

City of Gresham, Oregon

Language Access Plan. Revised 12.2025

Introduction and Purpose

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of national origin, and the Supreme Court has interpreted this to include language access. In compliance with this legal requirement and to support it, the City of Gresham, Oregon, has established the following Language Access Plan (LAP) to ensure that individuals with limited English proficiency (LEP) have meaningful access to all City activities, services, and programs.

An “LEP individual” is defined as “an individual who does not speak English as their primary language and who has limited ability to read, speak, write, or understand English.”

The purpose of this plan is to establish strategies for engaging with and providing services to LEP individuals, ensuring fair, accessible, and respectful operations of programs and activities. This is essential to our governance mission of fostering a safe, thriving, and welcoming community for all.

To prepare for the development of this plan, we conducted a **Four-Factor Analysis**, which balanced the following factors:

1. The number or proportion of LEP persons served or encountered in the Gresham, Oregon service area.
 - The City determines the number or proportion of people to be served or likely to encounter the program or service who might be excluded due to a language barrier.
 - The number or proportion of LEP persons who will use a program, or division's efforts, should guide the “reasonableness” of language assistance measures.
2. The frequency with which the LEP persons encounter City services, programs, and activities.
 - The more often there is contact with a specific language group, the greater the need for improved language services in that language.
 - The steps considered reasonable for City staff when assisting a LEP person on a one-time basis might differ from those expected of staff who serve LEP persons regularly through their programs or services.

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3. The nature and importance of the program, activity, or service provided by the City.

- The City will evaluate the nature, the impact on well-being, and the significance of the program, activity, or service provided to the LEP community.
- The greater the impact on well-being conditions, the importance of the activity, information, service, or program, or the potential consequences of contact with LEP individuals, the more likely language services will be needed.

4. The resources available and budget impact.

- The City will aim to be fair, accessible, respectful, and accountable in distributing language access resources. The scope and type of language assistance services may vary depending on staffing capacity and budget considerations.
- Steps to provide meaningful access to language services may become unfeasible when the costs to deliver the requested language access exceed what is reasonable, considering the other three factors of the analysis. The City is committed to ongoing efforts to explore innovative, cost-effective services and tools to help remove language barriers for all LEP community members in Gresham.

People Charged with Implementing the Plan

The City of Gresham's Title VI Coordinator will oversee the implementation of this plan. In addition to their oversight responsibilities, the Title VI Coordinator will maintain and update the plan as needed to reflect changes.

The Title VI Coordinator will annually report on the assessment of this plan to the City Manager. Their LAP plan implementation also involves coordinating with various City departments and with Translation & Interpretation Services staff to carry out the directives established by this plan.

Section 1: Needs Assessment

Gresham, Oregon Demographic

The City of Gresham, Oregon, is a lively and diverse community in Multnomah County.

The City aims to provide equitable and meaningful access to its programs and services for community members and individuals with limited English proficiency (LEP). To support this goal, the City uses all reasonably available tools and data sources to identify interpretation and translation needs that foster genuine community engagement, outreach, and civic participation.

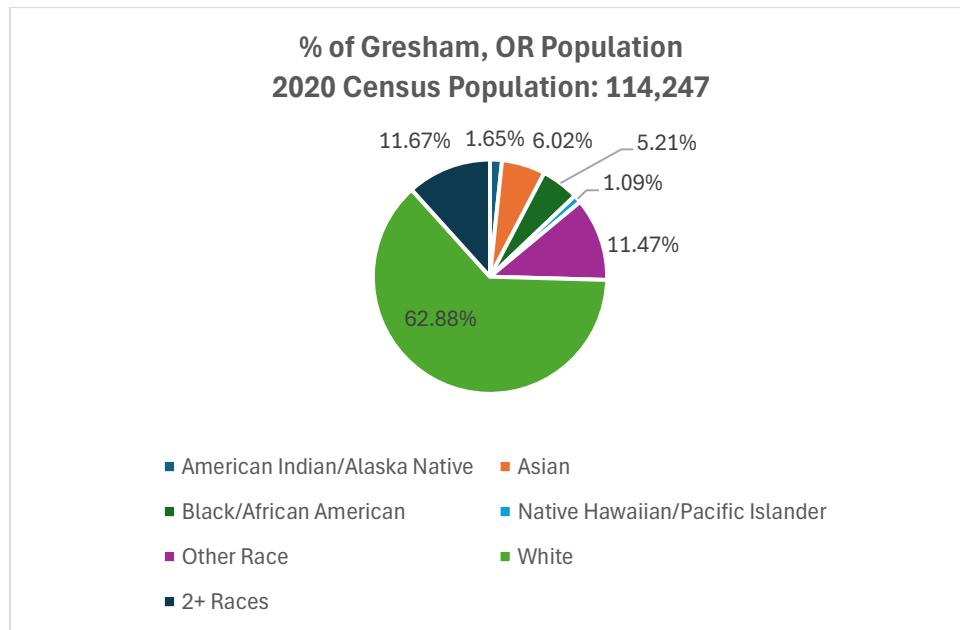
As the City evolves, it will continue to monitor shifts in its population's demographics through biennial assessments to ensure it adequately tracks LEP representation in the community.

