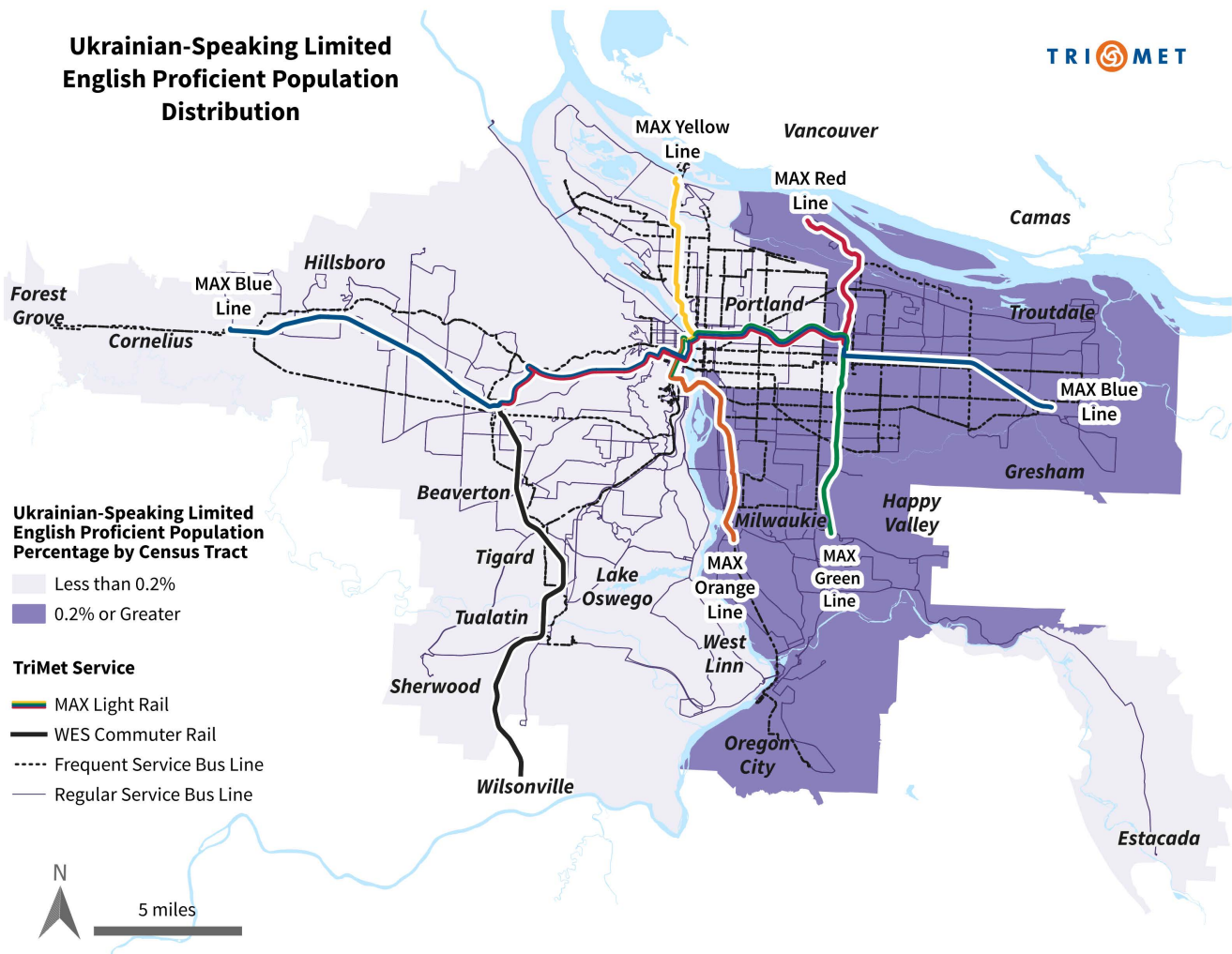
Figure 6: Distribution of Korean-Speaking LEP Populations

