

Columbia County, Oregon Language Access Plan

Introduction

Columbia County, Oregon, is located in northwest Oregon, with an approximate population of 49,351. The County is governed by a three-member Board of Commissioners and provides a multitude of public services, including: Law Enforcement, Public Works, Community Development, Economic Development, Parks and Recreation, Transit, Elections, Justice Courts, and Emergency Management.

Although the Columbia County population is predominantly English speaking, other languages spoken in the county include Spanish and other Indo-European languages, as well as Asian, Pacific Islander, and other languages. The County is required to take reasonable steps to ensure meaningful access to its services by individuals who are Limited English Proficient (LEP). This Language Access Plan, which was prepared by Community Action Team for Columbia County, reflects the County's commitment to that requirement. In preparing this plan, the County has consulted with the United States Department of Housing and Urban Development LEP Guidance to perform the LEP four-factor analysis to determine the appropriate mix of LEP services to offer.

Four-Factor Analysis:

As Columbia County provides a variety of public services, application of the four-factor analysis varies depending on the specific service. Accordingly, a four-factor analysis was performed with participation and input from all County departments, including those who already had LEP/LAP Plans in place.¹

Community Action Team met with various Columbia County Departments and staff members over 5 meetings: September 6, September 22, September 26, October 11 and October 13, 2016, to perform the various components of the four-factor analysis and to develop Columbia County Oregon's Language Access/Limited English Proficiency Plan.

Factor 1: The number or proportion of LEP persons in the service area.

Columbia County's total population is approximately 49,351. English is the primary language of approximately 96% of the population. Three percent of the county's population speaks Spanish as their primary language, and of that 3%, only 488 people or 0.9% of the county's total population identified as speaking English less than "very well." The remaining primary languages spoken at less than "very well" are interspersed among 148 individuals in the Columbia County population, which is 0.3% (three-tenths of one percent) of the county's total population.²

Step 1: Prior experience with LEP individuals.

County staff provided the following information on the number of prior interactions with LEP individuals:

¹ Both the Columbia County Sheriff's Office and Columbia County Rider, the County's public transportation department, have adopted LEP plans that are specific to their departments and the services they provide to the public.

² See Attachment 1, American FactFinder 2010 Census – Race and Hispanic or Latino Origin and Attachment 2, American FactFinder 2011-2015 – Language Spoken at Home.

DEPT.	NUMBER OF PERSONS	LANGUAGE	FREQUENCY
Land Dev.	1 Person	Spanish	4-6 times with one person, then nothing else
	1 Person	Sign Language	
Community Justice - Juvenile	3 per year of 100-200 annual interactions	Spanish	Periodically; continued interaction with parents
Tax	10-20 out of about 4,000 annual interactions	Spanish	10-20 annually
County Counsel	None		
Board of Commissioners	None		
Assessor	1 in 10 years		1 over 10 years ago
Parks	Only 1		1 in 29 years working in department
Roads	Only 1		1 in 29 years working in department
Surveyor	None		0 in 8 years
Community Justice - Adult			Infrequently
County Clerk	1 or 2		Infrequently
HR & IT	None		None
District Attorney	1 or 2 annually	Spanish	Infrequently
	1	Korean	Infrequently
Emergency Management	None		
Justice Court (Vernonia, Clatskanie, Rainier)	5-10 per year	Spanish & Russian	Generally 1 - 2 times per family (no criminal cases)
Transit	2 people	Spanish & Unknown	Infrequently

Sheriff	<u>Jail:</u> 15-20/day Spanish-only speakers and 30-50 English as a second language; <u>Enforcement:</u> 1/month; <u>Front office:</u> 4-5 annually	Mostly Spanish; occasionally Russian and Mandarin	Frequent LEP contact, mostly Spanish speaking.
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Step 2: Data was gathered from the following sources to identify information on persons who speak languages other than English at home and those who speak English less than well or not at all and would be classified as Limited English Proficient or “LEP”:

- a. 2010 Census Data
- b. Census Bureau’s American Community Survey and Fact Finder Surveys, Language Spoken at Home, 2011-2015 American Community Survey 5-year Estimates.

Step 3: In Columbia County, the most common language other than English spoken at home was Spanish, with 3% of the total population, recorded as speaking Spanish or Spanish Creole (Source: American Community Survey, 2011-2015 American Community Survey 5-Year Estimates, S1601, Columbia County, Oregon, <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>) (see attached). Of the 3% who speak Spanish or Spanish Creole, the data shows 488 people – or 0.9% of Columbia County’s total population – speak English less than “very well.”

Factor 2: The frequency with which LEP individuals come into contact with the service.

As shown on the chart above, there is extremely limited contact with LEP persons in many departments; some with none or one in 29 years. Aside from the Sheriff’s Office, the most frequent are the Justice Courts and the Tax department.

Factor 3: The importance of the service to LEP persons.

Columbia County provides government services to the public, such as, but not limited to: law enforcement, land development services, public transportation, roads, emergency management, parks and recreation, elections, and solid waste management. LEP individuals therefore may use County services to report a crime, get a building permit, dispose of garbage, take the bus, vote, and recreate in County parks. The County thus provides services that are integral to the daily lives of its residents, businesses and visitors, including those who are LEP. However, despite the importance of County services, County staff come into direct contact with only a fraction of the County’s population and even less so with LEP individuals who make up less than one percent of the total population. Overall there is a very limited contact with LEP persons, but their input and participation in the community is highly valued.