To identify LEP individuals and communities in Gresham, Oregon, data from the American Community Survey, available on the United States Census Bureau website (City of Gresham, Oregon Decennial Census 2020), were used. Gresham's 2020 population demographics are presented in the tables below.

Gresham Ethnicity

<u>City of Gresham Ethnicity Demographics</u> <u>2020 Census Report</u>	<u>Population %</u>	<u>Population</u>
<u>Gresham, Oregon</u>	<u>100.00%</u>	<u>114247</u>
<u>Hispanic/Latino (any race)</u>	<u>21.04%</u>	<u>24043</u>

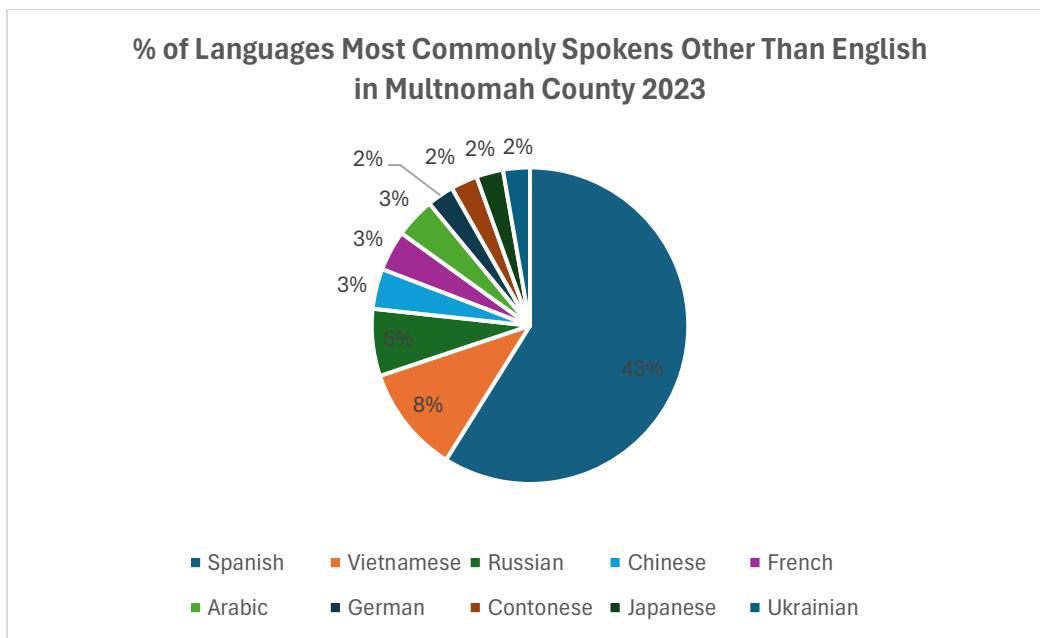
Gresham Racial Demographic



City of Gresham Race Demographics 2020 Census Report	Population %	Population #
American Indian/Alaska Native	1.65%	1882
Asian	6.02%	6886
Black/African American	5.21%	5957
Native Hawaiian/Pacific Islander	1.09%	1251
Other Race	11.47%	13106
White	62.88%	71835
2+ Races	11.67%	13330



Most Spoken Languages in Multnomah County Other Than English: 2023



Most commonly spoken Languages Other Than English in Multnomah County: 2023	% of LOTE	Estimate
Spanish	43%	88577
Vietnamese	8%	16713
Russian	5%	9652
Chinese	3%	6552
French	3%	6266
Arabic	3%	6027
German	2%	5099
Cantonese	2%	4187
Japanese	2%	4166
Ukrainian	2%	3471
Note: "LOTE stands for 'Language other than English.'		
Most Popular Languages Spoken in Multnomah County: 2023		

Points of Contact

Individuals with limited English proficiency will need language assistance when they contact the City Hall Front Desk, pay utility bills, complete forms, file a grievance, participate in City programs and services, and interact with City staff.