Korean-Speaking Limited English Proficient Population Distribution

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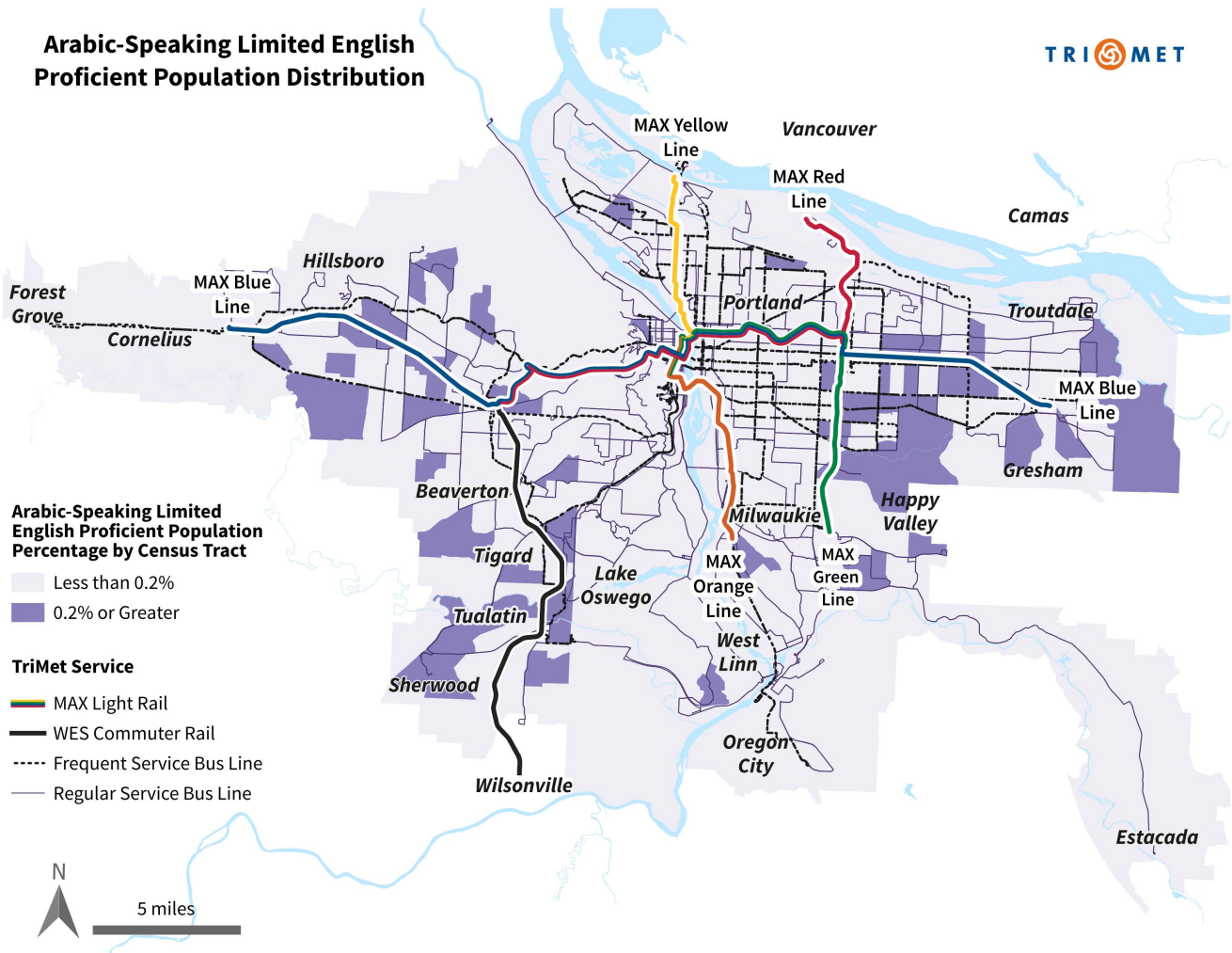
Figure 7: Distribution of Ukrainian-Speaking LEP Populations

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Figure 8: Distribution of Arabic-Speaking LEP Populations

