



Meaningful Implementation of the Language Access Policy

Rita Salmo | Tualatin Hills Park & Recreation District



THPRD Values

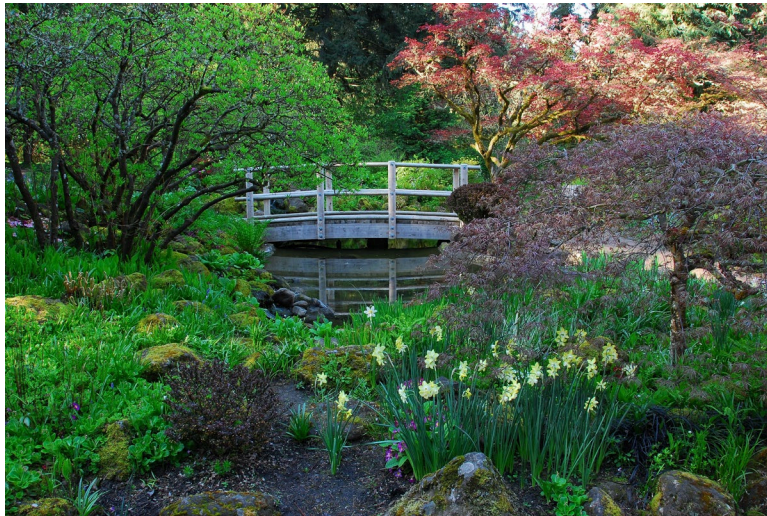
Equity & Inclusion Statement

We acknowledge that all U.S. government agencies have roots stemming from systemic racism and oppression, including THPRD. We seek to hold ourselves accountable for our role in perpetuating these systems and are committed to taking action to create meaningful change. We aspire to bring people together, to be a welcoming and inclusive park & recreation district, and to live our values of advancing social and racial equity.

THPRD Values:

- Leading with Equity with special attention to Racial Equity
- Environmental Stewardship
- Commitment to Community Vision







Project Purpose & Goals

Scope

To implement create and expand effective language access to English Language Learners (ELLs) seeking meaningful access to THPRD programs, information, and services as required by federal law. The project will seek to provide best practices and guidelines to implementation, in a way that will go beyond compliance with the aim of providing meaningful access and ensure implementation continuity.

Goals

The Language Access project will provide equitable and meaningful access to district programs and services to its ELL individuals. ELLs are individuals for whom English is not their primary language. Also including persons currently building their English skills and capacity toward becoming bilingual or multilingual.

Language Access Policy		1.04.04
Date: 04/03/2023	Supersedes Policy: 4.01.05 - 05/21/2015	
Adopted by: Doug Menke General Manager	Implemented by: Holly Thompson Communications Director	
Signature: 	Signature: 	
Date: 04/03/2023	Date: 4/03/2023	

PURPOSE

Tualatin Hills Park & Recreation District (THPRD) serves culturally diverse and multilingual communities. THPRD is committed to a Language Access Policy and plan that offers meaningful access for English Language Learners (ELLs) and individuals for whom English is not their primary language. This policy outlines THPRD's process for ensuring meaningful access to ELLs in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency.

The basis for Executive Order 13166 is Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, which provides that no person shall "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." This indicates that differential treatment based on an individual's inability to speak, read, write, or understand English is a type of discrimination by national origin. This Executive Order applies to all state and local governments that receive federal funds, directly or indirectly, including THPRD.

POLICY

It is the policy of THPRD to ensure the district provides meaningful access to all THPRD patrons, regardless of their English language ability. To ensure its ability to successfully serve ELLs, THPRD is committed to complying with Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

The language access policy and accompanying implementation plan follow a data-informed framework, the Four Factor Analysis, established by the federal government in support of Title VI and EO 13166. The Four Factor Analysis enables local governments to ensure meaningful access to ELLs by utilizing nationwide criteria the federal government has established for evaluating when local governments are administering language access policies. The factors that THPRD will utilize in implementing our Language Access Plan are outlined in this policy as follows:

Factor 1: The number of people served or eligible to be served by the district who would potentially be excluded due to language barriers;

Factor 2: The frequency with which individuals learning English come into contact with the district;

Factor 3: The possible consequences, nature, or importance of programs, activities, or services provided by the district and the impacts to ELLs

Language Access Policy 1.04.04

Factor 4: The resources available and costs incurred by the district to provide these services to ELLs.

THPRD will undertake an update to the Four Factor Analysis, periodically or every 10 years, as the U.S. census data is updated and made available to local governments. As part of the analysis, district staff will identify specific documents or materials that must be translated into required languages and will update the district's Language Access Plan to reflect the district's practices to ensure meaningful access to ELLs.