Factor 4: The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

Columbia County is a rural county, with a fairly small population and limited financial resources. However, the County has explored cost efficient ways to provide language assistance. For instance, the County is in the process of implementing a "Google Translate" or similar program in order to provide published information in multiple languages.

Some County departments already utilize language assistance services. For example, the Justice Courts use the ATT service for those requiring translation. The District Attorney's office has used an interpreter via Skype for a Korean speaker for Grand Jury.

The Sheriff's office has an employee in the jail who is bilingual (Spanish) and provides interpretive services for the office in all three divisions. The Sheriff's office also uses the Tele-language resource for whenever an interpreter is unavailable, or the language is not Spanish. In the case of hearing impaired, the Sheriff's office uses a TTY service.

Columbia County Rider (CC Rider) currently provides information in Spanish and other languages on its website at www.columbiacountyrider.com. They also post information on their buses. CC Rider maintains a list of employees who are fluent in Spanish and other languages, and professional translation services are available when requested or if CC Rider dispatch needs such interpreter service.

All departments have access to the AT&T Language Line to assist LEP individuals who call by phone, or can be connected by staff members using phones for LEP individuals who are served at County offices or by County staff in the field.

Conclusion

Based on the four-factor analysis, the County concludes that although its contact with LEP individuals is very limited, there are actions it can take to ensure meaningful access to services by LEP individuals. Those actions and processes for providing language assistance are described in detail, below.

LANGUAGE ACCESS PLAN

To ensure meaningful access to services by LEP individuals, the County will provide language services in accordance with the procedures stated below. The Sheriff's Office and Columbia County Rider will provide language services in accordance with their adopted LEP plans. (See Attachments 5 and 6.) Where additional language services are required by law, rule or grant funding term or condition, the County will comply with such additional requirements.

Identifying LEP Individuals

Columbia County will use, when there is difficulty determining the language spoken, Language Identification Cards ("I Speak" cards), which were created by the State of Ohio with guidance of the US Department of Health and Human Services. (See Attachment 4.) Furthermore, the County will post notices in the locations where public notices are normally posted, such as bulletin boards near public entrances, in English and Spanish explaining that LEP services are available.

Language Services Available

Procedure for In-Person Communication with LEP Individuals

Staff will have available to them the “I Speak” cards, with additional information of how to access AT&T USA Direct Language Assistance Language Translations Services.

Staff who encounter a Spanish speaking LEP individual will seek the assistance of a Spanish speaking staff member in their department or in another department at the same location, who will inform the LEP individual that they can provide free interpretation services. The LEP individual can decline the interpretation assistance if he or she wishes to utilize another individual for interpretation, but the individual will still be offered the translation service.

If there is no readily available Spanish speaking staff member, staff will utilize AT&T USA Direct Language Assistance for oral interpretation.

For non-Spanish speaking LEP individuals, staff will utilize AT&T USA Direct Language Assistance for oral interpretation.

Procedure for LEP callers

For Spanish speaking LEP individuals who call Columbia County, staff will use the procedure, above, i.e., contact Spanish speaking staff in the department or in another department at the same location. If staff cannot communicate with them, and there is no one on their end of the phone who can speak English, they will be transferred to AT&T USA Direct Language Assistance translation services, a telephonic interpretation service that Columbia County has contracted to utilize its interpretation services. An overview of services provided by AT&T USA Direct Language Assistance is described in Attachment 3.

Procedure for Written Communication with LEP Individuals

As with the procedure for oral translation, staff will attempt to respond to written communication from Spanish speaking LEP individuals by seeking assistance from Spanish speaking staff in their department or in another department at the same location. In addition, a “Google Language Button” will be added to the website so that non-English speaking persons can translate the information on the website. Any written communication not in English that cannot be translated by readily available staff will be referred to AT&T USA Direct Language Assistance for translation.

Translation of Written Documents

The County’s LEP Safe Harbor Provision provides that written translation of vital documents for LEP language groups that constitute five percent (5%) or 1,000 persons, whichever is less, is strong evidence of compliance with written translation obligations. Columbia County is well under the numbers identified as triggering the Safe Harbor provisions. Therefore, the County is not required to provide written translation of vital documents.

However, Columbia County Rider, in order to assist their clientele who have limited English proficiency, has added a statement in Spanish that interpretation of their written materials is available at no cost. They have also updated the Columbia County Rider website to allow for all language translations by clicking a button.

Ensuring Competency in Interpreters and Translation Services

Columbia County will make every reasonable effort to ensure that the competency of interpreters and translators is appropriate to the situation. In many cases, formal certification is not necessary for effective communication. The importance of the encounter or consequences will direct the level of expertise required. For example, actions to abate a dangerous building may require a specially qualified interpreter, while explaining information about dog licensing may not. Where the importance of the encounter or consequences dictate, and County staff are not qualified to act as interpreters, the County will utilize a formal interpretation and translation service.

Columbia County will only utilize companies acknowledged as providing accurate interpretation and translation services, such as AT&T USA Direct Language Assistance.

Complaints

All County Departments shall ensure that LEP individuals who wish to file a complaint regarding County staff are able to do so. A complaint must be in writing and be filed within 180 days following the date of the alleged discriminatory occurrence. The County may provide an authorized interpreter or translated forms, as appropriate. LEP individuals will first be referred to the LEP Coordinator, who will ensure that the complainant is provided with the information on how to file a complaint, and the documentation or forms to file his/her complaint.

