

Hood River County Limited English Proficiency Plan

Adopted April 8, 2025

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Hood River County's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Hood River County.

Hood River County is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Elements of an Effective LEP Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

- Identifying LEP person who needs language assistance
- Identifying ways in which language assistance will be provided
- Training staff
- Providing notice to LEP persons
- Monitoring and updating the LEP Plan

These recommended elements have been incorporated into this plan.

Methodology and Four Factor Analysis

Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy

Hood River County analyzes four factors to determine what reasonable steps should be taken to ensure meaningful access for LEP persons:

- The number or proportion of LEP person eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- The frequency with which LEP individuals come in contact with the program.
- The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
- The resources available to Hood River County and the overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed.

The Four-Factor Analysis

Each of the factors outlined above is examined to determine the extent of language assistance measures required. Recommendations in this plan are based on the results of the analysis.

Factor 1: The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has a range of four classifications of how well people speak English. The classifications are 'very well,' 'well,' 'not well,' and 'not at all.' Table 1 in the appendix of this plan shows 2023 American Community Survey data about the population of the Hood River County region who speak English less than 'very well.' Based on this information, there are 2,600 out of 22,668 (or 11.5%) who speak English less than 'very well' with the majority (42%) speaking Spanish as their language.

Factor 2: Frequency of Contact with LEP Individuals

Contacts with Hood River County are made through its offices in Hood River, its websites, its social media pages, its officers, and its staff who make presentations, provide direct service delivery and build networks among public agencies and private employers in Hood River County. Hood River County serves LEP persons daily through bi-lingual and/or bi-cultural staff in key services positions and the ability to translate the county website into a language of choice. The county identifies priority communications, forms and FAQs for ongoing translation.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP

Hood River County provides direct services to LEP populations, examples include: administration of land use (permitting); public health, environmental health and prevention services (immunizations, health care, food service licensing, septic approvals); assessment, records and elections (voter registration, record recording, land valuation); transportation access; public facility access (public buildings, campgrounds, trails); public safety and court services (animal control, victims advocate services, juvenile services); emergency services (safety net resources during disaster declarations); human resources (job applications and accommodations); executive services (public meeting involvement, claim receipt).

Factor 4: The Resources Available to Hood River County and the Overall Cost

Hood River County reviewed its available resources that could be used for providing LEP assistance, specifically for written resource materials and translation services for the most likely needed programs and services. Hood River County's funds are limited. Thus, the costs associated with necessary translation are allocated on an as-needed basis each fiscal year according to prioritizing critical LEP communications and adding bi-lingual and bi-cultural staff where LEP individuals need county services. Hood River County also partners with The Next Door, Inc. who have provided experienced staff fluent in Spanish to assist as needed and they provide ongoing specific trainings. Hood River County evaluates census data to determine if other languages are rising in significance in addition to Spanish.

Implementation Plan

Options

Federal fund recipients have two main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis. Hood River County is defining an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and a translator as a person who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.

Hood River County is a small county by population with population thresholds that allow the county to focus resources where LEP population thresholds are greater allowing the county to utilize its budget effectively.

For example, in cases of direct service provision to the Odell Community where Spanish language spoken in the home is at a greater percentage than the county at large, LEP resources are augmented. In general, Hood River County prioritizes translation of vital documents and language assistance measures required for the LEP individuals. Oral interpretation options are provided to meet all requests for those language groups to ensure equal access while also complying with LEP regulations.

Proposed Actions

Hood River County will take the following actions:

- With advance notice of at least 48 (forty-eight) hours, Hood River County will provide interpreter services at public meetings.
- The Census Bureau "I-speak" Language Identification Card will be distributed to all employees that may potentially encounter LEP individuals.
- Hood River County's Title VI complaint form is made available on our website.
- In the event that a Hood River County employee encounters a LEP individual, they will follow the procedure listed below.

Office Encounter

- Provide an "I-speak" language identification cards to determine the language spoken of the LEP individual.
- Once the foreign language is determined, provide information to the Title VI coordinator who will contact an interpreter.
- If the need for a vital document to be translated arises, the Title VI coordinator will have the document translated and provided to the requestor as soon as possible.

In Writing

- Once a letter has been received it will be immediately forwarded to the Title VI Coordinator.
- The Title VI Coordinator will contact a translator to determine the specifics of the letter request information.
- The Title VI Coordinator will work with the elected agency to provide the requested service to the individual in a timely manner.

Over the Phone

- If someone calls into Hood River County offices speaking another language, every attempt will be made to keep that individual on the line until an interpreter can be conferenced into the line and if possible, determine the language spoken of the caller.
- Once the language spoken by the caller has been identified, we will proceed with providing the requested assistance to the LEP individual.

Hood River County Staff Training

Hood River County staff will be provided training at staff meetings of the requirements for providing meaningful access to services for LEP persons.

Providing Meaningful Access to Limited English Proficient (LEP) Persons

Title VI and its implementing regulations require that recipients of federal funds take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient. Hood River County offers language proficiency pay to bilingual employees and partners with local nonprofits to provide translation services as

necessary. Hood River County is also working to hire staff who are bilingual and bi-cultural in identified areas where LEP contact is occurring.

Employee Responsibility

Each employee shall:

- Ensure that there are no barriers to service or accommodation that would prevent usage or access to services.
- Train subordinates as to what constitutes discrimination and barriers to access.
- Take prompt and appropriate action to avoid and minimize the incidence of any form of discrimination.
- Notify the Title VI Coordinator in writing of the circumstances surrounding any reported allegations of discrimination no later than the next business day.

Notice and Access

Providing Notice to LEP Persons

Hood River County will provide language service by notifying LEP persons of services available free of charge. Hood River County will post the LEP Plan on our website. Hood River County will post notices of available services, in languages LEP persons would understand, in the office in places where LEP persons may seek services and on our website.

Hood River County staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year to identify modifications to this plan to improve outreach and services to Limited English Proficient Persons.

LEP Plan Access

A copy of the LEP plan document can be requested at the County Business Administration Building during normal business hours:

Hood River County Title VI Coordinator
601 State Street
Hood River, Oregon 97031
By phone: 541-386-3970
By fax: 541-386-9392

Hood River County's Title VI policy and complaint form are posted on the Hood River County website and at the County Business Administration Building (located at 601 State Street, Hood River, Oregon 97031). Title VI notification forms and complaint forms are available in English and Spanish. Individuals who believe they have been discriminated against may request a complaint form from the Title VI Coordinator/Clerk of the Board at the County Business Administration Building.

Table 1: Language Spoken at Home by Ability to Speak English (Population 5 yrs and over)

2023 American Community Survey Data

Hood River County, Oregon							
	Population 5 years and over	Speak only English	Speak a language other than English	Spanish	Other Indo-European languages	Asian and Pacific Island languages	Other languages
Total							
Estimate	22,668	16,226	6,442	6,016	207	190	29
Margin of Error	±45	±437	±426	±388	±103	±113	±44
Speak English only or speak English "very well"							
Estimate	20,068	(X)	3,842	3,492	198	123	29
Margin of Error	±388	(X)	±410	±414	±99	±84	±44
Speak English less than "very well"							
Estimate	2,600	(X)	2,600	2,524	9	67	0
Margin of Error	±383	(X)	±383	±377	±16	±67	±25

Signed by:

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Signature
 Chair Euwer, Hood River County Commissioners

4/9/2025 | 3:03 PM PDT

Date