Level of Interaction

Individuals with limited English proficiency may engage with the City in various ways. Interactions may include, but are not limited to:

- Outreach programs;
- Public meetings and hearings;
- City of Gresham website;
- Written materials, or complaints; and
- Public Service information brochures.

Section 2: Language Services

Interpretation

Interpreters facilitate verbal translation between languages. They may be dedicated staff members, contracted interpreters, or qualified bilingual personnel, and may provide services via phone or video remote. Bilingual family members are often not adequately equipped to interpret, and relying on them is strongly discouraged.

Translation

Translation emphasizes written communication. The City will evaluate which documents are "vital," meaning those that contain information essential to obtaining services and to meaningful access or participation. The Four-Factor Analysis will be used to identify which documents qualify as "vital."

It is essential to ensure that documents are translated accurately, effectively, and with sensitivity to cultural nuances. There may be times when sections of the City's documents need to be translated verbatim. It is also essential to ensure that the content remains conceptually, linguistically, and culturally accurate after translation. Whenever possible, working directly with the communities served helps ensure that translations are culturally relevant.

Identification

A person who does not speak English as their primary language and has limited ability to read, write, speak, or understand English may be considered Limited English Proficient (LEP). An LEP individual may need language assistance to access City services, programs, or information. Language support may include interpretation and/or translation.

The City will work to identify LEP individuals during its daily interactions with the public by (select at least one; additional options may be included):

- Assuming LEP if communication seems impaired.
- Responding to individual requests for language assistance services.
- Relying on self-identification by the non-English speaker or LEP individual.
- Asking open-ended questions to determine language proficiency.
- Using the "Interpretation Services Available" language identification reference card or posters.

City Hall frontline and field staff are the first to greet residents and visitors upon arrival at City Hall or when they approach staff in the field. Starting a conversation can help assess the individual's comfort level with English.

Aids to assist in identifying what language is being spoken include the following:

Language Translation Reference Card: ([Translation and Language Support](#))

The Interpretation Services Available card is a reference tool that helps identify the language an individual speaks and the language an interpreter needs to communicate effectively with them. The card features the text “Point to your language. An Interpreter will be called. The Interpreter is provided at no cost to you” in multiple languages. Its goal is to help individuals point to a language they understand. The card is available on the City’s intranet (WALTER), on the Tools and Support page under the Communication Services tab.

Once the appropriate language is identified, City staff can follow the procedure to request services from the options below that best meet the LEP individual's needs and the situation.

- City bilingual staff or
- Utilize the “LanguageLine” Software for real-time interpretation or
- Use of the PocketTalk interpretation device (located at the City Hall Front Desk

Language Access Resources and Procedure

The City offers the following language assistance resources to support LEP individuals.

CERTIFIED BILINGUAL CITY STAFF (CBCS)

The City has certified bilingual staff who provide interpretation services for customers at City Hall and in the field. CBCS may also be used by staff for small, urgent translation requests. Staff must obtain their manager's approval to become certified. The certification candidate will undergo a testing process outlined by Human Resources to verify language proficiency. A list of current certified staff is available on the City’s intranet (Walter) under the ‘Tools and Support/ Translation and Language Support’ page.

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All requests for interpretation and translation assistance must follow the formal Request Procedure. See the instructions below. To ensure fair access, City staff should not contact CBCS directly for assistance.

The City will continue to monitor available tools and resources that could improve the meaningful access experience for LEP individuals.

THIRD-PARTY VENDOR INTERPRETATION AND TRANSLATION SERVICES

The City contracts with third-party vendors to provide translation and interpretation services. The Community and Civic Life Division manages these contracts. Staff in this division handle all internal and external requests for language access assistance.

POCKETALK DEVICE TRANSLATION SERVICES

Prism Language Systems' proprietary language engine powers Pocketalk's translation services. This solution will help the City bridge language gaps, improve communication, and promote inclusivity and respectful public engagement, especially as Gresham's communities grow more diverse.

LANGUAGE ACCESS ASSISTANCE REQUEST PROCEDURE

Requests for interpretation and translation assistance should be submitted using the Translation/Interpretation Request form. The form is available in the dropdown menu under the Interpretation Services and Translating Documents tabs, located in the Translation and Language Support section of the City's intranet-WALTER.

Designated staff will decide whether the language assistance request can be handled efficiently and effectively internally or whether a third-party vendor is better suited for the task. The City aims to provide fair, culturally appropriate, meaningful, and respectful access for LEP individuals.