Complaints under this LEP plan shall be filed with the LEP Coordinator at the address listed, below, and shall be handled in accordance with the County's Title VI Policy and Procedures. Authorized interpreters used for any interview with an LEP individual during an investigation should not be members of the department where the complaint was filed against.

Any notice required to be sent to an LEP individual as a complaining party pursuant to the Limited English Proficiency Complaint Procedure and Form should be translated or otherwise communicated in a language accessible manner.

Training Staff

Each Department will appropriately train its staff on the use of "I Speak" cards. All Columbia County staff acting as point-of entry contacts or in the field will be given instruction on how to identify LEP clients using Language Identification Cards ("I Speak" cards) and other established methods, how to utilize interpretation services, and how to access the Columbia County Bilingual Staff.

Documenting LEP Interactions

Columbia County staff acting as point-of entry contacts will record their interactions with LEP individuals, including the method of interaction, number of interactions, and reason for interaction. Staff will report such interactions to the LEP Coordinator.

Additional LEP Plans

The Sheriff's Office and the Transit Department (Columbia County Rider) each have individually developed and implemented Limited English Proficiency plans. These plans are attached hereto as Attachments 5 and 6 respectively and incorporated herein by this reference.

LEP Coordinator

Board of Commissioners Administrator shall serve as the LEP Coordinator. The LEP Coordinator's contact information is as follows:

Columbia County LEP Coordinator
Office of the Board of County Commissioners
230 Strand Street, Room 331
St. Helens, Oregon 97051
(503)397-4322

Monitoring and Updating the LAP

The LEP Coordinator will monitor and update the LAP as needed. The LAP will be reviewed once a year to identify any changes that need to be made as a result of changes in demographics, types of services or other factors that merit reevaluation or updating of the plan.

Attachments:

- 1 American Fact Finder 2010 Census – Race and Hispanic or Latino Origin
- 2 American Fact Finder 2011-2015 – Language Spoken at Home
- 3 AT&T USA Direct Language Assistance Services Guide
- 4 "I Speak" Card
- 5 Columbia County Sheriff's Office Limited English Proficiency Policy
- 6 Columbia County Rider Transit System Language Assistance Plan

S1601

LANGUAGE SPOKEN AT HOME
2011-2015 American Community Survey 5-Year Estimates

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Columbia County, Oregon												
Subject	Total		Percent		Percent of specified language speakers							
	Estimate	Margin of Error	Estimate	Margin of Error	Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
					Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	46,866	+/-64	(X)	(X)	46,230	+/-186	98.6%	+/-0.4	636	+/-177	1.4%	+/-0.4
Speak only English	44,612	+/-391	95.2%	+/-0.8	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	2,254	+/-383	4.8%	+/-0.8	1,618	+/-360	71.8%	+/-7.7	636	+/-177	28.2%	+/-7.7
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	1,412	+/-300	3.0%	+/-0.6	924	+/-293	65.4%	+/-11.7	488	+/-160	34.6%	+/-11.7
5 to 17 years old	385	+/-138	0.8%	+/-0.3	324	+/-158	84.2%	+/-19.3	61	+/-63	15.8%	+/-19.3
18 to 64 years old	929	+/-194	2.0%	+/-0.4	502	+/-163	54.0%	+/-12.1	427	+/-134	46.0%	+/-12.1
65 years old and over	98	+/-72	0.2%	+/-0.2	98	+/-72	100.0%	+/-27.6	0	+/-25	0.0%	+/-27.6
Other Indo-European languages	363	+/-138	0.8%	+/-0.3	353	+/-137	97.2%	+/-4.4	10	+/-15	2.8%	+/-4.4
5 to 17 years old	45	+/-52	0.1%	+/-0.1	45	+/-52	100.0%	+/-44.2	0	+/-25	0.0%	+/-44.2
18 to 64 years old	253	+/-89	0.5%	+/-0.2	243	+/-87	96.0%	+/-6.2	10	+/-15	4.0%	+/-6.2
65 years old and over	65	+/-46	0.1%	+/-0.1	65	+/-46	100.0%	+/-36.7	0	+/-25	0.0%	+/-36.7
Asian and Pacific Island languages	398	+/-111	0.8%	+/-0.2	276	+/-89	69.3%	+/-9.9	122	+/-51	30.7%	+/-9.9
5 to 17 years old	50	+/-36	0.1%	+/-0.1	50	+/-36	100.0%	+/-41.9	0	+/-25	0.0%	+/-41.9
18 to 64 years old	307	+/-97	0.7%	+/-0.2	185	+/-82	60.3%	+/-14.1	122	+/-51	39.7%	+/-14.1
65 years old and over	41	+/-32	0.1%	+/-0.1	41	+/-32	100.0%	+/-46.3	0	+/-25	0.0%	+/-46.3
Other languages	81	+/-57	0.2%	+/-0.1	65	+/-51	80.2%	+/-29.2	16	+/-25	19.8%	+/-29.2
5 to 17 years old	0	+/-25	0.0%	+/-0.1	0	+/-25	-	**	0	+/-25	-	**
18 to 64 years old	39	+/-37	0.1%	+/-0.1	23	+/-27	59.0%	+/-50.8	16	+/-25	41.0%	+/-50.8
65 years old and over	42	+/-43	0.1%	+/-0.1	42	+/-43	100.0%	+/-45.8	0	+/-25	0.0%	+/-45.8
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	37,372	+/-236	(X)	(X)	37,149	+/-225	99.4%	+/-0.3	223	+/-111	0.6%	+/-0.3
Speak only English	36,198	+/-312	96.9%	+/-0.6	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	1,174	+/-216	3.1%	+/-0.6	951	+/-199	81.0%	+/-8.6	223	+/-111	19.0%	+/-8.6
Spanish	577	+/-169	1.5%	+/-0.5	456	+/-156	79.0%	+/-14.0	121	+/-91	21.0%	+/-14.0
Other languages	597	+/-125	1.6%	+/-0.3	495	+/-122	82.9%	+/-9.0	102	+/-55	17.1%	+/-9.0