Limited English Proficient (LEP) are persons who do 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
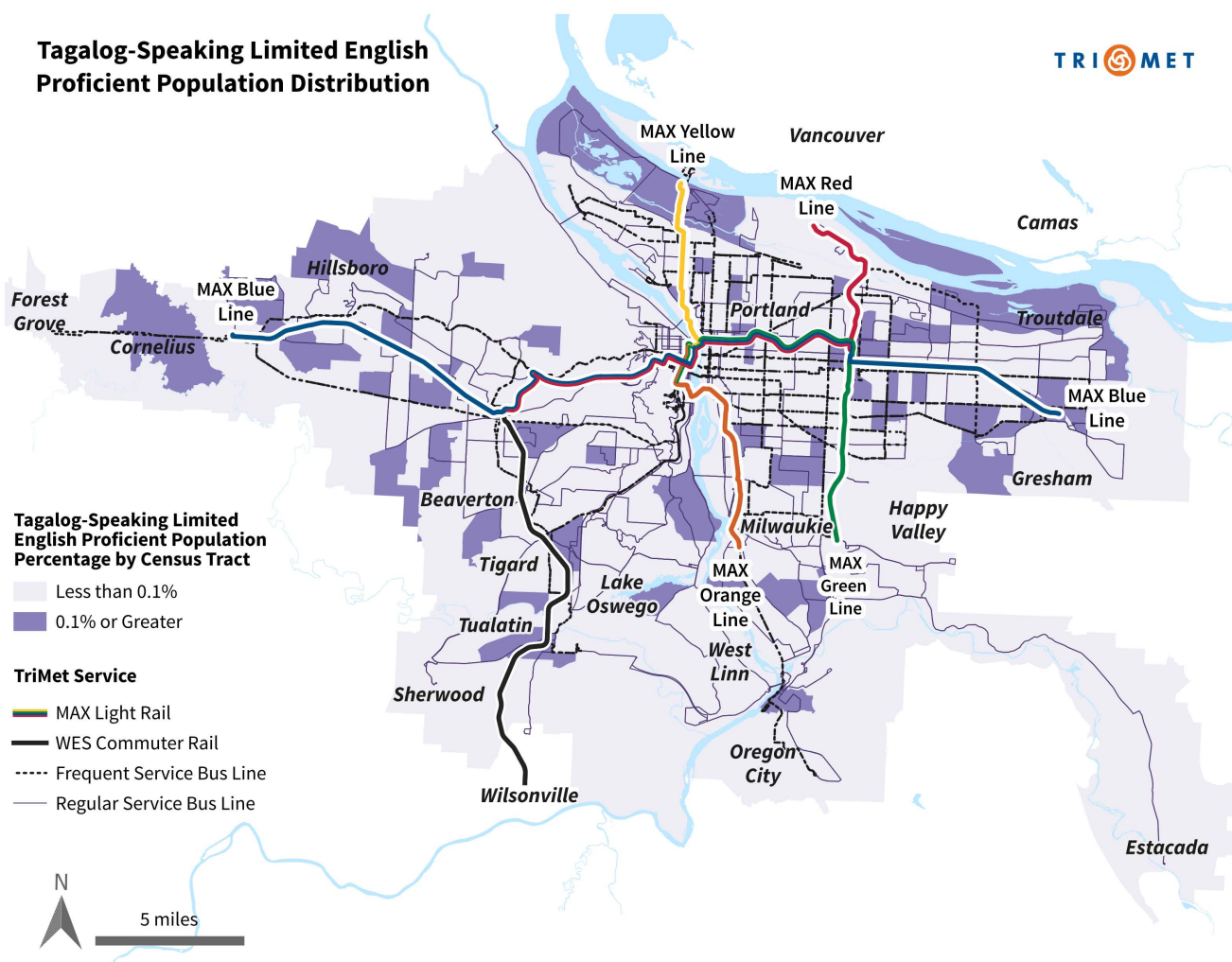
Figure 9: Distribution of Tagalog-Speaking LEP Populations

Tagalog-Speaking Limited English Proficient Population Distribution

Tagalog-Speaking Limited English Proficient Population Percentage by Census Tract
- Less than 0.1%
- 0.1% or Greater

TriMet Service
- MAX Light Rail
- WES Commuter Rail
- Frequent Service Bus Line
- Regular Service Bus Line