District staff will complete the Four Factor Analysis, per this policy, then update the associated THPRD Language Access Plan to reflect any changes required based on the updated analysis. The Communications division will then work to raise awareness districtwide among staff on the updated Language Access Plan and will coordinate, centralize, and track, the district's language access implementation work.

DEFINITIONS

English Language Learners (ELLs) – Individuals for whom English is not their primary language or those that are currently building their English skills and capacity toward becoming bilingual or multilingual. The Federally used term is Limited English Proficient or LEP. This Policy uses ELLs or individuals learning English to emphasize the positive versus limiting aspects of a person's language ability.

Meaningful Access – Ability to participate in and use all services, programs, and activities offered by the district. Access to services is effective and timely and not significantly restricted, delayed, or inferior compared to English-proficient individuals. An individual learning English has meaningful access when (they):

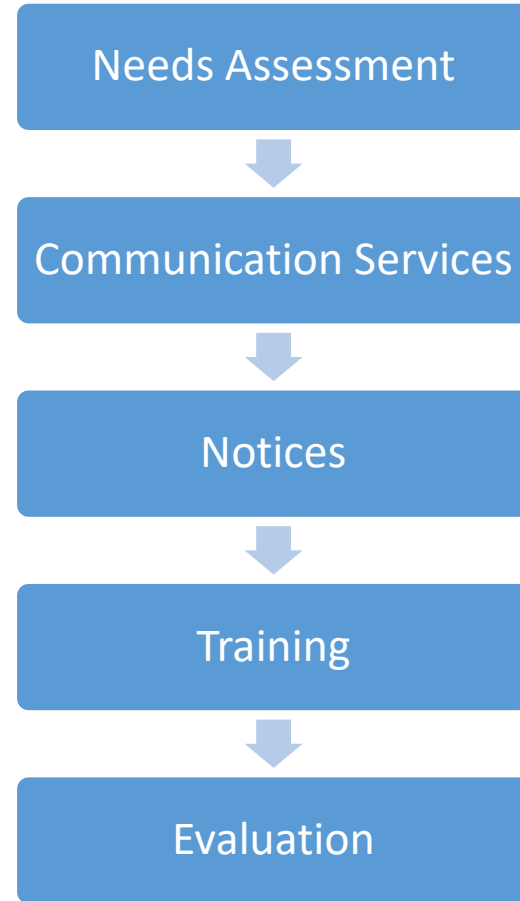
- have access to adequate information in a culturally responsive and effective way;
- understand the services and benefits available in a way that best serves them;
- can receive the services for which they are eligible;
- can communicate the relevant circumstances of their situation to the service provider.

Vital Documents (as defined by Civil Rights Division U.S. Department of Justice) – A document will be considered vital if it contains information that is critical for obtaining district services and/or benefits or is required by law. Examples include, but are not limited to:

- Consent and complaint forms
- Intake and application forms with the potential for important consequences
- Written notices of rights
- Notices of denials, losses, or changes in benefits or services
- Notice of disciplinary action; signs; and notices advising ELL individuals of free language assistance services.



Components of a Language Access Plan



THPRD Needs Assessment

Methodology Using Beaverton School District (BSD) boundaries as proxy
Estimate specific language speakers within THPRD boundaries.

Beaverton School District's top translated languages:

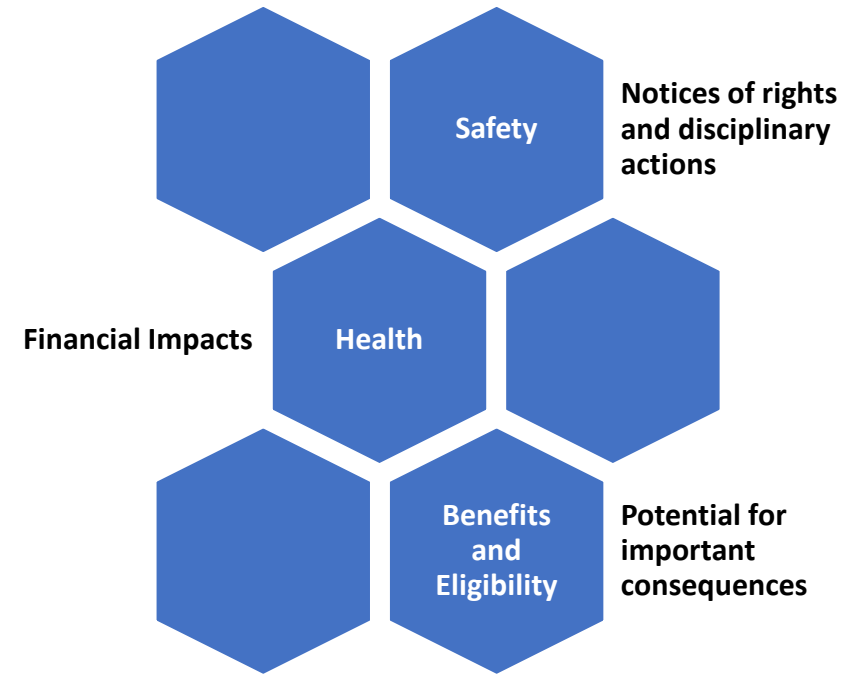
1. Spanish
2. Arabic
3. Japanese
4. Vietnamese
5. Korean
6. Somali
7. Chinese – Traditional (Hong Kong, Macau, Taiwan)
8. Chinese – Simplified (mainland China, Singapore, Malaysia)
9. Russian