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Explanation of Symbols:

- An "N" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
- An "-" entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
- An "-" following a median estimate means the median falls in the lowest interval of an open-ended distribution.
- An "+" following a median estimate means the median falls in the upper interval of an open-ended distribution.
- An "****" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
- An "*****" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
- An "N" entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
- An "(X)" means that the estimate is not applicable or not available.

Versions of this table are available for the following years:
2015
2014
2013
2012
2011
2010
2009

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented by the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: Language User Note.

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While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

QT-P3

**Race and Hispanic or Latino Origin: 2010
2010 Census Summary File 1**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/doc/sf1.pdf>.

Geography: ▼

	Subject	Number	Percent
1	RACE		
31	Total population	49,351	100.0
of	One race	47,656	96.6
31	White	45,651	92.5
	Black or African American	207	0.4
	American Indian and Alaska Native	656	1.3
	American Indian, specified [1]	478	1.0
	Alaska Native, specified [1]	36	0.1
	Both American Indian and Alaska Native, specified [1]	1	0.0
	American Indian or Alaska Native, not specified	141	0.3
	Asian	457	0.9
	Native Hawaiian and Other Pacific Islander	95	0.2
	Some Other Race	590	1.2
	Two or More Races	1,695	3.4
	Two races with Some Other Race	176	0.4
	Two races without Some Other Race	1,380	2.8
	Three or more races with Some Other Race	21	0.0
	Three or more races without Some Other Race	118	0.2
	HISPANIC OR LATINO		
	Total population	49,351	100.0
	Hispanic or Latino (of any race)	1,987	4.0
	Mexican	1,423	2.9
	Puerto Rican	75	0.2
	Cuban	39	0.1
	Other Hispanic or Latino [2]	450	0.9
	Not Hispanic or Latino	47,364	96.0
	RACE AND HISPANIC OR LATINO		
	Total population	49,351	100.0
	One race	47,656	96.6
	Hispanic or Latino	1,724	3.5
	Not Hispanic or Latino	45,932	93.1
	Two or More Races	1,695	3.4
	Hispanic or Latino	263	0.5
	Not Hispanic or Latino	1,432	2.9

X Not applicable.

[1] "American Indian, specified" includes people who provided a specific American Indian tribe, such as Navajo or Blackfeet. "Alaska Native, specified" includes people who provided a specific Alaska Native group, such as Inupiat or Yup'ik.

[2] This category is comprised of people whose origins are from the Dominican Republic, Spain, and Spanish-speaking Central or South American countries. It also includes general origin responses such as "Latino" or "Hispanic."

Source: U.S. Census Bureau, 2010 Census.

Summary File 1, Tables P5, P8, PCT4, PCT5, PCT8, and PCT11.



Language Assistance

AT&T USADirect® connects to a variety of language assistance programs for non-English speakers, including translation services and in-language operators. Calls can be billed to your calling card or any major credit card. For pricing and additional information, call 831-648-7582.

AT&T USADirect® In-Language Service

Your non-English-speaking friends and relatives living abroad can reach you using AT&T operators who speak their language. Non-English speakers calling collect or using an AT&T Calling Card should dial the AT&T USADirect® In-Language access number for the country and ask the operator to put the call through.

Language Line Services

Get over-the-phone translation service in 150 languages, whenever and wherever you need it.

- Follow the AT&T USADirect® dialing instructions for the country you're calling from.
- When asked for the number you're calling, dial **831-648-7582**.
- After the tone, dial your credit card or AT&T Calling Card number.
- Follow the English-language instructions, or stay on the line to reach a professional interpreter.

AT&T USADirect® In-Language Access Numbers

Note: ^ indicates that you should wait for a second dial tone before dialing the next number.

Country	Language/Code(s)
Argentina	Spanish 0-800-288-5288
Bolivia	Spanish 800-101-111
Chile	Spanish 800 360 312 Spanish 171 00 312 Spanish 120 00 288 Spanish 800-800-312
China	Mandarin 108-10
Colombia	Spanish 01-800-911-0011
The Dominican Republic	Spanish 11-22
Ecuador	Spanish 1-800-999-119
El Salvador	Spanish 800-1785
Gabon	French 00^002
Guatemala	Spanish 999-9190 Spanish 138-120
Haiti	French Creole 181
Honduras	Spanish 800-0123

Country	Language/Code(s)
Ivory Coast	French 00-111-12
Mexico	Spanish 001-800-658-5454 Spanish 01-800-112-2020
Nicaragua	Spanish 1-800-0164
Panama	Spanish 800-2288
Peru	Spanish 0-800-50-000
The Philippines	Tagalog 105-12
Senegal	French 3073
The United States	Cantonese 1-800-833-1288 Hindi 1-800-233-7003 Japanese 1-800-233-8006 Korean 1-800-233-8923 Mandarin 1-800-233-1823 Polish 1-800-233-8622 Russian 1-800-233-2394 Spanish 1-800-233-9008 Tagalog 1-800-233-9118 Vietnamese 1-800-233-1388
Venezuela	Spanish 0-800-552-6288

I SPEAK ...