Limited English Proficient (LEP) are persons who do 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
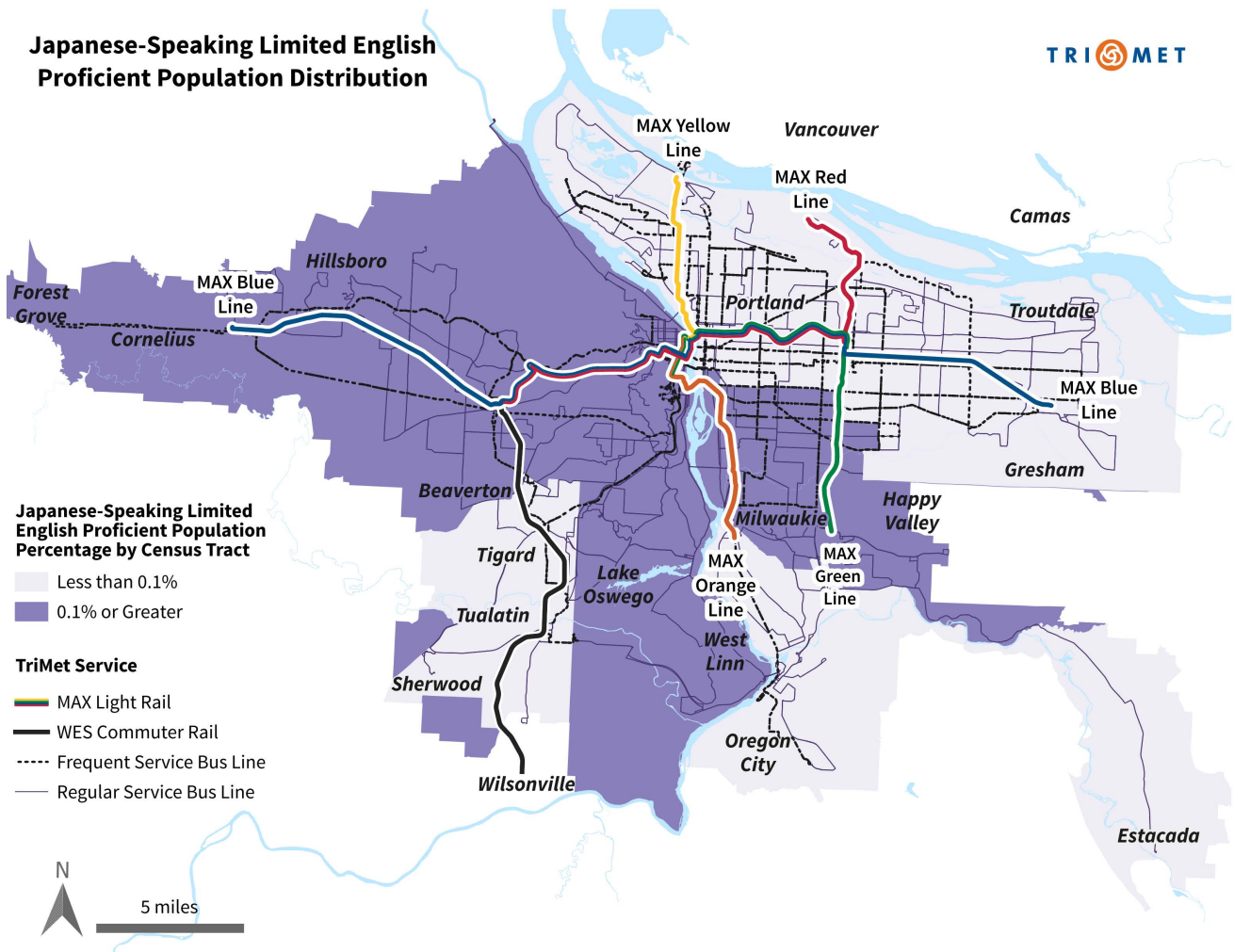
Figure 10: Distribution of Japanese-Speaking LEP Populations