To uphold those values, City Staff are advised:

Against using "Google Translate." Google Translate has limitations. Complex sentence structures, idioms, and contextual nuances can lead to inaccurate or nonsensical translations. It may also misinterpret ambiguity or gendered language. Additionally, its accuracy depends on the languages involved and the complexity of the text.

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Avoid contacting bilingual City staff directly. Staff designated to assist with language access requests can identify the appropriate bilingual personnel to respond promptly and efficiently.

Consult with the Designated Community and Civic Life staff before using translated materials from other agencies or organizations.

Interpretation Services for In-Person Meetings

Staff seeking interpretation services for in-person meetings are asked to complete and submit the Interpretation/Translation Request form in the Translation and Language Support section of the City's intranet, WALTER.

- Requests should be submitted at least five business days before the event.
- Last-minute emergency interpretation requests should be flagged as "Urgent" in the email. Best efforts will be made to fulfill the request through a contracted third-party vendor, Language Line, or a certified City staff member.
- An Interpretation Headset system is available for in-person meetings. The system should be used with an Interpreter. Contact the designated Community and Civic Life staff to reserve the system and receive training on its use. A 48-hour advance notice is required.

Advertising the availability of interpretation services at meetings:

- The following tagline can be used when advertising interpretation services for your meeting.
 - All are welcome to attend this meeting. Language assistance services are available at no cost. If you need language assistance, please notify (enter your name), (enter your position) by calling (enter your contact number) or emailing (enter your email) by 5:00 p.m., five (5) business days before the meeting. The City will do its best to provide translation services. We appreciate your interest in attending this meeting.
 - To request services, please complete and submit the Interpretation/Translation Request form located in the Translation and Language Support section of the City's intranet, WALTER, whenever a request is received.

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Language Line

The City's Language Line account can be used when a bilingual City staff member fluent in the person's language is unavailable, or when a Pocketalk Interpretation device is unavailable.

- If the LEP person is on the phone, use the conference call button on your phone to place the caller on hold.
- Dial 1-800-523-1786 (you may press 0 or stay on the line for assistance)
- Provide the City's Client ID: **542018**
- Select the needed language:
 - Press 1 for Spanish
 - Press 2 for all other languages and state the name of the language needed
 - Press 0 for agent assistance if you do not know the language
- Provide your Employee Number.
- Personal code: your last name and employee number.
- Brief the interpreter. Summarize what you wish to accomplish and provide any special instructions.
- Add the LEP onto the call or put the phone on speaker for in-person.
- Say "End of Call" to the interpreter when your call is completed.

3-way Call Using the Language Line

- Use the conference feature on your phone and follow the instructions above to connect to an interpreter.
- If you are initiating the call, get the interpreter on the line first, then call the LEP individual.
- If you are receiving a call, ask the caller to "Please Hold," and then conference in the interpreter.

NOTE the following when working with an interpreter, formal or informal:

- Explain to the interpreter the purpose of the communication and the information to be conveyed.
- Briefly explain to the interpreter any technical terms that may come up during the

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communication.

- Avoid the use of acronyms, double negatives, and contractions.
- Speak in short sentences that contain one idea at a time.
- **Talk directly with the LEP individual** and not to the interpreter.
- Enunciate clearly and wait for the interpreter to finish before continuing to the next idea.
- To ensure accuracy, the interpreter may occasionally request clarification or repetition of information.

Section 3: Notices

Posting notices about the availability of language assistance services is an effective way to raise awareness and ensure that individuals and communities with limited English proficiency (LEP) can meaningfully access the City's services, programs, and benefits.

To ensure Gresham LEP communities are aware of the free language assistance services available to them, the following outreach method will be used.

- Language Translation Reference Card. This card helps identify the language a person speaks and the language an interpreter needs to speak to communicate effectively with that person. The cards are designed to help someone point to a language they understand.
- Notices of the Language Access Plan and instructions for accessing language access services are posted in public areas of City facilities.
 - To ensure everyone can participate, the City will provide translations, make reasonable adjustments to its policies and procedures, and offer assistive tools or formats for people with disabilities. If you need help with translations, assistive tools, or formats, or want more information, please call 503-618-3214 or email Translations@greshamoregon.gov.
- Frontline staff have digital access to the Language Access Plan for reference.
- The Language Access Plan will be posted on the GreshamOregon.gov website.
- Anyone can request a copy of the plan by phone, email, fax, USPS, or in person at no charge. LEP individuals can order copies in their preferred language.
- The plan will be shared with the City's community-based organization (CBO) network and neighborhood associations.
- When using taglines in printed and electronic materials, the City translates the tagline text into its four most common languages (Spanish, Russian, Vietnamese, and Arabic). Taglines should be used when translating the entire document isn't necessary or feasible. You can find taglines under Translation and Language Support on Walter.