ARABIC	أنا أتكلم اللغة العربية	FRENCH	Je parle français	LAOTIAN	ຂອບປາກາວສາລາວ	SPANISH	Yo hablo español
ARMENIAN	Ես խոսում եմ հայերեն	FRENCH CREOLE (HAITIAN CREOLE)	M pale kreyòl ayisyen	LITHUANIAN	Aš kalbu lietuviškai	SWAHILI	Ninaongea Kiswahili
BENGALI	আমি বাংলা ভাষা বলতে পারি	GERMAN	Ich spreche Deutsch	MANDARIN (CHINESE)	我講國語/普通話	SWEDISH	Jag talar svenska
BOSNIAN	Ja govorim bosanski	GREEK	Μιλώ τα ελληνικά	NORWEGIAN	Jeg snakker norsk	TAGALOG	Marunong akong mag-Tagalog
BULGARIAN	Аз говоря български	GUJARATI	હું ગુજરાતી બોલું છું	POLISH	Mówię po polsku	THAI	พูดภาษาไทย
BURMESE	ကျွန်ုပ်တို့ မြန်မာလို ခြေငြိမ်း ဝေဟင်	HEBREW	אני מדבר עברית	PORTUGUESE	Eu falo português do Brasil (Brasil)	TURKISH	Türkçe konuşurum
CAMBODIAN	ខ្ញុំនិយាយភាសាខ្មែរ	HINDI	मैं हिंदी बोलता हूँ।		Eu falo português de Portugal (Portugal)	UKRAINIAN	Я розмовляю українською мовою
CANTONESE (CHINESE)	我講廣東話	HMONG	Kuv has lug Moob	PUNJABI	ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।	URDU	میں اردو بولتی ہوں
CROATIAN	Govorim hrvatski	HUNGARIAN	Beszélek magyarul	ROMANIAN	Vorbesc românește	VIETNAMESE	Tôi nói tiếng Việt
CZECH	Mluvím česky	ITALIAN	Parlo italiano	RUSSIAN	Я говорю по-русски	YORUBA	Mo nso Yoruba
DUTCH	Ik spreek het Nederlands	JAPANESE	私は日本語を話す	SERBIAN	Ja govorim srpski		
FARSI (PERSIAN)	من فارسی صحبت می کنم	KOREAN	한국어 합니다	SLOVAK	Hovorím po slovensky		

* Registrars should use this tool to guide patients in identifying their spoken language when they do not speak English at all.
 Source: Adapted from the State of Ohio's Office of Criminal Justice Services and recommended by the US Department of Health and Human Services - Office of Civil Rights for use by healthcare facilities.

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332.1 PURPOSE AND SCOPE

This policy provides guidance to members when communicating with individuals with limited English proficiency (LEP) (42 USC § 2000d).

332.1.1 DEFINITIONS

Definitions related to this policy include:

Authorized interpreter - A person who has been screened and authorized by the Department to act as an interpreter and/or translator for others.

Interpret or interpretation - The act of listening to a communication in one language (source language) and orally converting it to another language (target language), while retaining the same meaning.

Limited English proficient (LEP) - Any individual whose primary language is not English and who has a limited ability to read, write, speak or understand English. These individuals may be competent in certain types of communication (e.g., speaking or understanding) but still be LEP for other purposes (e.g., reading or writing). Similarly, LEP designations are context-specific; an individual may possess sufficient English language skills to function in one setting but these skills may be insufficient in other situations.

Qualified bilingual member - A member of the Columbia County Sheriff's Office, designated by the Department, who has the ability to communicate fluently, directly and accurately in both English and another language. Bilingual members may be fluent enough to communicate in a non-English language but may not be sufficiently fluent to interpret or translate from one language into another.

Translate or translation - The replacement of written text from one language (source language) into an equivalent written text (target language).

332.2 POLICY

It is the policy of the Columbia County Sheriff's Office to reasonably ensure that LEP individuals have meaningful access to law enforcement services, programs and activities, while not imposing undue burdens on its members.

The Department will not discriminate against or deny any individual access to services, rights or programs based upon national origin or any other protected interest or right.

332.3 LEP COORDINATOR

The Sheriff shall delegate certain responsibilities to an LEP Coordinator. The LEP Coordinator shall be appointed by, and directly responsible to the Undersheriff, or the authorized designee.