Steps to accomplish this project



Criteria for identifying and categorizing vital documents:



Vital Documents – Examples

FEDERAL



- ☐ Consent and complaint forms
- ☐ Intake forms with the potential for important consequences
- ☐ Written notices of eligibility criteria, rights, denial
- ☐ Notices advising the public of free language assistance
- ☐ Written notices of eligibility criteria, rights, denial
- ☐ Applications to receive benefits/services

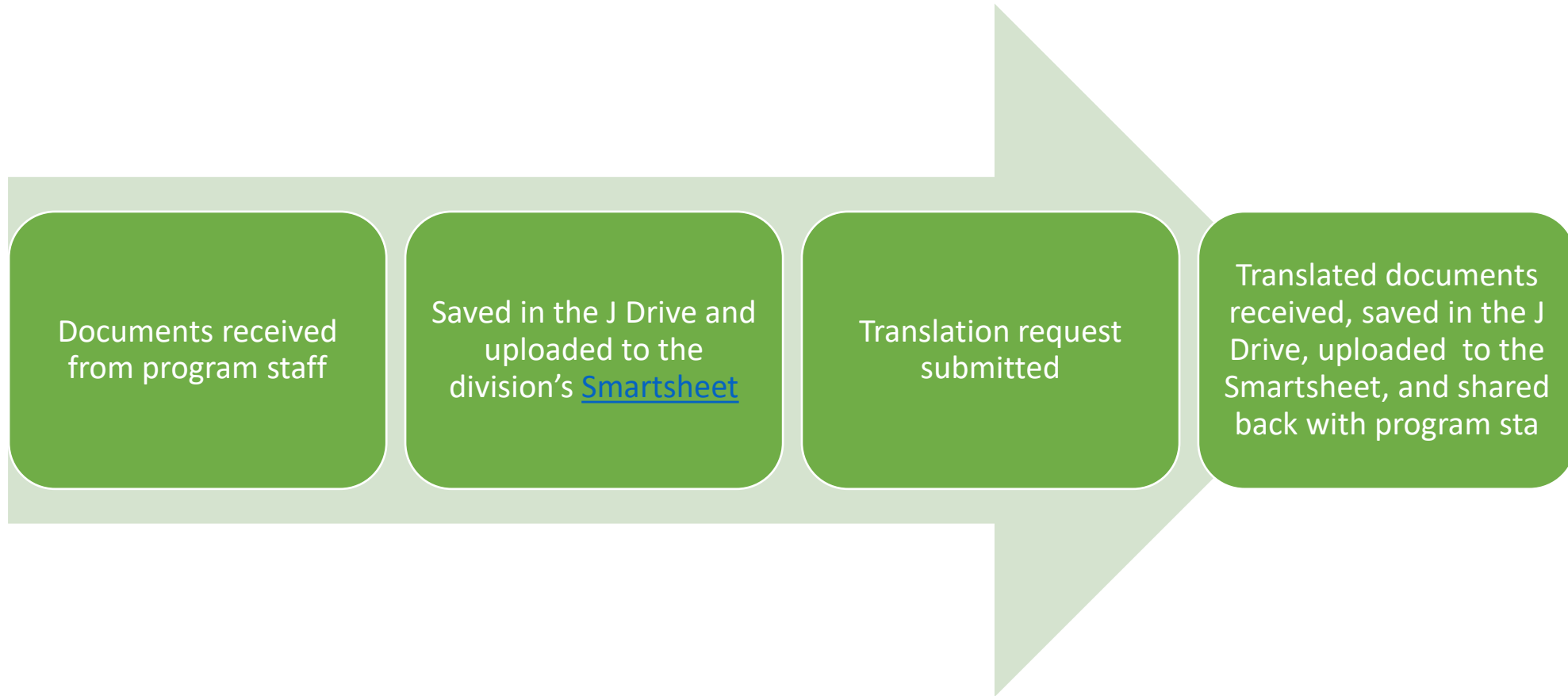
THPRD



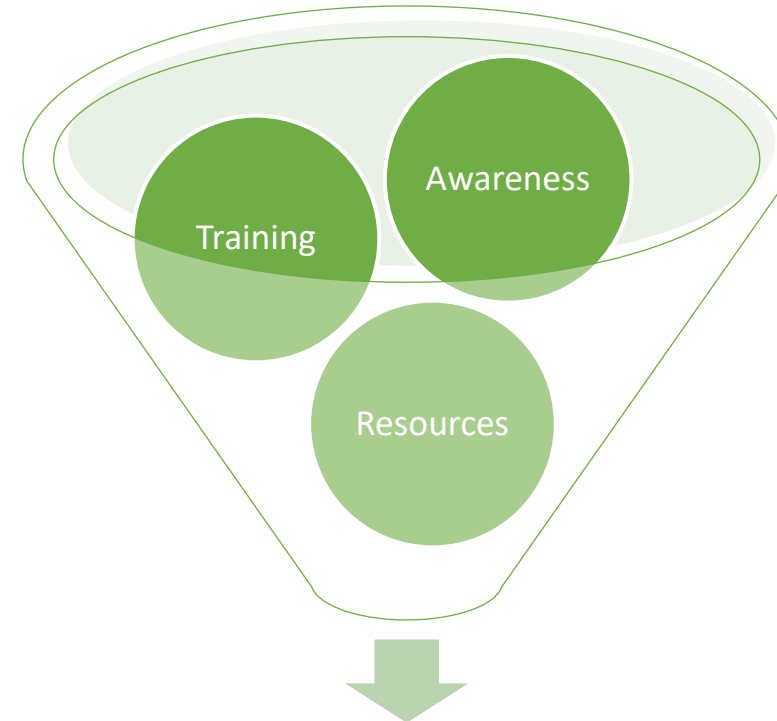
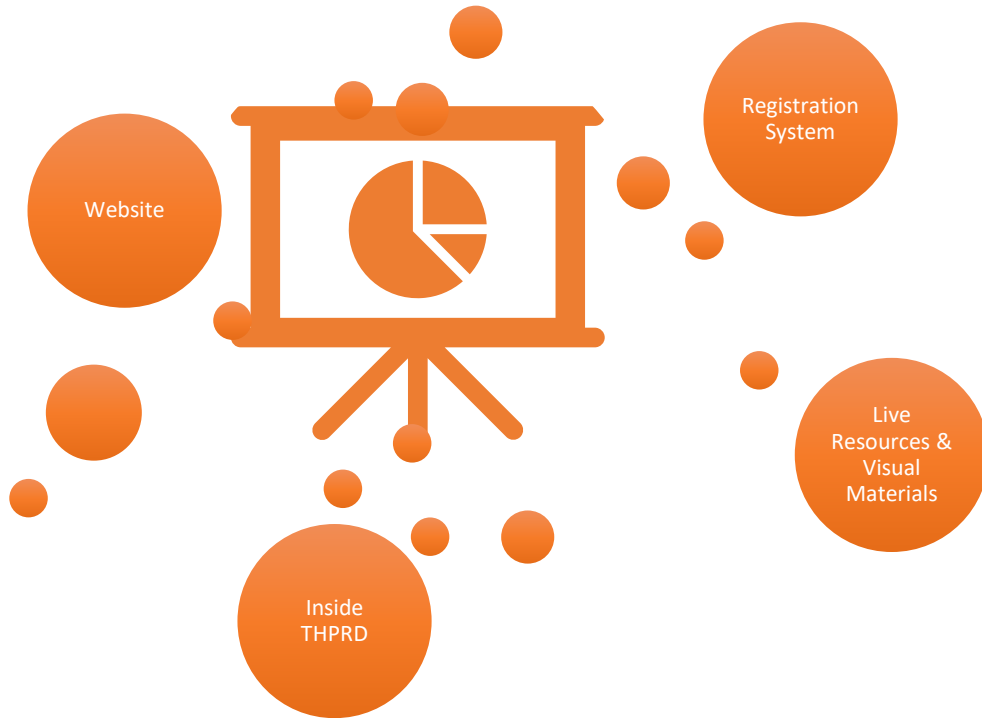
- ☐ Health & safety notices
- ☐ Financial Aid: applications, approvals, denial decisions
- ☐ ADA: complaint & request forms
- ☐ Patron registration forms
- ☐ Information noticing classes, activities, & sign-up information (what is at front of the Activities Guide)
- ☐ Inclusion Services information



Data Collection & Record Keeping



Final Product



Experiment a new communications site through SharePoint

Introduction to Language Access



Recommendations & Next Steps...





Questions



*Action Is the Foundational Key to All Success
– Pablo Picasso*

Thank you!





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