Section 4: Training

The City of Gresham acknowledges that staff training is essential to providing language assistance services to individuals with limited English proficiency. Training will include everyone who interacts with LEP community members and partners, including frontline staff, public safety personnel, volunteers, and anyone in a role that represents the City.

Staff Training is being developed during the Title VI Plan period 2024-2027. The training will cover the following topics:

- Why it is important to provide language assistance services.
- How to communicate and interact effectively and respectfully with individuals with limited English proficiency.
- The City's policies and procedures for providing language access services, including the availability of free interpretation and translation services for the consumer.
- How staff can capture data on consumers' language needs and preferred language.
- Procedures to request and work with an interpreter, including when to use an interpreter.
- The types of translated information available to consumers and where it can be found.

Section 5: Evaluation

The City will monitor and assess the effectiveness of this plan and update it as needed. The City might also consider using the following mechanisms:

- Monitoring responses to complaints or suggestions from individuals with limited English proficiency, community members, and employees regarding language assistance services.
- Staying updated on community demographics and needs by engaging local public authorities, school districts, faith communities, refugee resettlement agencies, and other local resources.
- Surveying staff members about their use of language assistance services, suggestions for improvement, and whether the services meet the language needs of local communities.
- Monitoring the utilization rates of various types of language access services used throughout the City.
- Conducting surveys among the City's communities with limited English proficiency about their experiences with services, including language assistance.
- Collaborating with other agencies, leveraging emerging technology, and promoting staff development to improve access for individuals with limited English proficiency.

This plan aims to establish strategies for engaging with and providing services to LEP individuals to ensure fair, accessible, and respectful operations of programs and activities.

Examples of Performance Measures to assess the effectiveness of this plan may include, but are not limited to:

- What did we do?
 - Volume of Services: Total clients served, interpreted hours, interpreted events, and translated documents.
 - Languages Covered: The range of languages offered for both oral interpretation and written translation services.
 - Service Methods: Tracking the ways services are delivered (e.g., staff interpreter use, Pocketalk use, Language Line use, other methods).
- How well did we do it?
 - Percentage of city staff participating in community service activities using the Pocketalk device.

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- Financial Expenditures: Unit Cost (Amount paid for translation/interpretation technologies, services, and pay differentials for bilingual staff/Actual usage)
- Percentage of staff in high community engagement roles trained on the language access plan procedures and on how to access language services.
- Is anyone better off?
 - Language Access Experience
 - Was support available in your preferred language? (yes/no)
 - Did language barriers increase the time it took to resolve your issue? (yes/no)
 - Quality and Effectiveness of the Service Provided
 - How satisfied were you with the language services you received? (e.g., on a scale from 1 to 5, ranging from “Not satisfied at all” to “Extremely satisfied”)
 - How well did our staff or interpreter understand your needs or issues and offer appropriate solutions?
 - How comfortable were you communicating with our team through the provided interpreter services? (e.g., on a scale of 1–5)

Glossary of Terms

BILINGUAL

The ability to communicate fluently in two languages includes understanding and using technical and law enforcement terminology. Bilingual proficiency varies widely. For example, some bilingual individuals may be fluent enough to communicate directly in a non-English language but not skilled enough to interpret or translate between languages.

CERTIFIED STAFF

A bilingual staff member has completed the City-mandated training and is approved to serve as an interpreter or translator.

DEMOGRAPHICS

Data on the population and specific groups within it, such as race, education level, median income, and more.

INTREPRETATION

Listening to a message in one language and verbally translating it into another while preserving the same meaning.

LANGUAGE ACCESS

This refers to providing services and information to individuals with LEP in a way they can understand, often with the help of translation or interpretation services.

LIMITED ENGLISH PROFICIENT (LEP)

Refers to individuals whose primary language is not English and who have limited skills in reading, writing, speaking, or understanding English. LEP individuals may be proficient in certain forms of communication (e.g., speaking or comprehension) but still be considered LEP for other purposes.

TRANSLATION

The process of replacing written text from one language (the source language) with an equivalent written text in another language (the target language).

VITAL DOCUMENTS

Any document essential to ensuring meaningful access to recipients' major activities and programs for beneficiaries in general and LEP persons specifically. Whether a document (or the information it requests) is "vital" may depend on the importance of the program, information, encounter, or service involved, and on the potential impact on the LEP person if the information is not provided accurately or promptly.