The responsibilities of the LEP Coordinator include, but are not limited to:

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- (a) Coordinating and implementing all aspects of the Columbia County Sheriff's Office's LEP services to LEP individuals.
- (b) Developing procedures that will enable members to access LEP services, including telephonic interpreters, and ensuring the procedures are available to all members.
- (c) Ensuring that a list of all qualified bilingual members and authorized interpreters is maintained and available to each employee. The list should include information regarding the following:
 - 1. Languages spoken
 - 2. Contact information
 - 3. Availability
- (d) Reviewing existing and newly developed documents to determine which are vital documents and should be translated, and into which languages the documents should be translated.
- (e) Annually assessing demographic data and other resources, including contracted language services utilization data and community-based organizations, to determine if there are additional documents or languages that are appropriate for translation.
- (f) Identifying standards and assessments to be used by the Department to qualify individuals as qualified bilingual members or authorized interpreters.
- (g) Periodically reviewing efforts of the Department in providing meaningful access to LEP individuals, and, as appropriate, developing reports, new procedures, or recommending modifications to this policy.
- (h) Receiving and responding to complaints regarding department LEP services.
- (i) Ensuring appropriate processes are in place to provide for the prompt and equitable resolution of complaints and inquiries regarding discrimination in access to department services, programs and activities.

332.4 FOUR-FACTOR ANALYSIS

Since there are many different languages that members could encounter, the Department will utilize the four-factor analysis outlined in the U.S. Department of Justice (DOJ) Guidance to Federal Financial Assistance Recipients, available at the DOJ website, to determine which measures will provide meaningful access to its services and programs. It is recognized that law enforcement contacts and circumstances will vary considerably. This analysis, therefore, must remain flexible and will require an ongoing balance of four factors, which are:

- (a) The number or proportion of LEP individuals eligible to be served or likely to be encountered by department members, or who may benefit from programs or services within the jurisdiction of the Department or a particular geographic area.

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- (b) The frequency with which LEP individuals are likely to come in contact with department members, programs or services.
- (c) The nature and importance of the contact, program, information or service provided.
- (d) The cost of providing LEP assistance and the resources available.

332.5 TYPES OF LEP ASSISTANCE AVAILABLE

Columbia County Sheriff's Office members should never refuse service to an LEP individual who is requesting assistance, nor should they require an LEP individual to furnish an interpreter as a condition for receiving assistance. The Department will make every reasonable effort to provide meaningful and timely assistance to LEP individuals through a variety of services.

The Department will utilize all reasonably available tools, such as language identification cards, when attempting to determine an LEP individual's primary language.

LEP individuals may choose to accept department-provided LEP services at no cost or they may choose to provide their own.

Department-provided LEP services may include, but are not limited to, the assistance methods described in this policy.

332.6 WRITTEN FORMS AND GUIDELINES

Vital documents or those that are frequently used should be translated into languages most likely to be encountered. The LEP Coordinator will arrange to make these translated documents available to members and other appropriate individuals, as necessary.

332.7 AUTHORIZED INTERPRETERS

Any person designated by the Department to act as an authorized interpreter and/or translator must have demonstrated competence in both English and the involved non-English language, must have an understanding of the functions of an interpreter that allows for correct and effective translation, and should not be a person with an interest in the department case or investigation involving the LEP individual. A person providing interpretation or translation services may be required to establish the accuracy and trustworthiness of the interpretation or translation in a court proceeding.

Authorized interpreters must pass a screening process established by the LEP Coordinator which demonstrates that their skills and abilities include:

- (a) The competence and ability to communicate information accurately in both English and in the target language.
- (b) Knowledge, in both languages, of any specialized terms or concepts peculiar to this department and of any particularized vocabulary or phraseology used by the LEP individual.
- (c) The ability to understand and adhere to the interpreter role without deviating into other roles, such as counselor or legal adviser.

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(d) Knowledge of the ethical issues involved when acting as a language conduit.

332.7.1 SOURCES OF AUTHORIZED INTERPRETERS

The Department may contract with authorized interpreters who are available over the telephone. Members may use these services with the approval of a supervisor and in compliance with established procedures.

Other sources may include:

- Qualified bilingual members of this department or personnel from other County departments.
- Individuals employed exclusively to perform interpretation services.
- Contracted in-person interpreters, such as state or federal court interpreters, among others.
- Interpreters from other agencies who have been qualified as interpreters by this department, and with whom the Department has a resource-sharing or other arrangement that they will interpret according to department guidelines.

332.7.2 COMMUNITY VOLUNTEERS AND OTHER SOURCES OF LANGUAGE ASSISTANCE

Language assistance may be available from community volunteers who have demonstrated competence in either monolingual (direct) communication and/or in interpretation or translation (as noted in above), and have been approved by the Department to communicate with LEP individuals.

Where qualified bilingual members or other authorized interpreters are unavailable to assist, approved community volunteers who have demonstrated competence may be called upon when appropriate. However, department members must carefully consider the nature of the contact and the relationship between the LEP individual and the volunteer to ensure that the volunteer can provide neutral and unbiased assistance.

While family or friends of an LEP individual may offer to assist with communication or interpretation, members should carefully consider the circumstances before relying on such individuals. For example, children should not be relied upon except in exigent or very informal and non-confrontational situations.

332.8 CONTACT AND REPORTING

While all law enforcement contacts, services and individual rights are important, this department will utilize the four-factor analysis to prioritize service to LEP individuals so that such services may be targeted where they are most needed, according to the nature and importance of the particular law enforcement activity involved.

Whenever any member of this department is required to complete a report or other documentation and interpretation services are provided to any involved LEP individual, such services should be noted in the related report. Members should document the type of interpretation services utilized and whether the individual elected to use services provided by the Department or some other identified source.

