



Language Access Plan

City of West Linn

Contents

INTRODUCTION	2
PLAN SUMMARY	3
FOUR-FACTOR ANALYSIS.....	4
The number or proportion of individuals with LEP in the service area.	4
The frequency of contact with individuals with LEP.	4
The nature and importance of services provided by the City.	4
The resources available to the City and overall costs to provide LEP assistance.	5
LANGUAGE ASSISTANCE	6
Identifying Individuals with LEP and providing notice of language assistance services	7
Language Assistance Measures	7
STAFF TRAINING	8
TRANSLATION OF DOCUMENTS	8
MONITORING AND UPDATING THE LAP	8
COMPLAINT PROCEDURE	9

INTRODUCTION

For individuals with limited English proficiency (LEP), the English language can be a barrier to receiving important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other vital information. This Language Access Plan (LAP) has been prepared to ensure individuals with LEP who visit or engage with the City of West Linn (City) have meaningful access to participation in the programs and services provided by the City. 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. Section 602 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) states:

No person in the United States 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.

As a recipient of federal funding, the City provides language access in accordance with applicable laws. The City is committed to providing meaningful access to individuals with LEP. The City has developed this LAP to help identify reasonable steps for providing language assistance to individuals with LEP who wish to access benefits or services provided. To ensure meaningful access and participation for individuals with LEP, the City shall notify such individuals that language services are available to them at no cost and shall take reasonable steps to see that language services are provided according to the LAP as described herein.

The City intends to ensure meaningful access to programs and services for individuals with LEP while balancing resource constraints. The City has designated the City Recorder as its LAP Services Manager, who shall provide oversight for the implementation of the LAP and policies, coordinate and facilitate delivery of language services where appropriate, and direct the ongoing monitoring and periodic updates to the LAP.

When interpretation is needed and reasonable, it shall be provided in as timely a manner as possible and in an appropriate place to ensure meaningful access to a City benefit or service. The importance of the benefit or service will dictate the urgency of providing the language service. Where access to or exercise of a service or benefit will not be denied by a reasonable delay, the language service may be reasonably delayed, if necessary, given available resources.

PLAN SUMMARY

This plan outlines how to identify a person who may need language assistance, the ways in which language assistance will be provided, staff training, how to notify individuals with LEP that assistance is available, and how to monitor and update this LAP.

To prepare this plan, the City used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of individuals with LEP in the service area who may be served by the City that would potentially be excluded from the program or activity absent efforts to remove language barriers.
2. The frequency with which individuals with LEP use the City's services. Some City Departments may interact with the public and serve individuals with LEP more than others.
3. The nature and importance of services or benefits.
4. The resources, including interpretation and translation services, available to the City, and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

FOUR-FACTOR ANALYSIS

1. The number or proportion of individuals with LEP in the service area.

According to the 2020 U.S. Census Report, 27,387 people live in the City. Approximately 10.7% (2,930) of the population speak a language other than English. 3.9% (1,068) speak Asian and Pacific Island languages, 3.6% (986) speak other Indo-European languages, 2.7% (739) speak Spanish, and 0.5% (137) speak other languages.

2. The frequency of contact with individuals with LEP.

The City consists of the following departments: Administration, Building, Community Development, Finance, Human Resources, Legal, Library, Municipal Court, Parks & Recreation, Police, and Public Works. City staff from each department reviewed the frequency with which they have contact with individuals with LEP and reported as follows below. Other departments reported minimal contacts with individuals with LEP. The frequency of contact with individuals with LEP will be monitored by each department on an ongoing basis.

- Building: Staff have contact with non-English speaking individuals a couple of times a week out in the field on inspections. Staff are able to communicate with them.
- Finance: Staff have contact with Spanish speaking individuals a few times a month (around 10 when business licenses are renewed).
- Municipal Court: Staff have frequent contact with Spanish speaking individuals who receive interpreters at Municipal Court proceedings.
- Police: Staff have frequent contact with non-English speaking individuals who use the language line and body cameras to translate.
- Public Works: Staff have contact with non-English speaking individuals a few times a month. Primarily during calls for inspections or clarifications regarding permits and/or coordination with specific contractual services to help maintain the City's rights-of-ways, detention ponds, and/or medians. Staff are able to communicate with them.
- Library: Staff have contact with individuals with LEP several times per month. Spanish is the number one language represented. Staff have contact with Russian, Ukrainian, and Chinese speakers as well.

3. The nature and importance of services provided by the City.

The City provides a variety of programs, activities, and benefits. It is necessary for each department to identify programs and activities that would have serious consequences for individuals with LEP if language barriers prevented them access to critical information, benefits, or services. For example, it is essential that individuals with LEP receive interpreters and language access services at municipal court.

4. The resources available to the City and overall costs to provide LEP assistance.

It is necessary to consider the resources available for providing language assistance services to individuals with LEP. Some services can be offered at little or no additional cost to the City. City departments should carefully explore the most cost-effective means of delivering competent and accurate language assistance services before deciding to limit services due to resource concerns.

The City reviewed its available resources that could be used for providing language access services, which of its documents would be most valuable to be translated if the need should arise, and reached out to local community members that would be willing to provide voluntary Spanish translation within a reasonable time period. Other language translation if needed would be provided through a telephone/internet interpreter for which the City would pay a fee.

Translation Services

Effectiff translation services <https://effectiff.net/>

The [Latino Community Association](#)

[Passport to Languages](#)

[Contact Us - Linguava](#)

Language Line

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be an individual with LEP.

Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

Identifying individuals with LEP and providing notice of language assistance services

- All City staff will be annually surveyed on their experience and frequency concerning contacts with individuals with LEP during the previous year.

- Notice: The City posts notice of the LAP and the availability of free language access services upon request, such as interpretation and translation services at initial points of contact, including the City Hall lobby, West Linn Police Department and the Library. As of June 2026, the City is working to translate such notice into other common languages.
- The City also posts the "I Speak Statements" form in those locations.

Language Assistance Measures

City staff will take all reasonable steps to ensure meaningful access to individuals with LEP. The City will offer the following resources:

- i. Use of bilingual staff, if available, to handle the majority of interpretation and translation services throughout City departments.
- ii. Contracting with qualified interpreters and translators, either individually or through an organization which provides such persons when bilingual staff is not available, or if the importance of the information that needs to be translated or interpreted is high and there is a need for absolute accuracy.
- iii. Use of telephone or video conferencing interpreter services.
- iv. Use of the services of community volunteers or community service agencies, particularly those recommended by County, State, or Federal service agencies.
- v. Translation services may not be able to be provided at every City event, but the need will be evaluated and identified for future events on an ongoing basis.

The City endeavors to deliver effective language access services. Typically, the City will utilize the services of qualified staff, or when not available, federally funded interpreters or translators to further the goals of federal laws, regulations and guidelines while minimizing costs to the City. The City will also document the process used to identify and provide necessary language services to individuals with LEP to demonstrate compliance with the LAP.

The City will endeavor to maintain an accurate list of bilingual City staff and a register of qualified interpreters and translators classified by their level of qualifications for staff to use when language services are required for individuals with LEP.

STAFF TRAINING

The following training will be provided to all City staff:

- Information on the City's LAP responsibilities.
- Description of language assistance services offered by the City.
- How to identify when the need for language assistance services arises.
- How to provide access to language assistance services, including how to request an interpreter or translator and how to use the list of bilingual City staff and register of qualified interpreters and translators.
- How to use the "ISpeak" cards.

- Instructions on how to document language assistance requests.

TRANSLATION OF DOCUMENTS

The City evaluated the cost and benefits of translating documents for potential individuals with LEP.

The translation of written materials into non-English languages is important when a significant concentration of likely recipients is individuals with LEP and/or when the written materials convey vital information. Vital information is information that critically affects the ability of the recipient to make decisions regarding their participation in, or rights regarding, a City program or service.

When staff prepares a document, or schedules a meeting, for which the target audience is expected to include individuals with LEP, then documents, meeting notices, flyers, and agendas will be printed and/or provided in an alternative language based on the known LEP population. In addition, the City translates, upon request, documents that convey vital information, such as business license and permit applications, court documents, tickets, and code enforcement violation letters.

Considering the expense of translating all documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is unduly burdensome to translate all City documents without a specific need identified. The City will continually monitor whether documents should be translated.

MONITORING AND UPDATING THE LAP

The City will review the LAP annually and update it as needed. The plan will also be reviewed and updated when data from the U.S. Census is available or when it is identified that a higher concentration of individuals with LEP are present in the City service area. Updates will be made by the City Recorder and include:

- Determination of the current LEP population in the service area.
- The number of documented individuals with LEP contacts experienced annually by each City department.
- The frequency of use of interpreters.
- How the needs of individuals with LEP have been addressed.
- Determination as to whether the need for translation services has changed.
- Determination whether local language assistance programs have been effective and sufficient to meet the need.

- Determination whether the City's financial resources are sufficient to fund language assistance resources needed.
- Determination whether the City fully complies with the goals of this LAP.
- Solicitation of community feedback.

The City shall monitor the implementation of the LAP on an ongoing basis, revising policies and procedures as may be required by the needs of the community. The City shall also review the overall effectiveness of its LAP to ensure that meaningful access and participation in programs and services is provided to individuals with LEP. The review should consider changes in demographics, frequency of encounters with individuals with LEP, whether existing language services are meeting the needs of the community, and the availability of new resources or technology to assist in the delivery and dissemination of information. Changes to the Plan may be made as needed.

COMPLAINT PROCEDURE

The City will make every effort to resolve complaints generated from alleged non-compliance through an internal process. The City encourages submittal of non-compliance complaints to its City Recorder as follows:

1. Mail, drop off, or email:
City of West Linn
Attn: City Recorder
22500 Salamo Rd
West Linn, OR 97068
kmollusky@westlinnoregon.gov
2. Complaints of non-compliance should be filed in writing and must contain the name of the complainant and brief description of the alleged violation.
3. Complaints must be filed within thirty calendar days after the complainant becomes aware of the alleged violation.
4. An investigation will be conducted to evaluate the complaint. The City will conduct an informal but thorough investigation affording interested parties, if any, an opportunity to submit testimony and/or evidence pertinent to the complaint.
5. The City will provide written documentation detailing the findings of the investigation to the complainant. The City Attorney may be consulted for review of the findings for accuracy and completeness before it is released to the complainant. The findings will be made available within thirty days after the complaint is filed with the City.
6. The City shall make every attempt to correct any deficiency found after investigation, whether by providing necessary language services or by review and revision of the plan or policy documents. In all instances, the needs of the community and individuals with LEP must be considered of paramount importance.

For more information about this plan, or to request a different format or language, please call the City Recorder at 503-742-6013 or email kmollusky@westlinnoregon.gov.