Limited English Proficient (LEP) are persons who do 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
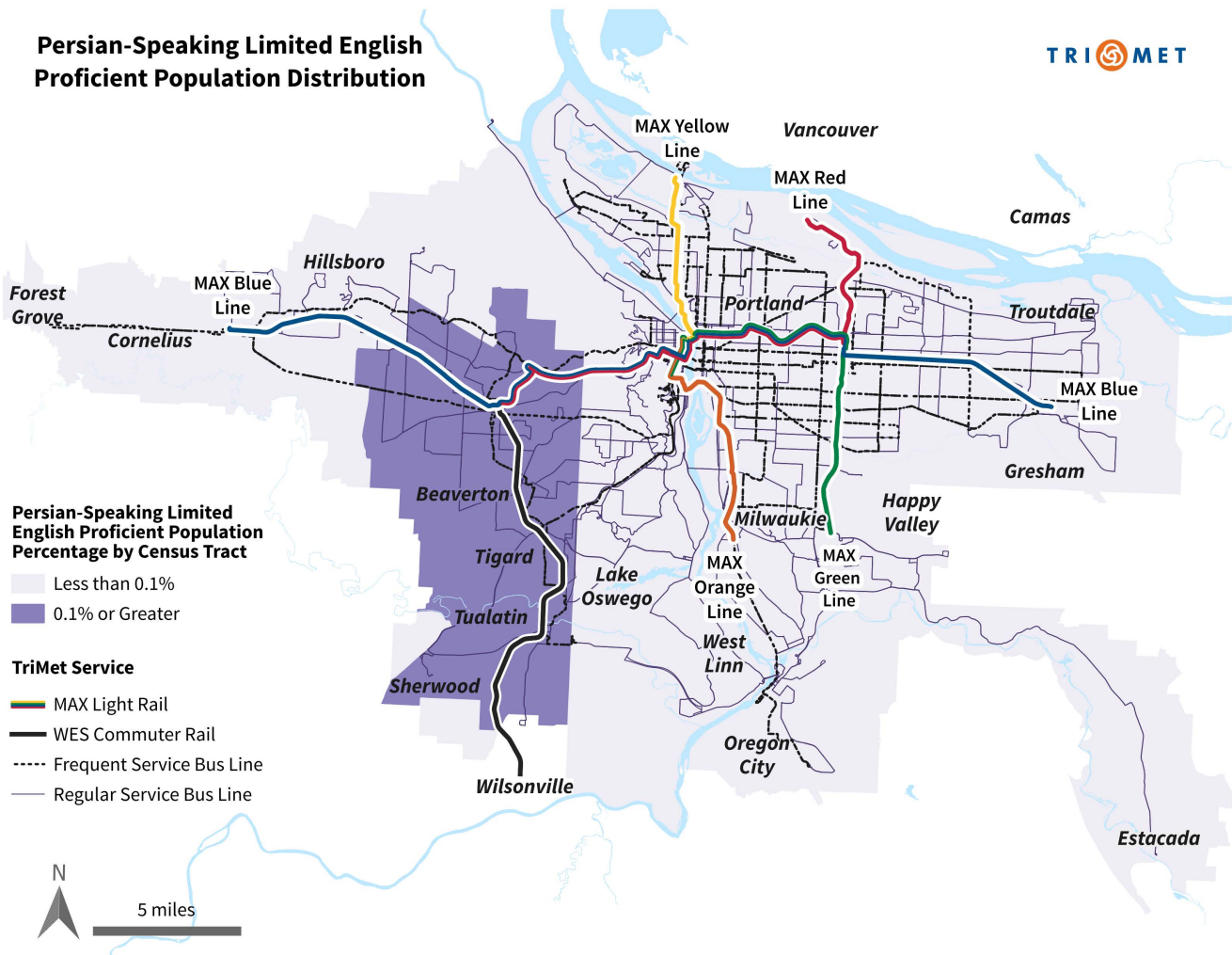
*Figure 11: Distribution of Persian-Speaking LEP Populations*