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332.9 RECEIVING AND RESPONDING TO REQUESTS FOR ASSISTANCE

The Columbia County Sheriff's Office will take reasonable steps and will work with the Department of Human Resources to develop in-house language capacity by giving preference points in the hiring or appointing process for qualified members proficient in languages representative of the community being served as well as providing language development skills training for current members.

332.10 FIELD ENFORCEMENT

Field enforcement will generally include such contacts as traffic stops, pedestrian stops, serving warrants and restraining orders, crowd/traffic control and other routine field contacts that may involve LEP individuals. The scope and nature of these activities and contacts will inevitably vary. Members and/or supervisors must assess each situation to determine the need and availability of language assistance to all involved LEP individuals and utilize the methods outlined in this policy to provide such assistance.

Although not every situation can be addressed in this policy, it is important that members are able to effectively communicate the reason for a contact, the need for information and the meaning or consequences of any enforcement action. For example, it would be meaningless to request consent to search if the deputy is unable to effectively communicate with an LEP individual.

If available, deputies should obtain the assistance of a qualified bilingual member or an authorized interpreter before placing an LEP individual under arrest.

332.11 INVESTIGATIVE FIELD INTERVIEWS

In any situation where an interview may reveal information that could be used as the basis for arrest or prosecution of an LEP individual and a qualified bilingual member is unavailable or lacks the skills to directly communicate with the LEP individual, an authorized interpreter should be used. This includes interviews conducted during an investigation with victims, witnesses and suspects. In such situations, audio recordings of the interviews should be made when reasonably possible. Identification and contact information for the interpreter (e.g., name, address) should be documented so that the person can be subpoenaed for trial if necessary.

If an authorized interpreter is needed, deputies should consider calling for an authorized interpreter in the following order:

- An authorized department member or allied agency interpreter
- An authorized telephone interpreter
- Any other authorized interpreter

Any *Miranda* warnings shall be provided to suspects in their primary language by an authorized interpreter or, if the suspect is literate, by providing a translated *Miranda* warning card.

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The use of an LEP individual's bilingual friends, family members, children, neighbors or bystanders may be used only when a qualified bilingual member or authorized interpreter is unavailable and there is an immediate need to interview an LEP individual.

332.12 CUSTODIAL INTERROGATIONS

Miscommunication during custodial interrogations may have a substantial impact on the evidence presented in a criminal prosecution. Only qualified bilingual members or, if none is available or appropriate, authorized interpreters shall be used during custodial interrogations. *Miranda* warnings shall be provided to suspects in their primary language by the qualified bilingual member or an authorized interpreter.

In order to ensure that translations during custodial interrogations are accurately documented and are admissible as evidence, interrogations should be recorded whenever reasonably possible. See guidance on recording custodial interrogations in the Investigation and Prosecution Policy.

332.12.1 INTERPRETER REQUIRED IN ARRESTS

A deputy who arrests a person who cannot readily understand or communicate the English language shall, prior to any interrogation or the taking of a statement, make available a qualified interpreter to assist throughout the interrogation or taking of the statement. Fees and expenses of the interpreter will be paid as specified by Oregon law (ORS 133.515).

332.13 BOOKINGS

When gathering information during the booking process, members should remain alert to the impediments that language barriers can create. In the interest of the arrestee's health and welfare, the safety and security of the facility, and to protect individual rights, it is important that accurate medical screening and booking information be obtained. Members should seek the assistance of a qualified bilingual member whenever there is concern that accurate information cannot be obtained or that booking instructions may not be properly understood by an LEP individual.

332.14 COMPLAINTS

The Department shall ensure that LEP individuals who wish to file a complaint regarding members of this department are able to do so. The Department may provide an authorized interpreter or translated forms, as appropriate. Complaints LEP individuals will first be referred to the LEP Coordinator prior to assignment to an investigator. The LEP Coordinator will assure that the complainant is provided with the proper resources to file his/her complaint.

Investigations into such complaints shall be handled in accordance with the Personnel Complaints Policy. Authorized interpreters used for any interview with an LEP individual during an investigation should not be members of this department.

Any notice required to be sent to an LEP individual as a complaining party pursuant to the Personnel Complaints Policy should be translated or otherwise communicated in a language-accessible manner.

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332.15 COMMUNITY OUTREACH

Community outreach programs and other such services offered by this department are important to the ultimate success of more traditional law enforcement duties. This department will continue to work with community groups, local businesses and neighborhoods to provide equal access to such programs and services.

332.16 TRAINING

To ensure that all members who may have contact with LEP individuals are properly trained, the Department will provide periodic training on this policy and related procedures; including how to access department-authorized telephonic and in-person interpreters and other available resources.

The LEP Coordinator shall be responsible for ensuring new members receive LEP training. Those who may have contact with LEP individuals should receive refresher training at least once every two years thereafter. The LEP Coordinator shall maintain records of all LEP training provided, and will retain a copy in each member's training file in accordance with established records retention schedules.

332.16.1 TRAINING FOR AUTHORIZED INTERPRETERS

All members on the authorized interpreter list must successfully complete prescribed interpreter training. To complete interpreter training successfully, an interpreter must demonstrate proficiency in and ability to communicate information accurately in both English and in the target language, demonstrate knowledge in both languages of any specialized terms or phraseology, and understand and adhere to the interpreter role without deviating into other roles, such as counselor or legal adviser.

Members on the authorized interpreter list must receive refresher training annually or they will be removed from the authorized interpreter list. This annual training should include language skills competency (including specialized terminology) and ethical considerations.

The LEP Coordinator shall be responsible for coordinating the annual refresher training and will maintain a record of all training the interpreters have received.

(Excerpt from *Columbia County Rider Title VI Program*, adopted by Board Order No. 12-2017)

CCR TRANSIT SERVICES LANGUAGE ASSISTANCE PLAN

CCR Transit is required to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of our programs and activities of individuals who are Limited English Proficient (LEP). CCR Transit consulted the USDOT's LEP Guidance and performed a four factor analysis of our contact with the public to determine the appropriate mix of LEP services to offer.

Four Factor Analysis:

Factor 1: The number or proportion of LEP persons in the service area.

Columbia County's total population is 46,534 residents over 5 years of age. Of that total population number, 2.6% or 1,209 people speak Spanish at home. Of those who speak Spanish at home there is 0.9% or 397 people who have difficulty speaking and understanding English.

Step 1: Prior experience with LEP individuals. Over the past year, our dispatchers have not taken any phone calls from LEP persons which have required the use of an interpreter.

Step 2: Data was gathered from the following sources to identify information on persons who speak languages other than English at home and those who speak English less than well or not at all and would be classified as Limited English Proficient or "LEP":

a. 2010 Census Data

b. Census Bureau's American Community Survey and Fact Finder Surveys, Language Spoken at Home, 2008-2012 American Community Survey 5-year Estimates.

Step 3: In Columbia County, the most common language other than English spoken at home was Spanish, with 2.6% of the total population over age 5 years, recorded as speaking Spanish or Spanish Creole (Source: American Community Survey, 2008-2012 American Community Survey 5-Year Estimates, S1601, Columbia County, Oregon, 2012 American Community Survey data (<http://factfinder.census.gov>). Of the 2.6% who speak Spanish or Spanish Creole, the data shows that 0.9% or 397 people in Columbia County's population who speak English less than "very well."

(Source: http://www.doleta.gov/reports/censusdata/LWIA_by_State.cfm?state=OR).

Factor 2: The frequency with which LEP individuals come into contact with the service.

CCR Transit serves LEP persons daily through the public transit service we provide. Over the past year, our dispatchers have taken NO phone calls from LEP persons which has required the use of an interpreter.

Factor 3: The importance of the service to LEP persons.

CCR Transit provides important transit services to the public through its fixed route and Dial-A-Ride service(s). CCR Transit is the only major public transportation provider in Columbia County and provides a link between residential areas, commercial centers, healthcare facilities, educational campuses, and social service offices. Riders experiencing issues with language barriers would be those using the Dial-A-Ride and Fixed Route systems as information, travel planning and trip scheduling is provided by our dispatch system.

Factor 4: The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

CCR currently provides information in Spanish and other languages on our website at www.columbiacountyrider.com. We also post information on our buses. The Columbia County maintains a list of employees who are fluent in Spanish and other languages, and professional translation services are available when requested or if our dispatch needs such interpreter service. CCR also uses the AT&T Language Line to assist LEP individuals with phone inquiries. All riders can use the line at no charge to them at 1-800-874-9426.

Processes for providing language assistance services by language

Based on the four factor analysis, CCR recognizes the need to provide language interpretation services to those who may need that service. A review of CCR relevant programs, activities and services that are being offered by CCR as of July 2014 include:

- The inclusion of the AT & T Language Line contact information in our schedules, brochures and on our website.
- Route and schedule information are available in Spanish and other languages are on the CCR Transit website

Based on the demand for alternate language services, and considering the limited budget of the CCRider Transit programs, other activities and services that will continue to be provided over the next three years include:

- The AT & T language Line will continue to be provided.
- Route and schedule information will continue to be provided in Spanish and other languages on the CCR Transit Website.
- Monitoring and updating the need to provide additional LEP Services will be reviewed annually.

CCR Transit's outreach and marketing initiatives have provided us with a list of community organizations that are most apt to serve populations with limited English proficiency. The following list of community organizations will be contacted to assist in gathering information and see what services are most frequently sought by the LEP population:

- Public School District
- Area Chambers of Commerce
- Community Action Team (CAT)
- Oregon Department of Health & Human Services
- Oregon Employment Department
- Aging and Disability Services
- Commission on Children and Families

Providing notice to LEP's of language assistance

Notice will be placed on the transit buses, transit website, and on the bus schedules, and brochures announcing the availability of Language assistance. The CCR Website has been updated to allow for instant language translations by the click of a tab. A new page will be added that provides instruction and information on route and schedule information that can be translated into any language, downloaded and printed by the rider.

Monitoring, evaluating and updating LAP

CCR Transit staff will contact the community organizations that serve LEP persons and perform a four factor analysis every three years to identify what, if any, additional information or activities might better improve transit services to assure non-discriminatory service to LEP persons. CCR will then evaluate the projected financial and personnel needed to provide the requested services and assess which of these can be provided cost-effectively.

Training Employees

CCR Transit will require its operations contractor to provide training and information in the driver manual for all employees, staff and volunteers regarding the language assistance services available to riders. Employees will be encouraged to use the services provided when contact with LEP individuals prevents or hinders communication. This training will be provided as a refresher course at least annually and when all new drivers are hired.