Limited English Proficient (LEP) are persons who do 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 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 that 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
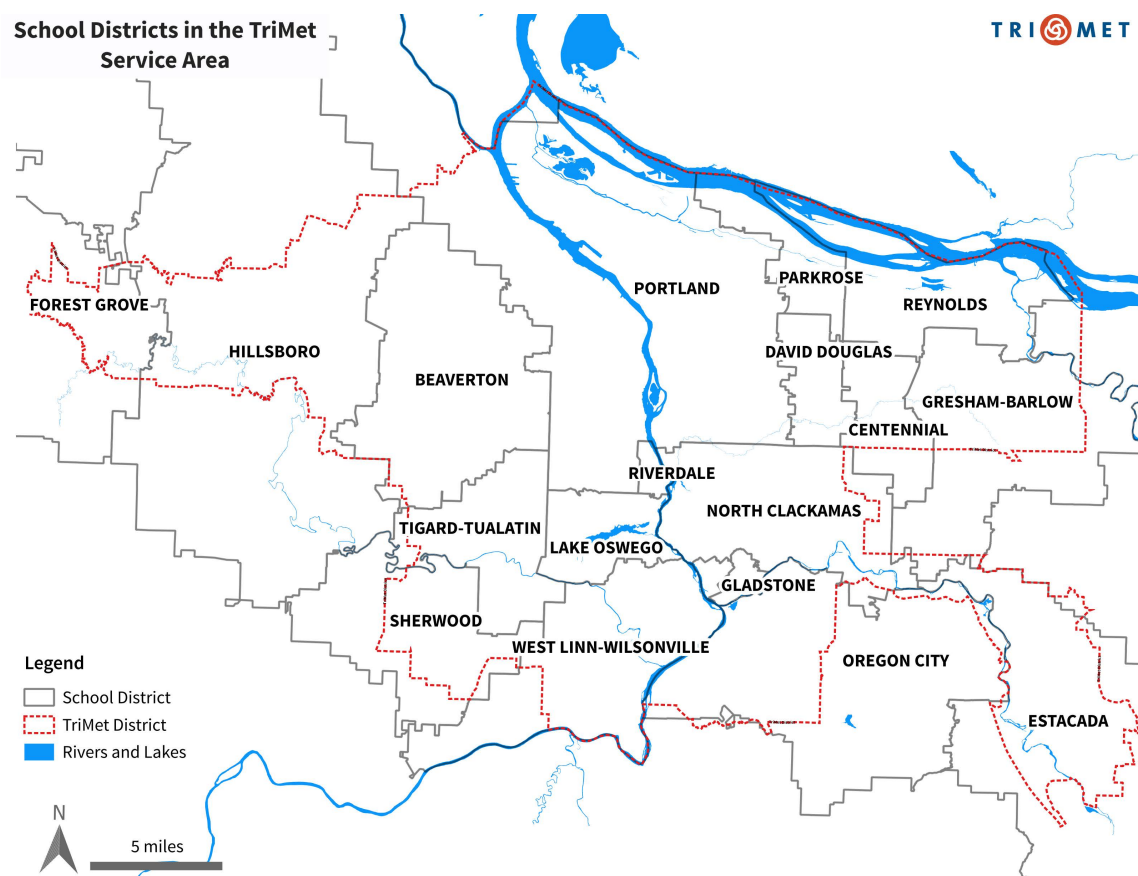
Data from the Oregon Department of Education (*At-a-glance district profiles, 2023*) indicate that the TriMet region supports a high population of ELLs. This dataset specifically reports on ever ELLs, a category that includes both current and former ELL, providing a comprehensive view of students with 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 ever ELLs 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),* the TriMet 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—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 ELLs 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 are designed to provide comprehensive health coverage to 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 Limited English Proficient (LEP). In 2022, members who identified as 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 limited English proficient population 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 LEP individuals. 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. 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 a 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, indicate 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 that 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 multicultural services contracts that include community-based organizations such as Latino Network, IRCO, and APANO yield consistent interaction with multilingual communities.

The survey feedback from frontline employees, operators, and TriMet's own outreach activities confirm that Spanish-speaking people 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 that 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 ensuring and improving access.

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., 82nd Avenue Transit Project, TV Highway Project)

TriMet recognizes that providing timely, understandable information to populations that 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 oversees 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 and 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 that 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 innovated 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.